THE STATE OF NEW HAMPSHIRE before the PUBLIC UTILITIES COMMISSION

Northern New England Telephone Operations LLC and Enhanced Communications of Northern New England, Inc.

Objection to Public Utility Assessments
Docket No. DM 12-276

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S PETITION TO INTERVENE

Public Service Company of New Hampshire (PSNH) hereby respectfully petitions to intervene in the above-captioned matter pursuant to RSA 541-A: 32 and Puc §§ 203.02 and 203.17. In support of its Petition, PSNH says the following:

- 1. On September 17, 2012, Northern New England Telephone Operations LLC and Enhanced Communications of Northern New England, Inc., affiliates of FairPoint Communications, Inc. (FairPoint), filed an objection to two public utility assessments from the New Hampshire Public Utilities Commission (Commission). In its objections, FairPoint contended that its public utility assessments under RSA chapter 363-A should be reduced by approximately half. According to the Commission's Order of Notice in the docket, "If the assessment of one public utility is reduced, it is possible that the assessments of the remaining public utilities will increase, in order to fully reimburse the Commission for its expenses." DM 12-276, October 5, 2012 Order of Notice at 2.
- 2. PSNH is a New Hampshire corporation in the business of generation, transmission and sale of electricity, and is a public utility under RSA 363:2. Pursuant to RSA chapter 363-A, PSNH is subject to regular public utility assessments from the Commission. In fact, for fiscal year 2013 PSNH has been assessed \$3,299,147, nearly half of the total amount assessed to all utilities in New Hampshire by the Commission. Accordingly, any reduction in the assessment to any other utility could have the effect of increasing the substantial costs already borne by PSNH for the

expenses of the Commission and could have an adverse effect on PSNH and its ratepayers.

3. For the reasons stated, PSNH has rights, duties, privileges immunities and other substantial interests that may be affected by the proceeding. Accordingly, PSNH is entitled to, and should be granted, full intervenor status in this proceeding pursuant to RSA 541-A:32 and the Commission's rules.

WHEREFORE, PSNH respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

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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 on the Service List in this docket.

Matthew I. Fossum

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