

Town of Hampton



November 4, 2005

Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301



Re: DM 05-172

Dear Ms. Howland,

Enclosed please find for filing an original and eight copies of the Town of Hampton's Motion to Intervene in the above entitled matter, along with a computer diskette version of this letter and the Motion per Commission rule 202.08.

Thank you for your cooperation with regard to this matter.

Very truly yours,

Mark S. Gearreald, Esq.
Hampton Town Attorney

Cc: James S. Barrington, Town Manager
Board of Selectmen, Town of Hampton
See attached service list

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UNITIL ENERGY SYSTEMS INC
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The State of New Hampshire
Before the New Hampshire Public Utilities Commission

DM 05-172

TOWN OF HAMPTON'S MOTION TO INTERVENE

NOW COMES the Town of Hampton in the above entitled matter and moves to allow it to intervene in these proceedings as a party, and in support of said motion says as follows:

1. The Town of Hampton has approximately 15,000 year round residents and lies at the heart of the Seacoast region of New Hampshire.
2. The population of Hampton in the summer months rises dramatically to the point where Hampton becomes the second largest municipality population-wise in the State.
3. The vast majority of utility poles in Hampton are jointly owned or maintained by Unitil Service Corporation and Verizon New Hampshire.
4. The Town of Hampton has undertaken at Hampton Beach, starting in the fall of 2004, a major infrastructure renovation project funded through loans from the State Revolving Fund and bonds totaling \$12 million dollars. This commitment by Hampton's taxpayers to upgrading the infrastructure at the Beach is designed to promote the Town's major industry - tourism; and the positive impact of this development will be felt not only regionally but on a State-wide level.
5. Because widening of roads and installation of sidewalks are integral components of this multi-million dollar project, relocating of utility poles is necessarily occurring.
6. In other parts of the Town of Hampton, the process of relocating utility poles has been delayed by Verizon New Hampshire. If such delays are encountered at Hampton Beach, they would jeopardize not only the completion time for the entire project, but also the ability of the project to be completed within budget. Timing for completion of this project is critical in that delays would result in construction work being pushed into the summer months, when

tourists and residents alike come to the Beach for recreation; the viability of the summer season could thereby be severely impacted.

7. Accordingly, the Town of Hampton has a substantial interest in the issue of jointly owned poles and their replacement and servicing and in preventing major delays in such work from occurring.
8. The Town of Hampton thus seeks to intervene herein pursuant to the invitation to do so from the Commission in its Order of Notice dated October 21, 2005.

WHEREFORE, the Town of Hampton requests that the Commission:

- A. Allow the Town of Hampton to intervene as a party in this matter; and
- B. Grant such other and further relief as may be just.

Respectfully submitted
Town of Hampton

By its Town Attorney

Dated: November 4, 2005



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Certificate of Service

I hereby certify that I have this 4th day of November, 2005 mailed via U.S. mail a copy of the foregoing Motion to Intervene to the entities and individuals appearing on the attached service list.



Mark S. Gearreald, Esq.

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