

**THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DG 15-494**

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.  
d/b/a LIBERTY UTILITIES**

**RESPONSE TO ENERGYNORTH'S MOTION TO CLARIFY**

Pursuant to Puc 203.07, the New Hampshire Municipal Pipeline Coalition (“Coalition”), hereby responds to Liberty Utilities’ (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the “Company”) Motion to Clarify Order 25,861 (“Motion”). The Coalition states the following:

1. EnergyNorth filed its Motion on January 26, 2016, for the stated purpose of seeking “clarification that the term “EnergyNorth-customer members” means only those towns in the Coalition that are customers of the Company [ ], as opposed to those members of the Coalition that have residents whom are customers of the Company.” Motion at 1.
2. In its Order 25,861 (“Order”), the New Hampshire Public Utilities Commission (“Commission”), found that “the participation of the Coalition’s non-customer members would “impair the orderly and prompt conduct of [these expedited] proceedings.”” (citing RSA 541-A:32, II). Order at 4.
3. The Coalition submits that the Order should be clarified to allow the Coalition’s participation to include Litchfield. While Litchfield is not a customer of the Company, the Coalition submits that Litchfield’s participation in this proceeding on behalf of its resident customers would be consistent with the Commission’s ruling, i.e., would not impair the orderly and prompt conduct of the proceeding. Indeed, allowing a municipality to intervene on behalf of its ratepayer residents, as opposed to the

intervention of multiple individuals or groups of residents, would actually promote efficiency within the proceeding.

**WHEREFORE**, the Coalition requests that the Commission:

- A. Clarify its Order to allow towns that have citizen ratepayers, i.e., Litchfield, to participate as Coalition members; and
- B. Grant such other and further relief as it may determine to be just, reasonable, and consistent with the public interest.

Respectfully Submitted,

**The New Hampshire Municipal  
Pipeline Coalition**

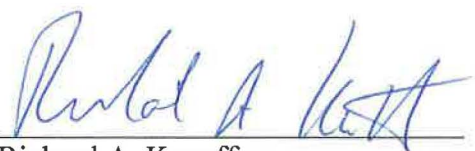


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**Certificate of Service**

I hereby certify that on February 5, 2016, I served an electronic copy of the foregoing document on each person identified on the Commission's service list for this docket, by delivering it to the email address specified on the Commission's service list for this docket.



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Richard A. Kanoff