

**EXHIBIT "A"**

Jonathan Chaffee  
21 Highland Avenue  
West Lebanon, NH 03784  
March 23, 2018

Via email to [executive.director@puc.nh.gov](mailto:executive.director@puc.nh.gov) and [puc@puc.nh.gov](mailto:puc@puc.nh.gov)

Debra Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**RE: DG 16-852 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Petition for Expansion of Franchise to the Town of Hanover and City of Lebanon**

Dear Ms. Howland:

This is a request for information pursuant to Puc 104, Puc 201.07 and RSA 91-A:4.

I request copies of all documents that Liberty Utilities has submitted in the above-captioned docket in response to [Order No. 26,109](#) Approving Settlement Agreement with Conditions and Granting Franchise. In that order, the Commission found that

*... Liberty's request goes too far in seeking to protect the entirety of those documents. Ms. Arwen and Dr. Chaffee adequately demonstrated that some of the information is publicly known and that some of the information is sufficiently aggregated so as not to affect the privacy interests of any party. We find that most of the privacy interests and competitive harm raised by Liberty could be resolved simply by redacting potential customers' names from the documents. In addition, while third-party advisors have an interest in protecting proprietary information and closely guarded methodologies, the fatal-flaw analysis is based primarily on publicly known information about the area and the Lebanon Landfill, and the property appraisal report is based primarily on public land records.*

The Commission directed Liberty as follows:

*Because Liberty's request is over-inclusive, we direct Liberty to refile the documents with the appropriate redactions and a revised motion for protective treatment within 15 days of this order. Following that filing, other parties will be allowed 10 days to file objections.*

More than 15 days have elapsed since the Commission's Order was issued and I have received none of the documents referenced in it. It appears that Liberty is already in violation of at least one of the conditions of the Order. I look forward to your response.

Sincerely,

/s/Jonathan Chaffee  
Jonathan Chaffee



**EXHIBIT “B”**

THE STATE OF NEW HAMPSHIRE

CHAIRMAN  
Martin P. Honigberg

COMMISSIONERS  
Kathryn M. Bailey  
Michael S. Giaimo

EXECUTIVE DIRECTOR  
Debra A. Howland



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March 23, 2018

Jonathan Chaffee  
[Jonathan.chaffee@valley.net](mailto:Jonathan.chaffee@valley.net)

Re: Request for Information RSA 91-A  
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
DG 16-852 Petition to Expand Franchise to the Town of Hanover and  
the City of Lebanon

Dear Mr. Chaffee:

We have received your email dated today, March 23, 2018, requesting disclosure of material contained in a Liberty Utilities filing required by Order No. 26,109 (March 5, 2018). The Commission has not received the additional filing by Liberty, required by Order No. 26,109.

As soon as we receive Liberty's filing we will forward it to you. You appear to be an intervenor in Docket DG 16-852, and therefore you should also receive the filing by Liberty directly when it is made.

Please feel free to contact me should you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Anne Ross".

F. Anne Ross, Esq.  
General Counsel

cc: Nancy Smith, Esq.  
Claire Howard-Pike