

Freedom Logistics, LLC d/b/a Freedom Energy Logistics
Petition for Authorization Pursuant to RSA 362-A:2-A, II
for a Purchase of LEEPA Output by the Private Sector

Docket No. DE 15-068

**MOTION TO LIFT STAY AND TO SCHEDULE A PREHEARING CONFERENCE
TO ESTABLISH A PROCEDURAL SCHEDULE FOR THE REMAINDER OF THE
PROCEEDING**

NOW COMES Freedom Logistics, LLC d/b/a Freedom Energy Logistics (“FEL”) by its attorney, and hereby motions the Commission to lift the stay and to schedule a prehearing conference to establish a procedural schedule for the remainder of the proceeding, and in support hereof, says as follows:

1. On June 26, 2015, Eversource filed a Motion to Dismiss and Motion to Stay in this proceeding.
2. On or about June 29, 2015, FEL received a total of 78 Data Requests propounded by Eversource, Liberty, Staff and OCA.
3. FEL filed an Objection to Eversource’s Motion to Dismiss on July 6, 2015.
4. On July 9, 2015, FEL also filed a Motion to Stay based upon the need for additional time to respond to the 78 Data Requests from Requests from Eversource, Liberty Utilities, PUC Staff and OCA as well as the delay caused by the need for FEL to object to Eversource’s Motion to Dismiss.
5. The Commission granted FEL’s Motion to Stay on July 14, 2015 and suspended the the procedural schedule “until further notice.”
6. On July 29, 2015, the Commission denied Eversource’s Motion to Dismiss.

WHEREFORE, FEL respectfully requests that the Commission:

- A. Lift the Stay imposed by the Secretarial Letter on July 14, 2015; and
- B. Schedule a prehearing conference to establish a procedural schedule for the remainder of the proceeding, unless the parties reach agreement on a new procedural schedule within 10 days.

C. Order such further relief as may be just and equitable.

Respectfully Submitted,
Freedom Logistics, LLC d/b/a
Freedom Energy Logistics
by its Attorney,

Dated: August 2, 2015

/s/ James T. Rodier

James T. Rodier, Esq.
1465 Woodbury Ave., No. 303
Portsmouth, NH 03801-1918
603-559-9987
jrodier@mbtu-co2.com

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Objection to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

/s/ James T. Rodier