

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ELECTRIC RENEWABLE PORTFOLIO STANDARD

RSA 362-F:4, VI ADJUSTMENTS TO CLASS III RENEWABLE PORTFOLIO
REQUIREMENTS

DOCKET NO. DE 13-021

LIBERTY UTILITIES' PETITION TO INTERVENE

Granite State Electric Company d/b/a Liberty Utilities ("Liberty Utilities" or the "Company") hereby petitions 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. Liberty Utilities is a public utility engaged in the retail distribution of electricity in New Hampshire. As a regulated electric utility, Liberty Utilities is required to comply with RSA 362-F:3 which requires that Liberty Utilities obtain and retire a certain amount of renewable energy certificates ("RECs"), including those denoted as Class III RECs, which encompass certain existing biomass and methane gas facilities.

2. The Commission has opened this docket to consider whether any adjustments to the requirements to purchase Class III RECs is appropriate, as well as whether it is appropriate to accelerate or delay by up to one year, any given year's incremental increase in Class I thermal renewable portfolio requirements pursuant to RSA 362-F:4, V.

3. Liberty Utilities seeks to intervene in this docket because any changes in these REC obligations will have a direct impact on the Company's customers, including the amount which the Company will have to spend to satisfy the law. As a result, the Company's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding. 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.

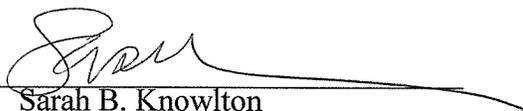
Respectfully submitted,

GRANITE STATE ELECTRIC COMPANY
D/B/A LIBERTY UTILITIES

By its Attorney,

Date: February 11, 2013

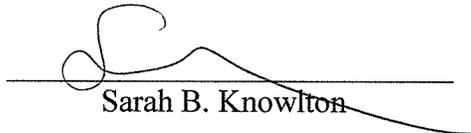
By:



Sarah B. Knowlton
Assistant General Counsel
Liberty Energy Utilities (New Hampshire) Corp.
11 Northeastern Boulevard
Salem, NH 03079
Telephone (603) 328-2794
sarah.knowlton@libertyutilites.com

Certificate of Service

I hereby certify that on February 11, 2013, a copy of this Petition to Intervene has been sent to the service list in this docket.



Sarah B. Knowlton