

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

Docket No. DG 09-141

**PETITION TO INTERVENE OF NATIONAL GRID NH**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH (“National Grid” or “Company”) hereby respectfully submits this petition for full intervenor status in the above-captioned proceeding.

This petition is submitted pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17.

In support of this Petition, National Grid states the following:

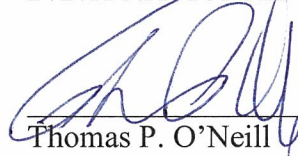
1. On August 7, 2009, Northern Utilities, Inc. (“Northern”) filed a petition with the New Hampshire Public Utilities Commission (“Commission”) seeking approval of a Proposed Financial Hedging Program Redesign.
2. As stated in the Order of Notice issued on November 10, 2009 in this docket, Northern’s petition raises issues related to: (1) whether and to what extent, hedging mitigates natural gas price volatility; (2) risk management oversight and control; (3) the rate impact on firm sales customers due to hedging for commercial and industrial customers that migrate to transportation service; (4) use of physical and financial hedges for gas supplies; (5) program design; (6) whether Northern’s hedging program should be continued; and (7) whether Northern’s proposed amendments are appropriate.
3. National Grid is a public utility providing natural gas distribution service to approximately 86,000 New Hampshire customers. National Grid’s principal office in New Hampshire is 130 Elm Street, Manchester, New Hampshire 03101.

4. National Grid, like Northern, engages hedging activities for the purpose of mitigating natural gas price volatility for its customers pursuant to its Natural Gas Price Risk Management Program. Any action the Commission may take with respect to Northern's filing may impact the rights, duties and interests of National Grid or its customers. These interests are substantial and are not adequately represented by any other party to this proceeding.
5. Accordingly, National Grid requests that it be granted status as a full intervenor in this docket.
6. National Grid's Petition to Intervene is timely as it has been filed on or before December 2, 2009, as provided in the Order of Noticed issued November 10, 2009, at page 3. Therefore, the granting of National Grid's Petition to Intervene will not impair the orderly and prompt conduct of the proceeding.
7. National Grid has contacted counsel for Northern who authorized National Grid to state that it does not object to this Petition to Intervene.

**WHEREFORE**, National Grid respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC.  
D/B/A NATIONAL GRID NH



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Dated: December 1, 2009

### **CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, a copy of the above Petition to Intervene was hand delivered, sent by overnight delivery, or sent electronically to Northern and the persons named on the Service List in the above-captioned docket.

Dated: December 1, 2009

  
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Thomas P. O'Neill