

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

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

DOCKET NO.: DG 17-198

**OBJECTION TO AMENDED MOTION FOR PROTECTIVE ORDER**

NOW COMES United Steelworkers of America Local 12012, by and through their attorneys, Law Offices of Shawn J. Sullivan, PLLC, and hereby Objects to Repsol's Amended Motion for Protective Order dated May 17, 2018, in the above captioned matter, and in support thereof says as follows:

- I. Local 12012 is not a competitor of Repsol.
- II. As an intervenor the Union has full party status.
- III. The Union would benefit from all information produced in this docket so that it can better evaluate the Petition and offer the most constructive input.
- IV. Repsol's motion at paragraph VI references an existing informal confidentiality agreement.
- V. Local 12012 is willing to sign such an agreement so as to maintain confidentiality and the integrity of the proceedings.
- VI. Local 12012 has previously participated in several PUC dockets wherein such agreements were signed and complied with.


WHEREFORE, the Union respectfully requests the Commission to:

- A. Deny the Amended Motion for Protective Order; and

B Grant such other relief as is deemed just and proper.

Respectfully submitted,  
United Steelworkers - Local 12012  
By Its Attorneys  
Law Offices of Shawn J. Sullivan, PLLC

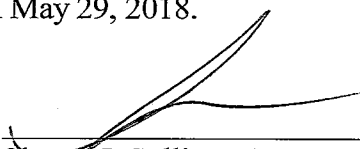
Dated: May 29, 2018

  
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Shawn J. Sullivan, Esq. #6904  
10 Ferry St., Suite 317  
Concord, NH 03301  
(603) 225-3362

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document will be sent via electronic mail to all persons on the Service List in Docket No. DG 17-198 on May 29, 2018.

By:

  
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Shawn J. Sullivan, Esq.