

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 15-442

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

Petition for Approval of a Gas Franchise in Jaffrey, Rindge, Swanzey, and Winchester

Motion to Amend Filing

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (EnergyNorth or the Company), through counsel, respectfully moves the Commission for leave to amend its petition in this docket so that EnergyNorth's franchise request is limited to the Town of Swanzey.

In support of this motion, EnergyNorth states as follows:

1. This docket addresses EnergyNorth's request to provide natural gas service to four towns in southwestern New Hampshire -- Jaffrey, Rindge, Swanzey, and Winchester. The request was based in part on the expectation that Kinder Morgan's Northeast Energy Direct (NED) pipeline project would be constructed through the region, allowing the Company to provide natural gas service to these towns. Indeed, the Commission approved EnergyNorth's contract to buy capacity on the NED Market Path pipeline in Docket No. DG 14-380.

2. On April 20, 2016, Kinder Morgan announced that it was not going to proceed with the NED project.

3. After analyzing the projected demand in the towns of Jaffrey, Rindge, and Winchester, without the NED pipeline there is not an economical way for EnergyNorth to provide natural gas service to the towns at this time, thus EnergyNorth seeks to amend its filing to omit those three towns.

4. There remains an economic case to serve the Town of Swanzey through an extension of the Company's existing and planned infrastructure located in the City of Keene.

5. In the near future Liberty intends to convert its existing propane-air system in Keene to natural gas via the construction of a liquefied natural gas and/or compressed natural gas facility. EnergyNorth expects to file for the appropriate approvals with the Commission to allow for construction over the summer of 2017.

6. EnergyNorth will design the new Keene system to have the ability to serve Swanzey, and the Company's 2017 construction plans may include Swanzey, provided the Commission approves this franchise request.

7. Therefore, the Company intends to proceed with the request in this docket for the franchise rights in the Town of Swanzey.

WHEREFORE, EnergyNorth respectfully requests that the Commission:

- A. Allow EnergyNorth to amend its petition in the above matter to limit the Company's franchise request to the Town of Swanzey; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

LIBERTY UTILITIES (ENERGYNORTH NATURAL
GAS) CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



Date: August 9, 2016

By: _____

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Certificate of Service

I hereby certify that on August 9, 2016, a copy of this Motion has been forwarded to the service list in this docket via electronic mail.



Michael J. Sheehan