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March 14, 2016

**Via Hand Delivery and Email**

Debra A. Howland, Executive Director & Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit St., Suite 10  
Concord, NH 03301-2429

**Re: DG 15-155, Valley Green Natural Gas, LLC, Petition for Franchise Approval - Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities' Response to Valley Green's Reply to Limited Objection to Motion for Protective Treatment**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities I am filing an original and 6 copies of this letter as a response to Valley Green's March 11, 2016 "Reply to Limited Objection to Motion for Protective Treatment". EnergyNorth's Limited Objection pointed out an inconsistency in how certain projected rate information was being treated in the two parallel dockets, DG 15-155 and DG 15-289. EnergyNorth is filing this letter to correct a few inaccuracies in Valley Green's Reply.

The Valley Green Reply, on page 5, says: "...in Docket DG 14-180, the Commission acknowledged that EnergyNorth's revenue requirement might change as a result of the independent audit's report on Energy North's 'account creation and management, meter data management, billing processes, payments and collections processes, call center, vendor relationships, corporate services/IT support and service, staffing accounting, business planning and property records.' Order 25,868 at 5." There are two problems with this statement. First, the reference is incorrect. Valley Green quotes language from Order 25,797 at page 15, not Order 25,868 at page 5. Second, and most importantly, the quote is taken out of context and mischaracterized the order; there is nothing in Order 25,797 that suggests EnergyNorth's revenue requirement might change as a result of the audit.

Although there are other things in Valley Green's Reply with which EnergyNorth takes issue, we believe the underlying purpose of our Limited Objection remains, as a matter of fundamental fairness and legal consistency it is important that information in both dockets be treated the same. The fact that Valley Green submitted a Reply to our objection, arguably contrary to Commission practice and administrative rules, suggests that there is something they

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do not want the public to see in their estimated rates, information which the Commission believed was important to allowing the public to compare and comment on two competing proposals. EnergyNorth submits this makes an even more compelling case for making the Valley Green information available to the public in DG 15-155 as has already been made available to the public pursuant to Commission order in DG 15-289.

To the extent that Valley Green suggests that the Commission is not authorized to consider EnergyNorth's limited objection at this time, EnergyNorth notes that the Commission has ongoing authority with regard to confidentiality issues. See Admin. Rule Puc 203.08(k): "The granting of a motion for confidential treatment shall be subject to the ongoing authority of the commission on its own motion, or on the motion of staff, any party, or member of the public to reconsider the determination."

If you have any questions, please do not hesitate to contact me. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Patch", written over the printed name.

Douglas L. Patch

DLP/eac

Enclosures

cc (via email): Service List in DG 15-155

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