# THE STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

#### **Docket DE 16-241**

#### PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY

Petition for Approval of Gas Capacity Contract with Algonquin Gas Transmission, LLC, Gas Capacity Program Details, and Distribution Rate Tariff for Cost Recovery

### PETITION TO INTERVENE OF RICHARD M. HUSBAND

Pursuant to the New Hampshire Public Utilities Commission ("Commission")'s Order of Notice dated March 24, 2016 ("Order") issued in the above-captioned matter, N.H. Code Admin. Rules Puc 203.17 and N.H. R.S.A. 541-A:32, the petitioner, Richard M. Husband, hereby respectfully petitions for leave to intervene in this proceeding as a party, with all rights as such to the full extent allowed by law. In support of his petition, the petitioner states:

- The petitioner is a New Hampshire citizen residing at 10 Mallard Court,
  Litchfield, New Hampshire.
- 2. The petitioner is a customer of the Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource"), receiving electric service from Eversource since before commencement of this proceeding, with no intention of terminating that service.
- 3. On February 14, 2016, Eversource commenced this proceeding by filing a petition "for approval of a proposed 20-year contract between Eversource and Algonquin Gas Transmission, LLC (Algonquin) for natural gas capacity on Algonquin's Access Northeast Project, and recovery of associated costs through a new distribution rate tariff, to be assessed on all Eversource customers." Order, p. 1 (emphasis added).

- 4. Under the Order, interested persons have until April 11, 2016 to petition to intervene in this matter. *Id.*, p. 5.
- 5. As an Eversource customer and ratepayer subject to the contemplated "new distribution rate tariff" referenced in the preceding paragraph, the petitioner has substantial interests which will be directly affected by this proceeding.
- 6. Pursuant to Puc 203.17, "[t]he commission shall grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32.." *Id*.
- 7. Under N.H. R.S.A. 541-A:32 1(b) and (c), a petition to intervene *must* be granted if the petitioner states facts demonstrating how his/her rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petition otherwise qualifies under the law), and the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. Under N.H. R.S.A.541 -A:32 II, the Commission *may* 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 conduct of the proceedings." This petition meets both standards given the petitioner's substantial interests in this proceeding as a ratepayer directly affected by the outcome: justice requires intervention and there is no reason that such intervention, particularly as it is timely and early in the matter, should impair the orderly conduct of the proceedings.

WHEREFORE, for the reasons expressed, the petitioner respectfully requests that the Commission:

- A. Grant this petition and allow the petitioner to intervene in this proceeding as a party, with all rights as such to the full extent allowed by law; or
- B. Schedule a hearing on this matter; and
- C. Grant such other and further relief as is just, lawful and otherwise appropriate.

Respectfully submitted,

Richard M. Husband

10 Mallard Court

Litchfield, NH 03052

Telephone No. (603)883-1218 E-mail: RMHusband@gmail.com

## **CERTIFICATE OF SERVICE**

Pursuant to the Order, p. 5, I hereby certify that I have submitted seven copies of this petition to the Commission by first class mail, postage prepaid, with copies sent to Eversource and the Office of the Consumer Advocate. I further certify that I have, on April 7, 2016, served an electronic copy of this petition on every other person/party identified on the Commission's service list for this docket at <a href="file:///C:/Users/User/Downloads/ServiceList%20(3).pdf">file:///C:/Users/User/Downloads/ServiceList%20(3).pdf</a>, by delivering it to the e-mail address identified on the Commission's service list for the docket.

Richard M. Husband