

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

Joint Application of Northern Pass Transmission, LLC and Public Service 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 NASHUA'S PETITION TO INTERVENE**

The City of Nashua by and through its attorneys, Office of Corporation Counsel, petitions the Site Evaluation Committee to allow it to intervene in the above-captioned matter in accordance with RSA 541-A:32 and NH Admin. Rule Site 202.11, stating as follows:

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

2. The City of Nashua has an interest in the proposed facility because of its state wide economic impact. The Northern Pass Project, through its Forward NH Fund, is committing \$200 million for New Hampshire priorities. These priorities include clean energy, economic development and tourism.

3. The Northern Pass Project's application states that the fund will be controlled by an advisory board structure. Upon information and belief, the City of Nashua understands that the funds may be given to the state to administrator. The City of Nashua plays a unique and vital role in the state's economy and the state's largest manufacturing and technology employers are located in Nashua. The city has a methane to energy facility at its landfill and two hydroelectric facilities within its borders, one is currently owned by the city and the other the city is exercising its option to purchase. Further, the city is working towards rail access which will allow further economic development and tourism throughout the state. The city is uniquely positioned,

therefore, to benefit from Forward NH Fund funding and would like the funds distributed directly to municipalities, instead of the state.

4. RSA 541-A:32 and NH Admin. Rule Site 202.11 provide that the Site Evaluation Committee, or its presiding officer, shall grant petition for intervention if:

- (1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer's order of notice of the hearing, at least 3 days before the hearing;
- (2) The petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities' or other substantial interests might be affected by the proceeding or the petitioner qualifies as an intervenor under any provision of law; and
- (3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

5. The City of Nashua requests intervenor status in order to ensure the administration of the Forward NH Fund is fully considered during this process. As discussed herein, the proposed facility will impact the rights, duties, privileges, immunities' and other substantial interests of the City of Nashua. The interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

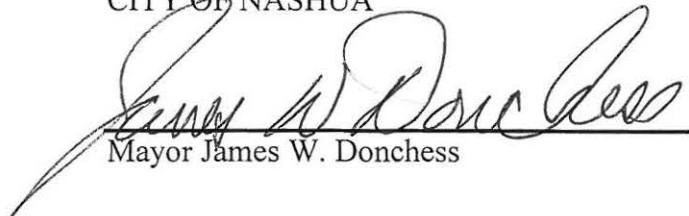
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WHEREFORE, the City of Nashua respectfully requests that the Site Evaluation Committee:


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

Respectfully submitted,

CITY OF NASHUA

  
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Mayor James W. Donchess

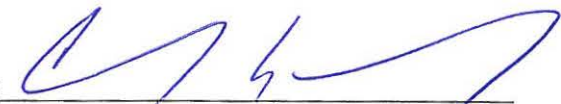
Date: February 5, 2016

By:   
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of February, a copy of the foregoing was sent by electronic mail to persons named on the Service List of this docket.

Date: February 5, 2016

By:   
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Celia K. Leonard, Esquire