

THE STATE OF NEW HAMPSHIRE  
BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 09-033

PETITION TO INTERVENE  
BY  
THE CONSERVATION LAW FOUNDATION

Pursuant to the Order of Notice issued on March 6, 2009, by the New Hampshire Public Utilities Commission ("Commission") in the above-captioned docket, the N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Conservation Law Foundation ("CLF") hereby petitions for leave to intervene in the above-captioned docket. In support of its petition, CLF states the following:

1. CLF is a private, non-profit environmental membership organization dedicated to the protection and responsible use of New England's natural resources, including resources affected by the generation, transmission and distribution of electric power. CLF represents the interests of its members in ensuring that environmental impacts resulting from electric utility operation in New Hampshire and the region are minimized.
2. CLF has over 3,300 members, including 370 members residing in New Hampshire. CLF and CLF's New Hampshire members may be directly and substantially affected by this proceeding. Intervention will allow CLF to protect its members' substantial interests in achieving reductions in the environmental and health impacts of electricity generation. The economic interests of CLF's New Hampshire members as ratepayers also may be directly affected by this proceeding. CLF's primary interest is to promote environmental protection.
3. In this docket, Public Service Company of New Hampshire (PSNH) seeks authority to issue up to \$150 million in principal amount of long-term debt securities through

December 31, 2009, to mortgage its property in connection with the issuance of long-term debt, to enter into an interest rate transaction to manage interest rate risk, and to increase its short-term debt limit to ten percent of next fixed plant plus a fixed amount of \$60 million. Such long-term debt issuance is to be used to refinance PSNH's short-term debt, to finance anticipated capital expenditures, and to pay for issuance costs. The Commission must determine whether this request is in the public good. These issues raise important environmental concerns for CLF and its members.

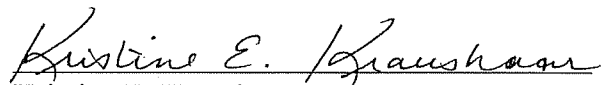
4. CLF's policy and program experience includes over twenty years of extensive collaborative work and participation in numerous utility commission dockets throughout New England, including DR 97-211, DE 07-064 and DE 08-145 in New Hampshire. CLF's institutional expertise in these matters will inform its participation and benefit the investigation.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By:



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Dated: March 19, 2009

CERTIFICATE OF SERVICE

I hereby certify that on the 19<sup>th</sup> day of March, 2009, a copy of the foregoing Petition to Intervene by the Conservation Law Foundation was sent electronically, and by First Class Mail, to

Allen Desbiens  
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780 N. Commercial Street  
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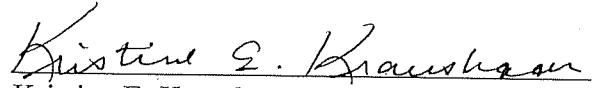
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Dated in Concord, New Hampshire this 19<sup>th</sup> day of March, 2009.



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