

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 16-383

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities

Request for Change in Rates

Petition to Intervene of International Brotherhood of Electrical Workers, Local 326

The International Brotherhood of Electrical Workers ("IBEW") Local 326, respectfully moves the Commission to intervene in this docket pursuant to RSA 541-A:32 and Puc 203.17.

1. IBEW Local 326 represents Granite State Electric employees who serve as line workers, meter readers, and utility technicians.
2. An issue in this rate case is whether Granite State can recover the costs of the Training Center in Concord. In testimony filed in December 2016, Staff recommended that Granite State should not be allowed to recover the Training Center costs.
3. The IBEW members have received training at the Training Center and continued access to the Training Center is very important for the IBEW members.
4. The IBEW thus has a right to intervene on behalf of its members under RSA 541-A:32.
5. The IBEW wishes to intervene in order to file testimony supporting the Company's recovery of costs related to the training center. That testimony is attached to this motion.

Therefore, IBEW Local 326 respectfully asks that the Commission to grant this motion to intervene and accept the attached testimony.

Respectfully Submitted,

Dated: February 1, 2017

International Brotherhood of Electrical
Workers, Local 326

By: James Red Simpson
James "Red" Simpson, Business Manager

Certificate of Service

I hereby certify that I emailed a copy of this motion to the service list on February 1, 2017.

By: James Red Simpson
James "Red" Simpson