

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

National Grid USA, et al.

Docket DG 11-040

**LIBERTY UTILITIES' MOTION FOR EXTENSION OF TIME FOR CERTAIN
CUSTOMER SERVICE FILINGS**

Granite State Electric Company d/b/a Liberty Utilities and EnergyNorth Natural Gas, Inc. d/b/a Liberty Utilities (“Liberty Utilities” or the “Companies”) respectfully requests that the Commission grant the Companies a two month extension to make certain customer service filings required by the Settlement Agreement in DG 11-040. In support hereof, Liberty Utilities states as follows:

1. Section V(D)(3) of the Settlement Agreement in DG 11-040 requires that Liberty Utilities submit the following two filings regarding its customer service operations no later than six months after the closing date: (a) detailed plans that explain how customer service operations and support functions will be operated and maintained after the relevant TSA services are finished, and; (b) a customer service staffing contingency plan that will govern in the event of failures during the cutover from National Grid to the Companies (the “Customer Service Filings”).

2. By this motion, Liberty Utilities is requesting that the Commission grant it until March 4, 2013 to submit the Customer Service Filings. The extension is necessary because Liberty Utilities is in the process updating the information technology implementation plans for its New Hampshire operations, including its customer service functions, and will be meeting with the Staff and its consultant on January 24 to discuss the status of that implementation plan.

3. The Company has discussed this request with Staff and Staff does not oppose the request. The Company has contacted the Office of Consumer Request to discuss the request but the OCA has not had the opportunity to respond. The Company has agreed with Staff to meet in February to discuss the customer service plans in more detail, prior to submitting its status reports.

4. The Company asserts that granting such an extension is in the public interest because the Companies will have more information available to develop the reports after discussions with Staff. In addition, given that neither cutover nor termination of customer service TSA services from National Grid are imminent, there will be no harm associated with the delayed filing.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

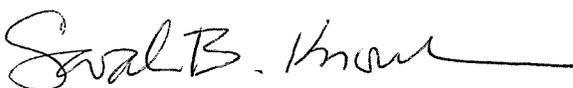
- A. Grant this motion for extension; and
- B. Grant such other and further relief as the Commission deems necessary and just.

Respectfully submitted,

GRANITE STATE ELECTRIC
ENERGYNORTH NATURAL GAS, INC.
BOTH D/B/A LIBERTY UTILITIES

By its Attorney,

Date: January 18, 2013

By: 
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Certificate of Service

I hereby certify that on January 18, 2013, a copy of this Motion has been forwarded to the parties on the service list in DG 11-040.



Sarah B. Knowlton