

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 09-033

PETITION TO INTERVENE OF NATIONAL GRID

Granite State Electric Company d/b/a National Grid ("National Grid" or "Company") hereby respectfully submits this petition for full intervenor status in the above-captioned proceeding, with certain voluntary limitations as discussed below. This petition is submitted pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17. In support of this Petition, National Grid states the following:

1. On February 20, 2009, Public Service Company of New Hampshire ("PSNH") filed a petition with the New Hampshire Public Utilities Commission ("Commission") seeking authority to issue up to \$150 million in principal amount of long-term debt securities through December 31, 2009, to mortgage its property in connection with the issuance of long-term debt, to enter into an interest rate transaction to manage interest rate risk, and to increase its short-term debt limit to ten percent of net fixed plant plus a fixed amount of \$60 million.

2. As stated in the Order of Notice issued on March 6, 2009 in this docket, PSNH's petition raises issues related to RSA 369, the proposed uses of funds, and whether the issuance of up to \$150 million of long-term debt, the mortgaging of property, the execution of an interest rate transaction and a permanent increase in PSNH's short-term debt limits are in the public good.

3. National Grid is a public utility providing electric distribution service to

approximately 41,000 New Hampshire customers. National Grid's primary place of business in New Hampshire is 9 Lowell Road, Salem, New Hampshire 03079.

4. National Grid's long and short-term debt limits, the use of its funds and its financial transactions in general are regulated by the Commission. Thus, many of the issues raised in this proceeding may be applicable to National Grid in a subsequent proceeding. Any action the Commission may take with respect to PSNH's filing may impact the rights, duties and interests of National Grid or its customers. These interests are substantial and are not adequately represented by any other party to this proceeding.

5. National Grid requests that it be granted status as a full intervenor in this docket, subject to the following voluntary limitations: That it be entitled to receive copies of all pleadings and other documents, all discovery that is not confidential, and all e-mails and other correspondence among the parties and staff, with the exception of materials relating to settlement negotiations and/or confidential matters; and that it may attend and participate in technical sessions, but not attend settlement conferences or negotiations, even in a monitoring role. At this time, National Grid does not intend to present or cross-examine witnesses or file closing briefs. National Grid reserves the right to withdraw or modify these voluntary limitations upon petition to the Commission. However, the Company does not currently anticipate requesting modification of these limitations.

6. National Grid's Petition to Intervene is timely as it has been filed on or before

March 19, 2009, as provided in the Order of Noticed issued March 6, 2009, at page 3.

Therefore, the granting of National Grid's Petition to Intervene will not impair the orderly and prompt conduct of the proceeding.

7. National Grid circulated a draft of this Petition to Intervene to counsel for PSNH. As of the deadline for the submission of petitions to intervene, counsel for PSNH did not indicate whether PSNH will oppose the Company's limited participation in this docket.

WHEREFORE, National Grid respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,

GRANITE STATE ELECTRIC
COMPANY d/b/a NATIONAL GRID

By Its Attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, a copy of the above Petition to Intervene was hand delivered, sent by First Class U.S. Mail postage prepaid, or sent electronically to PSNH and the persons named on the Service List in the above-captioned docket.

3/19/09
Date

Marla B. Matthews
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