

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No.: DG 16-852

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Petition for Expansion of Franchise to the Town of Hanover and
City of Lebanon, New Hampshire

TOWN OF HANOVER'S PETITION TO INTERVENE

Now Comes the Town of Hanover (the "Town"), and petitions the New Hampshire Public Utilities Commission, pursuant to NH Code of Administrative Rules PUC 203.17 and PUC 203.02 and New Hampshire Revised Statute Annotated 541-A:32, to allow the Town to intervene in the above-captioned matter for the following reasons:

1. The Town of Hanover ("Town") is a municipal corporation with an address of 41 South Main Street, Hanover, New Hampshire 03755.
2. On November 28, 2016, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities") filed a Petition for Expansion of Franchise to the Town of Hanover and City of Lebanon with the New Hampshire Public Utilities Commission ("Commission").
3. Liberty Utilities proposes to provide re-gasified liquefied natural gas (LNG) and/or compressed natural gas (CNG) through a pipeline distribution system to customers in Hanover and Lebanon, New Hampshire.
4. The Town of Hanover is responsible for implementing and enforcing regulations intended to provide for the safe and attractive development or change or expansion of uses of properties and to guard against such conditions as would promote danger or injury to health, safety, or prosperity; to provide for the harmonious and aesthetically pleasing development of the municipality and its environs; to provide guidance and management for orderly municipal growth that allows for the appropriate provision of services to the citizens of the community; and to provide for prosperity and protection of property investments for the citizens of Hanover.

5. The proposed construction of an LNG pipeline through the Downtown Hanover area, adjacent to several densely settled residential neighborhoods, the community's high school, community center and affordable senior housing complex, a busy and congested downtown civic and business center, and the Dartmouth College campus will have an impact on the Town's infrastructure and abutting properties. The pipeline could also pose a public safety risk. Therefore, the Town has an interest in making sure that it retains its full site plan review authority with respect to this project, and in opposing any request that the facility be exempted from such review by the PUC (see *Appeal of Milford Water Works*, 126 N.H. 127 (1985)).
6. Many of the potential customers of the Liberty Utilities project will be located within Hanover.
7. The Town of Hanover has a direct interest in the issues to be addressed by this docket and the Town's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in delay, and will not prejudice the interest of any party.

WHEREFORE, the Town of Hanover requests that the Commission grant this petition to allow the Town to be made a full intervenor in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted this 2nd day of May, 2017.

Town of Hanover

By: 

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