

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Eversource Energy – Petition for Approval)	
of Gas Capacity Contract with)	
Algonquin Gas Transmission, LLC, Gas)	DE 16-241
Capacity Program Details and Distribution)	
Rate Tariff for Cost Recovery)	

**PETITION TO INTERVENE OF
REPSOL ENERGY NORTH AMERICA CORPORATION**

Pursuant to New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32 and New Hampshire Code Administrative Rules § 203.17, Repsol Energy North America Corporation (“RENA”) hereby petitions the New Hampshire Public Utilities Commission (the “Commission”) for leave to intervene and participate as a full party in the above-captioned proceeding.

RSA 541-A:32 provides that a petition to intervene shall be granted where “(b) [t]he petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law” and “(c) [t]he presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing intervention.”

In support of this petition, RENA states as follows:

1. RENA and its affiliate Repsol Energy Canada Ltd (“REC”) provide a full range of natural gas trading and origination services in North America including baseload gas purchases and sales, structured and daily natural gas transactions,

seasonal and peaking gas supply services, daily natural gas trading and asset management. Specifically, with respect to its ability to serve New England gas markets, RENA's affiliate REC has contracted for approximately 1,000,000 dekatherms per day ("Dth/d"), which is 100 percent of the capacity of the Canaport™ LNG facility at Saint John, New Brunswick, Canada ("Canaport LNG").¹ With REC having a long-term contract in place for 100 percent of this capacity and RENA having a corresponding long-term contract in place for 730,000 Dth/d of firm transportation capacity on Maritimes & Northeast Pipeline, L.L.C., RENA has the ability to supply New England gas markets with substantial volumes of natural gas through deliveries into the eastern ends of Algonquin Gas Transmission, LLC at Beverly-Salem, MA and Tennessee Gas Pipeline Company, L.L.C. at Dracut, MA. RENA has been serving the New England gas market since 2008 and plays a very critical role in supplying the winter peak needs of the region via the fast response and high deliverability capabilities of Canaport LNG.

2. The transportation and storage contract between Algonquin Gas Transmission, LLC and Public Service Company of New Hampshire d/b/a/ Eversource Energy ("Eversource") submitted for approval in this proceeding is the result of a joint RFP by Eversource and National Grid that was issued on October 23, 2015. In response to the RFP, seven bids were submitted by four interstate pipeline companies serving the New England region and three LNG providers.
3. RENA was one of the three LNG providers who submitted a proposal for natural gas services.

¹ Canaport LNG is jointly owned by Repsol Partners (75 percent) and Irving Partners (25 percent).

4. RENA's proposal for services conformed to the general requirements established by the RFP.
5. RENA's proposal would best satisfy the gas service needs established by the RFP in the most efficient and economic manner without the need for expensive new gas pipeline infrastructure, but its proposal was not selected.
6. As a party to the original RFP process giving rise to the transportation and storage contract submitted for approval in this proceeding and as a potential competitor for the markets proposed to be served by the utilization of the proposed transportation and storage contract, RENA's rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding and RENA's interest cannot be adequately represented by any other party.
7. RENA has knowledge and expertise in the area of gas transportation and energy markets and can attest to its own costs and ability to enter long-term contracts with distribution companies in the public interest or offer service in competitive markets. RENA's participation in this proceeding will assist the Commission in developing a comprehensive record and in resolving issues in this docket.
8. The interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention, particularly where the proceeding is just beginning.
9. Accordingly, RENA requests the right to participate in all aspects of this case with full intervenor status, including, as it deems necessary, the right to the presentation of testimony, discovery, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

10. RENA requests that all notices, testimony, pleadings, and correspondence pertaining to these proceeding be directed to:

Robert Neustaedter
Director, Regulatory Affairs
Repsol Energy North
America Corporation
2455 Technology Forest Blvd.
The Woodlands, Texas 77381
Robert.Neustaedter@repsol.com
(832) 442-1548

Xóchitl M. Perales
General Counsel
Repsol Energy North
America Corporation
2455 Technology Forest Blvd.
The Woodlands, TX 77381
xperalesm@repsol.com
(832) 442-1726

WHEREFORE, for the reasons stated above, RENA respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

Repsol Energy North America Corporation

By: /s/ Xóchitl M. Perales
Xóchitl M. Perales

Dated: April 11, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has on this day been sent via electronic mail to all persons on the Service List in docket No. DE 16-241.

/s/ Xóchitl M. Perales

Xóchitl M. Perales

Dated: April 11, 2016