

**BEFORE THE PUBLIC UTILITIES COMMISSION
STATE OF NEW HAMPSHIRE**

DE 19-120

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.

2019 Least Cost Integrated Resource Plan

CITY OF LEBANON PETITION TO INTERVENE

Now Comes the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, in response to the Order of Notice issued by the PUC on 8/30/19 in this matter and pursuant to NH Code of Administrative Rules Puc 203.2 and Puc 203.17 and NH RSA 541:A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City is a municipal corporation and subdivision of the State of New Hampshire with an address of 51 North Park St., Lebanon, NH 03766.
2. The City is an electric customer of Liberty Utilities with approximately 85 meters and accounts and purchases and consumes approximately 4-5 million kWh per year. As such the City has an interest in Liberty’s Least Cost Integrated Resource Planning.
3. The City is participating in a number of related PUC proceedings, including IR-15-296, DE 16-576, DE 17-189, and DE 19-064, that latter 3 as an intervenor.
4. The City has a substantial interest in the issues to be addressed by this docket and the City’s intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay, and will not prejudice the interest of any party.

WHEREFORE, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

Respectfully submitted this 19th day of September 2019.

City of Lebanon, by its Assistant Mayor

A handwritten signature in black ink that reads "Clifton Below". The signature is written in a cursive, slightly slanted style.

Clifton Below