

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

**Docket No. DG 17-022**

**CITY OF CONCORD**

**Petition to Establish Oversight Protocols for  
Concord Steam's Abandonment of Manholes and Pipes  
and for Payment of Damage Costs**

**CONCORD STEAM CORPORATION'S OBJECTION TO**  
**CITY OF CONCORD'S MOTION FOR THE PUC**  
**TO ISSUE ORDERS**

NOW COMES Concord Steam Corporation ("Concord Steam" or "the Company"), by and through its undersigned attorneys, and respectfully objects to the City of Concord's Motion dated April 18, 2017 which requests that the New Hampshire Public Utilities Commission ("the Commission") issue an order in the above-captioned docket denying Concord Steam's Motion to Dismiss and granting the City of Concord's Petition to Establish Oversight Protocols For Concord Steam's Abandonment of Manholes and Pipes and for Payment of Damage Costs ("Petition for Oversight Protocols and Payment of Damages"). In support of this Objection, Concord Steam states as follows:

1. For the reasons set forth in Concord Steam's Motion to Dismiss filed February 8, 2017 in the above-captioned docket, all of which are expressly incorporated herein by reference, the Commission should dismiss the City of Concord's Petition with prejudice.

2. In the alternative, the Commission should dismiss the City of Concord's Petition as moot, for the reasons set forth below.

3. Mark Saltsman, Vice President of Concord Steam, has met with City Engineer Edward Roberge and other City Staff to discuss the issues raised in the City's Petition. Based on those conversations, Concord Steam has taken the following steps to address the bulk of the City's concerns expressed in its Petition:

A. Concord Steam has identified to the City Engineering Department all of the manholes which Concord Steam intends to discontinue using as well as the process that Concord Steam will use to fill the manholes.

B. Concord Steam has agreed to pay for the City's Engineer to monitor the closure of the manholes.

C. Concord Steam will be filing a for a street excavation permit this week for the entire manhole closure process, which includes a bond to cover damages.

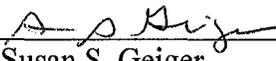
D. Concord Steam has agreed to pay the City for the repair of the sewer manholes that the City has identified as needing repair.

WHEREFORE, in view of the foregoing, Concord Steam Corporation respectfully requests that the Commission:

- A. Issue an order dismissing the City of Concord's Petition with prejudice; and
- B. Grant such further relief as it deems appropriate.

Respectfully submitted,

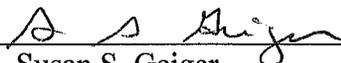
**CONCORD STEAM CORPORATION**  
By its Attorneys,  
**ORR & RENO, P.A.**

By:   
Susan S. Geiger  
45 South Main St.-P.O. Box 3550  
Concord, N.H. 03302-3550  
Telephone: (603) 223-9154  
Email: [ssg@orr-reno.com](mailto:ssg@orr-reno.com)

Dated: April 19, 2017

**Certificate of Service**

I hereby certify that on this 19th day of April, 2017, I caused a copy of this Objection to be delivered by electronic mail to persons named on the Service List in this docket.

  
\_\_\_\_\_  
Susan S. Geiger

1736497\_1