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May 10, 2007

OFFICES IN:
MANCHESTER
CONCORD
PORTSMOUTH


Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: DW 07-033; Petition of EnergyNorth Natural Gas, Inc., D/B.A. KeySpan Energy
Delivery New England to Intervene**

Dear Ms. Howland:

Enclosed for filing with the Commission are an original and six copies of Petition of EnergyNorth Natural Gas, Inc. d./b/a KeySpan Energy Delivery New England to Intervene with regard to the above matter.

Sincerely,



Steven V. Camerino

SVC:cb
Enclosures

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Re: Northern Utilities, Inc.

DOCKET NO. DG 07-033

PETITION OF ENERGYNORTH NATURAL GAS, INC. D/B/A KEYSpan
ENERGY DELIVERY NEW ENGLAND TO INTERVENE

EnergyNorth Natural Gas, Inc. d/b/a KeySpan Energy New England ("KeySpan") hereby requests that the Commission grant it full intervenor status in the above-captioned proceeding. In support of this Petition, KeySpan states as follows:

1. KeySpan is a local distribution company that provides natural gas sales and transportation service to nearly 84,000 residential and commercial customers in thirty cities and towns in New Hampshire.

2. On April 27, 2007, the Commission issued Order No. 24,743 in this docket, indicating that it intended to accept briefs regarding the rate of return used to determine the working capital allowance for Northern Utilities ("Northern") for purposes of determining Northern's cost of gas rate.

3. The Commission Staff has raised substantially the same issue with regard to KeySpan in Docket DG 07-050, and had agreed prior to the Order No. 24,743 or the hearing related thereto to establish a procedural schedule that permitted for discovery and the prefilng of testimony to allow the parties in the KeySpan docket sufficient opportunity to develop the rate of return issue as well as other issues relating to KeySpan's indirect gas costs.

4. If the Commission were to decide the rate of return issue with regard to Northern, it is likely that its decision would be highly influential if not dispositive with regard to how the Commission later decided how to resolve the issue as it relates to KeySpan. Therefore, the Commission's decision in Docket DG 07-033 is likely to directly or indirectly affect KeySpan.

5. For the foregoing reasons, the rights, duties, privileges, immunities and other substantial interests of KeySpan will be affected by this proceeding.

6. KeySpan believes that, as the largest regulated gas utility in New Hampshire, its participation in this proceeding will assist the Commission in its consideration of the matters before it to the extent that they have application to natural gas utilities generally in the state.

7. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing KeySpan's intervention.

8. Notwithstanding its request to intervene in this proceeding, KeySpan reserves its right to fully litigate the issue of rate of return on working capital in the docket that has already been opened to address that issue. Nevertheless, KeySpan feels compelled to intervene in Northern's docket to protect its interests as best it can, and to call to the Commission's attention the potential for significant prejudice to KeySpan if the two proceedings are addressed independently.

9. Counsel for KeySpan has contacted counsel for Northern, the Commission Staff and the Office of Consumer Advocate, all of whom consent to the relief requested in this motion.

WHEREFORE, KeySpan respectfully requests that, pursuant to RSA 541-A:32 and N.H. Code of Admin. Rules Puc 203.17, the Commission grant KeySpan full

intervenor status in this proceeding.

Respectfully submitted,

EnergyNorth Natural Gas, Inc. d/b/a
KeySpan Energy Delivery New England
By its Attorneys

McLANE, GRAF, RAULERSON & MIDDLETON
PROFESSIONAL ASSOCIATION

Date: May 10, 2007

By: _____
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition has been forwarded this 10th day of May, 2007 to the service list in the above-captioned proceeding.

Steven V. Camerino