

# BURNS & LEVINSON LLP

**CONFIDENTIAL  
MATERIAL  
IN COMM FILE**

125 SUMMER STREET BOSTON, MA 02110  
T 617.345.3000 F 617.345.3299  
BURNSLEV.COM

NHPUC 14MAY15AM9:25

RICHARD A. KANOFF  
617.345.3210  
RKANOFF@BURNSLEV.COM

**VIA OVERNIGHT MAIL**

May 13, 2015

<b>ORIGINAL</b>
N.H.P.U.C. Case No. <u>DG 14-380</u>
Exhibit No. <u>22</u>
Witness <u>Panelli</u>
<b>DO NOT REMOVE FROM FILE</b>

Debra Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord New Hampshire 03301

RE: DG 14-380 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a/ Liberty Utilities  
Submission of Pipe Line Awareness Network for the Northeast, Inc. ("PLAN")  
Printed Copies of Attachment Staff 2-2(c) and CONFIDENTIAL Attachment PLAN 1-3  
Request for Waiver Pursuant to Puc. 201.05(a)

Dear Ms. Howland:

Per our letter on May 8, 2015 and consistent with our understanding following discussions with administrative staff, we filed electronic versions (due to size) on CD of Attachment Staff 2-2(c) (referenced in Exhibit JAR-1) and CONFIDENTIAL Attachment PLAN 1-3 (referenced in Exhibits JAR-5 & JAR-15). Following additional clarification, we have enclosed one original printed hard copy set of CONFIDENTIAL Attachment PLAN 1-3 (referenced in Exhibit JAR-1, and bearing Bates numbers 0084-0131) and Attachment Staff 2-2(c) (referenced in Exhibits JAR-5 & JAR-15, and bearing Bates number 0132-1262). The hard copies of the two attachments are identical to the electronic versions previously provided.

Pursuant to Puc 201.05, PLAN respectfully requests that the Commission waive Puc 203.02(a)(1) regarding the required number of filed hard copies of the printed version of the two attachments. PLAN asks that in the alternative, the Commission accept as sufficient one hard copy set (enclosed) and one electronic version (previously submitted on CD on May 8). As grounds for this request and pursuant to Puc 201.05(e), PLAN states as follows:

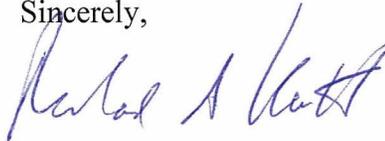
- The public interest would be served by such a waiver. *See* Puc 201.05(a)(1).
  - The enclosed hard copy set provided collectively represents complete print-outs of two Excel workbooks, amounting to 1,179 numbered pages (or 590 double-sided sheets) per set. Reducing the number of hard copies of the material reduces costs and preserves natural resources through reduction of paper use. *See* Puc 201.05(b)(1).

May 13, 2015  
Page 2

- By providing one hard copy set here, in conjunction with the electronic versions previously submitted, the purpose of the PUC rule is fulfilled. Both the public and the Commission will have access to these materials in either print or electronic format. *See* Puc 201.05(b)(2).
- The waiver will not disrupt the orderly and efficient resolution of matters before the commission. *See* Puc 201.05(a)(2). The information is readily available to the Commission, parties, and Staff. In the event any party had a need for an additional copy, we would promptly provide a copy upon request.

Please contact my office should you have any questions. Thank you for your assistance in this matter.

Sincerely,



Richard A. Kanoff

Enclosures

cc: Service List sent electronically (without enclosures)