

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No.: DG 15-155

Valley Green Natural Gas, LLC

Petition for Approval of a Gas Franchise in Lebanon and Hanover

CITY OF LEBANON'S OBJECTION TO
VALLEY GREEN NATURAL GAS, LLC'S MOTION FOR STAY

Now Comes the City of Lebanon (the "City"), and objects to the Motion for Stay filed by Valley Green Natural Gas, LLC ("Valley Green"). In support of this objection, the City states as follows:

1. The City is an intervenor in the above-captioned docket.
2. On August 15, 2016, Valley Green filed a motion to stay for a stay in this proceeding because they are engaged in discussions with Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities ("Liberty Utilities") which may result in a proposal to resolve this docket and the docket addressing Liberty Utilities' request, Docket No. DG 15-289. Liberty Utilities filed a similar motion for stay with respect to Docket No. DG 15-289 on August 12, 2016.
3. Valley Green has not provided the City with any information regarding the nature of the resolution under discussion. Therefore, it is impossible to evaluate how, whether, and if the City's interests will be affected by a stay of the current proceedings.
4. In order to preserve the due process and integrity of the proceedings that have taken place to date, the City respectfully suggests that Valley Green's pending petition should be granted or denied based solely on the merits of its petition *as presented* at the hearings; especially so given the extent of the proceedings that have already taken place and the relative imminence of a decision on the merits of the pending petition. Upon issuance of decisions in their respective dockets, Valley Green and Liberty Utilities are presumably free to further petition the PUC

individually or jointly as they see fit relative to any new proposal they would like the PUC to consider.

5. In the alternative, the City seeks an order from the PUC requiring that Valley Green sufficiently demonstrate that its discussions with Liberty Utilities and any new proposal will not result in any material or meaningful change to the petition filed in the above-captioned docket, which representations the City will be permitted to comment on, before the PUC rules on the motion to stay.

6. Additionally in the alternative, the City seeks an order that, with respect to (i) any future filings made *jointly* by Valley Green and Liberty Utilities, and (ii) any additional filings made by either Valley Green or Liberty Utilities that result in material or meaningful changes to their pending petitions, would be treated as new applications to the Commission, given separate docket numbers, and be subject to the same procedural requirements that applied in the above-captioned docket.

7. For these reasons, the City objects to Valley Green's motion for stay. A similar objection has been filed in Docket No. DG 15-289.

WHEREFORE, the City of Lebanon respectfully requests that the Commission:

A. Deny Valley Green's motion for stay.

In the alternative:

B. Prior to rendering a decision on their motion, require that Valley Green sufficiently demonstrate that its discussions with Liberty Utilities and any new proposal will not result in any material or meaningful change to the petition filed in the above-captioned docket, which representations the City will be permitted to comment on prior to the PUC ruling on the motion for stay; and/or

C. Require that with respect to (i) any future filings made jointly by Valley Green and Liberty Utilities, and (ii) any additional filings by either Valley Green or Liberty Utilities that result in material or meaningful changes to their petitions, will be treated as new

applications to the Commission, given separate docket numbers, and be subject to the same procedural requirements that applied in the above-captioned docket.

Respectfully submitted,

CITY OF LEBANON



Date: August 16, 2016

By: _____

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Certificate of Service

I hereby certify that on this 16th day of August, 2016, a copy of this objection has been forwarded by email to the persons listed on the Commission's service list for this docket.



Tim Corwin