

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
DG 15-155
VALLEY GREEN NATURAL GAS, LLC
Petition for Franchise Approval

Limited Objection to Motion for Protective Order and Confidential Treatment

Now comes Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or “the Company”), an intervenor in DG 15-155, by and through its attorneys, Orr & Reno, P.A., and pursuant to Admin. Rule Puc 203.07(e) objects to a limited aspect of Valley Green Natural Gas, LLC’s (“Valley Green”) Motion for Protective Order and Confidential Treatment (“Motion for Protective Order”) pertaining to estimated rate information. In support of this Limited Objection EnergyNorth states as follows:

1. In this docket Valley Green is seeking franchise approval to provide regulated gas service for the Town of Hanover and the City of Lebanon. EnergyNorth is also seeking franchise approval for Hanover and Lebanon in docket DG 15-289. On February 24, 2016 Valley Green filed the Motion for Protective Order seeking confidential treatment of responses to a number of data requests. It appears that at least two of these responses to data requests, Staff 1-2 and Staff 3-10, may contain information pertaining to estimated rates. Because EnergyNorth has not sought and does not have access to confidential information in this docket, it does not know whether such estimated rate information is contained in any of the responses for which Valley Green is seeking confidential treatment.

2. In DG 15-289, the Commission issued an Order on Motions to Compel Discovery and for Confidential Treatment, Order No. 25,868 (February 19, 2016), in which it found that the public's interest in estimated customer rate information outweighed the Company's privacy interest and ordered that the estimated rates should be disclosed to the public. Order No. 25,868, at 6. On February 25, 2016 EnergyNorth complied with that Order and filed a redacted form of its response to Staff 3-9 that showed estimated customer rates.

3. To the extent that Valley Green is seeking confidential treatment for information pertaining to estimated customer rates, its request for confidential treatment of such information should be denied and such information should be made available to the public under the same reasoning and process followed in DG 15-289, Order No. 25,868. There is no rational basis for treating estimated customer rate information as confidential in one docket but not in the other. RSA 91-A:5,IV should be interpreted consistently in both dockets.

Wherefore, EnergyNorth respectfully requests that the New Hampshire Public Utilities Commission:

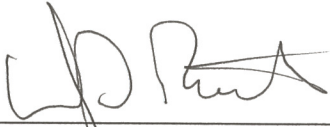
- A) Deny Valley Green's request for confidential treatment of estimated customer rate information; and
- B) Grant such other relief as the Commission deems just and equitable.

Respectfully submitted,

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

By Its Attorneys

Orr & Reno, P.A.



Douglas L. Patch, NH Bar #1977
Orr & Reno, P.A.
45 South Main St.
Concord, N.H. 03302-3550
(603) 223-9161
dpatch@orr-reno.com



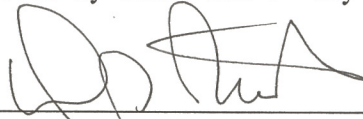
Maureen D. Smith, NH Bar #4857
Orr & Reno, P.A.
45 South Main St.
Concord, N.H. 03302-3550
(603) 223-9166
msmith@orr-reno.com

Dated: March 7, 2016

Certificate of Service

A copy of this Objection has been served by email this 7th day of March on the service list in DG 15-155.

Dated: March 7, 2016



Douglas L. Patch