

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DG14-239**

Northern Utilities, Inc. - New Hampshire Division

Winter 2014-2015 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 September 16, 2014, Northern Utilities, Inc. d/b/a Unitil ("Northern") filed with the New Hampshire Public Utilities Commission ("Commission") a petition for approval of its Winter 2014-2015 Cost of Gas for its New Hampshire division.

2. In its filing, Northern increased the peaking demand charge \$4.03 per MMBtu over the current charge, asserting the changes are based on an update of the volumes and costs used in calculating the charge. In addition, Northern has proposed updated capacity allocator percentages that allocate pipeline, storage and local peaking capacity to competitive suppliers operating on Northern's New Hampshire division system.

3. In its Order of Notice dated September 22, 2014, the Commission stated the filing raises issues related to RSA 378 and the forecasting of supplier and transportation prices, purchasing decisions related to current and past winter supplies and capacity, revenue projections related to transportation services and released capacity, cost allocations between the New

Hampshire and Maine divisions, among others.

4. In this proceeding, Northern has proposed to assign Granite Gas Transmission capacity, without an associated upstream supply, as assignable pipeline capacity. This is a new change for this year that impacts retail marketers operating in Northern's New Hampshire division.

5. 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 the capacity allocations and assignments each year, as well as the methodology employed and any changes introduced by Northern in making those allocations. Therefore, Global and Sprague are directly and substantially affected by this proceeding. No other party does or can represent Global and Sprague's interests in this proceeding.

6. Global and Sprague are actively involved in the on-going proceeding related to Northern's proposed revisions to its capacity assignment program and its delivery service terms and conditions for its Maine division.

7. As required by the rules, shortly after Northern's September 16 filing, Global and Sprague inquired of both Northern and the Consumer Advocate whether either would object to Global and Sprague's participation in this proceeding. Northern has indicated it will not object to Global and Sprague's request for full party status. As of this filing, the Consumer Advocate has not responded.

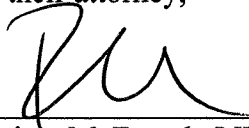
**WHEREFORE**, Global Montello Group Corp. and Sprague Operating Resources, LLC respectfully request that the New Hampshire Public Utilities Commission grant their petition to intervene.

Respectfully submitted,

**GLOBAL MONTELLO GROUP CORP. and**

**SPRAGUE OPERATING RESOURCES, LLC**

By their attorney,



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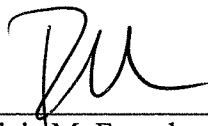
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Dated at Portland, Maine, this 20<sup>th</sup> day of October 2014.

**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 20th day of October 2014 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