

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DE 16-693

Public Service Company of New Hampshire d/b/a Eversource Energy

Petition for Approval of a Power Purchase Agreement with Hydro Renewable Energy Inc.

**ASSENTED-TO MOTION OF THE SOCIETY FOR THE PROTECTION OF NEW
HAMPSHIRE FORESTS FOR LEAVE FOR LATE FILING**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully requests the New Hampshire Public Utilities Commission (“PUC”) accept for its consideration the concurrently filed Petition to Intervene (“Petition”). In support, the Forest Society states as follows:

1. The interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the filing of the Petition given that the deadline is only a week past and the proceedings before the Commission in this docket have just begun.

2. On October 25, 2016, the Commission issued an Order of Notice requiring interested parties to intervene on or before November 2, 2016. Since that time, a few filings have been submitted including various petitions to intervene which have not yet been acted upon, a pre-hearing conference convened, and a deadline set for submitting legal briefs with a bifurcation of issues. But, none of the underlying substance of both phases of the petition have been adjudicated by the Commission yet.

3. The Forest Society is apprised of the outcomes of the pre-hearing conference and prepared to participate according to the bifurcated review process. The Forest Society understands that the Commission will not rule on petitions to intervene until after the first phase.

4. The Forest Society was hindered in filing timely due to multiple other deadlines and occurrences in Site Evaluation Committee Docket No. 2015-06 (Joint Application of

Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility).

5. This matter has not progressed substantially such that permitting the late intervention would prejudice the applicant or any other party in interest.

6. Reserving the right to object to the Petition to Intervene, the applicant assents to this Motion for Leave for Late Filing.

WHEREFORE, the Forest Society respectfully requests that the Public Utilities Commission:

- A. Accept for consideration the Petition to Intervene of the Forest Society; and
- B. Grant such other and further relief as may be just.

Respectfully Submitted,

SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS

By its Attorneys,

November 10, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on this day, November 10, 2016, a copy of the foregoing petition was sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket.



By: _____
Amy Manzelli, Esq.