

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

**NATIONAL GRID USA, NATIONAL GRID NE HOLDINGS 2 LLC,
GRANITE STATE ELECTRIC COMPANY D/B/A NATIONAL GRID,
ENERGYNORTH NATURAL GAS, INC, D/B/A NATIONAL GRID, NH**

AND

**LIBERTY ENERGY UTILITIES CO. AND LIBERTY ENERGY UTILITIES (NEW
HAMPSHIRE) CORP.**

Docket No. DG 11-040

**JOINT PETITION FOR AUTHORITY TO TRANSFER OWNERSHIP OF GRANITE
STATE ELECTRIC CO. AND ENGERGYNORTH NATURAL GAS INC. TO LIBERTY
ENERGY UTILITIES (NEW HAMPSHIRE) CORP. AND FOR RELATED APPROVALS**

**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, Law Offices of Shawn J. Sullivan, PLLC., and requests leave to intervene as a party in the above captioned matter, pursuant to Puc 203.17 and RSA 541-A:32 and in support thereof says as follows:

1. Local 12012-3 is the duly authorized collective bargaining representative for certain employees of the National Grid.
2. The union members employed by National Grid are citizens of the State of New Hampshire.
3. The union has been monitoring the filings 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 individual Union members have a substantial interest in these proceedings.

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

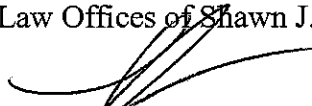
8. The Union, through its attorney, has contacted or attempted to contact the other parties in the case for the purpose of providing notice that the Union seeks to intervene.

9. Undersigned counsel has informed Sttorney DelVecchio and Attorney Camerino of this Petition to Intervene. No objection will be forthcoming.

WHEREFORE, the Union respectfully requests that the Commission consider this petition at its next scheduled meeting; grant this petition; allow the union to intervene as a full 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
Law Offices of Shawn J. Sullivan, PLLC

April 1, 2011


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CERTIFICATION

I, Shawn J. Sullivan, hereby certify that a copy of the foregoing Petition has been forwarded via electronic filing or via first class mail to all parties listed on the attached service list.



Shawn J. Sullivan, Esq.