## RATH YOUNG PIGNATELLI

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NHPUC DEC23'15 PM12:18

December 23, 2015

## Via Hand Delivery and Electronic Mail

Debra A. Howland **Executive Director** New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

> Re: DG 14-380: Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities; Petition for Approval of Long-Term Firm **Transportation Agreement**

Dear Ms. Howland:

I am writing on behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities regarding the Office of Consumer Advocate's ("OCA") December 21, 2015 request to replace the brief it filed on August 7, 2015 in this docket.

It is unclear why such a correction is necessary given that none of the parties had access to a transcript for the August 6, 2015 hearing when submitting their final briefs. In addition, the OCA cites to no legal or procedural basis for making this correction, which is occurring over four months after the brief was filed and two months after the Commission issued Order 25,822 approving the Settlement Agreement in this docket. The Company objects to OCA's request, and is concerned about the precedent it would set where litigants can replace pleadings long after they have been filed and relied upon based upon no legitimate need.

Very truly yours,

Scral B. Knowlth

Sarah B. Knowlton

cc: Service list