

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

Docket No. DG 17-068

Petition for Declaratory Ruling

Docket No. DG 17-152

Least Cost Integrated Resource Plan

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

**Assented-to Motion to Extend until September 17, 2020, the Deadline for Objecting to  
Intervenor Clark's Second Amended Motion to Condition the Development of the Keene  
Project on RSA 378 Consistency and Compliance and to Order Supplemental RSA 378  
Filing**

Liberty Utilities (EnergyNorth Natural Gas) Corp. ("Liberty"), through counsel, respectfully moves the Commission to extend until September 27, 2020, the deadline for objecting to the above referenced motion that Mr. Clark filed in both Dockets DG 17-068 and DG 17-152.

In support of this motion, Liberty represents as follows:

1. Mr. Clark filed a motion in the above dockets raising issues of the LCIRP statute's application to each pertaining to the Company's planned conversion of its Keene system from propane-air to natural gas.

2. The issues require input from a number of Company employees as these dockets touch on many areas of the Company's planning and operation. The Company needs additional time to confer with these employees to adequately prepare its responses.
3. The extension will not affect the orderly conduct of either docket.
4. The Supreme Court recently issued an Order affirming the Commission's orders in Docket No. DG 17-068, and no further proceedings will occur in that docket until Liberty makes the required filing in advance of the next phase of the Keene conversion.
5. Docket No. DG 17-152 is currently suspended by secretarial letter of December 2, 2019. Although the Company made a filing to resume the related docket, DG 17-198, which will likely trigger a resumption of DG 17-152, the Commission has yet to indicate how and when DG 17-152 will resume, so there is no hearing or other procedural event that would be impacted by the requested extension.
6. Counsel for Staff and for the active parties to this docket (the Office of the Consumer Advocate, Conservation Law Foundation, Mr. Clark, and Pipeline Awareness Network) assent to the relief sought.

WHEREFORE, Liberty respectfully requests that the Commission:

- a. Extend until September 17 the deadline for responding to Mr. Clark's Second Amended Motion to Condition Keene Project on RSA 378 Consistency and Compliance and to Order Supplemental RSA 378 Filing; 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: September 10, 2020

By: \_\_\_\_\_

Michael J. Sheehan, Esq. #6590  
116 North Main Street  
Concord, New Hampshire 03301  
Telephone (603)724-2135  
[Michael.Sheehan@libertyutilites.com](mailto:Michael.Sheehan@libertyutilites.com)

**Certificate of Service**

I hereby certify that on September 10, 2020, a copy of this motion has been electronically forwarded to the service list in Docket No. DG 17-068 and in Docket No. DG 17-152.



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Michael J. Sheehan