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VIA HAND DELIVERY AND EMAIL

May 1, 2015

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 Motion to Compel Responses To The Intervenor PLAN's Second Set of  
Data Requests

Dear Ms. Howland:

Enclosed for filing please find the original plus six copies of the Motion to Compel  
Responses to the Intervenor PLAN's Second Set of Data Requests.

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

Sincerely,



Richard A. Kanoff

Enclosure  
cc: Service List