

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

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

DOCKET NO.: DG 17-198

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 as determined by the National Labor Relations Board.
2. Certain Union members employed by Liberty Utilities are citizens of the State of New Hampshire.
3. In particular, Union Local Treasurer, David Bellisola resides at 6 Datillo Road in Derry, NH 03038.
4. 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.
5. 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 and the subject pipeline.

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

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

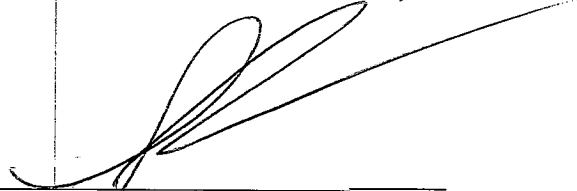
8. As individual consumers, certain Union members have a substantial interest in these proceedings.

9. The Union has participated in prior PUC matters involving the Petitioner.

10. The Union, through its attorney, has contacted counsel for the Petitioner to notify him of the requested intervention and has received assent thereto.

WHEREFORE, the Union respectfully requests that the Commission 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



March 28, 2018

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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.



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Docket #: 17-198-1 Printed: March 26, 2018

FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
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21 S. FRUIT ST, SUITE 10
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.

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SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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