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May 5, 2010

Debra A. Howland, Executive Director
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
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Re: Docket No. DG 10-041
EnergyNorth Natural Gas, Inc., d/b/a/ National Grid NH
Staff's Position on Northern Utilities Inc.'s Intervention Request

On April 21, 2010, the Commission noticed the instant docket to review the adequacy of EnergyNorth Natural Gas, Inc. d/b/a/ National Grid NH's (EnergyNorth) "planning process, including demand forecasts, gas supply and demand resource assessments, and the integration of supply and demand resources; and RSA 378:39 relating to evaluation of integrated least-cost resource plans and the potential environmental, economic and health-related impacts of proposed options."

On May 4, 2010, Northern Utilities, Inc. (Northern) filed a petition for full intervention to participate in the docket. Northern states that its duties and substantial interests may be affected by the instant docket. Northern states that in a prior docket, Docket No. DG 06-105, the Commission developed requirements for EnergyNorth's Integrated Resource Plan (IRP) which were then applied to Northern in Docket No. DG 06-098. Northern believes that since the instant docket is the "first time the new IRP framework will be implemented...it is likely to serve as a model for development of Northern's 2010 IRP."

Staff would like to respond to this concern and the necessity of Northern's intervention. Staff agrees that in Docket No. DG 06-105, the Commission issued an order that established the framework for EnergyNorth's next IRP and that in Docket No. DG 06-098, to the extent elements of the EnergyNorth IRP framework were relevant to Northern, Staff proposed those elements be applied to Northern. Docket No. DG 06-098 resulted in a settlement agreement between Northern and Staff. The terms of the settlement were also adopted by the Maine Public Utilities Commission. Staff expects Northern's next-filed IRP to be consistent with that settlement agreement. In the instant docket, Staff expects to review EnergyNorth's IRP filing to ensure that the filing is consistent with the order issued in Docket No. DG 06-105. Staff views the instant docket as a compliance-oriented proceeding, specific to EnergyNorth's resource

planning processes and procedures. If changes to EnergyNorth's IRP planning processes and procedures are necessary to comply with the Commission's order, then Staff expects to work with EnergyNorth to make them. Staff, however, does not anticipate proposing in this docket changes to the framework issued in Docket No. DG 06-105 nor to Northern's IRP requirements as set forth in Docket No. DG 06-098. Therefore, there would be no impact on Northern's duties or substantial interests.

Staff does not oppose Northern's intervention request provided that it is limited to proposed policy changes, should they occur, and which are not already covered by the order issued in Docket No. DG 06-105. The IRP policies underlying that order, to the extent they applied to Northern, were incorporated into the settlement agreement in Docket No. DG 06-098 and therefore are not noticed for revision in this docket. In the event that Northern's intervention request is granted and Northern seeks to expand the docket to consider IRP policies that extend beyond consideration of EnergyNorth's compliance with Docket No. DG 06-105, then Staff will request the Commission re-notice the docket.

Thank you.

Sincerely,



Marcia A. B. Thunberg
Staff Attorney

cc: Service List

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