

BEFORE THE STATE OF NEW HAMPSHIIRE

PUBLIC UTILITIES COMMISSION

PSNH Determination Regarding Generation Assets

DE 14-238

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

Pursuant to New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32, New Hampshire Administrative Rules, Puc 203.17, and the June 26, 2015 Supplemental Order of Notice in this docket, North American Power and Gas, LLC (“NAPG”) petitions to intervene as a party in the above-captioned docket reviewing issues relating to the potential divestiture by Public Service Company of New Hampshire (“PSNH”) of its generation assets in New Hampshire.

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 Unutil territories. NAPG has been granted intervenor status, and actively participated, in various recent dockets relative to competitive conditions in the New Hampshire marketplace, including ongoing reviews of PSNH supplier fees (12-295), the utility payment hierarchy (13-244), and the 2013 default service rate case (13-275).

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 generation facilities and related costs, including but not limited to 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 generation facilities and costs, as well as related 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.

3. NAPG at this point has not determined the extent of its participation in this proceeding. NAPG plans to monitor PSNH’s initial testimony and discovery and consider whether any particular issues are of sufficient important to NAPG merit responsive factual evidence and/or written arguments from NAPG. 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’s General Counsel, Seth Hopson, and NAPG Director of Regulatory Affairs, Keenia Joseph, at the following addresses: (1) shopson@napower.com; and (2) kjoseph@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: July 7, 2015

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 7th day of July, 2015 been sent by email to the service list in DE 14-238.

By: 
Robert J. Munnelly, Jr.