

Alexandra E. Blackmore Senior Attorney

February 23, 2007

VIA HAND DELIVERY & ELECTRONIC MAIL

Ms. Debra A. Howland Executive Director and Secretary New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Re: <u>DT 07-011; Petition to Intervene of Granite State Electric Company d/b/a National</u> <u>Grid</u>

Dear Ms. Howland:

On behalf of Granite State Electric Company d/b/a National Grid, I am submitting seven copies of a Petition to Intervene in the above-captioned proceeding.

Thank you for your attention to this matter. Please feel free to contact me at (508) 389-3243 with any questions.

Very truly yours,

Alexandra E. Blackmore

Alexandra E. Blackmore

enclosures

cc: Service List

STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DT 07-011

Joint Application of Verizon New England, Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, Verizon Select Services, Inc. and FairPoint Communications, Inc.

Petition to Intervene of Granite State Electric Company d/b/a National Grid

Granite State Electric Company, d/b/a National Grid ("National Grid") hereby respectfully petitions for intervenor status in the above-captioned proceeding pursuant to N.H. Code Admin. Rules Puc 203.17 and RSA 541-A:32. National Grid's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding. In support of this Petition, National Grid states the following:

- The Joint Application of Verizon New England, Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, Verizon Select Services, Inc. (collectively "Verizon") and FairPoint Communications, Inc. requests, among other things, that the Commission authorize the transfer of Verizon's local exchange and long distance telephone businesses in New Hampshire to FairPoint Communications, Inc. Joint Application at 2.
- 2. National Grid is a New Hampshire public utility providing electric distribution services to approximately 40,000 customers in New Hampshire. National Grid owns an undivided one-half interest in many of the utility poles, anchors and guys located within the franchise service territory served by both National Grid and Verizon. This service territory is divided roughly in half between Verizon and National Grid into regions known as maintenance areas. In their respective maintenance areas, Verizon

and National Grid each have responsibility for setting poles for new utility service, maintenance of poles and their rights of way, and emergency response to replace poles damaged by accidents or weather. The responsibilities of the two companies are governed by a Joint Ownership Agreement dated October 1, 1980 and amended on September 25, 2001 and Intercompany Operating Procedures dated August 1, 1993 and amended on September 25, 2001.

- 3. Verizon's transfer of ownership of its undivided one-half interest in its utility poles, anchors and guys to FairPoint Communications, Inc. has the potential to impact the quality of service that National Grid provides to its customers who reside in Verizon's maintenance area, and rely on Verizon for pole installations, replacements and repairs.
- 4. National Grid's interest in this proceeding is to ensure that Verizon's proposed transfer of ownership of its local exchange and long distance businesses, including its undivided one-half interest in utility poles, anchors and guys owned jointly with National Grid will not adversely impact the provision of reasonably safe and adequate and just and reasonable service to National Grid customers as required by RSA 374:1.
- 5. Granting of National Grid's Petition for Intervention would not impair the orderly and prompt conduct of the proceeding.

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WHEREFORE, National Grid respectfully requests full party intervenor status in this proceeding and requests such further relief as the Commission may deem just and equitable.

Respectfully submitted, Granite State Electric Company d/b/a National Grid *Aluandra E. Blackmere*

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Donald J. Pfundstein Gallagher, Callahan & Gartrell, P.C. P.O. Box 1415 Concord, NH 03302-1415 (603) 228-1181

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, a copy of the above Petition to Intervene was sent by first class mail to the persons named on the Service List in this proceeding.

Alexandra E. Blackmore

Dated: February 23, 2007

Alexandra E. Blackmore