STATE OF NEW HAMPSHIRE

DOCKET NUMBER DG-08-048

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

JOINT PETITION OF UNITIL AND NORTHERN UTILITIES FOR MERGER

PETITION OF UNITED STEEL WORKERS OF AMERICA LOCAL 12012-6 TO INTERVENE

STATE OF NEW HAMPSHIRE

DOCKET NUMBER DG-08-048

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION JOINT PETITION OF UNITIL AND NORTHERN UTILITIES FOR MERGER <u>PETITION OF UNITED STEEL WORKERS OF AMERICA LOCAL 12012-6 TO</u> INTERVENE

NOW COMES, United Steelworkers of America Local 12012-6, by and through their attorney's, Cook & Molan, P.A., and requests leave to intervene as a party in the above captioned matter, pursuant to Puc 203.17 and RSA 541-A:32 and in support thereof says as follows:

1. Local 12012-6 is a duly authorized collective bargaining representative for certain employees of the Northern Utilities, Inc.

2. The union members employed by Northern Utilities, Inc. are citizens of the State of New Hampshire.

3. The union has been monitoring the progress of the Petition for Approval and believes that the Commission may benefit from receiving certain fundamental information as gained through the experience of its employees who actually perform the services referenced in the filing.

4. In particular, the union and its members have the ability to address issues of safety and efficiency as they relate to the national gas industry.

5. Further, the above cited union members have substantial financial interest in the evolution of the industry.

6. As consumers, the union members have a substantial interest in these proceedings.

2

7. The union submits that intervention as a full party would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings.

8. The union, through its attorney, has contacted or attempted to contact the other parties in this case for the purpose of providing notice that the union seeks to intervene.

9. Attorney Damon (PUC) assents, Attorney Epler (Unitil) and Attorney Ferro (Northern Utilities) have been notified of the intent to file but have not communicated a position at this time.

WHEREFORE, the union respectfully requests that the Commission consider this petition at its next scheduled meeting; and grant this petition; allowing the union to intervene as a fun party in this proceeding; and grant such other relief as is deemed just and proper.

Respectfully submitted, United Steelworkers - Local 12012-6 By its attorneys Cook & Molan,/P.A

Shawn J. Sullivan 100 Hall Street, PO Box 1465 Concord, NH 03302-1465 (603) 225-3323

CERTIFICATE OF SERVICE

I, hereby certify that a copy of the foregoing was this day mailed, via first class mail postage prepaid, to the individuals and companies on the Commission's Service List in this proceeding.

11/21

Date:

Shawn J. Sullivan

STATE OF NEW HAMPSHIRE

DOCKET NUMBER DG-08-048

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

JOINT PETITION OF UNITIL AND NORTHERN UTILITIES FOR MERGER

SERVICE LIST

Karen Asbury Unitil Svc Corp. 6 Liberty Lane West Hampton, NH 03842-1720

Stephen R. Eckberg Office of Consumer Advocate 21 South Fruit St. Ste 18 Concord, NH 03301

Gary Epler Unitil Energy Systems Inc. 6 Liberty Lane West Hampton, NH 03842-1720

Joseph A. Ferro Northern Utilities Inc. 300 Friberg Parkway Westborough, MA 01581-5039

Patricia French Nisource Corporate Service Company 300 Friberg Parkway Westborough, MA 01581

Meredith A. Hatfield Office of Consumer Advocate 21 South Fruit St. Ste 18 Concord, NH 03301 Susan Kullberg Bay State Gas 300 Friberg Parkway Westborough, MA 01581

Ken E. Traum Office of Consumer Advocate 21 South Fruit St. Ste 18 Concord, NH 03301-2429