

**THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

Petition for Approval of Lease Agreement Between Public Service Company of New Hampshire
d/b/a Eversource Energy and Northern Pass Transmission LLC

Docket No. DE 15-464

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY'S OBJECTION
TO PETITION TO INTERVENE OF
WALTER A. PALMER AND KATHRYN TING PALMER**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07 and RSA chapter 541-A, Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH" or the "Company") hereby objects to the petition to intervene of Walter A. Palmer and Kathryn Ting Palmer in the above-captioned docket. In support of its objection, PSNH states the following:

1. On October 19, 2015, PSNH filed a petition for approval of a lease transaction between it and Northern Pas Transmission LLC ("NPT") whereby PSNH would lease to NPT certain real estate rights owned by PSNH. After the close of business on February 17, 2016, the Palmers submitted a petition to intervene in the docket. The petition does not demonstrate how any of the Palmer's rights, duties, privileges, immunities or other substantial interests are affected by the proceeding, nor that the interests of justice require the intervention. The Palmer's petition should, therefore, be denied.
2. In their petition, the Palmers contend that their property abuts the proposed route for the NPT line, and that the construction of the NPT line may have a negative impact on their home and business. In the petition, the Palmers identify their address as one in Franconia. In Franconia, the NPT line is proposed to built entirely underground in public

roadways. See, e.g., <http://www.northernpass.us/franconia-nh.htm>, for a description of the NPT line in Franconia. In Franconia, the NPT line would not use any easements owned by PSNH, and no land in Franconia is included in the properties that are covered by the lease in this docket. See, e.g., PSNH Lease Petition in Docket No. DE 15-464, Bates Page 185, Attachment to Testimony of Robert P. LaPorte, Jr., listing towns with properties subject to the proposed lease. While the Palmers may have some generalized interest in the NPT project, or some aspect of it, they would not be affected by any decisions of the Commission relative to the lease that is the subject of this proceeding. Accordingly, in that the Palmers do not have the requisite interests at stake as required by RSA 541-A:32, their intervention should not be granted.


WHEREFORE, PSNH respectfully requests that the Commission:

- (1) Deny the Palmers' petition to intervene in this proceeding; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

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

February 19, 2016
Date

By: 
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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Objection to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

February 19, 2016
Date


Matthew J. Fossum