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STATE OF NEW HAMPSHIRE



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December 3, 2018

Debra A. Howland  
Executive Director  
N.H. Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

NHPUC 3DEC'18PM12:45

Re: DG 17-198 Liberty Utilities (EnergyNorth Natural Gas) Corp.  
d/b/a Liberty Utilities  
Withdrawal of Staff Motion to Compel Responses to Data Requests

Dear Ms. Howland:

By this letter, Staff wishes to withdraw its motion to compel responses from Liberty Utilities (Liberty) to certain data requests propounded in the above-captioned docket. Staff's motion to compel was filed on August 1, 2018. Liberty filed a response to the motion on August 7, 2018, stating that the requests were unreasonable and burdensome, but that the remaining responses would be provided on that same day.

Liberty ultimately provided responses to the pending data requests through a number of emails and phone calls with Staff, who determined on September 21, 2018, that the clarifications and additional information were adequate. In the meantime, at the end of August 2018, Liberty introduced a new element related to the petition that could have a major impact on the Granite Bridge Project proposal. On November 16, 2018, Liberty filed a motion to amend the procedural schedule in this docket to accommodate a supplemental filing on the new proposal. The amendment would extend the currently approved, but effectively suspended, procedural schedule for DG 17-198.

In its November 16<sup>th</sup> motion, the Company states that it plans to provide a range of updated SENDOUT model results with its January filing. Staff anticipates conducting discovery on the new proposal once it is filed. At this time, however, Staff withdraws its pending motion to compel.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Fabrizio".

Lynn Fabrizio  
Staff Attorney

Cc: Service List (by email)

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**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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Docket #: 17-198-1      Printed: December 03, 2018

**FILING INSTRUCTIONS:**

**a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

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EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
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**b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**

**c) Serve a written copy on each person on the service list not able to receive electronic mail.**