

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION
DG 16-852**

**Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Petition for Expansion of Franchise to the Town of Hanover and City of Lebanon,
New Hampshire
Petition for Intervention by Devin Wilkie and Samantha White**

Pursuant to the Commission's Order of Notice dated February 16, 2017, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, we, Devin Wilkie and Samantha White, hereby respectfully petition to intervene in this proceeding as a party, with rights as such to the full extent allowed by law. The Order of Notice, posted on February 16, 2017, specified "on or before March 21, 2017" as the appropriate time to submit petitions to intervene.

In support of our petition, we state:

1. The petitioners Devin Wilkie and Samantha White are New Hampshire citizens residing at 33 Pleasant #44, W. Lebanon, NH and 10 High St., Apt. 1, Lebanon, NH, respectively. Mr. Wilkie is intervening as an individual, but also on behalf of the Upper Valley Young Liberals, whose mission is to foster and encourage cultural, civic, and political participation among young adults in the Upper Valley. Eight members of the UVYL steering committee are Lebanon residents.
2. The petitioners are customers of Liberty Utilities (Liberty), and reside within the area into which Liberty is petitioning to expand.
3. On December 21, 2016, Liberty commenced this proceeding by filing a petition, which states "Liberty Utilities will build out the underground pipeline system over a number of years, from south to north, ultimately reaching all areas of Hanover and Lebanon that it can economically serve." As set forth in the Order of Notice, the proceeding will consider issues of public safety; the keeping of accounts and records; whether the proposal is in the public good; whether the proposal comports with the New Hampshire Energy Policy; and whether Liberty would be required to petition the Commission for a license to cross public waters within its proposed franchise territory, as part of its construction of its distribution network. As residents of Lebanon, a part of the targeted service area and the town in which the trucked gas will be delivered to the proposed LNG depot, we have a direct and substantial interest in the matters being considered and the outcome of this proceeding. Intervention will allow us to protect our substantial interests in this proceeding, both as potential new Liberty gas customers and residents of Lebanon affected by the safety, environmental and other impacts of this proceeding.

4. Pursuant to Puc 203. 17, "[t]he commission shall grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32."
5. Under N.H. R.S.A. 541-A:32 1(b) and (C), a petition to intervene must be granted if the petitioner states facts demonstrating how his/her rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petition otherwise qualifies under the law), and the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. Under N.H. R.S.A.541-A:32 II, the Commission *may* grant a petition to intervene "at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings." This petition meets both standards given the petitioners' substantial interests in this proceeding as residents in the projected service area who would be directly affected by the outcome: justice requires intervention and there is no reason that such intervention, particularly as it is timely, should impair the orderly conduct of the proceedings.

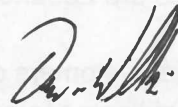
WHEREFORE, for the reasons expressed, the petitioners respectfully request that the Commission

- A. Grant this petition and allow the petitioners to intervene in this proceeding as a Party, with all rights as such to the full extent allowed by law; or
- B. Schedule a hearing on this matter; and
- C. Grant such other and further relief as is just, lawful and otherwise appropriate.

Respectfully submitted,

/s/

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March 16, 2017

CERTIFICATE OF SERVICE

We, Devin Wilkie and Samantha White, certify that on this date, in accordance with Puc 203.11, an original and 6 copies of this petition were sent by registered mail to the Executive Director of the Public Utilities Commission and a copy has been sent electronically to the persons in the Commission's service list.