STATE OF MAINE PUBLIC UTILITIES COMMISSION

Docket No. 2024-00072

April 16, 2024

PORTLAND NATURAL GAS TRANSMISSION SYSTEM ET. AL., Section 708 Exemption or Approval of Reorganization PETITION TO INTERVENE OF ND PAPER

ND OTM LLC ("ND Paper") hereby petitions to intervene in the above-captioned matter pursuant to Chapter 110, Section 8(B) of the Commission's Rules of Practice and Procedure, 65-407 C.M.R. Ch. 110, and in support thereof states as follows:

- 1. On March 26, 2024 Portland Natural Gas Transmission System ("PNGTS") and related entities filed a petition requesting that the Commission grant an exemption or approval regarding a proposed upstream change of ownership.
- 2. On April 8, 2024, the Commission issued a Notice of Filing, Opportunity to Intervene, Initial Case Conference, which included a deadline of April 16, 2024 for the filing of petitions to intervene.
- 3. ND Paper is the owner of a pulp and paper manufacturing facility in Rumford, Maine. ND Paper has an immediate and direct interest in this proceeding, as it currently takes service at the Rumford mill facility as a customer from PNGTS, and may be substantially and directly affected by the outcome of this proceeding, with regard to both rates and service.
- 4. As such, ND Paper is entitled to and should be granted mandatory intervention according to Chapter 110, § 8(B)(1) of the Commission's Rules. ND Paper intends to participate as an active party to this proceeding as it determines may be needed to protect its interests, and to address issues of concern to ND Paper, including attending conferences, hearings and negotiations, submitting discovery requests, evidence and/or testimony, and cross-examining witnesses, and submitting arguments.
- 5. Accordingly, ND Paper respectfully requests that the Commission grant this Petition to Intervene with the right to participate as a full party to this proceeding.
- 6. Please enter the following on the service list for this proceeding as representatives of ND Paper and please provide for the direction of all communications regarding this proceeding to them:

Joel Pike	Steven A. Hudson
ND Paper Inc.	Anthony Buxton
Director of Energy Strategy	Joseph G. Donahue
35 Hartford Street	Preti Flaherty Beliveau & Pachios, LLP
Rumford, ME 04276	PO Box 1058
Tel. (207) 369-2823	45 Memorial Circle
Joel.pike@us.ndpaper.com	Augusta, ME 04332
[keep in mind that PUC will not place Joel on	Tel. (207) 623-5300
notification list and he or we must do it]	shudson@preti.com

jdonahue@preti.com

The contact information for these individuals will be placed on the notification list in CMS for this docket.

Dated at Augusta, Maine, this 16th day of April, 2024.

Steven A. Hudson Joseph G. Donahue Counsel for ND OTM LLC

Preti Flaherty Beliveau & Pachios, LLP PO Box 1058 Augusta, ME 04332-1058 (207) 623-5300