

*Thomas R. Clark*  
City Solicitor

*Thomas I. Arnold, III*  
Deputy City Solicitor



*Peter R. Chiesa*  
*Gregory T. Muller*  
*John G. Blanchard*  
*Jeremy A. Harmon*

**CITY OF MANCHESTER**  
*Office of the City Solicitor*

Via e-mail only

February 5, 2016

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

**Re: 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  
Docket No 2015-6**

Dear Ms. Monroe:

I have enclosed the City of Manchester's Petition to Intervene as well as my appearance in the above captioned matter.

Thank you for your assistance.

Very Truly Yours,

Thomas I. Arnold, III  
Deputy City Solicitor

TIA/hms  
p.c. Parties, Docket Distribution List  
via e-mail

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**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

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 for the Construction of a New High Voltage Transmission Line in  
New Hampshire

Docket No. 2015-06

City of Manchester's Petition To Intervene

NOW COMES the City of Manchester, by and through its counsel, the City Solicitor's Office and petitions the Site Evaluation Committee to allow it to intervene in the above captioned matter in accordance with NH Admin. R. Site 202.11 and RSA 541-A:32 and in support thereof does state as follows:

1. On October 19, 2015 Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy ("Northern Pass") filed an application for a Certificate of Site and Facility with the Site Evaluation Committee.

2. The City of Manchester ("City") is the largest City in the State of New Hampshire and is also one of Eversource's largest customers. From an economic development perspective the City has a strong interest in attracting new business, increasing its tax base and in having a growing job market. As such the City has a direct interest in the cost and availability of electricity within the City.

3. Northern Pass is proposing to bring 1,090 megawatts of clean, competitively priced, renewable hydropower to New Hampshire and New England while promising that all costs of sitting and constructing Northern Pass will be paid by the project, at no cost to New Hampshire customers including businesses and customers within the City. The City has a direct interest in intervening to ensure that Northern Pass representations are honored.

4. Northern Pass has proposed a power purchase agreement that will permit delivery to New Hampshire of approximately 100 megawatts of renewable hydroelectric power that will provide greater price stability at a customer cost savings of \$100 million over 20 years. The City has a direct interest in the power purchase agreement and Northern Pass representatives as to its provision of on-peak power and greater price stability.

5. Northern Pass has represented that the delivery of 1,090 megawatts of energy will suppress wholesale energy prices leading to cost savings of \$80 million for New Hampshire businesses and residential customers. The City has a direct interest in ensuring that these cost savings materialize and are passed through to its businesses and residents.

6. Northern Pass has proposed a Forward NH Fund with a commitment to fund \$200 million towards community betterment, clean energy innovation, economic development and tourism. While the fund will have an emphasis on host communities and the North Country the fund is for the entire State of New Hampshire. The City has an interest in how this fund is structured, participating in the monitoring of this fund, an interest in how the fund evolves, as well as an interest in how the fund is implemented and expended.

7. On February 2, 2016 the Board of Mayor and Aldermen authorized the City to seek intervener status with the Site Evaluation Committee.

8. As discussed herein the proposed project will impact the City's rights duties, privileges, immunities and other substantial interests and the City's intervention will support and not impair the interest of justice and the orderly and prompt conduct of the proceedings.

WHEREFORE the City of Manchester requests that the Site Evaluation Committee:

- A. Grant the City's Petition to Intervene.
- B. Grant such other relief as may be just and equitable.

Respectfully Submitted



Thomas I. Arnold, III  
Deputy City Solicitor  
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One City Hall Plaza  
Manchester, New Hampshire 03101  
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Certification

I hereby certify that a copy of the foregoing was sent by e-mail to Parties on the Distribution List of this docket.

February 5, 2016



Thomas I. Arnold, III

**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

Joint Application of Northern Pass Transmission, LLC and Public Service Company of New  
Hampshire d/b/a Eversource Energy for a Certificate of Site Facilities

Docket 2015-06

**APPEARANCE OF THOMAS I. ARNOLD, III**


Pursuant to NH Admin. Rule Site 202.04, please enter the appearance of Thomas I.  
Arnold, III as counsel for the City of Manchester in the above-captioned matter.

The matter involves an application by Northern Pass Transmission, LLC and Public  
Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and  
Facility. The undersigned, Thomas I. Arnold, III, is the Deputy City Solicitor for the City of  
Manchester, and is an attorney admitted to practice in the State of New Hampshire.

Respectfully submitted,

CITY OF MANCHESTER

February 5, 2016

By:   
Thomas I. Arnold, III, Deputy City Solicitor  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of February, 2016 a copy of the foregoing was sent by  
electronic mail to persons names as Parties on the Distribution List for this Docket.

February 5, 2016

By:   
Thomas I. Arnold, III, Deputy City Solicitor