

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DOCKET NO. DG 17-198

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES**

**Petition to Approve Firm Supply and Transportation Agreements and the Granite
Bridge Project**

ASSENTED-TO MOTION FOR LATE INTERVENTION

NOW COMES the Town of Epping, New Hampshire, by and through its attorneys, Donahue, Tucker & Ciandella, PLLC, and submits this Assented-To Motion for Late Intervention in the above-referenced matter, and in support thereof states as follows:

1. On December 22, 2017, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“Liberty”) filed a petition for, in part, findings from the Public Utilities Commission (“the Commission”) that an on-system liquefied natural gas facility, to be located in Epping, New Hampshire adjacent to Route 101 (“the Facility”), is a prudent investment.

2. On February 8, 2018, the Commission issued an Order of Notice establishing a deadline of March 9, 2018 by which to file motions to intervene.

3. Pursuant to RSA 541-A:32 and Site 203.17, the Town of Epping moves to intervene in this matter. As Epping is the municipality in which the Facility is to be located, Epping has rights, duties, privileges, immunities and other substantial interests in this matter.

4. The Town of Epping's rights, duties, privileges, immunities, and other substantial interests are implicated in this matter because the Facility will constitute a substantial piece of utility infrastructure in the Town that may implicate the rights of the Town's residents, taxpayers, and businesses, and which is anticipated to impact the Town's tax base and municipal resources.

5. Further, the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing intervention.

6. While the Town acknowledges the late nature of this filing, the Town's intervention will not impair the orderly and prompt conduct of these proceedings given the early stage of this intervention. The Town's delay in filing this Motion to Intervene was based solely on a good faith administrative oversight and was not due to the Town's neglect or bad faith.

7. In addition to the undersigned counsel, the following individual(s) should be included on the service list for this docket, and all communications should be sent to:

Gregory Dodge
Town Administrator
Town of Epping
157 Main Street
Epping, NH 03042
(603)679-8288
administrator@townofepping.com

8. Liberty assents to the relief sought in this Motion.

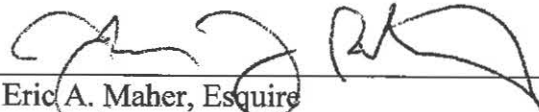
WHEREFORE, the Town of Epping respectfully requests that the Public Utilities Commission to:

- A. Allow it to intervene in the above-captioned matter; and,
- B. Grant such other relief as the Commission deems just and necessary.

Dated this 24 day of April, 2018.

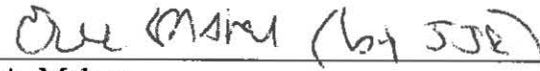
Respectfully submitted,
TOWN OF EPPING

By its attorneys:
DONAHUE, TUCKER & CIANDELLA, PLLC

By: 
Eric A. Maher, Esquire
NHBA # 21185
John J. Ratigan, Esquire
NHBA # 4849
16 Windsor Lane
Exeter, NH 03833
(603) 778-0686
emaher@dtclawyers.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pleading has this 24 day of April, 2018 been sent via e-mail only to all parties reflected on the Service List in this matter.


Eric A. Maher