STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Objection to Public Utility Assessments

DOCKET NO. DM 13-252

Petition to Intervene of New England Power Company, New England Electric Transmission Corporation, and New England Hydro-Transmission Corporation

New England Power Company ("NEP"), New England Electric Transmission Corporation ("NEET"), and New England Hydro-Transmission Corporation ("NE Hydro") hereby respectfully request that they be granted full intervenor status in the above-captioned proceeding. In support of their request, NEP, NEET, and NE Hydro state as follows:

- 1. NEP, NEET, and NE Hydro are all authorized to conduct business in New Hampshire as public utilities. As such they are subject to and pay an annual assessment by the Public Utilities Commission ("PUC") pursuant to RSA 363-A.
- 2. In this proceeding, Northern New England Telephone Operations LLC, Enhanced Communications of Northern New England Inc., and Public Service Company of New Hampshire have objected to their PUC assessments. Through their participation in Docket IR13-038, NEP, NEET, and NE Hydro have become aware that any reduction in one utility's PUC assessment for a given year may be used as a basis to increase the amount previously assessed to other utilities.
- 3. In addition, some of the positions being taken by other parties in this proceeding, including with regard to whether the PUC may or should base its assessment on revenues from rates that are subject to federal regulation or from activities that are otherwise not subject to PUC

jurisdiction, may have an impact on any future determination by the PUC regarding the amount that NEP, NEET, and NE Hydro should be assessed.

- 4. For the foregoing reasons, the rights, duties, privileges, immunities, and other substantial interests of NEP, NEET, and NE Hydro may be affected by this proceeding.
- 5. Granting NEP, NEET, and NE Hydro full intervenor status is consistent with the interests of justice and will not impair the orderly and prompt conduct of this proceeding.

WHEREFORE, NEP, NEET, and NE Hydro respectfully request that the Commission:

- A. Grant them full intervenor status in this proceeding; and
- B. Order such other relief as the Commission may determine to be consistent with the public interest.

Respectfully submitted,

NEW ENGLAND POWER COMPANY
NEW ENGLAND ELECTRIC
TRANSMISSION CORPORATION
NEW ENGLAND HYDRO-TRANSMISSION
CORPORATION

By Its Attorneys

McLANE, GRAF, RAULERSON &

MIDDLETON, P.A.

Date: November \S , 2013

Steven V. Camerino, Esq.

11 South Main Street, Suite 500

Concord, NH 03301

Telephone (603) 226-0400

Facsimile (603) 230-4448

steven.camerino@mclane.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition to Intervene has been forwarded to all persons on the Commission's Service List by electronic mail.

Dated: November $\frac{\S}{2}$, 2013

Steven V. Camerino