



1 Court Street
Lebanon, NH 03766
603:448-5899

January 26, 2017

Ms. Debra Howland,
Executive Director
NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301-2429

NH-PUC 26JAN17-PM4:26

RE: DE 16-835, Complaint Against Liberty Utilities (Granite State Electric) Corp. d/b/a
Liberty Utilities by Mr. Richard Balagur

Dear Ms. Howland,

I am writing on behalf of One Court Street Associates (“OCSA”), a New Hampshire limited partnership and a customer of Liberty Utilities (“LU” or “Liberty”) to request to be placed on the service list in this matter. Also, we would like to petition to be granted party or intervenor status in this complaint investigation in the event it becomes, or already is, an adjudicative proceeding pursuant to Puc 204.05. I noticed in your secretarial letter of 1/5/17 that the Commission has scheduled this matter for hearing on January 30, 2017 and OCSA would like to make an appearance as an interested party to offer additional information that may help inform the Commission’s investigation of this complaint.

One Court Street Associates purchased a redevelopment parcel from the Lebanon Housing Authority (LHA) and constructed of a new commercial building starting in 1988, at which time we became a customer of Granite State Electric (GSE). We are served by the same vintage underground electricity distribution system that failed the block of buildings on the south side of the Hanover Street pedestrian Mall as described in Mr. Balagur’s complaint, except that One Court Street is part of the block of buildings across the Mall on the north side served by a different common GSE transformer located in a City owned parking lot, formerly owned by the LHA in 1969.

I expect to file our own formal complaint against Liberty Utilities pursuant to Puc 204.01 within the next few days. With that filing I will provide significant additional documentation that I believe will make it clear that the parties at the time (GSE, LHA, and the City of Lebanon) all understood that these underground conduits and primary (high voltage) service conductors feeding GSE’s pad mounted transformers, all installed by GSE, were, in fact, constructed as a part of GSE’s electric utility distribution system, to be owned and operated by them, and that only the secondary (low voltage) cables and conduits to the point of interconnection with the utility system would be the responsibility of the various individual property owners served as customers (other than the public parking lots). Furthermore the evidence will make clear that GSE had the permission of the LHA and the City to place its distribution system underground within these parcels of land that were dedicated to public use, including underground public utilities.

Yours truly,

Clifton Below
Managing General Partner, One Court Street Associates

cc: service list, electronically