

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

Docket No. DG 16-827

Concord Steam Corporation Non-Governmental Customers

**Joint Petition to Establish Interconnection/Transition Fund for
Non-Governmental Concord Steam Customers**

Petition to Intervene of Liberty Utilities (EnergyNorth Natural Gas) Corp.
d/b/a Liberty Utilities

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“Liberty”), through counsel, respectfully moves the Commission to intervene in this docket pursuant to RSA 541-A:32 and Puc 203.17.

1. Petitioners are a state senator and Concord Steam customers who seek approval of a fund to help with their transition to natural gas.
2. An order on the merits of the petition may have an impact on Liberty’s distribution rates, thus Liberty’s “rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” RSA 541-A:32, I(b).
3. Liberty thus seeks intervention.

WHEREFORE, Liberty respectfully asks that the Commission:

- (a) Grant Liberty’s motion to intervene;
- (b) Grant such other and further relief as may be consistent with the public interest.

Dated: October 21, 2016

Respectfully Submitted,

Liberty Utilities (EnergyNorth Natural
Gas) Corp. d/b/a Liberty Utilities



By: _____

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Certificate of Service

I hereby certify that on this 21st day of October 2016, a copy of this Petition to Intervene has been sent electronically to the service list.



By: _____

Michael J. Sheehan