



City of Concord
City Solicitor's Office
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Paul F. Cavanaugh
City Solicitor

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Suzanne Dixon
Paralegal

November 3, 2005

Debra A. Howland
Executive Director & Secretary
NH PUC
21 S. Fruit St., Suite 10
Concord, NH 03301-2429

Re: The State of New Hampshire Public Utilities Commission
DM 05-172
City of Concord's Petition to Intervene

Dear Director Howland:

Enclosed please find the following documents for filing with the Commission:

- 1) The City of Concord's Petition to Intervene.

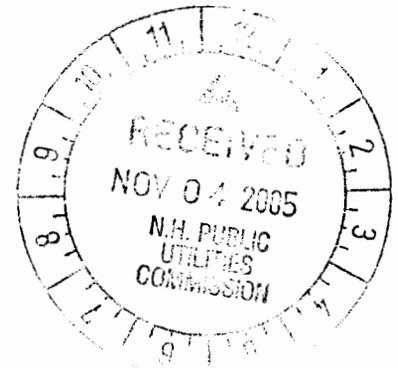
Thank you for your attention in this regard and please call our office should you have any questions or concerns.

Sincerely,


Paul F. Cavanaugh

skd/Enclosures:

- 1) Petition To Intervene (Original and 8 Copies plus Electronic Copy)
- 2) List of Service to all interested parties



THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DM 05-172

LIST OF SERVICE TO ALL INTERESTED PARTIES

John Andrews
NH Municipal Assoc.
P.O. Box 617
Concord, NH 03302-0617

Douglas L. Patch
Orr & Reno PA
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550

Frederick J. Coolbroth
Devine, Millimet & Branch
49 N. Main Street
P.O. Box 3610
Concord, NH 03302

Donald Pfundstein
Gallagher, Callahan & Gartrell
214 N. Main Street
Concord, NH 03301

Victor D. Del Vecchio
Verizon New England
185 Franklin Street, 13th FL.
Boston, MA 02110-1585

Meabh Purcell
Leboeuf, Lamb, Greene & Macrae, LLP
260 Franklin Street
Boston, MA 02110-3173

Gerald M. Eaton
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton, NH 03842-1720

F. Anne Ross
Office of Consumer Advocate
21 South Fruit Street, Ste. 18
Concord, NH 03301-2429

Susan Geiger
Orr & Reno PA
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550

William T. Sherry
Granite State Electric Co.
9 Lowell Road
Salem, NH 03079

Jeremy L. Katz
Segtel, Inc.
P.O. Box 369
Enfield, NH 03748

Seth L. Shortlidge
Pierce Atwood
114 North Main Street
Concord, NH 03301

Tom Meissner
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton, NH 03842

Lisa M. Thorne
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900 Elm Street, Ste. 1927
Manchester, NH 03101-2008

Scott Mueller
Leboeuf, Lamb, Greene & Macrae, LLP
260 Franklin Street
Boston, MA 02110-3173

Tom Newbauer
New Hampshire Electric Cooperative
578 Tenney Mountain Highway
Plymouth, NH 03264

11/03/05

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DM 05-172

PETITION TO INTERVENE

NOW COMES, The City of Concord ("City"), a municipal corporation duly chartered by the State of New Hampshire with a usual place of business at 41 Green Street, Concord, New Hampshire, and petitions to intervene in this matter pursuant to N.H. Admin Rule Puc 203.02 and RSA 541-A:32,I (b) before the Public Utilities Commission (Commission) and in support thereof states:

1. The City of Concord as a municipality has an interest in this matter as the entity responsible to the general public and citizens who reside within the municipality for maintaining the public rights of way and emergency response systems in a safe manner;
2. The City of Concord's interest may be affected by the proceedings and any rulings made thereon; and
3. The City of Concord qualifies as an intervener under the provisions of RSA 541-A:32, I (b).

WHEREFORE, The City of Concord respectfully requests the Commission:

- a) Grant its Petition to Intervene and
- b) Grant such other further relief as is just.



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Respectfully submitted,
CITY OF CONCORD

Dated: 11-3-2005

By:


Paul F. Cavanaugh, City Solicitor
41 Green Street
Concord, New Hampshire 03301
603-225-8505

Certificate of Service

I hereby certify that on this 3rd day of November, 2005, the foregoing Petition to Intervene was sent by first class, U.S. mail to the following parties to this action:

John Andrews
NH Municipal Assoc.
P.O. Box 617
Concord, NH 03302-0617

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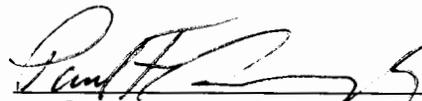
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