## STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

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## **Docket No. DE 10-001**

## <u>GRANITE STATE ELECTRIC COMPANY'S</u> <u>PETITION TO INTERVENE</u>

Granite State Electric Company d/b/a National Grid (the "Company") hereby petitions the New Hampshire Public Utilities Commission for intervenor status in the above captioned matter pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17. In support of this petition, the Company states as follows:

1. On January 8, 2010, the Commission issued an Order of Notice to examine the response of Unitil Energy Systems, Inc. ("Unitil") to the December 2008 ice storm. In the Order of Notice, the Commission stated that the docket will consider issues related to "the reasonableness of [Unitil's] response to the December 2008 ice storm, including the timing of its response, its restoration priorities and strategies, and the procurement and allocation of its resources in New Hampshire and Massachusetts." As indicated in the Order of Notice, this docket follows the Commission's after action review of the response of New Hampshire utilities to the December 2008 ice storm.

The Company is a public utility providing retail electric service in New
Hampshire, and participated in the Commission's after action review of the December 2008 ice storm.

3. Given that this docket relates to the Commission's after action review, the Company has a substantial interest in monitoring the proceeding because actions that the Commission may take with respect to Unitil's management of future storm events may be relevant to the interests of the Company and its response to future storms. Thus, the Company seeks to intervene in this docket so that it may remain aware of the Commission's consideration of the issues contained in the Order of Notice.

4. The Company requests that it be granted status as a full intervenor, including the right to receive all pleadings, discovery and communications among the parties with the exception of confidential information, and to participate in any briefing of issues that may occur. The Company does not seek to propound discovery, participate in settlement discussions or cross examine witnesses.

5. Granting this Petition will not impair the orderly and prompt conduct of this proceeding given that the Company is submitting its Petition by the intervention deadline.

6. Unitil assents to the relief sought herein.

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7. For these reasons, the Company requests that it be granted status as an intervenor subject to the conditions noted above.

WHEREFORE, Granite State Electric Company respectfully requests that the Commission:

A. Grant its Petition to Intervene; and

B. Order such other relief as is just and equitable.

Respectfully submitted,

Granite State Electric Company d/b/a National Grid

By Its Attorneys

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## Certificate of Service

I hereby certify that a copy of this Petition to Intervene has been forwarded to the parties on the Commission's service list in this docket by electronic mail on January 22, 2010.

Sarah B. Knowlton

Dated: January 22, 2010