

Freedom Logistics, LLC d/b/a Freedom Energy Logistics
Petition for Authorization Pursuant to RSA 362-A:2-A,II
for a Purchase of LEEPA Output by the Private Sector

Docket No. DE 15-068

FEL'S MOTION TO STAY PROCEEDING

NOW COMES Freedom Logistics, LLC d/b/a Freedom Energy Logistics ("FEL") by its attorney, and hereby affirmatively moves this Commission to grant Eversource's pending Motion to Stay ("Motion"), and separately, moves the Commission to stay this proceeding for the reasons stated hereinafter, and in support hereof, says as follows:

1. Eversource, *inter alia*, filed a Motion to Stay this proceeding on June 26, 2014. Liberty Utilities and Unitil Energy Systems, Inc. concurred in this Motion.

2. In its Motion to Stay, Eversource requested the Commission to stay this proceeding until the Commission rules on Eversource's Motion to Dismiss.

3. No other party, including FEL, has objected to Eversource's Motion to Stay. Accordingly, that Motion should be granted.

4. By this Motion, FEL affirmatively moves this Commission to grant the Eversource Motion to Stay.

5. Moreover, FEL also separately moves the Commission to stay this proceeding, including the technical session scheduled for July 15, for the following additional reasons.

6. FEL filed an objection to Eversource's Motion to Dismiss on July 6, 2015. In order to prepare and file its Objection in a timely manner, counsel for FEL had to work through the three-day Fourth of July Holiday.

7. On or about June 29, FEL received 78 Data Requests from various parties, a number of which are multi-part. FEL may object to some of these Requests as being (a) not reasonably calculated to lead to the discovery of information that is admissible in this proceeding; or, (b) the requests are overly broad and unduly burdensome. There may be ensuing motions to compel and objections thereto.

8. In any event, FEL needs a substantial amount of additional time to complete the responses to the 78 Data Requests, and resolve associated discovery issues.

9. Staff has assented to this Motion.

WHEREFORE, FEL respectfully requests that the Commission to:

- A. Grant Eversource's Motion to Stay;
- B. Grant FEL's Motion to Stay;
- C. Order such further relief as may be just and equitable.

Respectfully Submitted,
Freedom Logistics, LLC d/b/a
Freedom Energy Logistics
by its Attorney,

Dated: July 9, 2015

/s/ James T. Rodier

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Objection to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

/s/ James T. Rodier