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October 21, 2016

Via First-Class and Electronic Mail

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

**Re: Docket No. DG 16-827: Concord Steam Corporation Non-Governmental Customers
Joint Petition to Establish Interconnection/Transition Fund for Non-Governmental
Concord Steam Customers
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities Petition to
Intervene**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, enclosed please find an original and six copies of a Petition to Intervene in the above-referenced matter.

Staff's Motion to Dismiss, filed October 19, 2016, asserted that Liberty was attempting to convey information or its positions to the Commission regarding a rate proposal through a third party. That is not correct. Liberty is not making a rate proposal. The proposal was presented by the petitioners, not by Liberty.

Senator Feltes approached Liberty regarding the concept of creating a conversion assistance fund for some Concord Steam customers. Liberty indicated it would support creation of the fund if the petitioners agreed to include a provision discussing the Company's cost recovery of the fund. At Senator Feltes' request, Liberty updated the discounted cash flow analysis first presented as an exhibit in DG 16-770 to reflect the additional outlay of funding that the petitioners were proposing. Although the petition references discussions Liberty had with the Senator, it does not reflect an attempt by Liberty to convey information to the Commission through a third-party.

Liberty's willingness to provide funding, subject to approval of cost recovery, is driven by the unique circumstances of the Concord Steam situation. If the Commission approves Concord Steam's request to discontinue service in Docket No. DG 16-769 and the Asset

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Purchase Agreement in Docket No. DG 16-770, then Concord Steam will cease operation as of May 31, 2017, leaving customers with no source of energy for heating. To help alleviate the unanticipated financial consequences for customers as they convert to a new fuel, Liberty agreed to provide a source of funding for those customers, with that funding administered by a third party.

Should the Commission decide to address the merits of the petition, Liberty fully expected that the Order of Notice would have made Liberty a mandatory party to this docket, subject to discovery and cross-examination. To address one of Staff's concerns in its Motion to Dismiss, however, Liberty seeks intervention now. Staff's second concern, ripeness, will likely be rendered moot when the Commission issues orders in DG 16-769 and DG 16-770.

Thank you for your assistance. Please do not hesitate to call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Enclosures
cc: Service List