

SPIEGEL & MCDIARMID

GEORGE SPIEGEL (1919-1997)
ROBERT C. MCDIARMID
ROBERT A. JABLON
JAMES N. HORWOOD
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS C. TRAUGER
JOHN J. CORBETT
CYNTHIA S. BOGORAD
SCOTT H. STRAUSS
LISA G. DOWDEN
RISE J. PETERS
PETER J. HOPKINS
DAVID E. POMPER
WILLIAM S. HUANG
PABLO O. NÜESCH

1333 NEW HAMPSHIRE AVENUE, NW
WASHINGTON, DC 20036

WWW.SPIEGELMCD.COM

Telephone 202.879.4000

Facsimile 202.393.2866

E-mail INFO@SPIEGELMCD.COM

Direct Dial 202.879.4088

EMAIL REBECCA.BALDWIN@SPIEGELMCD.COM

ASSOCIATES

ANDREA G. LONIAN
LARISSA A. SHAMRAJ
STEPHEN C. PEARSON
ELAINE C. LIPPMANN
RUBEN D. GOMEZ
REBECCA J. BALDWIN*
(*MEMBER OF THE MD BAR ONLY)

OF COUNSEL

ALAN J. ROTH (1933-2003)
PAUL N. CONNOR
MARK S. HEGEDUS
TILLMAN L. LAY
MARGARET A. MCGOLDRICK
MARGARET A. MEISER
JEFFREY A. SCHWARZ
BARRY M. SMOLER
SANDRA J. STREBEL
LEE C. WHITE

September 28, 2006

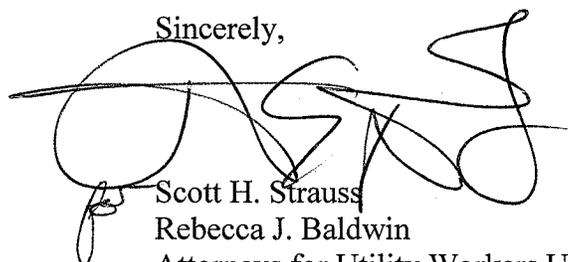
Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301-2429

**Re: National Grid USA and KeySpan, Docket No. DG06-107
Petition to Intervene of Utility Workers Union of America, AFL-CIO**

Dear Ms. Howland:

Please find attached the original and eight copies of the petition to intervene of the Utility Workers Union of America, AFL-CIO. In compliance with Rules 203.02, 203.03 and 203.11, electronic copies are being filed with the Commission and served on the Commission's service list for this docket and the Office of the Consumer Advocate, and a written copy is being served on any party identified on the Commission's service list as not being able to receive electronic mail.

Sincerely,



Scott H. Strauss
Rebecca J. Baldwin
Attorneys for Utility Workers Union of
America, AFL-CIO

RJB

cc: Service List for Docket No. DG-107
Office of the Consumer Advocate

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

National Grid USA and KeySpan

Docket No. DG06-107
Joint Petition of National Grid
and KeySpan for Merger

**PETITION TO INTERVENE OF UTILITY
WORKERS UNION OF AMERICA, AFL-CIO**

Pursuant to N.H. Rev. Stat. Ann. § LV 541-A:32 (2005) and N.H. Code Admin. R. Ann. Puc 203.04, 203.05, and 203.17 (2004), the Utility Workers Union of America, AFL-CIO (“UWUA”) requests leave to intervene in this proceeding, with full rights as a party to this proceeding, which concerns the August 10, 2006, “Joint Petition” of National Grid USA (“National Grid”) and KeySpan Corporation (“KeySpan”) (collectively, “Applicants”) for approval pursuant of National Grid’s proposed acquisition of KeySpan.

The application raises important issues with respect to the quality and reliability of service to be provided to customers in New Hampshire, as well as the impacts of any approval upon the workforces of both companies. UWUA urges that the Commission conduct a full investigation into the proposed acquisition and set the Joint Petition for hearing. Parties should be given a full opportunity to seek and present information concerning the proposed acquisition and its impacts to the Commission. The investigation should broadly consider all aspects of the proposal, including whether any approval should be conditioned to address potential adverse impacts.

I. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications concerning this submission should be directed to:

Donald Wightman
National President
UTILITY WORKERS UNION OF AMERICA,
AFL-CIO
Suite 210
220 Forbes Road
Braintree, MA 02184
Tel. (413) 589-0141
donaldwightman@compuserve.com

Scott H. Strauss, Esq.
Rebecca Baldwin, Esq.
SPIEGEL & MCDIARMID
1333 New Hampshire Avenue, N.W.
2nd Floor
Washington, D.C. 20036
Tel. (202) 879-4000
Fax (202) 393-2866
scott.strauss@spiegelmc.com
rebecca.baldwin@spiegelmc.com

II. MOTION TO INTERVENE

Applicants commenced this action by filing for Commission approval of a proposed acquisition of KeySpan by National Grid. UWUA represents a portion of the employee workforces of both of the Applicants. Specifically:

UWUA is the national union representing approximately 55,000 workers primarily in electric, gas and water industries across the United States. UWUA's principal office is at 815 16th Street, NW, Washington, D.C. 20006. UWUA, on its own and through its local unions, represents employees who work in facilities owned/operated by National Grid and/or KeySpan, and who purchase utility service from National Grid or KeySpan operating companies.

UWUA has 288 members living in New Hampshire, of whom 66 are retired. The 222 New Hampshire members who are not retired are employed by National Grid and KeySpan companies in Massachusetts but live in New Hampshire.

UWUA and its members are directly and substantially affected by the proposed acquisition, through both their employment and their status as electric utility customers in New Hampshire. Approval of the proposed transaction will affect the livelihoods, employment, and safety of UWUA members, who have long dedicated themselves to providing safe, reliable, and economic utility services. Equally important, the Joint Petition makes clear that staffing and service cutbacks are the most likely outcome of any unconditioned approval by this Commission.

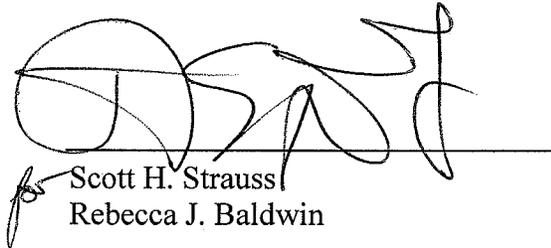
For these reasons, UWUA and the employees it represents have direct and substantial interests affected by the proposed merger, and have a strong interest in ensuring that any approval of the proposed acquisition is structured or conditioned to

protect those interests. No other party can adequately protect the interests of UWUA, and its participation in this proceeding with full rights as a party is required to protect its specific and substantial interests.

UWUA asserts that its participation will enhance the development of the record in this proceeding because its members have knowledge, information, and a perspective regarding the potential impacts of the proposed acquisition that cannot be provided by other parties.

In these circumstances, UWUA asserts that the granting of this motion for leave to intervene is in the public interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "S. Strauss", written over a horizontal line.

Scott H. Strauss
Rebecca J. Baldwin

Attorneys for
Utility Workers Union of America

Law Offices of:
SPIEGEL & MCDIARMID
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 879-4000

September 28, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of September, 2006, caused the foregoing document to be sent by first-class mail to all parties on the list compiled by the Secretary of the Commission in this proceeding.



Scott H. Strauss
Rebecca J. Baldwin

Law Offices of:
SPIEGEL & MCDIARMID
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 879-4000