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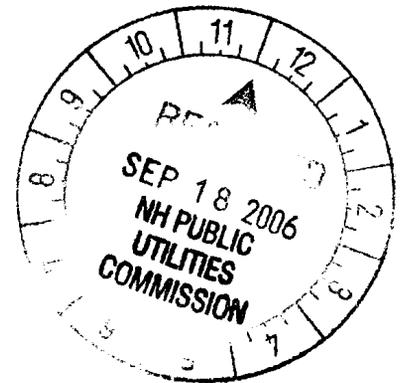
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September 15, 2006

Ms. Debra A. Howland
Executive Director & Secretary
New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301-2429

**Re: Joint Petition of National Grid and Keyspan for Merger
Docket No. DG 06-107**



Dear Ms. Howland:

Enclosed please find an original and eight (8) copies of the Petition of the United Steelworkers of America, Local 12012-3 to Intervene for filing with the Commission in the above entitled matter.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn J. Sullivan". The signature is fluid and cursive.

Shawn J. Sullivan

SJS/rbb

Enclosure

cc: Client
Alexandra E. Blackmore
Steven V. Camerino
Thomas O'Neill
Donald Pfundstein
Thomas Robinson
Ken E. Traum

STATE OF NEW HAMPSHIRE

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DG 06-107

JOINT PETITION OF NATIONAL GRID AND KEYSpan FOR MERGER

PETITION OF UNITED STEEL WORKERS OF AMERICA
LOCAL 12012-3 TO INTERVENE

NOW COMES United Steelworkers of America Local 12012-3, by and through their attorneys, Cook & Molan, P.A., and requests leave to intervene as a party in the above captioned matter, pursuant to Puc 203.02 and RSA 541-A:32 and in support thereof says as follows:

1. Local 12012 is the duly authorized collective bargaining representative for certain employees of the EnergyNorth Natural Gas, Inc.
2. The union members employed by EnergyNorth are citizens of the State of New Hampshire.
3. The union has been monitoring the progress of the Petition for Approval and believes that the Commission may benefit from receiving certain fundamental information as gained through the experience of its employees who actually perform the services referenced in the filing.
4. In particular, the union and its members have the ability to address issues of safety and efficiency as they relate to the natural gas industry.
5. Further, the above cited union members have a substantial financial interest in the evolution of the industry.
6. As consumers, the union has a substantial interest in these proceedings.

7. The union submits that invention as a full party would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings.

8. The union, through its attorney, has contacted or attempted to contact the other parties in the case for the purpose of providing notice that the union seeks to intervene.

9. Attorneys Damon (PUC), Robinson (National Grid), and Camerino (Keyspan) have no objection to the intervention.

WHEREFORE, the union respectfully requests that the Commission consider this petition at its next scheduled meeting; and grant this petition, allow the union to intervene as a party in this proceeding, and grant such other relief as is deemed just and proper.

Respectfully submitted,

United Steelworkers - Local 12012-3
By Its Attorneys
COOK & MOLAN, P.A.

September 21, 2006

By: /s/ Shawn J. Sullivan
Shawn J. Sullivan
100 Hall St., PO Box 1465
Concord, NH 03302-1465
(603) 225-3323

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day mailed, via first class mail postage prepaid, to the individuals and companies on the Commission's Service List in this proceeding.

/s/ Shawn J. Sullivan
Shawn J. Sullivan