

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DG 15-090

Northern Utilities, Inc.
2015 Summer Period Cost of Gas

MOTION TO INTERVENE OF
GLOBAL MONTELLO GROUP CORP AND
SPRAGUE OPERATING RESOURCES LLC

Global Montello Group Corp. (“Global”) and Sprague Operating Resources LLC (“Sprague”) hereby respectfully petition each for full party intervenor status in the above-captioned proceeding, pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17.

1. On March 17, 2015, Northern Utilities, Inc. filed with the New Hampshire Public Utilities Commission (“Commission”) its Cost of Gas (“COG”) Adjustment Filing for the 2015 Summer Period.
2. Global is a licensed competitive retail gas supplier in the state of New Hampshire.
3. Sprague is a licensed competitive retail gas supplier in the state of New Hampshire.
4. Global and Sprague are competitive retail marketers of natural gas in Northern’s New Hampshire division service territory and in its Maine division service territory. Global and Sprague (and their New Hampshire customers) are directly affected by Northern’s cost of gas adjustment as the allocation of capacity for the summer months is ascertained during this proceeding.
5. In addition, Global and Sprague have reason to believe that Northern failed to

correctly and timely allocate capacity for certain transportation customers during the Winter of 2014-2015 under the capacity assignment parameters required by the Commission. Global and Sprague would like to ensure the Commission fully understands the impact of such failure on transportation customers and marketers to ensure appropriate and timely recovery of the associated costs either from Northern or through a modification of the program requirements.

6. In addition, Northern has indicated a preferred methodology to refund the over-collection of Portland Natural Gas Transmission (PNGTS) interstate pipeline rates that will include a three year amortization of the refund to New Hampshire customers and the application of a simple interest rate of approximately 1% to the amounts held back. Global and Sprague question the reasonableness of this refund methodology.

7. Therefore, Global and Sprague are directly and substantially affected by this proceeding.

8. No other party does or can represent Global and Sprague's interests in this proceeding.

9. Pursuant to RSA 541-A:32, Admin. Rule 203.17, and established Commission precedent, the Commission must grant a petition to intervene if: (a) the petition is submitted in writing at least three days before the hearing; (b) the petition states facts demonstrating how the petitioner is substantially and specifically affected by the proceeding; and (c) the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding.

10. As required by the rules, Global and Sprague inquired of both the Consumer Advocate and Northern as to whether either would object to Global and Sprague's participation in this proceeding. Both the Consumer Advocate and Northern have indicated they would not object to Global and Sprague's request for full party status. Northern indicated that Global and

Sprague should accept the proceeding as they find it and within the scope as set out in the Commission's order of notice.

11. Global and Sprague intend to participate fully in this proceeding by propounding discovery, cross-examining witnesses and briefing the matter, as appropriate.

12. In order to protect their rights the rights, duties, privileges and/or substantial interests that may be affected by this proceeding, Global and Sprague believe they must intervene in this proceeding. Granting this petition for intervention would be in the interest of justice, and the intervention by Global and Sprague will not impair the orderly conduct of this proceeding.

WHEREFORE, Global Montello Group Corp. and Sprague Operating Resources, LLC respectfully request that the New Hampshire Public Utilities Commission grant their petition to intervene.

Respectfully submitted,

**GLOBAL MONTELLO GROUP CORP. and
SPRAGUE OPERATING RESOURCES, LLC**

By their attorney,



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Dated at Portland, Maine, this 17th day of April 2015.

Certificate of Service

I hereby certify that a copy of this Petition to Intervene has been served electronically on the persons on the Commission's service list in this docket in accordance with Puc 203.11 on this 17th day of April 2015 and that a hard copy of this Petition to Intervene has been mailed, first class to the Office of Consumer Advocate and Northern Utilities, Inc. - New Hampshire Division.



Patricia M. French