

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DG 15-289

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

Petition for Franchise Approval

Motion for Stay

Now comes Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or “the Company”), by and through its attorneys, Orr & Reno, P.A., and moves for a stay of this proceeding until September 2, 2016. In support of this Motion, EnergyNorth states the following:

1. In this proceeding the Company is seeking approval of its request for a natural gas franchise to serve customers in Lebanon and Hanover. In docket DG 15-155 Valley Green Natural Gas, LLC (“Valley Green”) is seeking approval of its request for a natural gas franchise for the same area.
2. EnergyNorth respectfully asks the Commission to stay all further proceedings and to take no further action in this matter until September 2, 2016 because the Company and Valley Green are engaged in discussions that may result in a proposal to resolve this docket and the Valley Green docket.
3. Staff, the Office of Consumer Advocate, and Valley Green, an intervenor in this docket, assent to the relief requested. Ariel Arwen and the City of Lebanon do not assent. A similar Motion for Stay is being filed in DG 15-155.

Wherefore, EnergyNorth respectfully requests that the New Hampshire Public Utilities Commission:

- A) Grant this Motion for a Stay of this proceeding; and
- B) Grant such other relief as may be just and equitable.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities

By Its Attorneys

Orr & Reno, P.A.



Douglas L. Patch, NH Bar #1977
Orr & Reno, P.A.
45 South Main St.
Concord, N.H. 03302-3550
(603) 223-9161
dpatch@orr-reno.com



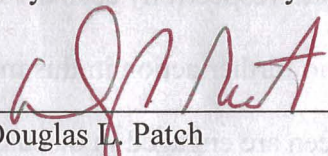
Maureen D. Smith, NH Bar #4857
Orr & Reno, P.A.
45 South Main St.
Concord, N.H. 03302-3550
(603) 223-9166
msmith@orr-reno.com

Dated: August 12, 2016

Certificate of Service

A copy of this Motion has been served by email this 12th day of August, 2016 on the service list in DG 15-289.

Dated: August 12, 2016



Douglas L. Patch

1575824_1