

Professional Association

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May 22, 2007

OFFICES IN: MANCHESTER CONCORD **PORTSMOUTH**

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

DE 07-064 Electric Energy Efficiency - Petition to Intervene of KeySpan

Energy Delivery New England

Dear Ms. Howland:

Enclosed for filing with the Commission are an original and six copies of KeySpan's Petition to Intervene with regard to the above-entitled matter. If you have any questions at all about the enclosed Petition, please feel free to give me a call.

Sincerely,

Steven V. Camerino

SVC:cb **Enclosure**

Service List cc:

Tom O'Neill, Esq.

Ann Leary



STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Re: Electric Energy Efficiency

DOCKET NO. DE 07-064

PETITION TO INTERVENE OF KEYSPAN ENERGY DELIVERY NEW ENGLAND

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 approximately 84,000 residential and commercial customers in thirty cities and towns in New Hampshire.
- 2. This docket was opened to considered issues relating to rate mechanisms, including revenue decoupling, which would have the effect of removing obstacles to, and encouraging investment in, energy efficiency.
- 3. KeySpan currently has in place an extensive energy efficiency program, and has begun to consider whether a revenue decoupling mechanism would be an effective element for further expansion of that program.
- 4. The rate making concepts and mechanisms relating to energy efficiency for electric utilities are similar in many ways to those that would be considered for natural gas utilities, and therefore any discussions or determinations in this docket are likely to have a significant impact on natural gas utilities. In addition, as the largest

natural gas utility in New Hampshire, KeySpan believes that its participation in this docket will add constructively to the consideration of the issues in this proceeding.

- 5. For the foregoing reasons, the rights, duties, privileges, immunities and other substantial interests of KeySpan will be affected by this proceeding.
- 6. The interests of justice and the 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

THOMAS P. O'NEILL, ESQ.

Date: May 22, 2007

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Date: May 22, 2007

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition has been forwarded this 22nd day of May, 2007 to the service list in the above-captioned proceeding.

Śteven V. Camerino