

**THE STATE OF NEW HAMPSHIRE**

**PUBLIC UTILITIES COMMISSION**

**DOCKET NO. DG 18-094**

**NORTHERN UTILITIES, INC.**

**Petition for Authority to Operate in the Town of Epping**

**MOTION FOR INTERVENTION**

NOW COMES the Town of Epping (“the Town” or “Epping”), New Hampshire, by and through its attorneys, Donahue, Tucker & Ciandella, PLLC, and submits this Motion for Intervention in the above-referenced matter, and in support thereof states as follows:

1. On June 4, 2018, Northern Utilities, Inc. (“NU”) filed a petition with the Public Utilities Commission (“the Commission”) for authority to provide natural gas services to the Town pursuant to RSA 374:22.

2. Pursuant to RSA 541-A:32 and Rule PUC 203.17, the Town of Epping moves to intervene in this matter. As Epping is the municipality in which the natural gas distribution services are to be provided, Epping’s rights, duties, privileges, immunities and other substantial interests may be affected by NU’s proposal.

3. The Town of Epping’s rights, duties, privileges, immunities, and other substantial interests may be affected by NU’s proposal because NU’s proposal will involve the construction of six miles of new main, including three of the most frequently used roads in the Town – Route 27, Route 125, and Main Street – for the purported benefit of Epping’s business and residents. As such, NU’s proposal directly implicates the rights of the Town’s residents, taxpayers, and businesses.

4. Further, NU's proposal is anticipated to impact the Town's tax base and municipal resources, as the Town anticipates that any construction activities will require consultation and coordination with the Town's various departments.

5. Further, the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing intervention.

6. In addition to the undersigned counsel, the following individual(s) should be included on the service list for this docket, and all communications should be sent to:

Gregory Dodge  
Town Administrator  
Town of Epping  
157 Main Street  
Epping, NH 03042  
(603)679-8288  
[administrator@townofepping.com](mailto:administrator@townofepping.com)

WHEREFORE, the Town of Epping respectfully requests that the Public Utilities Commission to:

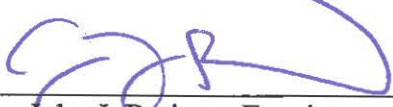
- A. Allow it to intervene in the above-captioned matter; and,
- B. Grant such other relief as the Commission deems just and necessary.

Dated this 22<sup>nd</sup> day of June, 2018.

Respectfully submitted,  
TOWN OF EPPING

By its attorneys:  
DONAHUE, TUCKER & CIANDELLA, PLLC

By: \_\_\_\_\_

  
John J. Ratigan, Esquire  
NHBA # 4849  
Eric A. Maher, Esquire  
NHBA # 21185  
PO Box 630  
Exeter, NH 03833

(603) 778-0686  
[jratigan@dtclawyers.com](mailto:jratigan@dtclawyers.com)  
[emaier@dtclawyers.com](mailto:emaier@dtclawyers.com)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pleading has this 22<sup>nd</sup> day of June, 2018 been sent via e-mail only to all parties reflected on the Service List in this matter.

Eric Maher (by JSR)  
Eric A. Maher