

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES

DOCKET NO.: DG 15-362

PETITION OF UNITED STEELWORKERS OF AMERICA
LOCAL 12012 TO INTERVENE

NOW COMES United Steelworkers of America Local 12012, by and through their attorneys, Law Offices of Shawn J. Sullivan, PLLC, and requests leave to intervene as a party in the above captioned matter, pursuant to Puc 203.17 and RSA 541-A:32 and in support thereof says as follows:

1. Local 12012 is the duly authorized collective bargaining representative for certain employees of the Liberty Utilities.
2. The union members employed by Liberty Utilities are citizens of the State of New Hampshire.
3. The Union has been monitoring the filings of the Petition for Approval and believes that the Commission may benefit from receiving certain fundamental information as gained through the experience of its employees who actually perform the services referenced in the filing.
4. In particular, the Union and its members have the ability to address issues of safety and efficiency as they relate to the natural gas industry.

5. As employees of the Petitioner, the Union members have contractual rights and duties which are affected by these proceedings.

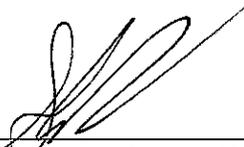
6. Further, the above cited Union members have a substantial interest in the evolution of the industry.

7. As individual consumers, the Union members have a substantial interest in these proceedings.

WHEREFORE, the Union respectfully requests that the Commission consider this Petition at its next scheduled meeting; grant this petition, allow the Union to intervene as a full party in this proceeding, and grant such other relief as is deemed just and proper.

Respectfully submitted,
United Steelworkers - Local 12012
By Its Attorneys
Law Offices of Shawn J. Sullivan, PLLC

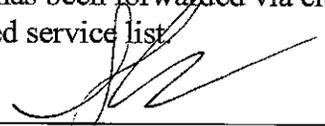
October 14, 2016



Shawn J. Sullivan, Esq. #6904
10 Ferry St., Box 12, Suite 317
Concord, NH 03301
(603) 225-3362

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition has been forwarded via electronic filing or via first class mail to all parties listed on the attached service list.



Shawn J. Sullivan

SERVICE LIST

Pradip K. Chattopadhyay
Office of Consumer Advocate
21 S. Fruit Street, Ste 18
Concord, NH 03301
Pradip.chattopadhyay@oca.nh.gov

Steve Mullen
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053
steven.mullen@libertyutilities.com

Gary Epler
Unitil Energy Systems, Inc
6 Liberty Lane West
Hampton, NH 03842-1720
epler@unitil.com

OCA Litigation
21 South Fruit Street. Ste 18
Concord, NH 03301
ocalitigation@oca.nh.gov

Stephen R. Hall
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053
Stephen.hall@libertyutilities.com

Michael Sheehan
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053
Michael.sheehan@libertyutilities.com

Maureen Karpf
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053
Maureen.karpf@libertyutilities.com

Karen Sinville-Dupuis
Liberty Utilities
Karen.sinville@libertyutilities.com

Donald M. Kreis
Office of Consumer Advocate
21 South Fruit Street, Ste 18
Concord, NH 03301
Donald.kreis@oca.nh.gov

Patrick H. Taylor
Unitil Energy Systems, Inc
6 Liberty Lane West
Hampton, NH 03842
taylorp@unitil.com

Brian McCarthy
Town of Pelham
6 Village Green
Pelham, NH 03076
selectmen@pelhamweb.com