

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

UNITIL ENERGY SYSTEMS, INC.

Petition for Approval of Distributed Energy Resources
Investment Proposal and Proposed Tariff

Docket No. DE 09-137

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S
LATE-FILED PETITION TO INTERVENE

Public Service Company of New Hampshire ("PSNH") hereby respectfully petitions for full party intervenor status in the above-captioned matter pursuant to N. H. Code Admin. Rule PUC § 203.17 and RSA 541-A: 32 II.. In support of its Petition, PSNH says the following:

1. On August 5, 2009, Unitil Energy Systems, Inc. ("Unitil") filed a Petition for Approval of Distributed Energy Resources Investment Proposal and Proposed Tariff with the New Hampshire Public Utilities Commission ("Commission") pursuant to RSA 374-G.

2. PSNH is a New Hampshire electric public utility which may invest in or own distributed energy resources under 374-G:4. PSNH has yet to formalize its policy with respect to participating in renewable energy resources under RSA 374-G. By participating in the instant docket, receiving non-confidential discovery responses, attending technical sessions and hearings, and receiving copies of submissions by other parties, PSNH will be able to learn how Unitil's approach will work and whether it is acceptable to the Commission, its Staff, the Office of Consumer Advocate.

3. Under RSA 541-A:32,II " The presiding officer may grant one or more petitions for intervention at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings." Learning first hand how the Commission, Staff and parties view this new statutory framework may promote a more orderly process when and if PSNH makes a filing under RSA 374-G. At this time, PSNH does not intend to participate actively in the proceeding and does not intend to sponsor a witness. PSNH seeks to intervene for informational purposes, to monitor the proceeding, and to receive copies of the pleadings, responses to discovery, testimony and exhibits filed by the parties. PSNH takes this proceeding where it lies in the procedural schedule; therefore, PSNH's participation would not impair the orderly conduct of the proceedings.

4. Counsel for Unitil has indicated that Unitil has no objection to this intervention request.

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

Date: November 24 2009

Respectfully submitted,
Public Service Company of New Hampshire
By: Gerald M. Eaton
Gerald M. Eaton, Senior Counsel
Energy Park, 780 North Commercial Street
P.O. Box 330
Manchester, New Hampshire 03105-0330
(603) 634-2961 (tel)
(603) 634-2438 (fax)
eatongm@nu.com

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Motion for Protective Order to be served pursuant to N.H. Code Admin. Rule Puc §203.11.

November 24, 2009
Date

Gerald M. Eaton
Gerald M. Eaton