State of New Hampshire Public Utilities Commission

Docket No. DG 17-152

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

Least Cost Integrated Resource Plan

Assented to Motion to Amend Procedural Schedule

Liberty Utilities (EnergyNorth Natural Gas) Corp. ("Liberty"), through counsel, respectfully moves the Commission to amend the procedural schedule in this docket by moving the November 14, 2019, technical session/settlement conference to December 3, 2019, at which time the parties will develop a procedural schedule for the balance of the docket.

In support of this motion, Liberty represents as follows:

- 1. The existing procedural schedule calls for Liberty data responses on November 8,¹ a technical session on November 14, and hearings on November 21-22, 2019.
 - 2. Liberty makes this request for two reasons.
- 3. First, the Commission recently suspended the related Granite Bridge matter, Docket No. 17-198, to allow Liberty time to conduct further analysis to best respond to the testimony of Staff, OCA, and the other intervenors. Some of the issues that the Company is currently working on in DG 17-198 may have an effect on the issues in this docket. Liberty seeks the additional time to develop those issues and incorporate them, as necessary, into this docket so that it may present the best record for the Commission's review.
- 4. Second, the Company is optimistic that there are certain issues on which the parties may be able reach agreement. The current, compressed schedule leaves little time for

1

¹ The Company will respond to pending data requests by the November 8 deadline.

meaningful negotiations. The Company thus seeks additional time to allow for those conversations.

5. The Company thus asks the Commission to reschedule the November 14 technical session/settlement conference to December 3, 2019, at which point the parties can assess the current status of the docket and propose an appropriate procedural schedule for the balance of the

docket.

6. All participants in this docket assent to the relief sought: Commission Staff, the

Office of the Consumer Advocate, Conservation Law Foundation, Pipeline Awareness Network,

and Mr. Clark.

WHEREFORE, Liberty respectfully asks that the Commission:

A. Amend the procedural schedule in this docket to reschedule the November 14

technical session to December 3, 2019; and

B. Grant such other relief as is just and equitable.

Respectfully submitted,

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

Liberty Utilities By its Attorney,

Date: November 8, 2019

By:

While

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Certificate of Service

I hereby certify that on November 8, 2019, a copy of this filing has been electronically forwarded to the service list.

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Michael J. Sheehan