

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Northern Utilities, Inc.

Docket No. DG 18-094

Petition for Authority to Operate in the Town of Epping

Petition to Intervene of Liberty Utilities (EnergyNorth Natural Gas) Corp.

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities (“Liberty”), through counsel, respectfully moves the Commission pursuant to RSA 541-A:32 and Puc 203.17 to allow Liberty to intervene in this matter because Liberty intends to compete for the franchise to provide natural gas distribution service in Epping.

In support of this petition, Liberty states as follows:

1. Liberty is a public utility that provides natural gas distribution service to more than 90,000 customers in New Hampshire.
2. On June 5, 2018, Northern Utilities, Inc. (“Northern”) filed a petition requesting the franchise to serve the Town of Epping. The Commission opened this docket to consider Northern's request.
3. The Commission issued an Order of Notice scheduling a prehearing conference for July 24, 2018, and setting a July 20, 2018, deadline for filing petitions to intervene. Liberty now seeks to intervene.
4. The Commission must grant intervention to a petitioner who “states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under

any provision of law,” and if “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.” RSA 54 I-A:32, I.

5. Liberty’s Granite Bridge Project¹ includes a proposed pipeline to be constructed within the energy infrastructure corridor of Route 101 that would connect Liberty’s distribution system in Manchester with an existing pipeline in the Seacoast area. *See* RSA 162-R. The new pipeline would pass through a number of towns, including Epping. The Granite Bridge Project also includes a proposed liquefied natural gas (LNG) storage facility to be sited in Epping.

6. Since Epping is not currently served by a natural gas utility, Liberty has expressed its intent to seek the franchise to serve Epping since announcing the Granite Bridge Project in 2017, both in Docket No. DG 17-198 and in public discussions. Liberty’s preliminary analysis shows that offering service to Epping off the proposed Granite Bridge pipeline would be economical.

7. On July 16, 2018, the Epping Board of Selectmen approved a request for proposals (“RFP”) from utilities to compete for Epping’s recommendation to be its utility of choice to provide natural gas distribution service. Liberty intends to respond to the RFP and, if selected by Epping, Liberty intends to file a franchise request with the Commission.

8. Liberty’s intent to compete for the franchise to serve Epping satisfies the above requirement that Liberty must demonstrate “rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” Liberty’s participation will not impair the proceedings of this docket.

WHEREFORE, Liberty respectfully requests that the Commission

- a. grant this motion to intervene; and
- b. grant such further relief as may be just and equitable.

¹ *See* Docket No. DG 17-198.

Respectfully submitted,

LIBERTY UTILITIES (ENERGYNORTH NATURAL
GAS) CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



Date: July 20, 2018

By: _____

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Certificate of Service

I hereby certify that on July 20, 2018, a copy of this motion has been electronically sent to the service list in this docket.



Michael J. Sheehan