

**UNITED STATES OF AMERICA**  
**Before the**  
**FEDERAL ENERGY REGULATORY COMMISSION**

**In the Matter of** )  
 )  
**BROADWATER PIPELINE LLC** ) **Docket No. CP06-55-000**

**MOTION TO INTERVENE**  
**OF**  
**THE NEW ENGLAND LOCAL DISTRIBUTION COMPANIES**

The New England Local Distribution Companies include:

|                                     |                                      |
|-------------------------------------|--------------------------------------|
| Bay State Gas Company               | City of Norwich, Department of       |
| Connecticut Natural Gas Corporation | Public Utilities                     |
| New England Gas Company             | NSTAR Gas Company                    |
| Northern Utilities, Inc.            | The Southern Connecticut Gas Company |
|                                     | Yankee Gas Services Company          |

Pursuant to the provisions of the Natural Gas Act (“NGA”), as amended, 15 U.S.C. §§ 717, *et seq.* (1997), and to the provisions of Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2004), the above-named companies (“New England LDCs”) respectfully move jointly and severally to intervene in this proceeding, designated as Docket No. CP06-55-00. This proceeding involves an application filed by Broadwater Pipeline LLC (“Broadwater Pipeline”) requesting authorization to construct certain pipeline facilities in connection with the LNG terminal proposed by Broadwater Energy LLC (“Broadwater Energy”).

In support of this motion to intervene, the New England LDCs state as follows:

1. The names and office addresses of movants are:

Bay State Gas Company  
300 Friberg Parkway  
Westborough, MA 01581

City of Norwich, Department  
of Public Utilities  
16 South Golden Street  
Norwich, CT 06360

Connecticut Natural Gas Corporation  
CNG 1<sup>st</sup> Floor  
77 Hartland Street  
East Hartford, CT 06108

NSTAR Gas Company  
One NSTAR Way, NE 220  
Westwood, MA 02090-9230

New England Gas Company  
100 Weybosset Street  
Providence, RI 02903

The Southern Connecticut Gas Company  
855 Main Street  
Bridgeport, CT 06604-4918

Northern Utilities, Inc.  
300 Friberg Parkway  
Westborough, MA 01581

Yankee Gas Services Company  
107 Selden Street  
Berlin, CT 06037

2. The name and address of the person to whom correspondence or communication in regard to this motion should be addressed is:

\*Gearold L. Knowles, Esq.  
Schiff Hardin LLP  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036-4390  
Email: [gknowles@schiffhardin.com](mailto:gknowles@schiffhardin.com)

It is also requested that copies of such correspondence or communication be sent to officers and attorneys of the respective movants as follows:

Bay State Gas Company  
Northern Utilities, Inc.  
\*George H. Simmons, Jr.  
FERC Specialist  
NiSource Inc.  
300 Friberg Parkway  
Westborough, MA 01581

NSTAR Gas Company  
\*Mr. James Daly, Director  
Electric and Gas Energy Supply  
One NSTAR Way, NE 220  
Westwood, MA 02090-9230

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\* Parties to be designated on the Commission's official service list.

Connecticut Natural Gas Corporation

\*Mr. John Rudiak  
Managing Director – Energy Services  
CNG 1<sup>st</sup> Floor  
77 Hartland Street  
East Hartford, CT 06108

The Southern Connecticut Gas Company

\*Mr. John Rudiak  
Managing Director – Energy Services  
855 Main Street  
Bridgeport, CT 06604-4918

New England Gas Company

\*Mr. Gary L. Beland  
Director of Gas Supply  
New England Gas Company  
100 Weybosset Street  
Providence, RI 02903

Yankee Gas Services Company

\*Mr. Marc N. Andrukiewicz  
Director, Gas Management  
107 Selden Street  
Berlin, CT 06037

City of Norwich, Department of  
Public Utilities

\*Mr. Richard E. DesRoches  
General Manager  
City of Norwich, Department of  
Public Utilities  
16 South Golden Street  
Norwich, CT 06360

\* Ms. Rosemary Leitz  
Counsel  
Northeast Utilities Service Company  
107 Selden Street  
Berlin, CT 06037

\*Stanley W. Balis  
Miller Balis & O’Neil, P.C.  
1140 19<sup>th</sup> N.W.  
Suite 700  
Washington, D.C. 20036-6600

3. The companies comprising the New England LDCs, together with their corporate affiliates, are engaged in the distribution and retail sale of natural gas to more than 1,000,000 consumers located in the States of Connecticut, Maine, Massachusetts, New Hampshire, and Rhode Island. These companies are firm transportation customers of the interstate natural gas pipelines serving the New England region.

4. On January 30, 2006, Broadwater Pipeline filed an application requesting a certificate of public convenience and necessity authorizing it to construct, own, operate, and

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\* Parties to be designated on the Commission’s official service list.

maintain a 30-inch, 22 mile subsea lateral and related facilities as a single-use pipeline. Broadwater Pipeline stated that the purpose of the proposed pipeline facilities is to connect the offshore liquefied natural gas (“LNG”) terminal proposed by Broadwater Energy to a subsea interconnection with existing facilities of the Iroquois Gas Transmission system.

5. Under the foregoing circumstances, movants have an interest in this proceeding which will be directly affected, which is not adequately represented by existing parties, and as to which the New England LDCs may be bound by the Commission's actions in such proceeding.

WHEREFORE, the companies comprising The New England LDCs respectfully request the Commission to permit each of them to intervene in and become a party to this proceeding, designated as Docket No. CP06-55-000. Movants pray for such further relief in respect of this subject matter as equity and justice and the best public interest may require.

Respectfully submitted,

THE NEW ENGLAND LOCAL  
DISTRIBUTION COMPANIES

By: /s/ Gearold L. Knowles  
Gearold L. Knowles  
Its Attorney

SCHIFF HARDIN LLP  
1101 Connecticut Avenue, N.W.  
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gknowles@schiffhardin.com

March 9, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list maintained in this proceeding.

Dated at Washington, D.C., this 9<sup>th</sup> day of March 2006.

/s/ Gearold L. Knowles  
Gearold L. Knowles  
Schiff Hardin, LLP  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036-4390

Attorney for  
THE NEW ENGLAND LOCAL  
DISTRIBUTION COMPANIES

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