## State of New Hampshire Public Utilities Commission

## DG 11-040

National Grid, et al. Joint Petition For Authority To Transfer Ownership To Liberty Energy Utilities Corp.

## Petition For Intervention On Behalf of Pamela Locke

Petitioner, Pamela Locke, moves for leave to intervene in this proceeding pursuant to Puc 203.17 and RSA 541-A:32 and states as follows:

- 1. Petitioner, Pamela Locke, resides in Concord, NH.
- 2. Petitioner is a low income residential heating customer of Energy North Natural Gas, Inc., d/b/a, National Grid NH (the Company).
- 3. Petitioner receives service under the Company's low income residential R-4 heating rate.
- 4. Petitioner has an interest in this proceeding as a residential customer of the Company.
- 5. Petitioner seeks to assure in this proceeding that Liberty Energy Utilities

  Corporation agrees to maintain the R-4 heating rate if the Commission approves the proposed transfer of ownership requested in the Joint Petition For Transfer Of Ownership filed in this docket.
- 6. Petitioner was a full party intervenor in prior dockets pertaining to National Grid's R-4 heating rate, including the current National Grid rate case (DG 10-017) and the prior National Grid rate case (DG 08-009).

- 7. The rights, duties, privileges, and other substantial interests of Petitioner may be affected by this proceeding.
  - 8. Petitioner seeks to intervene as a full party intervenor herein.
- 9. The granting of this petition will not impair the orderly and prompt conduct of this proceeding.

Wherefore, Petitioner Pamela Locke requests that the Commission grant her leave to intervene as a full party intervenor in this proceeding and grant such other relief as may be reasonable and just.

Respectfully submitted,

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## Certification Of Service

I certify that on this date I hand delivered and emailed this Petition to the Commission and sent copies of this Petition by email to the Office of Consumer Advocate and to the parties on the service list in this docket.

New Hampshire Legal Assistance

Alan Linder

Attorney for Petitioner

4/15/// Date

4/15/11