

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

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY

Petition to Lease Rights-of-Way to Northern Pass Transmission, LLC

DE 15-464

CITY OF CONCORD'S PETITION TO INTERVENE

The City of Concord, by and through its attorneys, the Office of the City Solicitor, petitions the Public Utilities Commission ("Commission") to allow it to intervene in the above-captioned matter in accordance with RSA 541-A:32 and Puc Rule 202.17, stating as follows:

1. On October 19, 2015, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") filed a petition for approval of a lease agreement between Eversource and Northern Pass Transmission, LLC ("Northern Pass").
2. The proposed lease between Eversource and Northern Pass is the agreement granting Eversource's rights-of-way to be leased to Northern Pass for construction of Northern Pass' proposed transmission line.
3. The City of Concord petitions to intervene in this matter because the proposed facility has significant and unique impacts on Concord. The proposed facility is projected to travel through heavily populated areas in Concord that include residential, commercial and industrial zones. Concord has a direct ownership interest in properties affected by the Project. The proposed route crosses through several lots that Concord owns in fee simple, as well as other lots on which Concord owns and manages conservation easements. Concord also owns and manages conservation easements on lots that are located immediately adjacent to the proposed route.

4. The City of Concord has previously expressed its concerns about the visual and audio impacts that the project will have on the City's character and property values as a result of the overhead lines and supporting structures, and it seeks to have the project buried in Concord. The City of Concord has been allowed to intervene at the Site Evaluation Committee, and it has also intervened in PUC Dockets 15-460 and 15-462.

5. On September 15, 2016, the PUC issued an order directing parties to submit legal memoranda relative to the scope of some of Eversource's easements and their transferability to Northern Pass. The City of Concord desires to submit a legal memorandum on this issue.

6. Based on the foregoing, the City of Concord respectfully seeks to intervene in this docket. The interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. The City has contacted Counsel for Eversource regarding the late filing of this petition to intervene, and Eversource neither assents nor objects.

WHEREFORE, the City of Concord respectfully requests that the Public Utilities Commission:

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

Respectfully submitted,

CITY OF CONCORD

September 22, 2016

By:



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail or U.S. Mail, postage prepaid, to those parties listed on the Service List of this docket, as well as the Office of Consumer Advocate, pursuant to N.H. Code Admin Rule Puc 203.11.

September 22, 2016

By: 

Danielle L. Pacik, Deputy City Solicitor