

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire
Reconciliation of Energy Service and Stranded Costs for Calendar Year 2011

Docket DE 12-116

Public Service Company of New Hampshire's Objection to TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast Inc.'s Petition to Intervene

Public Service Company of New Hampshire ("PSNH" or the "Company") hereby objects to the Petition to Intervene by TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast Inc. ("TransCanada") in this proceeding. In support of this objection, PSNH states as follows:

1. This proceeding pertains to PSNH's reconciliation of the revenues and expenses contained within its Energy Service and Stranded Cost Recovery Charge rate filings for the twelve month reporting period January 1, 2011 through December 31, 2011. As described in the Order of Notice, the filing raises issues regarding the prudence of PSNH's use of its generation resources during the period as well as the prudence of market purchases used to supplement those resources, the prudence of incurred capital costs, and the accounting for and reconciliation of certain associated revenues and expenses.

2. TransCanada seeks to intervene in this proceeding on the basis that its rights, duties, privileges and substantial interests as a competitive supplier of electricity in New Hampshire and as a producer of electricity that is sold into the New England ISO market may be affected by the proceeding. TransCanada's petition fails to explain how those

rights will be affected but rather provides only conclusory statements in support of that contention.

3. PSNH objects to TransCanada's petition because not only does the Petition fail to meet the standard for intervention set forth in RSA 541-A:32, TransCanada has no rights or duties that will be affected by this proceeding. This proceeding relates only to the amounts properly included in PSNH's rates and whether PSNH's use of its resources, incurred capital costs, and market purchases were reasonable and prudent. While TransCanada may have an opinion or claim to have expertise on those matters as a market participant, that does not rise to the level of a "right, duty or privilege" as provided under the intervention statute. If that were the standard for intervention, there would essentially be no limits on who could intervene in matters at the Commission.

4. For the reasons above, PSNH requests that the Commission deny TransCanada's Petition to Intervene.

WHEREFORE, PSNH respectfully requests that the Commission:

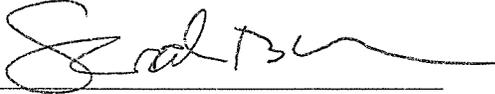
- A. Deny TransCanada's Petition to Intervene; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

By Its Attorneys

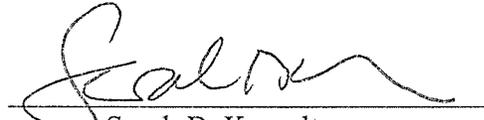
Dated: June 5, 2011

By: 

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Certificate of Service

I hereby certify that a copy of this Objection to Petition to Intervene has been served electronically on the persons on the Commission's service list this 5th day of June, 2012.


Sarah B. Knowlton