

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**DG 17-144**

**NORTHERN UTILITIES, INC.**

**2017-2018 Cost of Gas, Proposed Increased in Peaking Service Demand Charge**

**PETITION TO INTERVENE**

NOW COMES Direct Energy Business Marketing, LLC (hereinafter “Direct Energy”), and, pursuant to RSA 541-A:32 and N.H. Admin. R. Puc 203.17, respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) for intervention as a full party in the above-captioned proceeding. In support of this petition, Direct Energy states as follows:

1. On January 29, 2018, Northern Utilities, Inc. (“Northern”) filed a petition to increase its Peaking Service Demand Charge that was previously approved in the Cost of Gas proceeding by Order No. 26,068 on October 31, 2018. Northern proposed the following change: in the Fifth Revised Tariff Page No. 153, the Peaking Service Demand Charge would increase from \$35.51 per MMBtu to \$89.47 per MMBtu per MDPQ per month for November 2017 to April 2018. This proposed increase, if approved, would take effect March 1, 2018.

2. On February 1, 2018, the Commission issued Order No. 26,100 suspending the Fifth Revised Tariff Page No. 153, pursuant to RSA 378:6, I(b) until April 30, 2018. Order No. 26,100 also established an intervention date of February 8, 2018 and set a technical session for February 12, 2018 at 9:00 a.m.

3. Direct Energy is registered as a Competitive Natural Gas Supplier in the state of New Hampshire and currently serves small and large commercial as well as industrial natural

gas customers in the state of New Hampshire. Direct Energy is a subsidiary of Centrica plc (formerly known as British Gas), a diversified, global energy leader based in the United Kingdom and operating in seven countries with over 36,000 employees worldwide. Direct Energy is one of North America's largest retail providers of electricity, natural gas, and home and business energy-related services with over five million customer relationships. Its subsidiaries and/or affiliates operate in all 50 U.S. states plus the District of Columbia and four Canadian Provinces.

4. By this Petition, Direct Energy is seeking full intervention in the instant proceeding. The statutory standards for intervention, set forth in RSA 541-A:32, I and II, provide that a petition for intervention must be granted if the petitioner states facts demonstrating that its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petitioner qualifies under any provision of law) and if the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. See RSA 541-A:32, I(b) and (c). In addition, the Commission has the authority to grant a petition to intervene "at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings." RSA 541-A:32, II. See also N.H. Admin. R. Puc 203.17 (requiring the Commission to grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32).

5. As a Competitive Natural Gas Supplier registered with the Commission that serves natural gas end-use customers in the state, Direct Energy qualifies for intervention under the mandatory provisions of RSA 541-A: 32, I because its substantial interests will be directly affected by the proceeding. The Commission's decision on the proposed increase in the

Peaking Service Demand Charge will directly affect Direct Energy's business and its existing and future customers.

6. Direct Energy also qualifies for intervention under the discretionary standard articulated in RSA 541-A:32, II. The interests of justice and orderly and prompt conduct of the proceedings would be promoted by granting Direct Energy intervention. As an affiliate of one of the largest competitive retail and wholesale providers of natural gas in North America, Direct Energy has extensive knowledge and expertise regarding natural gas and the issues to be addressed in this docket. The Commission will benefit from Direct Energy's participation and discourse in this docket.

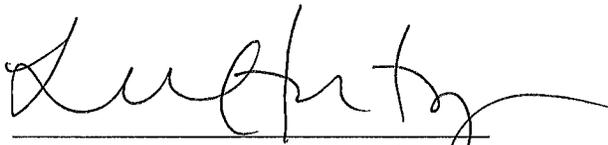
7. Direct Energy's intervention will not impair the orderly and prompt conduct of this proceeding. If allowed to intervene, Direct Energy will abide by the Commission's rules and the procedural schedule in this docket.

WHEREFORE, Direct Energy Business Marketing, LLC respectfully requests that the Commission grant it full party status as an intervenor in this proceeding and that it grants such other relief as the Commission deems just and equitable.

Respectfully submitted,  
Direct Energy Business Marketing, LLC

By Its Attorneys  
Orr & Reno, P.A.

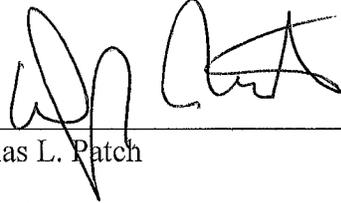
  
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Dated: February 8, 2018

**Certificate of Service**

I hereby certify that a copy of the foregoing Petition has on this 8<sup>th</sup> day of February, 2018 been either sent by electronic or first class mail, postage prepaid, to persons listed on the Service List.

A handwritten signature in black ink, appearing to read 'Douglas L. Patch', is written over a horizontal line.

Douglas L. Patch

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