

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Re: EnergyNorth Natural Gas, Inc. d/b/a National Grid NH

Docket DG 08-009

OBJECTION TO INTERVENTION REQUEST OF ROBERT GIORDANO

NOW COMES EnergyNorth Natural Gas, Inc. d/b/a National Grid NH ("National Grid NH"), and objects to the intervention request submitted by Robert R. Giordano. In support of this Objection, National Grid NH states as follows:

1. RSA 541-A:32, I(b) requires the Commission to grant a request for intervention if the request "states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law." Mr. Giordano's intervention request fails to meet this standard, and instead simply states that he has a general interest in "all matters affecting retiree pension and post-retirement health benefits" and the "financial viability of EnergyNorth."

2. The intervention request fails to explain how Mr. Giordano's general interest relates to the issues normally considered in a rate proceeding. On information and belief, the retirement benefit issues in which Mr. Giordano is interested do not relate to the ratemaking treatment for post-retirement benefits being requested by National Grid NH in this docket. If Mr. Giordano's interests relate to another matter that would be a proper subject for a rate case, that is not apparent from his letter to the Commission.

3. In addition, the Company believes that the retirement benefits concerning which Mr. Giordano is concerned are paid from a trust, which is administered by a trustee who is independent of the Company. The trustee, rather than Mr. Giordano, is the proper

representative of the interests of the beneficiaries under the trust if the issues identified by Mr. Giordano are appropriate for this proceeding.

WHEREFORE, National Grid NH respectfully requests that the Commission deny Mr. Giordano's request to intervene.

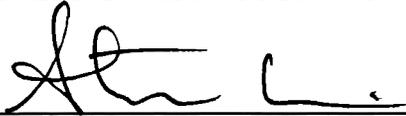
Respectfully submitted,

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH

By Its Attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON,
PROFESSIONAL ASSOCIATION

Date: April 9, 2008

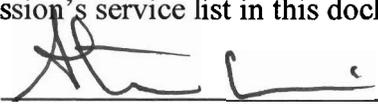
By:  _____

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Certificate of Service

I hereby certify that on this 9th day of April, 2008 a copy of this Objection has been forwarded to the parties listed on the Commission's service list in this docket.

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Steven V. Camerino