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P.R.U.C. Case No.	DG 14-380
Subj. No.	1
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LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES
Docket No.: DG 14-380

Respondent: Richard Kanoff
Title: Counsel

RECORD REQUEST:1 Produce an affidavit from Pipe Line Awareness Network for the Northeast, Inc. ("PLAN") attesting that its membership includes customers of the Company.

DATED: February 13, 2015

REPLY: See attached affidavit which states in relevant part that PLAN has members that are "Liberty customers/ratepayers."

PLAN respectfully requests it be allowed to intervene in the above docket as a full participant in the proceeding.

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

Docket No.: DG 14-380

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES**

Petition for Approval of Long-Term Firm Transportation Agreement

**AFFIDAVIT OF KATHRYN R. EISEMAN ("AFFIDAVIT") ON BEHALF
OF PIPE LINE AWARENESS NETWORK FOR THE NORTHEAST, INC. ("PLAN")**

I, Kathryn R. Eiseman, in my capacity as President of Pipe Line Awareness Network for the Northeast, Inc. ("PLAN"), hereby state under oath as follows:

1. I am the President of PLAN and am duly authorized to execute this Affidavit on behalf of PLAN.
2. As President of PLAN, I maintain a listing of each of the individuals and organizations that make up the membership of PLAN. As part of my responsibilities, I have access to accurate records with regard to each of PLAN's members, including but not limited to their (i) physical addresses and information relevant to their status as customers/ratepayers of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty"); and/or (ii) ownership/ownership rights with respect to land in New Hampshire that Tennessee Gas Pipeline Company, LLC ("Tennessee") proposes to use in the construction of Tennessee's Northeast Energy Direct pipeline project ("NED").
3. PLAN has members in New Hampshire whose rights, duties, privileges and interests will be substantially affected by the outcome of this proceeding because PLAN has (i) members who are Liberty customers/ratepayers and (ii) members who own land in New Hampshire that Tennessee proposes to use in the construction of NED.

4. All of the information set forth herein is true and accurate to the best of my knowledge and belief.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 17th DAY OF FEBRUARY,
2015.



Name: Kathryn R. Eiseman
*President, Pipe Line Awareness
Network for the Northeast, Inc.*

Subscribed and sworn to before me this 17th day of February, 2015.


Notary Public

My Commission Expires: June 13, 2019



CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February, 2015, a true and correct copy of the foregoing **AFFIDAVIT OF KATHRYN EISEMAN, PRESIDENT, PIPE LINE AWARENESS NETWORK OF THE NORTHEAST, INC.** was electronically served upon each individual or organization with the electronic mail address as indicated below:

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Richard A. Kanoff