

**BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**Valley Green Natural Gas, LLC**

**Request for Franchise Approval in Lebanon and Hanover**

**Docket No. DG 15-155**

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY**

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 grant it leave to file supplemental testimony. In support of its Motion, Valley Green states as follows:

1. Valley Green filed its request for franchise approval on May 15, 2015. In the year since that filing, Valley Green’s project has continued to develop and move forward. During the course of the procedural schedule, Staff, the Office of the Consumer Advocate and the Intervenor issued discovery requests to Valley Green that examined Valley Green's project on issues ranging from projected customer rates to qualifications to gas supply. Valley Green produced responses to those discovery requests that would aid the Commission’s understanding of Valley Green’s project.

2. Valley Green’s discovery responses are relevant to its managerial, technical, financial, and legal expertise to provide gas service within the requested franchise. This issue is the subject of a hearing scheduled for May 5-6, 2016 before the Commission. Valley Green intends to offer some of its discovery responses as exhibits for the record at the hearing.

3. Introducing the exhibits in the context of supplemental testimony offered by Valley Green's witnesses would enhance the orderly and efficient conduct of this proceeding and

aid the Commission's determination as to whether granting a franchise to Valley Green is in the public good.

4. Although the procedural schedule approved by the Commission provided for the filing of rebuttal testimony to rebut statements made in other parties' testimony, the schedule did not afford an opportunity to file testimony to supplement prior pre-filed testimony.

4. Pursuant to RSA 541-A:31, IV, Valley Green is entitled to an opportunity to "respond and present evidence and argument on all issues involved."

5. Valley Green has contacted parties to this proceeding and represents that Staff concurs with the relief requested in this motion.

WHEREFORE, Valley Green respectfully requests that the Commission:

- A. Grant this Motion for Leave to File Supplemental Testimony; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

**VALLEY GREEN NATURAL GAS, LLC.**

By its Attorneys,

Date: April 27, 2016

By:

  
Charles G. Willing, Jr., Esquire

Marcia A. Brown, Esquire

**RATH, YOUNG AND PIGNATELLI, P.C.**

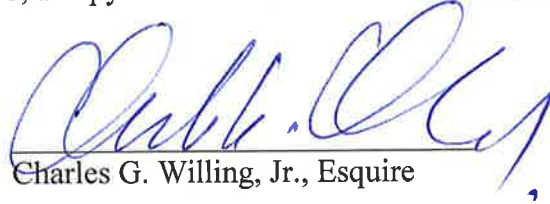
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2016, a copy of this Motion has been forwarded to the Commission's service list for this docket.



Charles G. Willing, Jr., Esquire