

**THE STATE OF NEW HAMPSHIRE  
Before the  
PUBLIC UTILITIES COMMISSION**

**Petition by segTEL, Inc. for Arbitration or, alternatively, Adjudication  
Regarding the Denial by PSNH of Access to Electric "Transbution" Poles  
for the Attachment of Telecommunication Cables**

**Docket No. DT 08-146**

**UNITIL ENERGY SYSTEMS, INC.  
PETITION TO INTERVENE**

Unitil Energy Systems, Inc. ("Unitil" or "Company") hereby respectfully petitions for full party Intervenor status in the above captioned matter pursuant to RSA 541-A: 32 and N.H. Code of Admin. Proc. Puc 203.17. In support of its Petition, Unitil states the following:

1. Unitil is a New Hampshire corporation and public utility primarily engaged in the distribution of electricity in the capital and southeastern seacoast regions of New Hampshire. Unitil's primary place of business is located at 6 Liberty Lane West, Hampton, New Hampshire.
2. Unitil submits that issues related to access to electric distribution poles, located on private property pursuant to private easement rights obtained by the utility, for the attachment of telecommunication cables by a third party attachee, may have a significant impact upon its customers and investors. These interests are substantial and are not adequately represented by any other party to this proceeding.
3. Granting of Unitil's Petition for Intervention would not impair the orderly and prompt conduct of the proceedings.

WHEREFORE Unitil respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,  
Unitil Energy Systems, Inc.

By: 

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### CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Petition to Intervene was sent by e-mail and overnight express mail to the following parties:

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02/02/2009  
Date

  
Gary Epler