

STATE OF NEW HAMPSHIRE

DOCKET NUMBER DG 11-196

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

RE: UNITIL CORPORATION AND NORTHERN UTILITIES, INC.

**PETITION OF UNITED STEEL WORKERS OF AMERICA LOCAL 12012 TO
INTERVENE**

NOW COMES, the United Steel Workers of America Local 12012, by and through their the Law Offices of Shawn J. Sullivan, PLLC 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:

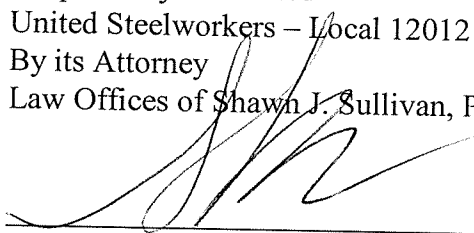
1. Local 12012 is a duly authorized collective bargaining representative for certain employees of Northern Utilities, Inc./Unitil.
2. The union members employed by Northern Utilities/Unitil are citizens of the State of New Hampshire.
3. Certain Union members perform Emergency Response duties. The Union 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. All employees are consumers, certain Union members have substantial interest in the evolution of the industry.
5. 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.
6. The Union, had intervened as a full party in the underlying PUC whereby Unitil acquired Northern Utilities and expects no objection to the Union's intervention here

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

Respectfully Submitted
United Steelworkers – Local 12012
By its Attorney
Law Offices of Shawn J. Sullivan, PLLC

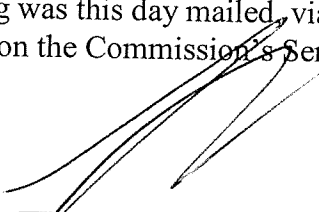
Date: _____

9/27/11


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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.


Shawn J. Sullivan, Esq.