

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 13-063

GRANITE STATE ELECTRIC COMPANY D/B/A LIBERTY UTILITIES

**MARY HITCHCOCK MEMORIAL HOSPITAL AND DARTMOUTH-HITCHCOCK
CLINIC'S PETITION TO INTERVENE**

Mary Hitchcock Memorial Hospital and Dartmouth-Hitchcock Clinic (collectively, “Dartmouth-Hitchcock”) petition the Public Utilities Commission, pursuant to Puc 203.17 and RSA 541-A:32, I(b), to intervene in DE 13-063 (Notice of Intent to File Rate Schedules).

1. On March 29, 2013, Granite State Electric Company d/b/a Liberty Utilities (“Liberty”) filed a petition for authority to implement new permanent distribution rates, replace certain pages of its current tariff, implement various other tariff changes, and set temporary electric distribution service rates. In Order No. 25,490 (the “Order”), the Commission acknowledged that Liberty’s request for temporary rates “would . . . result in an approximate monthly bill increase . . . of 11.7% for residential customers and increases ranging from 4.5% to 10.1% for small commercial customers.” Id. The Commission further noted that Liberty’s filing proposes revised permanent rates for electric service that “would result in a typical monthly bill increase of 18% for residential customers.” Id. at 2. Upon information and belief, Liberty has not identified the requested permanent rate for commercial customers, stating only that the rate increase would “vary.”

2. The Order required “any party seeking to intervene in the proceeding shall submit . . . a Petition to Intervene . . . on or before April 19, 2013.” Id. at 4.

3. Dartmouth-Hitchcock, together with the Geisel School of Medicine at Dartmouth, operates New Hampshire’s only academic medical center. It operates a large facility in Lebanon,

New Hampshire and serves a large patient population, including those covered by Medicare and Medicaid in the states of New Hampshire and Vermont.

4. Dartmouth-Hitchcock's purchase of electricity consists of two separate services: (a) the purchase of electricity itself, the cost of which comprises approximately two-thirds of Dartmouth-Hitchcock's electric invoices; and (b) the transmission and distribution of that electricity – through power lines, poles, and transformers – to Dartmouth-Hitchcock's meter, the cost of which comprises approximately one-third of its invoices.

5. Dartmouth-Hitchcock purchases the first service (electricity) competitively. That portion of its invoices will not be affected by any rate increases that result from this proceeding. The second service, however – the cost of the transmission and distribution of electricity – is provided by Liberty and will be substantially affected. Dartmouth-Hitchcock has no choice in its provider for these services.

6. The Affordable Care Act and various recent state efforts, including the Managed Medicaid Program, have required governmental authorities, health care providers, and insurers to reduce the cost of delivering health care at federal, state, and local levels. The provision of utilities falls within these costs that providers, such as Dartmouth-Hitchcock, are attempting to reduce, or at the very least, manage in order to continue providing efficient, high-quality services to patients.

7. As explained above, Liberty now seeks a rate increase equal to approximately \$15 million per year. This increase represents an approximate 18% increase in its total annual distribution revenues. Although the Commission's review process will take several months, Liberty has requested approval of 60% of this increase to take effect by July 1, 2013.

8. Puc 203.17 and RSA 541-A:32, I(b) state that a petition to intervene in a pending

administrative proceeding “shall” be granted if it “states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” Dartmouth-Hitchcock’s “substantial interests” will be affected by this proceeding. While the exact rate increase imposed on Dartmouth-Hitchcock is unknown, it could easily be several hundred thousand dollars a year and likely will impede Dartmouth-Hitchcock’s ability to fulfill its charitable mission.

9. During a time where healthcare providers are being paid less for services and being forced to revise their business models to operate profitably with less reimbursement, it is reasonable to expect Liberty to undertake similar measures and improve its business model to be able to operate profitably within the existing rate structure.

10. The interests of justice would be best served and the orderly and the prompt and orderly conduct of this proceeding would not be impaired by the participation of Dartmouth-Hitchcock as an intervening party.

WHEREFORE, Dartmouth-Hitchcock respectfully requests that the Commission:

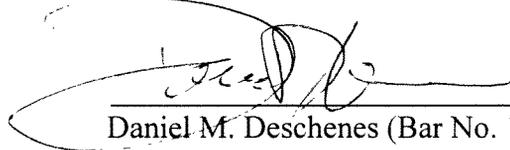
- A. Grant it full intervener status in this proceeding; and
- B. Grant such other and further relief as is just and reasonable.

Respectfully submitted,

DARTMOUTH-HITCHCOCK

By its attorneys,

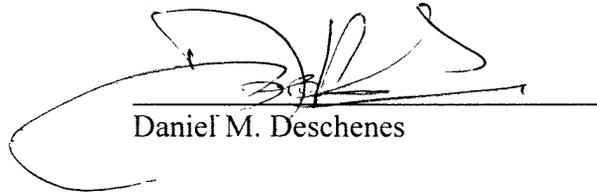
Dated: April 19, 2013



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was forwarded to all counsel of record.



Daniel M. Deschenes

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