

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

RE: Application for New License for)	Project Relicensings for:
Major Water Power Project – Existing)	Project No. P-1855-048
Dam)	(Bellows Falls);
)	Project No. P-1892-028
)	(Wilder);
)	Project No. P-1904-076
)	(Vernon)

**STATE OF NEW HAMPSHIRE
MOTION TO INTERVENE**

Pursuant to 18 C.F.R. § 385.212 and 385.214 of the Commission’s Rules of Practice and Procedure and the Commission’s January 30, 2015 Notice of Application Accepted for Filing, Soliciting Comments, Motions to Intervene, and Protests, Project Nos. 1904-076, *et al.*, the State of New Hampshire (the “State”) respectfully moves for intervention in the above-captioned proceeding. Copies of all notices, correspondence, and pleadings related to this proceeding should be directed to the following persons, who should be placed on the official service list for this proceeding:

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**STATEMENT OF INTEREST AND OF THE POSITION OF THE STATE OF
NEW HAMPSHIRE**

Pursuant to 18 C.F.R. § 385.214(b), the State respectfully sets forth the following interests and position in the above-captioned proceedings.

The boundary between the State of New Hampshire and the State of Vermont lies along the western shore of the Connecticut River. Accordingly, all of the waters, bed and eastern bank of the Connecticut River are part of the State of New Hampshire. The State holds the waters of the Connecticut River in the public trust. Each of the hydroelectric projects subject to this relicensing proceeding (Bellows Falls, Wilder and Vernon) (collectively the "Projects") impounds and utilizes the waters of the Connecticut River to produce electric power that is sold into the ISO-New England regional power market.

The State has an interest in the overall allocation of economic costs and benefits arising from private utilization of the State's public water resources. This broad State interest is separate from the specific interests managed by State resource agencies. The State's direct interest in these proceedings cannot be adequately represented by any other entity. Therefore, the State requests intervenor status in these proceedings so as to protect the foregoing interests and to take a position in the above-captioned proceedings consistent with the foregoing interests.

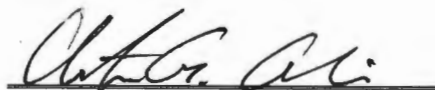
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Wherefore, the State of New Hampshire respectfully moves for intervention in the above-captioned docket.

Respectfully submitted,

Joseph A. Foster
Attorney General



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Counsel for the State of New Hampshire

Dated: March 2, 2015

cc: Service list

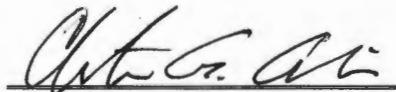
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CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Concord, New Hampshire, this 2nd day of March, 2015.



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