

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

Northern New England Telephone Operations LLC and  
Enhanced Communications of Northern New England Inc.

Docket No. DM 12-276

**LIBERTY UTILITIES' PETITION TO INTERVENE**

Granite State Electric Company and EnergyNorth Natural Gas, Inc. both d/b/a Liberty Utilities ("Liberty Utilities" or the "Companies") hereby petition to intervene in the above-captioned docket pursuant to RSA 541-A:32 and Puc 203.17. In support hereof, Liberty Utilities states as follows:

1. On September 17, 2012, Northern New England Telephone Operations LLC ("NNETO") and Enhanced Communications of Northern New England Inc. ("ECNNE") filed an objection to their Public Utility Assessment Invoices. Pursuant to that objection, NNETO and ECNNE assert that their assessments should be reduced by \$539,770 and \$64,952, respectively. On October 5, 2012, the Commission opened this docket to consider whether the NNETO and ECNNE assessments should be reset.

2. Each of the Companies are public utilities and subject to Public Utility Assessments pursuant to RSA 363-A. Currently, Granite State's Public Utility Assessment is \$267,390 and EnergyNorth's is \$476,289.

3. Under RSA 363-A:2, public utility assessments "...shall be calculated by using the gross utility revenue of all public utilities and 33 percent of the gross utility revenue of rural electric cooperatives for which a certificate of deregulation is on file with the commission and

allocating the expenses of the commission to each utility in direct proportion as the revenues relate to the total utility revenues as a whole.” As a result of this allocation methodology, the total Commission expense is allocated proportionally among all public utilities. Thus, if the Commission were to reset NNETO and ECNNE’s assessments, it could have an adverse impact on the remaining public utilities, including Liberty Utilities, whose proportional share of Commission expense might increase. *See* Order of Notice at 2.

4. As a result, Liberty Utilities seeks to intervene in this docket because its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding given that the Commission is considering whether to reset NNETO and ECCNE’s assessments. The interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention, particularly where the proceeding is just beginning.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

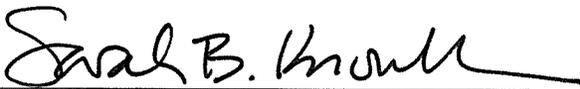
- A. Grant this petition to intervene; and
- B. Grant such other and further relief as the Commission deems necessary and just.

Respectfully submitted,

GRANITE STATE ELECTRIC COMPANY  
ENERGYNORTH NATURAL GAS, INC.  
BOTH D/B/A LIBERTY UTILITIES

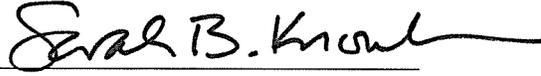
By its Attorney,

Date: October 29, 2012

By:   
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Certificate of Service

I hereby certify that on August 20, 2012, a copy of this Petition to Intervene has been sent to the service list in this docket.

A handwritten signature in black ink, appearing to read "Sarah B. Knowlton", written over a horizontal line.

Sarah B. Knowlton