

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DOCKET NO. DG 16-__

**PETITION OF NORTHERN UTILITIES, INC. FOR LICENSE TO CONSTRUCT AND
MAINTAIN A DISTRIBUTION GAS MAIN ACROSS PUBLIC WATERS**

Northern Utilities, Inc. ("Northern") respectfully petitions the New Hampshire Public Utilities Commission ("Commission") pursuant to RSA 371:17 for a license to construct and maintain a natural gas distribution main over public waters owned by the State of New Hampshire. In support of this Petition, Northern states as follows:

1. Northern is a public utility providing natural gas service to customers in twenty one (21) municipalities in the southeastern and seacoast regions of New Hampshire. Specifically relevant to this petition, Northern owns and operates natural gas distribution facilities regulated by the Commission within franchise areas previously approved by the Commission, including the Town of Exeter ("Exeter" or the "Town").

2. Northern currently operates a natural gas distribution main in Exeter, NH that partially extends across the String Bridge, an old stone arch bridge that crosses the Exeter River, to service customers located on "Kimball Island," which is situated approximately at the junction of the Exeter and Squamscott Rivers. The existing distribution main, which has been in place since 1986, crosses the Exeter River along the String Bridge for approximately half of the bridge's span.

3. Both the Exeter and Squamscott Rivers are identified as public waters on the Official List of Public Waters maintained by the New Hampshire Department of Environmental Services.

4. The Town of Exeter is in the process of making repairs and structural improvements to the String Bridge. In coordination with the Town's String Bridge rehabilitation project, Northern will replace the existing main with 4" schedule 80 plastic pipe encased in 8" schedule 80 steel pipe and further extend the main, also with 4" schedule 80 plastic pipe encased in 8" schedule 80 steel pipe, across the full span of the bridge to connect with an existing gas main on Water Street in Exeter. The portion of the main crossing the String Bridge and, thus, the Exeter River, will be located above the bridge's arches but below the road surface; in other words, it will be encased within the bridge structure. The main will not be exposed either above or on the underside of the bridge. Drawings of the gas main project across String Bridge are attached hereto as Attachment A.

5. The extension of the existing gas distribution main across the Exeter River in connection with the String Bridge rehabilitation project is necessary to improve the reliability of natural gas service to customers in Exeter. Presently, there is only one main crossing the Exeter River via the Water Street bridge to serve customers on the western side of the river. Extending the main across the full span of String Bridge to connect with the gas main on Water Street will improve reliability to those customers by creating a second feed between to the Water Street main.

6. Northern believes that the Commission license requested above will be exercised without substantially affecting public rights in affected waters. The existing main has extended approximately halfway across the bridge for many years, and the new, extended gas main will not impose any burden upon the public interest. The main will not present any impediment to vehicle or foot traffic on the bridge or marine traffic on the Exeter River – indeed, the main will not be exposed on the top or underside of the bridge, and marine traffic under the bridge is in any

event virtually, if not actually, impossible. Extension of the main across the Exeter River will allow for the improved reliability of gas service to customers on the western side of the Exeter River, and as such is in the public interest.

7. Upon information and belief, the Town's rehabilitation of the String Bridge will commence in early July 2016. Northern anticipates that it will install the new main in early August 2016. Consistent with this timeline, Northern respectfully requests that the Commission grant the requested licenses on an expedited basis.

WHEREFORE, Northern respectfully requests that the Commission:

- A. Find that a license for the construction and maintenance of a natural gas main over the Exeter River along the String Bridge in Exeter may be exercised without substantially affecting public rights in State waters;
- B. Grant Northern a license to construct and maintain a natural gas main over the Exeter River along the String Bridge in Exeter; and
- C. Issue an order *nisi* and orders for its publication.

Dated at Hampton, NH on this 16th day of June, 2016.

Respectfully submitted,

Northern Utilities, Inc.

By Its Attorney,



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