

THE STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

DG 16-769

Concord Steam Corporation, Petitioner for Emergency Rates and Discontinuance of Service
and

DG 16-770

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities & Concord Steam
Corporation, Joint Petition for Approval of an Asset Purchase Agreement

CITY OF CONCORD'S PETITION TO INTERVENE

The City of Concord ("Concord"), by and through its attorneys, the Office of the City Solicitor, hereby requests to intervene in this matter pursuant to RSA 541-A:32 and N.H. Code of Admin. Rule Puc 203.17. In support of its Petition, Concord states as follows:

1. Concord has attended the hearings to date on these interrelated dockets and has recently determined that it is necessary to intervene as party due to its direct and substantial interest in these matters.

2. Concord is an existing steam customer of Concord Steam, wherein Concord Steam provides heat to several Concord buildings, including City Hall, City Hall Annex, the Concord Police Station, the Concord Public Library, the Green Street Community Center and the Concord Public Library. The proposed discontinuance of steam, the requested emergency rate increase and the proposed sale of certain assets to Liberty Utilities will have a direct and substantial impact upon Concord.

3. Additionally, a substantial portion of Concord Steam's underground pipeline infrastructure is located within Concord's right-of-way. Concord has a direct and substantial interest in Concord Steam's and/or Liberty Utilities' or any other party's responsibility to

maintain this underground pipeline infrastructure, up to, and following the discontinuance of Concord Steam service.

4. Concord's intervention in these related dockets is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

5. Concord's interests will be affected by this Commission's decisions in these matters and therefore Concord's intervention is necessary.

WHEREFORE, the City of Concord respectfully requests that this Honorable Commission grant Concord's Petition to intervene as a full party in these proceedings and to grant such other relief as the Commission finds just and proper.

Respectfully submitted,

CITY OF CONCORD

September 6, 2016

By: 

James W. Kennedy, City Solicitor
NH Bar No. 15849
41 Green Street
Concord, New Hampshire 03301
(603) 225-8505
jkennedy@concordnh.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class, U.S. mail, pursuant to N.H. Code Admin Rule Puc 203.11.

September 6, 2016

By: 

James W. Kennedy