

STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

IN RE CLEAN POWER DEVELOPMENT, LLC v. PUBLIC SERVICE
COMPANY OF NEW HAMPSHIRE

DE 09-067

PETITION FOR INTERVENTION OF THE NEW HAMPSHIRE
SIERRA CLUB

New Hampshire Sierra Club, pursuant to the Order of Notice issued by the Public Utilities Commission on October 9, 2009, respectfully petitions to intervene in the captioned case.

New Hampshire Sierra Club is a non-profit organization whose over 4000 volunteer members in New Hampshire are dedicated to a sustainable energy future, reducing dependence on non-renewable fuels and maximizing the benefits of renewable energy.

A critical factor in the New Hampshire Sierra Club decision to ask to intervene in this case was the Clean Power Development, LLC, commitment to smart and sustainable wood harvest methodologies.

New Hampshire Sierra Club has a policy to support sustainable renewable energy projects that can truly reflect sustainability and energy efficiency while having a net reduction of carbon emissions. New Hampshire Sierra Club supports small-scale forest biomass-to-energy projects on non-federal lands where they are carefully monitored and designed as part of a sustainable system similar to that required for Forest Stewardship Council certification.

The Clean Power Development, LLC proposal is, therefore, an important proposal of the type of clean, sustainable energy development that State of New Hampshire should consider as part of the State Climate Action Plan and the future of energy generation in the state.

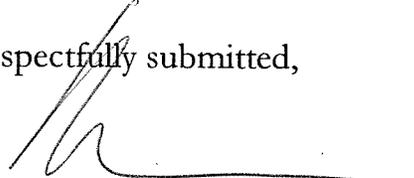
New Hampshire Sierra Club is very concerned about, and will insist upon, an open and comprehensive Public Utilities Commission investigation of the conduct of the Public Service Company of New Hampshire stance regarding

the Clean Power Development, LLC, biomass project. Public Service Company of New Hampshire must not be permitted to use its market and economic power as a regulated utility to block the types of projects represented by the Clean Power Development, LLC, Berlin proposal.

Wherefore, New Hampshire Sierra Club respectfully requests permission to intervene in this case.

10/28/09

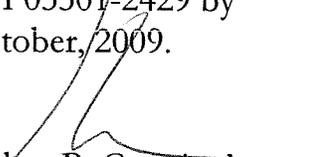
Respectfully submitted,


Arthur B. Cunningham
Attorney for Intervener
PO Box 511,
Hopkinton, NH 03229
603-746-2196
603-491-8629
gilfavor@comcast.net

NH Registration No. 18301

Certificate of Service

I certify that a copy of this Petition was mailed to Clean Power Development, LLC, 130 Pembroke Road, Suite 100, Concord, NH 03301; Public Service Company of New Hampshire, 780 North Commercial Street, Manchester, NH 06037; and, Meredith Hatfield, Consumer Advocate, New Hampshire Public Utilities Commission, 21 South Fruit Street, Concord, NH 03301-2429 by ordinary first class mail, postage prepaid, this 28th day of October, 2009.


Arthur B. Cunningham