

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ALL UTILITIES
Objections to Public Utility Assessments

Docket No. DM 13-252

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 6, 2013, 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 based on a claim that certain of their revenues are not subject to RSA 363-A. On September 9, 2013, Public Service Company of New Hampshire also filed an objection to its assessment, raising concerns about whether public utilities are being treated equally under RSA 363-A.

2. Each of the Companies are public utilities and subject to public utility assessments pursuant to RSA 363-A.

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, ECNNE, and PSNH’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 2-3.

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, ECCNE, and PSNH’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.

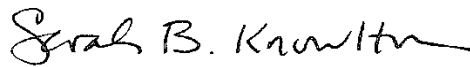
WHEREFORE, Liberty Utilities respectfully requests that the Commission:

- 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,



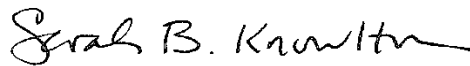
Date: November 7, 2013

By:

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Certificate of Service

I hereby certify that on November 7, 2013, a copy of this Petition to Intervene has been sent to the service list in this docket.



Sarah B. Knowlton