

**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**

Objection to Staff's Motion to Dismiss

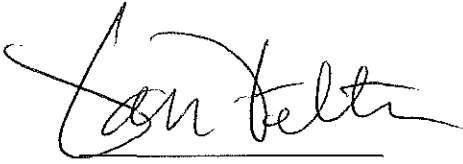
NOW COMES, State Senator Dan Feltes, District 15, in objection to the Motion to Dismiss filed by the Staff of the New Hampshire Public Utilities Commission (Commission) on October 19, 2016, and in support states as follows:

1. Liberty Utilities (Liberty) could and should be made a mandatory party to this proceeding, subject to Commission rules and practice, including discovery.
2. Moreover, on October 21, 2016, Liberty filed a Petition to Intervene in this matter, and that petition meets the standards for intervention set forth in RSA 541-A:32, I(b).
3. The *Joint Petition Establish Interconnection/Transition Fund for Non-Governmental Concord Steam Customers (Joint Petition)* is more than ripe, as it raises the unique and pressing transition and interconnection issues facing non-governmental Concord Steam customers right now.
4. Staff's Motion to Dismiss would force the unnecessary re-filing of the *Joint Petition*, resulting in the unwarranted delay of this docket's proceedings.
5. In light of the above, it is in the public interest to both deny Staff's Motion to Dismiss and to issue an Order of Notice to begin the proceedings in this docket.

WHEREFORE, the undersigned respectfully requests the Commission:

- 1.) Grant the Petition to Intervene by Liberty, or make Liberty a mandatory party;
- 2.) Issue an Order of Notice in this docket; and
- 3.) Grant such other relief as may be in the public interest.

Respectfully submitted,

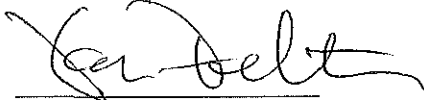


Dated: October 24, 2016

Dan Feltes
State Senate -- District 15
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Certificate of Service

I hereby certify that a copy of this Objection was emailed to the service list for dockets DG 16-769, DG 16-770 & DG-16-827 on this day, October 24, 2016.



Dan Feltes