

STATE OF NEW HAMPSHIRE

before the

PUBLIC UTILITIES COMMISSION

DG 16-769

Concord Steam Corporation,
Petition for Emergency Rates and Discontinuation of Service;

and

DG 16-770

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities
& Concord Steam Corporation,
Joint Petition for Approval of an Asset Purchase Agreement

STATE OF NEW HAMPSHIRE DEPARTMENT OF ADMINISTRATIVE SERVICES'
PETITION TO INTERVENE

NOW COMES the State of New Hampshire Department of Administrative Services (DAS), through counsel the Office of the Attorney General, and pursuant to N.H. Code of Admin. Rules Puc 203.17 and RSA 541-A:32, respectfully petitions to intervene in the above-captioned proceedings as a full party. In support of this petition, DAS states the following:

1. DAS is an agency of the State of New Hampshire (the "State") charged with managing and coordinating a broad range of administrative and financial functions, including management of the State's property and physical plant and oversight of State facility energy cost reduction.

2. DAS has a substantial interest in the issues cited by the Commission in its July 26, 2016 Orders of Notice in Dockets DG 16-769 and DG 16-770 regarding the proposed discontinuance of service by Concord Steam Corporation (Concord Steam), requested emergency rates, and the proposed sale of certain assets by Concord Steam to Liberty Utilities.

3. DAS is the largest customer of Concord Steam, contracting for heating services for 26 state buildings housing over 1800 state employees, including the State House and the Legislative Office Building. Transitioning 26 state buildings, many of which are large and/or historic buildings, to an alternative heating source poses a substantial challenge for the State, both technically and financially. In addition, the State is the owner of the steam generating facility operated by Concord Steam through a License for Use of Premises with DAS.

4. The proposed discontinuance of service by Concord Steam, the requested emergency rate increase of over 20%, and the proposed sale of certain assets to Liberty Utilities are all interrelated and will have a direct and substantial impact on the State.

5. DAS' intervention in these related dockets would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings. If allowed to intervene, DAS will abide by the Commission's rules and procedural schedule developed in this docket and make every effort to work collaboratively with the Staff and other parties.

WHEREFORE, DAS respectfully requests that this Honorable Commission grant this Petition and allow DAS to intervene as a full party in these proceedings, and to grant such other relief as the Commission finds just and proper.

Respectfully submitted,

STATE OF NEW HAMPSHIRE
DEPARTMENT OF ADMINISTRATIVE
SERVICES

by its attorney,

Joseph A. Foster
Attorney General

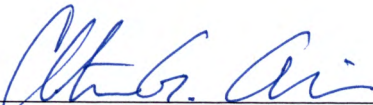


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Dated: August 24, 2016

Certificate of Service

I hereby certify that a copy of the foregoing Petition has been sent by e-mail this day to the members listed on the service lists in dockets DG 16-769 & DG 16-770.



Christopher G. Aslin, Esq.

Dated: August 24, 2016