

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

PETITION TO INTERVENE

Pursuant to N.H. Rev. Stat § 541-A:32, International Brotherhood of Electrical Workers (IBEW) Local 326 ("Intervenor"), hereby submits this petition to intervene in the above-referenced matter. As grounds therefore, Intervenor states the following:

1. Intervenor is a local union chartered by the International Brotherhood of Electrical Workers, which represents 725,000 workers in a variety of fields.
2. Intervenor represents 425 members who work in the electrical service and utility industries in New Hampshire and Massachusetts.
3. Intervenor represents 11 employees of Granite State Electric Company ("the Company"), who work as meter workers, meter readers, and linemen for the Company.
4. Intervenor and the Company have a collective bargaining agreement that is currently in effect until May 11, 2014. This collective bargaining agreement governs the wages, hours, and other conditions and terms of employment of the Intervenor's members who are employed by the Company.
5. Intervenor has 72 members who reside in New Hampshire. Many of these members are in the service area of the Company and are ratepayers and customers of the Company.

6. If the acquisition of Granite State is approved by the Public Utilities Commission, the collective bargaining agreement will remain in force and Liberty Energy Utilities will be bound to the terms of that agreement as the successor to National Grid.
7. The terms and conditions of employment of the Intervenor's members will be affected by the proposed transaction. Thus, the Intervenor and its members have a deep and abiding interest in the outcome of this proceeding.
8. The Intervenor and its members have an intimate working knowledge of the company, its capacity and its infrastructure. Their labor and knowledge will be critical to the success of the company going forward.
9. The Intervenor has important information and input to submit to the Commission concerning whether the proposed acquisition is in the public interest, on issues such as staffing levels, customer service, and the company's emergency response plan.
10. Further, permitting intervention by the Intervenor would be in the interest of justice and would not impair the orderly and prompt conduct of the proceedings.


Accordingly, the Intervenor respectfully requests that the Commission grant its petition to intervene in this matter.

Dated: April 7, 2011

Respectfully submitted,

IBEW LOCAL 326,

By its attorneys,


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