

STATE OF NEW HAMPSHIIRE
PUBLIC UTILITIES COMMISSION

Investigation into Payment Hierarchy between)
Competitive Energy Suppliers and Electric and) IR 13-244
Natural Gas Distribution Utilities)
)

**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 August 20, 2013 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 registered Competitive Electric Power Supplier (“CEPS”) that serves predominantly residential retail electricity and natural gas customers in several states. The Commission has registered NAPG as a CEPS to serve electric supply customers in the Public Service Company of New Hampshire (“PSNH”) service territory. NAPG is currently expecting registration to include the Liberty and Unitil territories.

2. As a supplier focused on New Hampshire electric customers, NAPG strongly supports Commission review of the longstanding payment hierarchy that has operated to the disadvantage of New Hampshire CEPS. NAPG substantially supports all or virtually all of the grounds necessitating Commission action as stated in the joint letter

from Staff and the Office of Consumer Advocate to the Commission dated May 9, 2013. See generally Order of Notice, pp. 1-2. 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 anticipates participating in this docket actively, consistent with its party status. NAPG plans to attend and offer a position statement at the September 20, 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.

4. Copies of all pleadings and other materials should be provided to the undersigned counsel for NAPG.

5. NAPG requests that courtesy electronic only copies be provided to NAPG and Murtha Cullina LLP personnel at the following addresses: (1) shopson@napower.com; (2) kjoseph@napower.com; and (3) mbaldwin@murthalaw.com.

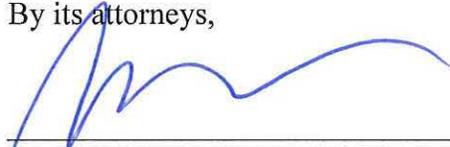
Conclusion

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: August 30, 2013