

STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

Docket No. DT 23-103

CONSOLIDATED COMMUNICATIONS HOLDINGS, INC. AND
CONDOR HOLDINGS, LLC

JOINT PETITION TO APPROVE TRANSFER OF CONTROL

Petition to Intervene

NOW COME the International Brotherhood of Electrical Workers, AFL-CIO, (“IBEW”), Second District, and IBEW, Local 2320 (“Local 2320” or the “Local”), collectively referred to herein as the “Union,” pursuant to N.H. Rev Stat § 541-A:32, and the N.H. Code of Admin. Proc. Puc 203.1, and hereby petition the New Hampshire Public Utilities Commission for leave to intervene as parties in the above-captioned matter. The Commission should grant this request because the rights, privileges and other substantial interests of the Union and its members may be directly affected by the Commission’s actions in this proceeding.

In support of this Petition, the Union states as follows:

1. The Union is a labor organization that serves as the exclusive bargaining representative of more than 300 employees of Consolidated Communications, Inc. (“CCI” or the “Company”) in the State of New Hampshire and is party to a collective bargaining agreement with CCI that is in effect until August 9, 2025, which agreement will be impacted by a transfer of control from CCI to another entity.
2. In addition to working for CCI, the far majority of the employees represented by the Union are CCI customers and thus are doubly impacted by the issues raised in the Petition.

3. The Union has a substantial interest in the outcome of the proceeding and is in a unique position to inform the Commission's determination in this matter as the Union and its members are on the front lines of the work performed by the Company. In this regard, the Union and its members provide services to the people of New Hampshire on behalf of CCI and have seen first-hand the way that the Company deploys its shrinking resources in the state of New Hampshire to provide such services. Indeed, since CCI took over operations from FairPoint Communications in 2017, CCI has eliminated approximately 99 jobs, or 23.5 percent of the IBEW unionized workforce, in the State of New Hampshire. The Union is thus compelled to seek intervention in order that the Commission may benefit from real-time information from a party in interest with regard to the crucial matters of workforce deployment, safety and readiness in the State of New Hampshire.

4. In light of the foregoing, the Union and its members have a direct and substantial interest in the subject matter of this proceeding; the Commission's determinations in this proceeding will have a direct impact on the rights, duties and privileges of the Union and its members; and no other party to this proceeding will be able to adequately represent the interests of the Union and its members.

5. The Union therefore respectfully requests that the Commission grant this Petition to Intervene and accord to the District and the Local full party status. The Union seeks the opportunity to participate in this proceeding to the fullest extent permitted, including, if applicable, by submitting testimony, cross-examining witnesses, engaging in discovery, and filing briefs.

WHEREFORE, for the foregoing reasons, the Second District and Local 2320 respectfully request that the Commission grant their Petition to Intervene as a full party to this proceeding with all rights attendant thereto.

Respectfully submitted,

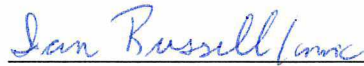


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Date: February 9, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-document was served on this date via email to the service list in this proceeding.



Ian O. Russell