

ELECTRONICALLY FILED

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2015-00063

April 8, 2015

MAINE NATURAL GAS CORPORATION
Request for Approval of Precedent Agreement
On Atlantic Bridge Project, Service
Agreements and Negotiated Rate Agreements
With Algonquin Gas Transmission, LLC and
Maritimes & Northeast Pipeline, L.L.C.

PETITION TO
INTERVENE OF NORTHEAST
ENERGY SOLUTIONS

Now comes NORTHEAST ENERGY SOLUTIONS, INC. (“NEES”) and pursuant to Chapter 110, § 8(B) of the Rules of Practice and Procedure (the “Rules”) of the Maine Public Utilities Commission (the “Commission”), moves to intervene in this proceeding.

For the purposes of adding NEES to the Commission’s service list and the service list of the parties, information and documents related to this proceeding may be sent to:

Northeast Energy Solutions, Inc.
c/o Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
(617) 757-6518
vdevito@bowditch.com

In support of its petition to intervene, NEES states as follows.

1. On March 26, 2015, Maine Natural Gas Corporation (“MNG”) filed a Petition for Approval of a Precedent Agreement and Service Agreements and Negotiated Rate Agreements with Algonquin Gas Transmission, LLC and Maritimes & Northeast Pipeline L.L.C. (the “Precedent Agreement”) requesting that the Commission issue an order, under the authority granted to the Commission by 35-A M.R.S. §§ 201 and 4703, finding that the proposed Precedent Agreement is prudent and that the decision by MNG to enter into such agreement represents efficient operation of the utility and the utilization of sound management practices. MNG also requested the Commission authorize MNG to recover costs associated with the Precedent Agreement through its annual cost of gas adjustment. MNG asserts the Precedent Agreement is consistent with the State Energy Policy objectives to expand natural gas service in Maine and with the Maine Cost Energy Reduction Act (“ECRA”).
2. NEES, a not-for-profit corporation comprised of stakeholders, including conservation land owners, who are committed to investigating and providing sound and thorough energy infrastructure analysis and advocacy regarding the economics and routing of energy transportation projects in the Northeastern United States. NEES is concerned

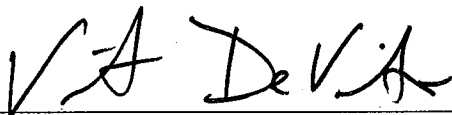
about the effect of energy infrastructure development as it relates to economic vitality and environmental impacts in the Northeast. NEES' mission is to thoroughly analyze and advocate responsible energy infrastructure development by means of public education and formal advocacy.

3. The Commission's consideration of the Precedent Agreement will directly affect prices and consumption of natural gas, and could set precedent for the use of ratepayer resources to achieve energy policy objectives, and impact efforts to ensure the efficient use of energy and energy infrastructure. Moreover, the Commission's consideration of the ECRA in this matter could impact one or more of the pipeline expansion project proposals in the Northeast, including Maine. NEES is party to another matter before this Commission, along with related matters before the Federal Energy Regulatory Commission and the U.S. Department of Energy.
4. NEES has a substantial and direct interest in this proceeding and cannot be adequately represented by any other party. Therefore, NEES is entitled to and should be granted mandatory intervention according to Chapter 110, § 8(B)(1) of the Rules.
5. In the alternative, NEES is entitled to and hereby requests the Commission grant it discretionary intervention and allow NEES full participation in this case pursuant to Chapter 110, § 8(B)(2) of the Rules.
6. NEES intends to participate actively in this proceeding according to the Rules and the procedural schedule as it exists and may be amended from time-to-time.

WHEREFORE, Northeast Energy Solutions respectfully requests that the Maine Public Utilities Commission grant it intervenor status with the rights to participate in the proceeding fully as a party thereto.

Respectfully submitted,

NORTHEAST ENERGY SOLUTIONS, INC.



BY: Northeast Energy Solutions, Inc.
Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
(617) 757-6518
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Dated at Boston, this 8th day of April, 2015.