

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

Docket No. DG 17-152

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

Least Cost Integrated Resource Plan

Docket No. DG 17-198

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

**Petition to Approve Firm Supply and Transportation Agreements and the
Granite Bridge Project**

CONSERVATION LAW FOUNDATION'S REQUEST TO MODIFY SCHEDULE

Conservation Law Foundation (“CLF”) requests to modify the schedule in the above referenced proceedings.

On July 15, 2019 CLF submitted a response to the Liberty Utilities’ (“Liberty”) June 28, 2019 supplemental filing in Docket 17-152, requesting that the Commission “reject Liberty’s supplemental filing, rule on pending objections and consider any major proposals only after an adequate LCIRP has been submitted.” (CLF 7/15/19 Response and Motion at 5).

In the alternative, and pending any resolution of the objections, CLF requests a modification of the existing schedule in the two proceedings to allow discovery on the additional supplemental testimony and incorporation of responses into testimony to be filed in both cases.

CLF offers the following alternative schedule.

	Current 17-152 schedule	Proposed 17-152 schedule	Current 17-198 schedule	Proposed 17-198 schedule
Technical Session	6/21	6/21	6/20	6/20
Second Supplemental filing		6/28		
Response to Second Supplemental filing		7/15		
Discovery	6/21 -7/12 [responses due 7/26]	7/29 – 8/9 [responses due 8/23]		
Staff/OCA/intervenor testimony	8/9	9/30	7/31	9/30
Discovery	8/9 – 8/16	9/30 – 10/11	7/31 – 8/14	9/30 – 10/11
Final date for responses	8/27	11/1	8/27	11/1
Technical Session	8/30	Week of 11/4	8/28 – 8/29	Week of 11/4
Liberty rebuttal testimony	9/27	11/22	9/20	11/22
Discovery	9/30 -[10/4]	11/22 – [12/6]	9/30	11/22 – 12/6
Final date for responses	10/18	12/20	10/11	12/20
Technical Session/ settlement conference	10/24	Week of 1/6	10/22 – 10/23	Week of 1/6
Hearing	11/21 – 11/22	Week of 1/20 or later	12/4 -- 12/5	Week of 1/20 or later

CLF has shared this alternative schedule with other parties in the above dockets and received the following responses.

PLAN does not object to the proposed request.

Terry Clark (as to DG 17-152) does not object to the proposed request.

Liberty Utilities do not agree with the proposed schedule, and stand by their proposal.

Repsol Energy North America takes no position on the proposed schedule in DG 17-198
(Repsol is not participating in DG 17-152).

PUC Staff agrees to the proposed revisions but recommends that each of the January
dates be one week later. CLF is fine with that additional modification of the schedule.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By its attorneys,

s/Sandra Levine

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July 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request to Modify Schedule has, on this 17th day of July, 2019, been sent by email to the service list in Docket Nos. DG 17-152 and DG 17-198.

s/Sandra Levine
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