

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

EVERSOURCE ENERGY - PETITION FOR :
APPROVAL OF GAS INFRASTRUCTURE : DOCKET NO. DE 16-241
CONTRACT WITH ALGONQUIN GAS :
TRANSMISSION, LLC :

**ALGONQUIN GAS TRANSMISSION, LLC
PETITION TO INTERVENE**

Pursuant to New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32 and New Hampshire Code Administrative Rules (“Puc”) § 203.17, Algonquin Gas Transmission, LLC (“Algonquin”) hereby petitions for leave to intervene in the above-captioned proceeding. In support of its petition, Algonquin states the following:

INTRODUCTION

1. On February 18, 2016, the Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) filed a Petition for Approval of Gas Infrastructure Contract with Algonquin Gas Transmission, LLC (“Petition”), which requests approval of a precedent agreement for firm gas transportation and storage services between Eversource and Algonquin relative to the proposed Access Northeast project (“ANE Project”).

2. On February 19, 2016, the Commission established the above-referenced docket to review the Petition but, as of the date of this filing, has not yet taken any further action.

STANDARD

3. The Commission must grant a petition to intervene if: (a) the petition is submitted in writing at least three (3) days before the hearing; (b) the petition describes how the petitioner is substantially and specifically affected by a proceeding; and (c) the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding. RSA 541-A:32(I).

4. The Commission also has the discretion to grant a petition to intervene “at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings.” RSA 541-A:32(II).

5. The Commission has previously authorized counter-parties to agreements that are implicated in a proceeding before the Commission to intervene as parties. *See, e.g.*, Docket No. 14-238 (Nov. 6, 2014), at 11.

PETITION

6. Algonquin is the developer of the ANE Project with an address at 5400 Westheimer Court, Houston, Texas 77056.

7. The Petition specifically requests approval of a 20-year transportation and storage contract between Eversource and Algonquin. Petition, at 3. As the counterparty to this agreement, Algonquin has rights and other interests that will be substantially and specifically affected by the outcome of this proceeding. Consequently, Algonquin’s intervention would be in the interests of justice.

8. The Commission has not yet established a procedural schedule or set a date for a hearing to consider the Petition. As such, Algonquin’s petition to intervene will not impair the orderly conduct of this proceeding.

9. Algonquin has not yet determined the full extent of its participation in this docket and reserves the right to fully participate in this proceeding, including through motion practice, discovery, pre-filed and live testimony, direct and cross-examination, and briefs.

CONCLUSION

For all the foregoing reasons, the Commission should grant Algonquin’s petition to intervene as a party in this proceeding.

Dated: March 9, 2016

Respectfully submitted,
ALGONQUIN GAS TRANSMISSION, LLC

By: 

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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition to Intervene has this day been sent via electronic mail or first class mail to all persons on the service list.


Joey Lee Miranda

Dated: March 9, 2016