

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 24-087**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
d/b/a EVERSOURCE ENERGY**

**Petition for Exemption from Town of Bethlehem Zoning Ordinance,  
Art. II, Part D, under RSA 674:30, III**

**Petition of the Town of Bethlehem for Intervention**

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission in the above captioned proceeding, N.H. Code Admin. Rules Puc 203.17 and in accordance with the standards of RSA 541-A:32, the Town of Bethlehem hereby petitions to intervene in the above-captioned docket. In support of its petition, the Town of Bethlehem states as follows:

1. Rule Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32.
2. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon showing that the petitioner has "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."
3. The Town of Bethlehem is a municipal corporation duly organized pursuant to New Hampshire state law.
4. Eversource Energy seeks an exemption from the Town of Bethlehem Zoning Ordinance to replace 100 wood H frame structures or poles, all of which already exceed the town's 40 foot height limitation, with 99 steel H frame structures or poles, all of

which will be approximately 15-20 feet taller than the existing structures and poles.

5. Thus, the rights, duties, privileges, immunities and substantial interest of its citizenry will be impacted by this proceeding.

6. The interests of justice would be served, and the orderly and prompt conduct of the proceedings would not be impaired by allowing intervention.

WHEREFORE, the Town of Bethlehem respectfully requests that this Honorable Commission:

- A. Grant this Petition for Intervention, and
- B. Provide any other such relief as it deems appropriate.

Respectfully submitted,

**TOWN OF BETHLEHEM**

By its Attorneys  
**MITCHELL MUNICIPAL GROUP, P.A.**

Date: September 5, 2024

By:

  
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**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that a copy of the foregoing has been e-mailed this day to all parties identified on the attached Service List.

Date: September 5, 2024

By:

  
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Laura Spector-Morgan