

**STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**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**

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**PETITION TO INTERVENE OF ROBERT COTE AND BRUCE ADAMI**

Robert J. Cote and Bruce A. Adami respectfully petition 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 Robert J. Cote and Bruce A. Adami, and the interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

In support of their request, Robert J. Cote and Bruce A. Adami state as follows:



1. On or about October 19, 2015, Public Service Company of New Hampshire ("PSNH") d/b/a Eversource Energy Service Company (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. Robert J. Cote and Bruce A. Adami own one parcel of land at 32 Mountain Road in Deerfield, NH. The property is 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 infra-structure for the importation of electricity from Canada.
3. The proposed Lease Petition will impact the rights, duties, privileges, immunities and other substantial interests of Robert J. Cote and Bruce A. Adami. 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. Robert J. Cote and Bruce A. Adami have contacted Counsel for Eversource to determine whether it will object to the late filing of this petition to intervene, and is currently awaiting a response.

**WHEREFORE**, Robert J. Cote and Bruce A. Adami respectfully request that the Public Utilities Commission grant their Petition to Intervene and such other and further relief as may be just.

Respectfully Submitted,

Robert J. Cote and Bruce A. Adami  
32 Mountain Road  
Deerfield, NH 03037

I certify that on this day, October 4, 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.



Robert J. Cote  
32 Mountain Road  
Deerfield, NH 03037