

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

CONCORD SCHOOL DISTRICT'S PETITION TO INTERVENE

Concord School District ("District"), by and through its attorneys, Upton & Hatfield, LLP, 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, the District states as follows:

1. The District 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. The District is an existing steam customer of Concord Steam, wherein Concord Steam provides heat to several District buildings, including Concord High School, Rundlett Junior High School, Abbot-Downing Elementary School, and Christa McAuliffe Elementary School. 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 the District.

3. The District has invested substantial sums towards the construction of steam lines to Rundlett Junior High School, Abbot-Downing Elementary School and Christa McAuliffe Elementary School.

4. The District is contractually entitled to a partial pay-back of these capital costs in the form of discounted rates from Concord Steam.

5. The setting of emergency rates and the allowance or disallowance of Concord Steam's Petition for Discontinuance of Service will have a direct and substantial effect on the District.

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

7. The District's interests will be affected by this Commission's decisions in these matters and therefore the District's intervention is necessary.

WHEREFORE, the Concord School District respectfully requests that this Honorable Commission grant the Concord School District'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,

CONCORD SCHOOL DISTRICT

Dated: September 7, 2016

By:



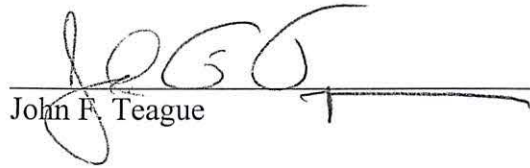
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CERTIFICATE OF SERVICE

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.

Dated: September 7, 2016

By:


John F. Teague