

State of New Hampshire
Public Utilities Commission

Docket No. DG 15-362

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities

Petition for Expansion of Franchise to Towns of Pelham and Windham

Assented-to Motion to Amend Procedural Schedule

Petitioner Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, respectfully moves the Commission to amend the procedural schedule in this matter to allow for Liberty to file supplemental testimony.

In support of this motion, Liberty represents as follows:

1. Liberty supported its initial filing with testimony presenting the facts which then supported Liberty's request to provide natural gas distribution service in the Towns of Windham and Pelham.

2. Liberty has new evidence that further supports Liberty's request and that will be important to the evaluation of Liberty's franchise request.

3. Liberty proposes to present that new information through supplemental testimony. However, the existing procedural schedule requires modification to accommodate the filing of supplemental testimony. By this motion Liberty asks the Commission to amend the procedural schedule to accommodate Liberty's filing of supplemental testimony.

4. Below is the proposed procedural schedule, with the existing dates in brackets:

Liberty to file Supplemental Testimony	April 15 [new]
Staff/OCA/Intervenor Testimony	April 22 [from April 11]
Discovery on Staff/OCA/Intervenor testimony	April 29 [from April 18]
Responses to Discovery	May 9 [from May 2]
Hearing on the Merits	May 24 at 9:00 a.m. [no change]

5. Staff, the OCA, and the Town of Pelham assent to the relief sought.

WHEREFORE, Liberty respectfully requests that the Commission:

- A. Amend the procedural schedule as described above; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a
Liberty Utilities



Date: April 8, 2016

By: _____
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Certificate of Service

I hereby certify that on April 8, 2016, a copy of this Motion has been forwarded to the service list in this docket.



Michael J. Sheehan