

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 16-817

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Auction of Electric Generation Facilities

PETITION FOR INTERVENTION BY THE SIERRA CLUB

Pursuant to the Commission's Order of Notice dated September 7, 2016, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Sierra Club hereby petitions to intervene in the above-captioned docket. In support of its petition, the Sierra Club states the following:

1. The Sierra Club, founded in 1892, is a national nonprofit environmental organization with more than 638,000 members nationwide, and over 3,900 in the New Hampshire Chapter. The Club's purposes include: to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. Members of the Sierra Club are greatly concerned about air and water quality, regulation and management of public utilities, and in the sustainability, equity, and environmental responsibility of the energy sector as a whole. Consistent with that, the Club has a long history of involvement in utility oversight activities on both the local and national levels.
2. As set forth in the Order of Notice, this proceeding is to oversee the process of auctioning the generation facilities owned by Public Service Company of New Hampshire d/b/a Eversource Energy.

3. As such, the determinations made by the Commission will likely involve a range of important issues associated with and flowing from the auction design and process, including environmental impacts, system reliability, generation diversification, and implications for rates paid by electricity customers in New Hampshire.

4. The Sierra Club and the Sierra Club's New Hampshire members have direct and substantial interests in the outcome of this proceeding including, but not limited to, its environmental and economic repercussions. For instance, intervention will allow the Sierra Club to protect its members' substantial interests in the environmental and public health impacts resulting from auction and divestiture or retirement of PSNH's generating assets.

5. This proceeding further directly impacts the economic interests of the Sierra Club's New Hampshire Chapter members as ratepayers, as the proceeding will have enormous impact on such developments as potential rate increases those members will be obligated to pay, the level of competition between different power providers, and other issues related to the overall structure of the power marketplace in New Hampshire.

6. The Sierra Club has been heavily involved in the dockets leading up to this one. For example, the Sierra Club was an intervenor in the determination docket, Docket DE 14-238, and participated in the hearings regarding the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement and the Partial Litigation Settlement Agreement, as well as the resolution of that docket and Docket DE 11-250. Likewise, the Sierra Club participated in the investigatory docket, Docket No. IR 13-020, submitting comments on the PUC's report, *Report on Investigation into Market Conditions Affecting PSNH and its Default Service Customers*

and the Impact of PSNH's Ownership of Generation on the Competitive Electric Market, and contributed information to the PUC as part of its investigation.

7. The Sierra Club also has extremely extensive experience working before and with utility commissions in a wide variety of dockets, including in New Hampshire (see, e.g., recent dockets DE 14-238, DE 11-250, DE 10-121, DE 10-122, DE 10-261, DE 09-067, DE 08-103, and DE 07-064). The Sierra Club's presence in the proceedings will be guided by this experience, and will aid in the Commission's ultimate determination. In particular, the Sierra Club can be an important source of information and perspective on such things as environmental impacts from operation of PSNH's generation assets, as well as long-term environmental compliance costs and requirements. Such input would have bearing on many of the issues the Commission will have before it in this proceeding, such as auction proceeds, stranded costs, and ensuring equitable participation by potential asset bidders.

Accordingly, allowing the Sierra Club to intervene will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, the Sierra Club respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully Submitted,

/s/

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Dated: September 15, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Sierra Club's Petition for Intervention has been served electronically on the persons in the relevant Commission's service lists in accordance with Puc 203.11 and the Order of Notice on this 15th Day of September, 2016.

/s/
Zachary M. Fabish