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April 18, 2017

***Via First-Class and Electronic Mail***

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

**Re: DG 16-852 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Petition for Expansion of Franchise to the Town of Hanover and City of Lebanon**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, I write to object to the letter request of Ms. Arwen and Mr. Chaffee to "revise" or "suspend" the proposed procedural schedule that Staff filed yesterday. The basis for the request is that the Company's motion for confidential treatment remains pending in light of the objection by Ms. Arwen and Mr. Chaffee.

The Company objects because (1) the confidentiality motion pertains to a very small fraction of the Company's filing, (2) nothing prevents Ms. Arwen and Mr. Chaffee from asking questions about the balance of the petition and attachments while the Commission considers the motion, and (3) the proposed schedule provides for a second round of discovery and a technical session during which Ms. Arwen and Mr. Chaffee could propose questions related to the confidential material should the Commission deny the Company's motion. The first set of data requests are due April 26 under the proposed schedule, the second set is due May 26, and there will be a June 15 technical session.

There is sufficient time built into the proposed schedule to allow full discovery after the Commission's order on confidentiality.

Note that the Company has offered, and continues to offer, to provide the confidential information to Ms. Arwen and Mr. Chaffee under a non-disclosure agreement, which would make the information immediately available to them.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

cc: Service List