# STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

### Valley Green Natural Gas, LLC

#### Docket No. DG 15-155

## PARTIALLY ASSENTED-TO MOTION FOR STAY

NOW COMES Valley Green Natural Gas, LLC ("Valley Green") and hereby moves the New Hampshire Public Utilities Commission (the "Commission") for a stay of this proceeding. In support of its Motion, Valley Green states as follows:

- 1. In this docket, Valley Green is seeking approval of a petition for a natural gas utility franchise to serve customers in Lebanon and Hanover. In Docket No. DG 15-289, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty") is seeking approval of a petition for a natural gas franchise to serve the same area.
- 2. Valley Green respectfully requests that the Commission stay all further proceedings and take no further action in this matter until September 2, 2016 because Valley Green and Liberty are engaged in discussions that may result in a proposal to resolve this docket and DG 15-289.
- 3. Staff, the Office of the Consumer Advocate and Liberty assent to the relief requested. The City of Lebanon, Ariel Arwen, Susan Almy and Stephen Wood do not assent. The other parties either took no position or did not respond to a request for assent. A similar motion has been filed in DG 15-289.

WHEREFORE, Valley Green respectfully requests that the Commission:

- A. Grant this Motion for a Stay of this proceeding; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

VALLEY GREEN NATURAL GAS, LLC.

By its Attorneys,

Date: August 15, 2016

By: Charles G. Willing, Jr., Esquire Marcia A. Brown, Esquire

RATH, YOUNG AND PIGNATELLI, P.C.

One Capital Plaza Concord, NH 03301 (603) 226-2600

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2016, a copy of this Motion has been forwarded to the

Commission's service list for this docket.

Charles G. Willing, Jr.