

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 09-186

PETITION TO INTERVENE OF NATIONAL GRID

Granite State Electric Company d/b/a National Grid (“National Grid” or “Company”) hereby respectfully submits this petition for full intervenor status in the above-captioned proceeding, with certain voluntary limitations as discussed below. 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 September 30, 2009, Public Service Company of New Hampshire (“PSNH”) filed a petition with the New Hampshire Public Utilities Commission (“Commission”) seeking approval of a new renewable default service rate option for its customers pursuant to HB395 (2009 NH Laws 236), codified as RSA 374-F:3, V(f).

2. As stated in the Order of Notice issued on October 9, 2009 in this docket, PSNH’s petition raises issues related to whether: (1) PSNH’s proposed renewable default service rate option complies with RSA 374-F:3, V(f); (2) the proposed calculation of a renewable default service rate is just and reasonable under RSA 378:7; (3) the proposal for reconciling the default energy service rate is just and reasonable; and (4) the proposal is consistent with the electric utility restructuring principles in RSA 374-F:3.

3. National Grid is a public utility providing electric distribution service to approximately 41,000 New Hampshire customers. National Grid’s primary place of business in New Hampshire is 9 Lowell Road, Salem, New Hampshire 03079.

4. Under RSA 374-F:3, V(f), National Grid is required to provide its customers

with one or more renewable energy source options. Accordingly, National Grid must also file a petition with the Commission seeking approval of its proposed renewable energy source program. Thus, many of the issues raised in this proceeding may be applicable to National Grid in a subsequent proceeding. Any action the Commission may take with respect to PSNH'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. National Grid requests that it be granted status as a full intervenor in this docket, subject to the following voluntary limitations: That it be entitled to receive copies of all pleadings and other documents, all discovery that is not confidential, and all e-mails and other correspondence among the parties and staff, with the exception of materials relating to settlement negotiations and/or confidential matters; and that it may attend and participate in technical sessions, but not attend settlement conferences or negotiations, even in a monitoring role. At this time, National Grid does not intend to present or cross-examine witnesses or file closing briefs. National Grid reserves the right to withdraw or modify these voluntary limitations upon petition to the Commission. However, the Company does not currently anticipate requesting modification of these limitations.

6. National Grid's Petition to Intervene is timely as it has been filed on or before October 22, 2009, as provided in the Order of Noticed issued October 9, 2009, at pages 3-4. Therefore, the granting of National Grid's Petition to Intervene will not impair the orderly and prompt conduct of the proceeding.

7. National Grid circulated a draft of this Petition to Intervene to counsel for PSNH. PSNH 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,

GRANITE STATE ELECTRIC
COMPANY D/B/A NATIONAL GRID

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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 First Class U.S. Mail postage prepaid, or sent electronically to PSNH and the persons named on the Service List in the above-captioned docket.

Alexandra E. Blackmore

Dated: October 22, 2009

Alexandra E. Blackmore