

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 09-035

Public Service Company of New Hampshire
Petition for Permanent Rate Increase

Petition to Intervene
on behalf of
City of Manchester Department of Public Works

The City of Manchester, New Hampshire, Department of Public Works (“Manchester DPW”) respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) for leave to intervene as a full party in the above-captioned proceeding under Rule Puc 203.17 and RSA 541-A:32. In support of this petition, Manchester DPW states:

1. The Commission opened the above-captioned docket in April of 2009 to address Public Service Company of New Hampshire’s (“PSNH”) request for temporary distribution service rates. In Order No. 24,997 the Commission approved temporary distribution service rates. In Order No. 24,994 the Commission suspended PSNH’s proposed tariffs seeking a permanent increase in its distribution service rates. Subsequently the Commission adopted a procedural schedule in this proceeding. Among the issues to be addressed in this docket, are whether PSNH should be allowed to increase its street lighting rates. It is Manchester DPW’s understanding that there is a technical session scheduled in this docket for March 3 and 4, 2010.

2. The Manchester DPW is responsible for paying PSNH the tariffed rates for street lighting service. The City of Manchester pays PSNH over \$1.2 million a year to for street lighting service. The City therefore believes pursuant to N.H. Code Admin. Rules Puc 203.17 and RSA 541-A:32,I(b) that its rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding.

3. Manchester DPW recognizes that this docket has been open for some period of time and that many aspects of the schedule have been completed. Manchester DPW recently became aware of this proceeding and the proposed increases to the street lighting rates. Since it is looking for ways to save on expense and believes that it is paying more than it should for the service it receives, and since this docket addresses the issue of whether those rates should be increased, Manchester DPW believes that it should be allowed to intervene in this proceeding. Manchester DPW recognizes that it will have to take the procedural schedule as it stands. Since Manchester DPW's interests are limited to street lighting and it understands that it will have to take the schedule as it stands, it does not believe that granting its intervention will adversely affect the interests of other parties to this proceeding.

4. Manchester DPW believes it must intervene in this proceeding to protect the rights of the City and its taxpayers. Granting this petition for intervention for the Manchester DPW to protect its interests with regard to street lighting rates would be in the interest of justice and would not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, Manchester DPW respectfully requests that the Commission grant it full intervenor status in the proceeding or grant such other relief as the Commission deems just and equitable.

Respectfully submitted,

Manchester Department of Public Works
By Its Attorneys



Douglas L. Patch
Orr & Reno, P.A.

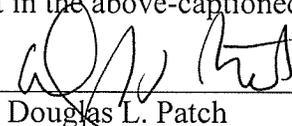
One Eagle Square
Concord, N.H. 03302-3550
(603) 223-9161

Dated: February 19, 2010

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 19th day of February, 2010 been sent by email to the service list in the above-captioned docket.

By:



Douglas L. Patch

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