

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No.: DG 15-155

Valley Green Natural Gas, LLC – Petition for Franchise Approval

CITY OF LEBANON'S PETITION TO INTERVENE

Now Comes the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, pursuant to NH Code of Administrative Rules PUC 203.17 and PUC 203.02 and New Hampshire Revised Statute Annotated 541-A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City of Lebanon (“City”) is a municipal corporation with an address of 51 North Park Street, Lebanon, New Hampshire 03766.
2. On May 15, 2015, Valley Green Natural Gas, LLC (“Valley Green”) filed a Petition for Franchise Approval with the New Hampshire Public Utilities Commission (“Commission”). An Order of Notice establishing the above-captioned docket was issued on July 6, 2015.
3. Valley Green proposes to provide re-gasified liquefied natural gas (LNG) through a pipeline distribution system to customers in Hanover and Lebanon, New Hampshire.
4. The City of Lebanon is responsible for implementing and enforcing regulations intended to provide for the safe and attractive development or change or expansion of uses of properties and to guard against such conditions as would promote danger or injury to health, safety, or prosperity; to provide for the harmonious and aesthetically pleasing development of the municipality and its environs; to provide

guidance and management for orderly municipal growth that allows for the appropriate provision of services to the citizens of the community; and to provide for prosperity and protection of property investments for the citizens of Lebanon.

5. The proposed re-gasification facility and bulk storage of LNG fuels are proposed to be constructed on property in Lebanon (Tax Map 26, Lot 17). The specific property is situated on a hillside above an industrial corridor comprising more than 20 business facilities. The clearing and grading of the property necessary to permit the construction and installation of the proposed facility has the potential to impact nearby properties, as well as wetlands and water resources adjacent to the site, due to inadequate drainage, flooding, or soil erosion. The proposed project also has the potential to impact the natural environment and the aesthetic character of the City based on its visible hillside location adjacent to +/-220 acres of City-owned conservation land as a result of noise, light, and other undesirable and preventable elements of pollution.

6. The City of Lebanon thus has an interest in making sure that it retains its full site plan review authority with respect to this project, and in opposing any request that the facility be exempted from such review by the PUC (*see Appeal of Milford Water Works*, 126 N.H. 127 (1985)).

7. The City of Lebanon is also responsible for public safety, emergency preparedness and response functions for incidents within the City. Liquefied natural gas (LNG) is typically transported in an unodorized condition. Transport of unodorized LNG poses a risk to public safety from trucks moving along heavily travelled corridors. Truck deliveries of unodorized LNG to the proposed facility would likely travel through Exit 18 of Interstate 89, which handles between 30,000 and 35,000 vehicles per day, and along NH Route 120, which handles approximately 29,000 vehicles per day on average.

Similarly, LNG is typically stored in an unodorized condition. Storage of unodorized LNG in populated areas poses a risk to public safety in that residents and employees of nearby businesses will be unable to detect a leak should one occur. The proposed project has the potential to impact the City by the inadequate provision of fire safety, prevention, and control measures.

8. Many of the potential customers of the Valley Green project will be located within Lebanon.

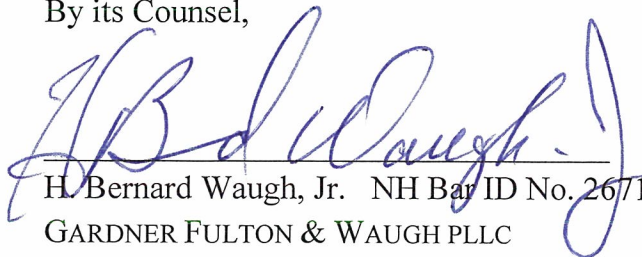
9. The City of Lebanon has a direct interest in the issues to be addressed by this docket and the City's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay in the Commission's proceedings, and will not prejudice the interest of any party.

WHEREFORE, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted this 22^d day of July, 2015.

CITY OF LEBANON

By its Counsel,

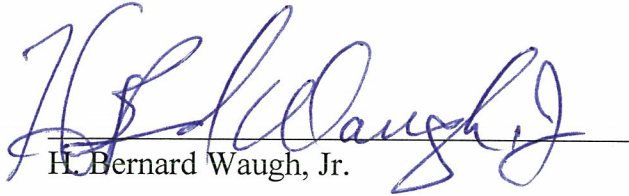


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Certificate of Service

I hereby certify that on this 22^d day of July, 2015, copies of the foregoing filing were sent by both regular and electronic mail to the Public Utilities Commission, and electronically to all persons listed on the Commission's on-line service list for Docket No. DG 15-155.


H. Bernard Waugh, Jr.