

July 25, 2016

Ms. Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: SEC Docket No. 2015-04: Application of Eversource Energy for a Certificate of Site and Facility –
Seacoast Reliability Project.**

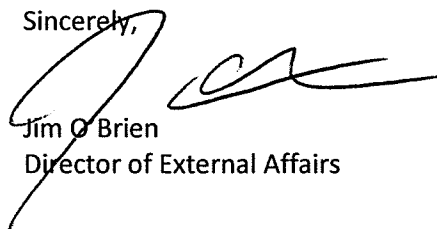
Dear Pamela:

Please find enclosed an original and one copy of the Petition to Intervene by The Nature Conservancy in the above-captioned matter.

A copy of this letter and motion have been sent to the SEC distribution list.

Thank you for your attention to this matter.

Sincerely,



Jim O'Brien
Director of External Affairs

Encl.

cc: Service List in SEC Docket 15-04

July 25, 2016

STATE OF NEW HAMPSHIRE – SITE EVALUATION COMMITTEE

PETITION TO INTERVENE: SEC Docket No. 2015-04

Application of Public Service Company of New Hampshire d/b/a/ Eversource Energy for a Certificate of Site and Facility for the Construction of a new 115 kV transmission line from Madbury substation to Portsmouth substation

The Nature Conservancy (“TNC”), pursuant to RSA 541-A:32 and N.H. Code of Administrative Rules Site 202.11, respectfully petitions the New Hampshire Site Evaluation Committee (the “Committee”) for leave to intervene as a party in the above-captioned proceeding. In support of this petition, TNC represents as follows:

1. On April 12, 2015 the Committee received an Application for a Certificate of Site and Facility from Eversource Energy for the construction of a new 115 kV Transmission Line from the Madbury Substation to Portsmouth Substation (the “Application”). On June 13, 2016, the Application was accepted and determined by the Committee to contain sufficient information to carry out the purposes of RSA 162-H.
2. The statutory standards for intervention are set forth in RSA 541-A:32, I and II. First, a petition for intervention *must* be granted if the petitioner states facts demonstrating how its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petitioner qualifies under any provision of law) and the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. *See* RSA 541-A:32, I(b) and (c). Second, the Committee *may* grant a petition to intervene “at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings.” RSA 541-A:32, II. *See also* N.H. Admin. R. Site 202.11 (requiring the presiding officer to grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32). For the reasons presented below TNC meets one or both of the foregoing intervention standards.
3. TNC is a 501(c)(3) non-profit organization dedicated to conservation for the benefit of people and nature, and is working with communities and a wide variety of public and private partners across New Hampshire to establish resilient, connected landscapes; foster healthy rivers and freshwater systems;

build sustainable fisheries; restore estuarine health; and create a clean energy future for New Hampshire.

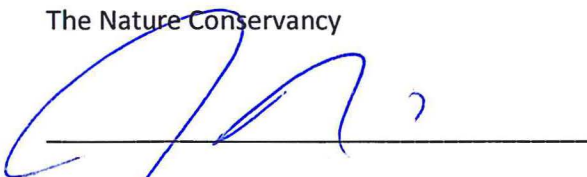
4. TNC owns or has a direct legal interest in four properties totaling more than 270 acres on which a portion of the Seacoast Reliability Project is located. In addition, since 2009 TNC and the University of New Hampshire have worked cooperatively on oyster reef restoration projects in over 20 acres of the Great Bay estuary, including seeding the reefs with more than 3 million oysters. Healthy oyster beds help filter water, remove polluting nutrients and provide important fish habitat—services with great environmental and economic value. A portion of the Seacoast Reliability Project is located in the Great Bay estuary.

5. In light of TNC's direct legal interest in properties on which a portion of the Seacoast Reliability Project is located and TNC's significant investment in conservation projects within the Great Bay estuary, TNC has rights, duties, privileges, immunities and/or other substantial interests that may be affected by this proceeding. Granting TNC's Petition to Intervene would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings. If granted intervention status, TNC will abide by the Committee's rules and procedural schedule and make every effort to work collaboratively with staff and other parties.

WHEREFORE, TNC respectfully requests that the Site Evaluation Committee grant this Petition and allow TNC to intervene as a full party in this proceeding, and to grant such other relief as the Commission finds just and proper.

Respectfully submitted,

The Nature Conservancy

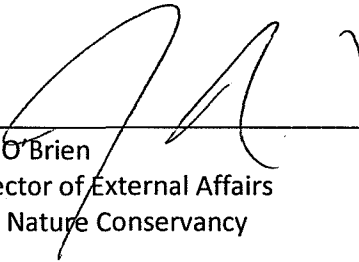


Jim O'Brien
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Dated: July 25, 2016

Certificate of Service

I hereby certify that an original and one copy of the foregoing Motion to Intervene has on this 22nd day of June 2016 been sent to the New Hampshire Site Evaluation Committee by email to all members on the SEC Distribution List.



Jim O'Brien
Director of External Affairs
The Nature Conservancy

Dated: July 25, 2016