

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 14-238

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Determination Regarding PSNH's Generation Assets

PETITION FOR INTERVENTION BY THE SIERRA CLUB

Pursuant to the Commission's Order of Notice dated September 16, 2014, 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 more than 618,000 members nationwide, and over 3,800 in the New Hampshire Chapter. 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 to fulfill the mandate by the New Hampshire legislature to determine the future status of PSNH's generation assets, including examining how to maximize value for PSNH's retail customers while

minimizing risk, reducing stranded costs, and investigating repowering PSNH's generating assets as well as the wisdom of continued operation of those facilities.

3. As such, the determinations made by the Commission will likely involve a range of important issues: fuel pricing, electrical system reliability, generation diversification, environmental impacts, and setting what if any rate increases ratepayers will be charged.

4. The Sierra Club and the Sierra Club's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Intervention will allow the Sierra Club to protect its members' substantial interests in the environmental and public health impacts resulting from a determination as to the future of PSNH's generating assets, including whether those assets should be divested, retired, or repowered.

5. This proceeding further directly impacts the economic interests of the Sierra Club's New Hampshire Chapter members as ratepayers, as the proceeding will likely determine such things as potential rate increases those members will be obligated to pay, the level of competition between different power providers, and other issues related to the overall structure of the power marketplace in New Hampshire.

6. The Sierra Club has also already participated in the investigatory docket, Docket No. IR 13-020, that in many ways prefigured this current docket, submitting comments on the PUC's report, *Report on Investigation into Market Conditions Affecting PSNH and its Default Service Customers and the Impact of PSNH's Ownership of Generation on the Competitive Electric Market*, and contributing information to the PUC as part of its investigation.

7. The Sierra Club also has extremely extensive experience working before and with utility commissions in a wide variety of dockets, including in New Hampshire (*see, e.g.*, recent dockets DE 11-250, DE 10-121, DE 10-122, DE 10-261, DE 09-067, DE 08-103, and DE 07-064). The Sierra Club's presence in the proceedings will be guided by this experience, and will aid in the Commission's ultimate determination. In particular, the Sierra Club can be an important source of information and perspective on such things as environmental impacts from operation of PSNH's generation assets, as well as long-term environmental compliance costs and requirements. Such input would have bearing on many of the issues the Commission has indicated would be raised in this proceeding, such as the sale value of PSNH's generation assets and the likely rate impacts of retaining or selling those assets.

Accordingly, allowing the Sierra Club to intervene will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, the Sierra Club respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully Submitted,

/s/
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Dated: September 29, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Sierra Club's Petition for Intervention has been served electronically on the persons in the Commission's service list in accordance with Puc 203.11 this 29th Day of September, 2014.

/s/
Zachary M. Fabish