

Professional Association

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August 11, 2006

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

Re: DG 06-098 Northern Utilities, Inc.

Dear Ms. Howland:

Enclosed are an original and seven copies of KeySpan Energy Delivery New England's Petition to Intervene.

Very truly yours,

Steven V. Camerino

SVC:cb

cc:

Service List

Thomas O'Neill, Esq.

Enclosure

MPRO (DOILNED PE)

STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Re: Northern Utilities, Inc.

DOCKET NO. DG 06-098

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 March 3, 2006, the Commission issued an Order of Notice in docket DG 06-33 regarding Northern Utilities, Inc.'s ("Northern") proposed tariff change to recover the cost specific to New Hampshire for a capacity reserve equal in size to thirty percent of Northern's total unassigned capacity transportation load in its New Hampshire and Maine divisions.
- 3. The March 3, 2006 Commission Order of Notice made KeySpan a mandatory party to docket DG 06-33.
- 4. On July 10, 2006, the Commission suspended the procedural schedule in Docket DG 06-33 pending an initial review of Northern's Integrated Resource Plan ("IRP").

6. On August 7, 2006, KeySpan filed its own IRP with the Commission. The

KeySpan IRP contains a discussion of the capacity reserve margin planning issue that is

the subject of docket DG 06-33.

7. Because the Commission may decide issues related to how gas companies

should plan to meet the load of their transportation customers, the Commission's

consideration of Northern's IRP may directly affect KeySpan.

8. For the foregoing reasons, the rights, duties, privileges, immunities and

other substantial interests of KeySpan will be affected by this proceeding.

9 KeySpan believes that, as a regulated gas utility, 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.

10. The interests of justice and orderly and prompt conduct of this proceeding

will not be impaired by allowing KeySpan's intervention.

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

Bv:

Date: August 11, 2006

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Thomas P. O'Neill Senior Counsel KeySpan Energy Delivery New England 52 Second Avenue Waltham, MA 02451 Telephone (781)-466-5136 Fax (781)-290-4965

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition has been forwarded this 11th day of August, 2006 to the service list in the above-captioned proceeding.

Steven V. Camerino