

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 17-124

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY**

Sale of Generation Facilities

PETITION FOR INTERVENTION BY THE SIERRA CLUB

Pursuant to the Commission's Order of Notice dated August 3, 2017, 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 nearly 820,000 members nationwide, and over 5,200 in New Hampshire. 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 intended to review the results of the auction process for the sale of Eversource's generation facilities as provided by Order No. 25,920.

3. As such, the determinations made by the Commission will likely involve a range of important issues concerning the quality and sufficiency of bids received for Eversource's generation assets, ultimately impacting the rates electricity customers in New Hampshire pay, as well as the disposition of environmentally significant generating facilities.

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 example, under the terms of Subsection IV G of the 2015 Settlement Agreement approved by the Commission in Order No. 25,920, if the Commission determines that some or all of the assets are not properly sold at auction, additional divestiture or retirement proceedings are to ensue. This determination, then, would directly affect the environmental impacts flowing from operation of Eversource's generation assets.

5. Likewise, the Commission's determinations in this proceeding will impact the degree to which New Hampshire electricity customers are required to pay for securitization bonds under the Agreement.

6. The Sierra Club has been heavily involved in the dockets leading up to this one. Sierra Club participated in Docket DE 16-187, submitting comments on the proposed auction design and process at issue in that proceeding. In addition, the Sierra Club was an intervenor in the determination docket, Docket DE 14-238, participating 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

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Dated: August 15, 2017

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Sierra Club's Petition for Intervention has been served electronically on the persons noted in the Order of Notice, in accordance with Puc 203.11 on this 15th Day of August, 2017.

_____/s/
Zachary M. Fabish