

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

**DE 13-059**

**RESIDENT POWER NATURAL GAS & ELECTRIC SOLUTIONS, LLC**

**DE 13-0606**

**PNE ENERGY SUPPLY, LLC**

**Investigation and Show Cause Hearing on Penalties and Suspension or Revocation of  
Aggregator and CEPS Registrations and Order that PNE Temporarily Cease Enrolling  
New Customers**

**MOTION FOR BRIEF EXTENSION OF TIME TO PROVIDE DOCUMENTS TO  
COMMISSION STAFF**

Resident Power Natural Gas & Electric Solutions, LLC (“Resident Power”) and PNE Energy Supply, LLC (“PNE”) (collectively referred to as the “Movants”), hereby move for a brief extension of the time to provide Commission’s Staff with documents. In support of the Motion, the Movants state as follows:

1. By Order of Notice issued on February 28, 2013, the Commission ordered Movants to produce information and documents to Staff no later than 9:00 a.m. on March 7, 2013. The Order requested eleven (11) categories of documents that encompass customer lists, financials, and other confidential corporate records. See Order, pp. 6-7.

2. Since receipt of the Order, Movants have been working diligently to marshal, organize and provide all of the requested documents. However, given the large volume of materials at issue, and the fact that Movants have recently retained Hinckley, Allen & Snyder LLP, Movants request an extension of the current March 7 deadline to respond. Specifically, Movants request that the deadline be established as 9:00 a.m., Tuesday, March 12, 2013.

3. This brief extension will not serve to prejudice Staff and will serve to ensure that Movants will have the opportunity to fully comply with each of the requests in the Order.

4. Movants' counsel discussed this request with the Director of the Legal Division, Attorney Shulock. He did not indicate Staff's position on this Motion.

Wherefore, Movants respectfully request that the Commission grant this motion and extend the time for providing the ordered documents until 9:00 a.m., Tuesday, March 12, 2013.

Respectfully submitted,

RESIDENT POWER NATURAL GAS &  
ELECTRIC SOLUTIONS, LLC and  
PNE ENERGY SUPPLY, LLC

By their attorneys,

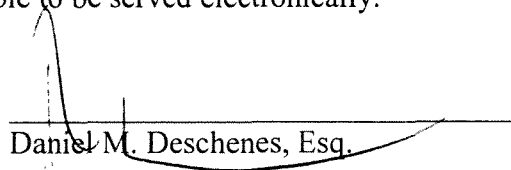


Dated: March 6, 2013

Christopher H.M. Carter (#12452)  
Daniel M. Deschenes (#14889)  
Hinckley, Allen & Snyder LLP  
11 South Main Street, Suite 400  
Concord, NH 03301  
Tel: 603.225.4334  
ccarter@haslaw.com  
ddeschenes@haslaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the above date I have forwarded a copy of the foregoing to the Office of Consumer Advocate via electronic mail, and persons listed on the service list via electronic mail, and U.S. mail for those unable to be served electronically.



Daniel M. Deschenes, Esq.