

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DOCKET NO. DG 16-___

**PETITION OF NORTHERN UTILITIES, INC. FOR LICENSE TO CONSTRUCT AND
MAINTAIN A DISTRIBUTION GAS MAIN ACROSS PUBLIC WATERS**

Northern Utilities, Inc. (“Northern”) respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) pursuant to RSA 371:17 for a license to construct and maintain a natural gas distribution main over public waters owned by the State of New Hampshire. In support of this Petition, Northern states as follows:

1. Northern is a public utility providing natural gas service to customers in twenty one (21) municipalities in the southeastern and seacoast regions of New Hampshire. Specifically relevant to this petition, Northern owns and operates natural gas distribution facilities regulated by the Commission within franchise areas previously approved by the Commission, including the City of Dover (“Dover”).

2. Northern currently operates a natural gas distribution main in Dover, NH within the portion of Whittier Street between that crosses the Cocheco River. The existing main, which has been in place since 1982, crosses the Cocheco River along the underside of the Whittier Street Bridge.

3. The Whittier Street Bridge is currently listed on the State of New Hampshire’s “Red List” of troubled municipally-owned bridges and is scheduled for replacement by Dover beginning in the spring of 2016.

a. Temporary Gas Distribution Main and Bridge

4. During the replacement of the Whittier Street Bridge, a process that will entail the removal of the existing bridge and the construction of a new bridge, Northern's gas distribution main will be temporarily relocated to a temporary utility pipe bridge across the Cocheco River located to the southeast of the exiting Whittier Street Bridge location. The portion of the gas distribution main to be attached to the temporary bridge is approximately 300 feet in length, and will be connected to the existing Whittier Street gas main on each side of the bridge. The gas distribution main will remain attached to the temporary bridge for the period of time that is required by Dover to replace the Whittier Street Bridge.

5. The temporary gas main bridge will be constructed consistent with the design specifications attached hereto as Attachment A.

6. The construction of the temporary gas main bridge and temporary relocation of Northern's gas distribution main is necessary for the continued provision of natural gas service to customers on both sides of the Cocheco River in Dover during the replacement of the Whittier Street Bridge. To continue to provide natural gas service to customers in Dover, Northern respectfully requests a license, pursuant to RSA 371:17, to construct and maintain a temporary gas pipeline and supporting bridge over the Cocheco River, to the extent such a license is necessary.

a. Permanent Gas Distribution Main and Bridge

7. Following the construction of the new Whittier Street Bridge, Northern will relocate its gas distribution main from the temporary gas main bridge to the new permanent structure, consistent with the design specifications attached hereto as Attachment B.

8. The construction of construction of a permanent gas distribution main across the Cocheco River in connection with the Whittier Street Bridge is necessary for the continued provision of natural gas service to customers on both sides of the Cocheco River in Dover.

9. As explained above, Northern already operates a gas distribution main that is attached to the existing Whittier Street Bridge in Dover. Thus, it is unclear as to whether Northern requires a license pursuant to RSA 371:17 to cross the Cocheco River via attachment to the new Whittier Street Bridge. However, because the new bridge, upon information and belief, will have a different design than the existing bridge, and because Northern will utilize new materials in constructing the replacement portion of the gas distribution main that will cross the river, Northern now requests such a license to the extent that one is necessary.

10. Northern believes that the Commission licenses requested above will be exercised without substantially affecting public rights in affected waters. The existing Whittier Street Bridge has been constructed and in place for years, and the temporary and permanent mains described above will not present any permanent impediment to vehicle and foot traffic on the bridge¹ or marine traffic on the River. The new gas main will not impose any additional burden upon the public interest and it will allow Unitil to continue the natural gas service that it already provides to customers on both sides of the Cocheco River.

11. Upon information and belief, construction of the new Whittier Street Bridge, including the dismantling of the existing bridge, may begin as early as April 2016. As such, Northern respectfully requests that the Commission grant the requested licenses on an expedited basis.

¹ Vehicle and foot traffic will presumably be halted during the period of time that it takes to replace the Whittier Street Bridge; this is in no way related to Northern's activities.

WHEREFORE, Northern respectfully requests that the Commission:

- A. Find that the license for construction and maintenance of a temporary natural gas main and supporting bridge over the Cocheco River to the southeast of the existing Whittier Street Bridge in Dover may be exercised without substantially affecting public rights in State waters;
- B. Find that the license for construction and maintenance of a permanent natural gas main over the Cocheco River along the new Whittier Street Bridge in Dover may be exercised without substantially affecting public rights in State waters;
- C. Grant Northern a license to construct and maintain a temporary natural gas main and supporting bridge over the Cocheco River to the southeast of the existing Whittier Street Bridge in Dover;
- D. Grant Northern a license to construct and maintain a permanent natural gas main and supporting bridge over the Cocheco River along the new Whittier Street Bridge in Dover; and
- C. Issue an order *nisi* and orders for its publication.

Dated at Hampton, NH on this 22nd day of April, 2016.

Respectfully submitted,

Northern Utilities, Inc.

By Its Attorney,



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STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

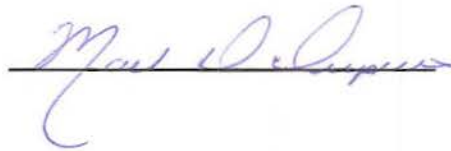
Petition for a License To Cross Public Waters)
Northern Utilities, Inc., Petitioner) DG 16-_____
)

AFFIDAVIT

Mark D. Dupuis, having been duly sworn, states under oath as follows:

1. I am over eighteen years of age; I am competent to provide this affidavit; and I have personal knowledge of the facts set forth below.
2. I am employed by Unitil Service Corp. ("USC") as Gas Engineer.
3. USC is a corporation providing services to the subsidiaries of Unitil Corporation, a New Hampshire corporation.
4. Northern Utilities, Inc. is a wholly owned subsidiary of Unitil Corporation.
5. I am familiar with the facts of this proceeding.
6. The facts alleged in the Petition of Northern Utilities for a License to Cross Public Waters, dated April 22, 2016, and the Attachments appended thereto, are true and correct to the best of my knowledge and understanding.

DATED this 22nd Day of April, 2016.



STATE OF NEW HAMPSHIRE)
COUNTY OF ROCKINGHAM) :ss

On this 22nd Day of April, 2016, then personally appeared before me Mark D. Dupuis, the signer of the above instrument, who duly acknowledged to me that he executed the same.



Notary Public
Residing in Rockingham County

CELINE COTE
NOTARY PUBLIC
State of New Hampshire
My Commission Expires
August 14, 2018

My Commission Expires: