

**BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

EVERSOURCE ENERGY - PETITION )	
FOR APPROVAL OF GAS )	
INFRASTRUCTURE CONTRACT )	DE 16-241
WITH ALGONQUIN GAS )	
TRANSMISSION, LLC )	

**PETITION TO INTERVENE OF  
TRANSCANADA PIPELINES LIMITED**

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, TransCanada PipeLines Limited (“TCPL”) hereby petitions for leave to intervene in the above-captioned proceeding, docketed as DE 16-241. As grounds therefor, TCPL sets forth the following:

**I.**

**Background**

TCPL is a high-capacity, inter-provincial natural gas pipeline which began serving Eastern Canada’s energy needs in 1958. Generally speaking, TCPL transports natural gas from the Alberta / Saskatchewan border and the Ontario / United States border to serve eastern Canada and interconnects to the United States. It connects with the Portland Natural Gas Transmission System (“PNGTS”) (via TransQuebec and Maritimes Pipeline) at the Canadian border. 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.

TCPL's address is:

450-1st Street SW  
Calgary, Alberta T2P 5H1

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. TCPL participated in Eversource's RFP process and submitted a bid in response thereto.

## II.

### **Request to Intervene**

TCPL 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).

TCPL 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.

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

outcome of this proceeding will undoubtedly have a substantial and specific effect on TCPL's commercial operations.

Given its expertise and unique knowledge of its own market area, system, supply capabilities, and participation in Eversource's RFP process, TCPL's 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 TCPL's 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.

TCPL acknowledges that Eversource made the choices that it considered most prudent at the time it entered into prior pipeline commitments, and TCPL does not seek to harm contractual relationships between Eversource and Algonquin.

As an intervenor, to the extent necessary, TCPL 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, TCPL respectfully requests that the PUC grants this Petition to Intervene.

Respectfully submitted,

TRANSCANADA PIPELINES LIMITED

By its attorney:

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

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Counsel for TCPL

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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