

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 24-066

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

Petition of the Town of Salem for Intervention

Pursuant to N.H. Code Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Town Council, on behalf of the Town of Salem ("Town of Salem") hereby petitions to intervene in the above-captioned docket. In support of its petition, the Town of Salem states as follows:

1. Rule Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32.
2. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a showing that the petitioner has "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."
3. The Town of Salem is a municipal corporation duly organized pursuant to New Hampshire law.
4. The subject Petition seeks to Amend the Tarriff to place the financial burden of placing Liberty's facilities underground in the Town of Salem.
5. Because of the relief requested, the rights, duties, privileges, immunities, and substantial interest of Salem's citizenry will be impacted by this proceeding.

6. Moreover, these added costs in the community directly impact economic development within the municipality.

7. The interests of justice would be served, and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

WHEREFORE, the Town of Salem respectfully requests that this Honorable Commission:

- A. Grant this Petition for Intervention, and
- B. Provide any other such relief as it deems appropriate.

Respectfully submitted,
TOWN OF SALEM
By its Attorneys
UPTON & HATFIELD, LLP

Date: May 14, 2024

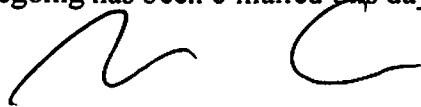
By:



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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that a copy of the foregoing has been e-mailed this day to all parties of record.



Michael P. Courtney

SERVICE LIST – DOCKET RELATED

Docket #: 2024-066

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