

THE STATE OF NEW HAMPSHIRE  
Before the  
PUBLIC UTILITIES COMMISSION

**ENERGYNORTH NATURAL GAS, INC.  
D/B/A NATIONAL GRID NH  
Petition for Permanent Rate Increase and for Temporary Rates**

Docket No. DG 08-009

UNITIL ENERGY SYSTEMS, INC.  
PETITION TO INTERVENE

Unitil Energy Systems, Inc. (“UES”) hereby respectfully petitions for full party intervenor status, with certain limitations as discussed below, in the above captioned matter pursuant to RSA 541-A: 32 and N.H. Admin Rules Puc 203.17. In support of its Petition, UES states the following:

1. On February 25, 2008, EnergyNorth Natural Gas, Inc. d/b/a National Grid NH (“National Grid NH” or the “Company”) made a delivery rate filing requesting permission to (1) implement new permanent delivery rates for natural gas service, (2) implement temporary delivery rates, (3) increase the customer charge and decrease volumetric rates, eliminate 280 day sales service and interruptible sales service, and implement a new service and main extension policy, (4) replace current tariff pages with the proposed tariff pages included in the filing, and (5) establish a pension and post retirement benefits other than pensions (OPEB) reconciliation mechanism. In its Order Suspending Tariff issued on March 14, 2008, the New Hampshire Public Utilities Commission (“Commission”) stated that the filing raises issues related to: whether the proposed permanent rates are just, reasonable and lawful pursuant to RSA 378:7; whether the proposed rates yield a reasonable return on the cost of National Grid NH’s property that is prudent as well as used and useful in the public service pursuant to RSA 378:27 and 28; whether the pension and OPEB mechanism proposed by National Grid NH is lawful and reflects appropriate policies for the Commission to follow; whether the rate re-design and service and main extension policy proposed by National Grid NH is fair and equitable; whether 280 Day Sales Service and Interruptible Sales service should be eliminated; and whether temporary rates

on the terms proposed by National Grid NH are appropriate, and if so, how any recoupment or refund, if appropriate, should be implemented..

2. UES Energy is a New Hampshire corporation and public utility primarily engaged in the distribution of electricity in the capital and southeastern seacoast regions of New Hampshire. UES's primary place of business is located at 6 Liberty Lane West, Hampton, New Hampshire.

3. UES's retail rates are regulated by the Commission. Some of the issues raised or which may be raised in this docket may be applicable to UES in a subsequent proceeding. Therefore, any action the Commission may take with respect to National Grid NH's filing may impact the rights, duties and interests of UES or its customers. These interests are substantial and are not adequately represented by any other party to this proceeding.

4. UES requests that it be granted status as a full intervenor in this docket, subject to the following voluntary limitations: That it be entitled to receive all non-confidential pleadings and other documents, all discovery that is not confidential, and all non-confidential e-mails and other correspondence among the Parties and Staff, with the exception of materials relating to settlement negotiations and/or confidential matters; and that it may attend and participate in non-confidential technical sessions, but not attend settlement conferences or negotiations, even in a monitoring roll. At this time UES does not intend to present or cross-examine witnesses or file closing briefs. UES retains the right to withdraw or modify these voluntary limitations upon petition to the Commission.

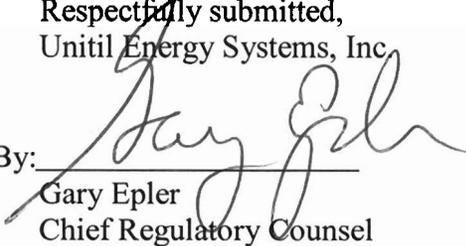
5. Granting of UES's Petition for Intervention will not impair the orderly and prompt conduct of the proceedings.

6. UES circulated a draft of this Petition to Intervene to counsel for National Grid and understands that there are no objections to the motion.

WHEREFORE UES respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,  
Unitil Energy Systems, Inc.

By: \_\_\_\_\_



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CERTIFICATE OF SERVICE

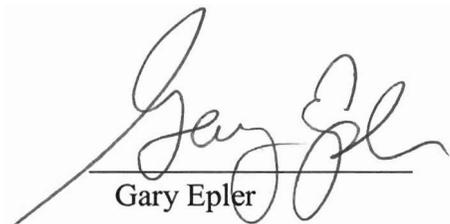
I hereby certify that, on the date written below, a copy of the above Petition to Intervene was sent by overnight express mail and e-mail to the following persons:

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APRIL 4, 2008  
Date

  
Gary Epler