

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DG 14-380

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES

TOWN OF DRACUT'S PETITION TO INTERVENE

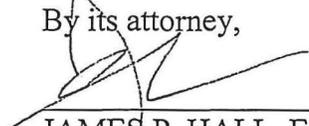
The Town of Dracut petitions for permission to intervene in this matter. As grounds, Dracut asserts:

1. The Town of Dracut is a municipality in Massachusetts with an approximate population of 35,000.00;
2. The Town of Dracut abuts Pelham, New Hampshire;
3. Dracut is a participating member of the Northern Massachusetts Natural Gas Pipeline Coalition (hereinafter "Coalition");
4. A major focus of the Coalition is to determine if the Region's natural gas needs can be met by alternatives to the Northeast Energy Direct proposal;
5. EnergyNorth has identified two other pipeline projects that could satisfy all or a portion of its design day capacity needs: Spectra's Atlantic Bridge project and TransCanda/PNGTS's C2C project;
6. The delivery of energy or the proposed delivery of energy through Dracut substantially impacts Dracut and Dracut's duties to its citizenry. Consistent with such impacts, on February 10, 2014, the Board of Selectmen voted to petition to intervene in this matter;
7. Energy delivery plans in the Northeast impact Dracut's citizenry, property values, preparedness, its fire department, and municipal services amongst other things.
8. Allowing Dracut to intervene would not impair the prompt conduct of the proceedings and would be in the public interest.

Accordingly, Dracut asserts that it has a substantial interest in this matter and requests that it be allowed to intervene.

TOWN OF DRACUT

By its attorney,

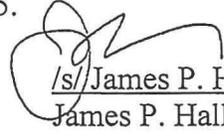


JAMES P. HALL, Esq.
Qua, Hall, Harvey & Walsh
25 Fletcher Street
Chelmsford, MA 01824
(978) 250-4255
NH BAR #14382

Date: February 11, 2015

CERTIFICATE OF SERVICE

I, James P. Hall, hereby certify that the foregoing document was served electronically to all the individuals on the service list. through the ECF system will be sent electronically to 11 addresses on the service list on 11 February 2015.


/s/James P. Hall
James P. Hall
