

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION
IR 15-009

Northern Utilities, Inc.
Investigation into the Cost Allocation Methodology

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 January 6, 2015, the New Hampshire Public Utilities Commission (“Commission”) opened this docket, pursuant to RSA 374:4 and 374:7, to investigate whether the current cost allocation methodology used by Northern Utilities Inc. (“Northern”) to assign supply costs to its Maine and New Hampshire Divisions achieves the “just and reasonable” ratemaking standard required under RSA 378:7 based on the Staff Recommendation for it to do so.

2. Global is a licensed competitive retail gas supplier in the state of New Hampshire.

3. Sprague is a licensed competitive retail gas supplier in the state of New Hampshire.

4. 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 Northern's integrated resource plans, because those plans directly impact the capacity allocations and assignments made each year, as well as the methodology employed and any changes introduced by Northern in making those allocations. Global and Sprague are equally impacted by any changes made as a result the state regulatory determinations regarding cost allocation between Northern's Maine and New Hampshire Divisions. Global and Sprague have customers in each Division and market natural gas in to retail customers in Northern's service territory in each state.

5. Therefore, Global and Sprague are directly and substantially affected by this proceeding.

6. No other party does or can represent Global and Sprague's interests in this proceeding.

7. Pursuant to RSA 541-A:32, Admin. Rule 203.17, and established Commission precedent, the Commission must grant a petition to intervene if: (a) the petition is submitted in writing at least three days before the hearing; (b) the petition states facts demonstrating how the petitioner is substantially and specifically affected by the proceeding; and (c) the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding.

8. As required by the rules, after Northern's January 16, 2015 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.

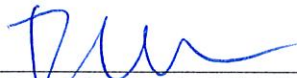
9. In order to protect their rights the rights, duties, privileges and/or substantial interests that may be affected by this proceeding, Global and Sprague believe they must intervene in this proceeding. Granting this petition for intervention would be in the interest of justice, and the intervention by Global and Sprague will not impair the orderly conduct of this proceeding.

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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Dated at Portland, Maine, this 2nd day of March 2015.

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 2nd day of March 2015 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