

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

DE 15-464

**Petition for Approval of Lease Agreement between PSNH dba Eversource Energy
and Northern Pass Transmission LLC**

PETITION TO INTERVENE OF JO ANNE BRADBURY

Jo Anne Bradbury respectfully petitions the New Hampshire Public Utilities Commission ("PUC") for late intervention in the above-captioned proceedings under RSA 541-A:32 and PUC Rule 203.17, because the proposed facility will impact the rights, duties, privileges, immunities, and other substantial interests of Jo Anne Bradbury, and the interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

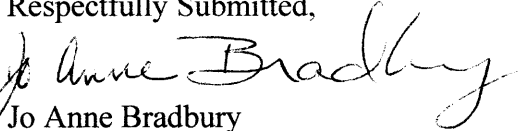
In support of her request, Jo Anne Bradbury states as follows:

1. On or about October 19, 2015, Public Service Company of New Hampshire ("PSNH") d/b/a Eversource Energy (Eversource) filed a Petition for Approval of a lease agreement (Lease Petition) between Eversource and Northern Pass Transmission LLC ("Northern Pass") pertaining to certain real estate interests of Eversource. Northern Pass also filed an application with the Site Evaluation Committee ("SEC") to construct, operate, and maintain a 192-mile, high voltage electric transmission line from the international border between New Hampshire and Canada to a substation in Deerfield, New Hampshire.
2. Jo Anne Bradbury owns four parcels of land on Thurston Pond Road in Deerfield, NH. Two properties are encumbered by easements that Public Service Company of New Hampshire (PSNH) has petitioned to lease to Northern Pass Transmission, LLC (NPT) for the construction of high voltage transmission infrastructure for the importation of electricity from Canada.
3. The proposed Lease Petition will impact the rights, duties, privileges, immunities and other substantial interests of Jo Anne Bradbury. Allowing this intervention will serve the interests of justice and will not impair the orderly and prompt conduct of the proceedings.
4. On January 29, 2016, the PUC issued an Order of Notice requiring interested parties to intervene by February 17, 2016. Since then, Parties have submitted filings but the underlying substance of the Lease Petition has not yet been adjudicated by the PUC. This matter has not progressed substantially such that permitting the late intervention would prejudice the Applicant.

5. Jo Anne Bradbury has contacted Counsel for Eversource to determine whether he will object to the late filing of this Petition to Intervene. Counsel for Eversource has responded, stating that he would treat Jo Anne Bradbury's Petition to Intervene the same as other petitions to intervene that have been submitted by other landowners in this docket.

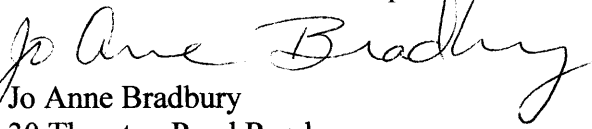
Jo Anne Bradbury respectfully requests that the Public Utilities Commission grant her Petition to Intervene and such other and further relief as may be just.

Respectfully Submitted,



Jo Anne Bradbury
30 Thurston Pond Road
Deerfield, NH 03037

I certify that on this day, May 9, 2016, a copy of the foregoing Petition was sent by electronic mail or US mail to persons named on the Service List of this docket.



Jo Anne Bradbury
30 Thurston Pond Road
Deerfield, NH 03037