## STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 09-158

## PETITION TO INTERVENE OF NATIONAL GRID

Granite State Electric Company d/b/a National Grid ("National Grid") hereby respectfully submits this petition for full intervenor status in the above-captioned proceeding. This petition is submitted pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17. In support of this Petition, National Grid states the following:

1. On August 27, 2009, Public Service Company of New Hampshire ("PSNH") filed a petition with the New Hampshire Public Utilities Commission ("Commission") requesting approval of tariff revisions proposing certain changes to PSNH's PeakSmart Plus program. PSNH proposes to revise its Voluntary Interruptible Program Rate to continue the current ISO-New England Demand Program Option, known as the PeakSmart Plus program, beyond its expiration date of May 31, 2010. PSNH proposes to revise the existing program to include direct administration by PSNH and funding through Forward Capacity Market revenues received from the Independent System Operator – New England for capacity reductions resulting from the CORE Energy Efficiency Programs, and to the extent there is a shortfall, through the System Benefits Charge set forth in RSA 374-F:3, VI.

2. As stated in the Order of Notice issued on September 15, 2009 in this docket, PSNH's request raises issues related to the merits of continuing the existing PeakSmart Plus program, and whether the proposed changes to the PeakSmart Plus program are reasonable and in the public interest.

3. National Grid is a public utility providing electric distribution service to approximately 41,000 New Hampshire customers. National Grid's primary place of business in New Hampshire is 9 Lowell Road, Salem, NH 03079.

4. National Grid participates in the statewide Core Energy Efficiency Programs which are subject to the Commission's jurisdiction and funded through the System Benefits Charge. Thus, any action the Commission may take with respect to PSNH's filing may impact the rights, duties and interests of National Grid or its customers. These interests are substantial and are not adequately represented by any other party to this proceeding.

5. National Grid's Petition to Intervene is timely as it has been filed on or before September 29, 2009, as provided in the Order of Notice issued September 15, 2009, at page 3. Therefore, the granting of National Grid's Petition to Intervene will not impair the orderly and prompt conduct of the proceeding.

National Grid circulated a draft of this Petition to Intervene to counsel for PSNH.
Counsel for PSNH has authorized National Grid to represent that PSNH has no objection to this
Petition to Intervene.

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WHEREFORE, National Grid respectfully requests full party intervenor status in this

proceeding and requests such further relief as the Commission may deem just and equitable.

Respectfully submitted, Granite State Electric Company d/b/a National Grid

Alexandra E. Blackmore

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## CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, a copy of the above Petition to Intervene was sent by electronic mail to the persons named on the Service List in this proceeding.

alexandra E. Blackmore

Dated: September 28, 2009

Alexandra E. Blackmore