

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

EVERSOURCE ENERGY - PETITION FOR)
APPROVAL OF GAS INFRASTRUCTURE)
CONTRACT WITH ALGONQUIN GAS)
TRANSMISSION, LLC)

DE 16-241

**PETITION TO INTERVENE OF
PORTLAND NATURAL GAS TRANSMISSION SYSTEM**

Pursuant to the Order of Notice in this proceeding (the “Notice”), New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32 and New Hampshire Code Administrative Rules §203.17, Portland Natural Gas Transmission System (“PNGTS”) hereby petitions for leave to intervene in the above-captioned proceeding, docketed as DE 16-241. As grounds therefor, PNGTS sets forth the following:

I.

Background

PNGTS is a high-capacity, interstate natural gas pipeline which began serving New England's growing energy needs in March 1999. Generally speaking, PNGTS runs from Pittsburg, New Hampshire through the southern portions of Maine and New Hampshire, and into Dracut, Massachusetts. It connects with the TransCanada Pipeline (via TransQuebec and Maritimes Pipeline) at the Canadian border, the Maritimes and Northeast Pipeline at Westbrook, Maine and Methuen, Massachusetts, and the Tennessee Gas Pipeline System at Haverhill and Dracut, Massachusetts. PNGTS shares ownership of the approximately 101-mile portion of its pipeline that extends from Westbrook, Maine to Dracut, Massachusetts (this section is referred to as the “Joint Facilities”) with Maritimes & Northeast Pipeline, L.L.C. (“Maritimes”), an affiliate of Algonquin Gas Transmission Company, LLC, (“Algonquin”) a party to the agreements at issue in this proceeding.

PNGTS' address is:

1 Harbor Place
Suite 375
Portsmouth, New Hampshire 03801

As discussed in the Notice, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") seeks approval of firm gas transportation and storage contracts between Eversource and Algonquin on Algonquin's Access Northeast Project ("ANE"), and recovery of associated costs through a new distribution rate tariff, to be assessed on all Eversource customers. These contracts are associated with a request for proposals ("RFP") that Eversource issued last year. PNGTS participated in Eversource's RFP process and submitted a bid in response thereto.

II.

Request to Intervene

PNGTS moves to intervene in this proceeding. The New Hampshire Public Utilities Commission (the "PUC") must grant a time-filed petition to intervene if the petition describes how the petitioner's rights, duties, privileges, immunities, or other substantial interests may be affected by the proceeding, and the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding. RSA 541-A:32(I).

PNGTS satisfies the standard for intervention. This petition is being filed prior to the April 11, 2016 deadline established in the Notice, so it is timely.

PNGTS' rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding as contemplated by RSA 541-A:32(I). First, PNGTS' participation in Eversource's RFP process is an issue upon which testimony has been submitted. Testimony in a public proceeding regarding PNGTS has and will continue to substantially and specifically affect PNGTS' interests, and may affect its rights, duties, privileges, and immunities. Moreover,

because this proceeding pertains to ANE, and the market areas of PNGTS and ANE overlap, the outcome of this proceeding will undoubtedly have a substantial and specific effect on PNGTS' commercial operations.

In addition, in Eversource's petition, numerous references were made to future deliverability of the ANE project into PNGTS and Maritimes pipelines. PNGTS co-owns the Joint Facilities with Maritimes. In addition, PNGTS has a direct interconnection with Eversource's PSNH generating station in Newington, NH that may be affected by the outcome of these proceedings. Thus, the outcome of this proceeding may have a substantial and specific effect upon the Joint Facilities and the PNGTS system.

Given its expertise and unique knowledge of its own market area, system, supply capabilities, and participation in Eversource's RFP process, PNGTS' intervention is necessary to protect its interests, rights, duties, privileges, and immunities, as well as to ensure the accuracy of the record. Moreover, these facts clearly demonstrate that PNGTS' intervention will not be duplicative of other parties, will be in the interests of justice, and will not impair the orderly conduct of the proceeding.

PNGTS acknowledges that Eversource made the choices that it considered most prudent at the time it entered into prior pipeline commitments, and PNGTS does not seek to harm contractual relationships between Eversource and Algonquin. As an intervenor, to the extent necessary, PNGTS expects to monitor the proceedings and present evidence, engage in motion practice, conduct discovery and examination of witnesses, and file briefs if necessary to ensure the accuracy of the record regarding issues such as those discussed herein, as well as to protect its interests.

III.

Conclusion

For the reasons discussed herein, PNGTS respectfully requests that the PUC grants this
Petition to Intervene.

Respectfully submitted,

PORTLAND NATURAL GAS
TRANSMISSION SYSTEM

By its attorney:

A handwritten signature in black ink, reading "Richard Bralow". The signature is written in a cursive, flowing style.

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Counsel for PNGTS

Dated: April 7, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition to Intervene has been sent this day via electronic mail or first class mail to all persons on the service list.



Dated: April 7, 2016

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