

charged with the enforcement of the state's consumer protection, antitrust and environmental laws, and protection of the state's property interests. For these reasons, the Attorney General has a direct and substantial interest in this proceeding, and no other party can adequately represent that interest. Accordingly, the Attorney General respectfully requests intervention in this docket to protect the State of New Hampshire and its citizens through the proper enforcement of New Hampshire and applicable federal laws.

The Attorney General's intervention in this docket will not cause prejudice to, or additional burdens on, any other party to the proceedings, and will not cause any disruption to the proceedings.

At this point, the Attorney General is not taking a position with respect to the merits of the pending request for a certificate of public necessity and convenience. He moves to intervene to obtain party status and preserve his rights to participate in the review process, including the ability to seek judicial review of any final decision on Tennessee's application. The Attorney General is not requesting a formal hearing in the docket, but reserves the right to request a hearing at a later date as allowed by the Commission's Rules and Regulations.

II. PLEADINGS AND SERVICE CONTACTS

Service of all pleadings and other filings in this proceeding should be addressed to the following person, whose name should be placed on the official service list prepared by the Secretary in this docket:

Ann Rice
Deputy Attorney General
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603) 271-4900
Ann.Rice@doj.nh.gov

III. CONCLUSION

WHEREFORE, the New Hampshire Attorney General Joseph A. Foster respectfully requests that the Commission grant this motion to intervene and grant the New Hampshire Office of the Attorney General full party status in this proceeding.

Dated this 14th day of January, 2016

Respectfully submitted,

Joseph A. Foster
Attorney General

Ann Rice _____
Ann Rice
Deputy Attorney General
Office of Attorney General
33 Capitol Street
Concord, New Hampshire, 03301
(603) 271-4900
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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 14th day of January, 2016.

Ann Rice _____
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