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STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DG 14-155

Liberty Utilities (EnergyNorth Natural Gas) Corp. and Iberdrola USA Enterprises, Inc.**Joint Petition for Authority to Transfer Ownership of New Hampshire Gas Corporation to Liberty Utilities (EnergyNorth Natural Gas) Corp.**

PETITION FOR INTERVENTION

NOW COME HotZero, LLC (HotZero) and hereby petitions the New Hampshire Public Utilities Commission for intervention in the above-captioned proceeding pursuant to RSA 541-A:32 and NH Code Admin. Rule Puc 203.17. In support of its Petition for Intervention, Petitioner says the following:

1. On June 6, 2014, Iberdrola USA Enterprises, Inc. (Iberdrola) and Liberty Utilities, through its EnergyNorth Natural Gas (Energy North) subsidiary, filed a petition for approval for Iberdrola to transfer its stock interests in New Hampshire Gas Corporation (NHGC) to Energy North. As part of its filing, Energy North included a summary of a rate plan it intends to propose following the transfer of NHGC to Energy North.
2. Petitions for Intervention, pursuant to RSA 541-A:32 and Rule Puc 203.17, must set forth the facts demonstrating that the petitioner's right's, duties, privileges, immunities, or other substantial interests may be affected by the proceeding, and that the interest of justice and the prompt and orderly conduct of the proceedings would not be impaired by allowing the intervention. Alternatively, the Commission may grant intervention in the interest of justice so long as the intervention would not impair the orderly and prompt conduct of the proceedings." RSA 541-A:32, II.
3. HotZero is a New Hampshire-based company formed in 2013 to lower heating costs in New Hampshire through the development of hot water district energy systems (HWDES). HotZero has been actively in discussions with the City of Keene as well as potential customers on the development of a HWDES in the City of Keene.
4. HotZero does not object to the transfer of NHGC from Iberdrola to EnergyNorth; however, HotZero does believe that the indicative rate plan could have the result of using existing customers of EnergyNorth to stifle competition for existing and new customers in Keene. HotZero also believes that the indicative rate plan may be contrary to the mains extension policies of the Commission, as implemented through the tariffs of NHGC, EnergyNorth and other gas providers. Given that the proponents have not sought approval for a rate plan, nor have provided sufficient information to gain approval, it is unclear what purpose the proponents have in putting forth their indicative proposal at this time.
5. In addition to the rate plan, the proponents have not indicated following the acquisition, how they would keep sufficient books and records that would allow the Commission to continue to establish separate cost-based rates for customers in Keene.

6. For the foregoing reasons, HotZero has substantial interests that will be affected by the Commission's deliberations in this proceeding. The prompt and orderly conduct of the proceedings would not be impaired by allowing the intervention. HotZero's position on filing testimony will be dependent on how the Commission wishes to consider the indicative rate plan in its determination of public interest.

WHEREFORE, HotZero hereby respectfully requests the Commission to grant it intervener party status and to order such other and further relief as may be just and equitable.

Respectfully submitted,
HotZero, LLC
By its Managing Director,



Dated: June 24, 2014

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Certification of Service

Pursuant to Rules Puc 203.02(2) and Puc 203.11, I have served copy of this petition on each person identified on the commission's service list for this docket.

