### STATE OF NEW HAMPSHIRE

### **DOCKET NUMBER DG 11-069**





## NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

RE: NORTHERN UTILITIES, INC. PETITION FOR RATE CHANGE

# PETITION OF UNITED STEEL WORKERS OF AMERICA LOCAL 12012-6 TO INTERVENE

NOT COMES, the Untied Steel Workers of America Local 12012-6, by and through their the 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 12012-6 is a duly authorized collective bargaining representative for certain employees of Northern Utilities, Inc.
- 2. The union members employed by Northern Utilities are citizens of the State of New Hampshire.
- 3. The union has been monitoring the progress of the Notice of Intent to File Rate Schedules 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. Further, the above cited union members have substantial financial interest in the evolution of the industry.
- 5. As a group of individual utility consumers, the Union has a substantial interest in these proceedings.
- 6. 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.

7. The Union, through its attorney, has contacted counsel for the Petitioner who expressed no objection to the Union's intervention.

WHEREFORE, the Union respectfully requests that the Commission consider this petition at its next scheduled meeting; and grant this petition, allow the Union to intervene as a party in this proceeding, and grant such other relief as deemed just and proper.

Respectfully Submitted

United Steelworkers Local 12012-6

By its Attorney

Law Offices of Shawn J. Sulfivan, PLLC

Shawn J. Sullivan, Esq. #6904

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# **CERTIFICATE OF SERVICE**

I, hereby certify that a copy of the foregoing was this day mailed, via first class mail postage prepaid, to the individuals and companies on the Commission's Service List in this proceeding.

Shawn J. Sullivan, Esq.