

BEFORE THE STATE OF NEW HAMPSHIIRE

PUBLIC UTILITIES COMMISSION

_____))
Public Service Company of New Hampshire))
Proposed Default Energy Service Rate for 2014)) DE 13-275
_____)

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

Pursuant to New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32 and New Hampshire Administrative Rules, Puc 203.17, North American Power and Gas, LLC (“NAPG”) petitions to intervene as a party in the above-captioned docket reviewing the Public Service Company of New Hampshire (“PSNH”) filing to establish a proposed Default Energy Service Rate for calendar 2014.

1. NAPG is a Competitive Electric Power Supplier (“CEPS”) that serves predominantly residential retail electricity and natural gas customers in several states. The Public Utilities Commission (the “Commission”) has registered NAPG as a CEPS to serve electric supply customers in the PSNH service territory, as well as in the Liberty and Unitil territories. NAPG has actively participated in various recent dockets relative to competitive conditions in the New Hampshire marketplace, including ongoing reviews of PSNH supplier fees (12-295) and the utility payment hierarchy (13-244).

2. As a retail supplier serving a significant number of New Hampshire electric supply customers, NAPG’s “legal rights, duties, privileges, immunities and special interests will be directly affected by the Commission’s final decision in this proceeding.” RSA 541-A:32. In this proceeding, the Commission will review and rule

on matters pertaining to, among other things, the treatment of PSNH's legacy generation costs and other default service-related costs. NAPG's interests in the encouragement and protection of a fair and competitive retail electric marketplace rely on the proper treatment of such costs. The issues related to PSNH's legacy costs and other issues have the potential to directly affect the competitive retail marketplace in which NAPG operates. Accordingly, in order to permit NAPG to adequately protect its interests, the Commission should grant NAPG's request to intervene in this matter. The Commission has granted similar intervention requests in earlier PSNH rate proceedings, such as in docket 09-180, where the Commission permitted the intervention of the New England Power Generators Association, Inc. , TransCanada Power Marketing, Ltd, and other suppliers on similar issues.

3. NAPG anticipates participating in this docket actively, consistent with its party status. NAPG plans to participate on any public hearing and/or technical session scheduled by the Commission. 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. Written and electronic 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) ttschamler@napower.com; and (3) mbaldwin@murthalaw.com.

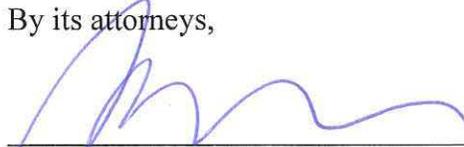
Conclusion

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,

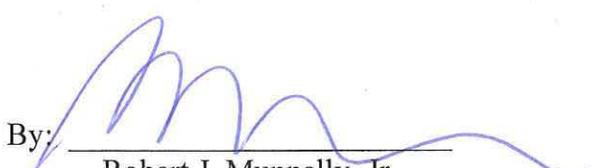


Robert J. Munnelly, Jr.
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, MA 02110
Telephone: (617) 457-4062
Fax: (617) 210-7062
Email: rmunnelly@murthalaw.com

Dated: October 10, 2013

Certificate of Service

I hereby certify that a copy of the foregoing Petition to Intervene of North
American Power and Gas, LLC has on this 10th day of October, 2013 been sent by email
to the service list in DE 13-275.

By: 

Robert J. Munnelly, Jr.