

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

PETITION FOR REVIEW OF PUBLIC SERVICE)
COMPANY OF NEW HAMPSHIRE'S SERVICES)
AND CHARGES TO COMPETITIVE ELECTRIC)
SUPPLIERS)

Docket No. DE 12-295

**PETITION TO INTERVENE OF
NORTH AMERICAN POWER AND GAS, LLC**

Pursuant to New Hampshire Revised Statutes Annotated 541-A:32, New Hampshire Administrative Rules, Puc 203.17, and the November 21, 2012 Order of Notice ("Order") issued by the Public Utilities Commission ("Commission"), North American Power and Gas, LLC ("NAPG") petitions to intervene as a party in the above-captioned docket. As set forth herein, NAPG's legal rights, duties, privileges, immunities and special interests will be directly affected by the Commission's final decision in this proceeding.

1. NAPG is a competitive energy supplier that serves predominantly residential retail electricity and natural gas customers in several states. The Commission has licensed it to serve electric supply customers in the Public Service Company of New Hampshire ("PSNH") service territory.

2. As a supplier focused on electric customers in the PSNH service territory, NAPG strongly supports Commission review of the "reasonableness and appropriateness" of any and all utility charges for services provided to retail electric

suppliers.¹ Additionally, given the relatively limited margins generated by most residential and small commercial accounts, cost inputs require careful review to ensure they do not inappropriately hinder competitive efforts in New Hampshire. As such, the legal rights, duties and privileges of NAPG are substantially and specifically affected by the instant investigation and its party intervention should be granted.

3. NAPG also would support Commission review of related competition-issues in the scope of this docket. Electronic data transmission processes, the manner in which late fees are applied to competitive suppliers, and the manner in which customer payments on a single utility are allocated to retail suppliers vis a vis the utility all should be subject to review and, if appropriate, consideration by the Commission.

4. NAPG anticipates participating in this docket actively, consistent with its party status. NAPG plans to attend and offer a position statement at the January 15, 2013 public hearing and to participate in the ensuing technical session. Thereafter, NAPG reserves the right to conduct discovery, present evidence, cross-examine witnesses and present written pleadings and briefs to the extent necessary given its interest in the issues before the Commission.

¹ Certain charges identified as potentially troubling by the Petitioner, are described as follows:

(1) the \$ 5.00 per request "Selection Charge" which is assessed when a customer switches to or from PSNH's default service; (2) the "Billing and Payment Service Charge" which PSNH charges on a \$0.50 per bill rendered basis for the billing and payment services PSNH provides to a competitive service supplier who has opted for consolidated billing services; and (3) the "Collection Services Charge" which is billed at 0.252% of total monthly receivable dollars pursuant to a written agreement with competitive suppliers.

5. Copies of all pleadings and other materials should be provided to the following:

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With an extra electronic copy provided to:

Michael D'Angelo, General Counsel
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Email: Mdangelo@napower.com

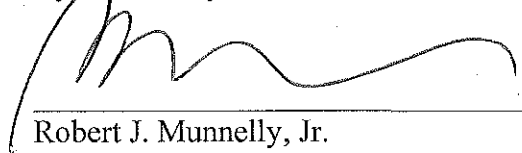
Conclusion

Accordingly, for the above described reasons, the Commission should grant NAPG's Petition to Intervene.

Respectfully submitted,

NORTH AMERICAN POWER AND GAS, LLC

By its attorneys,



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Dated: December 20, 2012