

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ORIGINAL	
P.U.C. Case No.	DG 14-380
Exhibit No.	2
Witness	
DO NOT REMOVE FROM FILE	

RE: LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP. D/B/A LIBERTY UTILITIES

DOCKET NO. DG 14-380

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP. RESPONSE TO AFFIDAVIT OF PIPE LINE AWARENESS NETWORK OF THE NORTHEAST, INC.

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the “Company”), in accordance with the Hearing Examiner’s February 13, 2015 Report and the procedural schedule issued by the Commission, submits the following response to the February 17, 2015 affidavit of the Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”):

1. The February 17, 2015 affidavit of Kathryn R. Eiseman (the “Affidavit”) submitted on behalf of PLAN was submitted in response to the Company’s request that PLAN substantiate its assertion that it has members who are customers of the Company. PLAN’s Petition to Intervene had merely stated that its members include “customers and ratepayers of Liberty in New Hampshire...and private landowners whose property will be adversely impacted (affecting their community, environment and safety) and taken by Tennessee to construct the natural gas pipeline that will provide the capacity Liberty seeks to purchase...” PLAN Petition to Intervene at ¶ 10.

2. The Affidavit, while under oath, also fails to provide any specific information regarding the number of its members who are customers of the Company, or more importantly,

to identify the towns in which those members reside so that the Company can verify the representations made. Effectively, PLAN has provided no more detailed information than submitted in its Petition to Intervene. The Company is perplexed by PLAN's reticence to provide more detailed information, as that sort of information has routinely been provided to this Commission in assessing intervention requests of membership-based organization. *See Public Service Company of New Hampshire, Order 25,733* (reciting membership facts of each proposed membership-organization intervenor).

3. Because PLAN has failed to provide any information that would allow the Company or the Commission to verify PLAN's allegation that is the foundation for its intervention request, the Company requests that the Commission deny PLAN's requested intervention.