

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Valley Green Natural Gas, LLC

Docket No. DG 15-155

MOTION TO MODIFY PROCEDURAL SCHEDULE

NOW COMES, Valley Green Natural Gas, LLC (“Valley Green”), in accordance with Puc 203.07, and hereby moves the New Hampshire Public Utilities Commission (the “Commission”) to modify the procedural schedule approved by the Commission on December 1, 2015. In support of its Motion, Valley Green states as follows:

1. In discovery propounded on Valley Green, Commission Staff (“Staff”) sought rate case schedules for certain years as part of Staff 3-10 and sales information in Staff 3-2;
2. Valley Green produced those rate case schedules and sales data, however, it came to Valley Green’s attention late last week that there was an error in the financials used to produce the rate case schedules. Making the correction and resulting flow through adjustments has taken additional time and has involved third parties such as municipalities.
3. Staff, the Office of the Consumer Advocate (“OCA”), and Intervenor testimony is due Friday, January 8, 2016. Valley Green expects that testimony to be based, in part, on Valley Green’s corrected responses to Staff’s discovery requests. Valley Green expects to provide Staff and the OCA with the discovery responses no later than January 8, 2016.
4. In light of the delay in providing the corrected discovery and the testimony deadline, Valley Green proposes the following modifications to the procedural schedule to allow Staff and the OCA time to review the discovery responses prior to filing testimony:

Testimony (Staff/OCA/Intervenor)	January 8 15 , 2016
Discovery on Testimony	January 15 22 , 2016
Responses due on Discovery	January 29 February 5, 2016
Rebuttal Testimony (by Company)	February 19 2 , 2016
Hearing on the Merits	March 1, 2016 at 9:00 a.m.

5. Commission Staff, the OCA, and Mr. Stephen M. Wood concur with Valley Green's requested modifications to the procedural schedule. NG Advantage concurred on the condition that the hearing date be delayed one week on account of a pre-existing vacation that would allow its attorney only one day of hearing preparation after rebuttal testimony. Other parties did not reply with a position by the time of the instant filing.

WHEREFORE, Valley Green respectfully requests that the Commission:

- A. Grant this Motion to amend the procedural schedule; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Valley Green Natural Gas, LLC

By its Attorneys,

RATH, YOUNG AND PIGNATELLI, PC

Date: January 7, 2016

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Certificate of Service

I hereby certify that on this 7th day of January, 2016, a copy of this objection has been forwarded by email to the persons listed on the Commission's service list for this docket.

Marcia A. Brown
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