# THE STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

#### **Docket No. DG 17-198**

#### LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP., d/b/a LIBERTY UTILITIES

Petition to Approve Firm Supply and Transportation Agreements and the Granite Bridge Project

### ENGIE GAS & LNG, LLC PETITION TO INTERVENE

The Public Utilities Commission ("Commission") has initiated a proceeding to consider Liberty Utilities' petition for approval of contractual arrangements, and for Commission findings regarding the prudence of proposed investments, including a delivered supply contract with ENGIE Gas & LNG, LLC ("ENGIE"), a precedent agreement with Portland Natural Gas Transmission System, a proposed new in-state pipeline called the Granite Bridge Pipeline, and an on-system liquefied natural gas facility proposed to be located in Epping. In its February 8, 2018 Order of Notice, the Commission directed interested parties to seek intervention by March 7, 2018. ENGIE hereby petitions to intervene in the above-captioned proceeding, pursuant to the Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32.

ENGIE states as follows in support of its petition for intervention:

1. ENGIE is a Delaware limited liability corporation that imports liquefied natural gas ("LNG") and sells this product in natural gas vapor or LNG liquid form for customers in New England. Its customers include local gas distribution companies, electric generating

facilities, natural gas marketers, and industrial end-users. The LNG facility owned by ENGIE's affiliate, Distrigas of Massachusetts LLC, is a major supplier of LNG liquid, with 22 percent of the total LNG storage capacity and a quarter of the LNG liquid delivery capacity of LNG facilities in New England.

- 2. ENGIE has a principal place of business at 20 City Square, Suite 3, Charlestown, Massachusetts 02129.
- 3. After a competitive process, ENGIE was selected as a firm supplier to Energy North at the city gate on the Tennessee Gas Pipeline.
- 4. The proposed contract is in the public file in this proceeding in a redacted format only.
- 5. Especially in light of the requested intervention of a competitor of ENGIE, ENGIE wishes to intervene to protect the confidentiality of its trade secrets and other confidential business information and avoid the competitive injury that would result from improper disclosure of the same.
- 6. The rights, privileges, and interests of ENGIE will be substantially affected by the outcome and conduct of this proceeding.
- 7. ENGIE furthermore respectfully submits that its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding, as a result of ENGIE's special expertise and experience.
- 8. ENGIE's participation is in the interests of justice and the orderly and prompt conduct of the proceeding. ENGIE's participation will neither delay nor disrupt this proceeding. The interests of ENGIE are not adequately represented by any other party.

**WHEREFORE,** ENGIE respectfully requests that the Commission grant its petition to intervene in Docket No. DG 17-198.

Respectfully submitted,

ENGIE GAS & LNG, LLC

By it attorneys,

#### /s/ Adam P. Kahn

Adam P. Kahn John A. Shope FOLEY HOAG LLP 155 Seaport Boulevard Boston, MA 02210 (617) 832-1000 akahn@foleyhoag.com jshope@foleyhoag.com

Dated: March 7, 2018

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 7<sup>th</sup> day of March, 2018, been sent by email to the service list in Docket No. DG 17-198.

/s/ Adam P. Kahn Adam P. Kahn