STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

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

Rate Case

Docket No. DG 14-180

Iberdrola USA Enterprises, Inc.'s Petition to Intervene

Iberdrola USA Enterprises, Inc. ("Iberdrola"), in accordance with RSA 541-A:32 and NH Code Admin. Rule Puc 203.17, hereby petitions the New Hampshire Public Utilities Commission (the "Commission") for intervention in the above-captioned rate case of Liberty Utilities (EnergyNorth Natural Gas) Corp. ("Liberty"). In support of its petition, Iberdrola states as follows:

1. In Joint Testimony submitted by Steven E. Mullen and Howard S. Gorman in this proceeding on August 1, 2014, Liberty indicated that it may update its request in this Docket to include proposed rates for New Hampshire Gas Corporation's ("NHGC") customers in Keene that would take effect after the closing of the transaction that is currently before the commission in Docket No. DG 14-155 (the "Closing"). *See* Docket No. DG 14-180, Direct Testimony of S. Mullen and H. Gorman at p. 27, lines 6-9.

2. As Iberdrola is currently the owner of NHGC, its rights, duties, privileges, immunities and other substantial interests with respect to NHGC may be affected until the Closing.

3. Iberdrola's intervention will not impair the interests of justice and the orderly and prompt conduct of the proceedings in this docket.

WHEREFORE, Iberdrola respectfully requests that the Commission:

- A. Grant this Petition to Intervene;
- B. Grant such other relief as is just and equitable.

Respectfully Submitted,

David L. Schwartz David E. Pettit Latham & Watkins LLP 555 Eleventh Street, NW, Suite 1000 Washington, DC 20004 Tel: (202) 637-2200 Email: david.schwartz@lw.com david.pettit@lw.com

Counsel for Iberdrola USA Enterprises, Inc.

Dated: September 25, 2014

Certificate of Service

I hereby certify that a copy of this Petition to Intervene has been hand delivered to the

New Hampshire Public Utilities Commission and electronically served to the docket service list.

Dated at Washington, DC, this 25th day of September, 2014.

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David É. Pettit Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington, DC 20004 Tel: (202) 637-2200