

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DG 16-852

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

Petition for Expansion of Franchise to Town of Hanover and City of Lebanon

Objection to Motion for Contempt

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (the “Company” or “Liberty”), through counsel, respectfully objects to Mr. Chaffee’s motion for contempt.

Order No. 26,109 in this docket stated that, “Liberty is required, within 15 days, to file the protected documents with more limited redactions and revised motion for confidential treatment consistent with this order.”

Due to an oversight, Liberty did not make the filing within 15 days, for which the Company apologizes.

However, the Company has this date filed the two portions of its initial filing that contained confidential material (the Attachments and Appendices to Mr. Clark’s testimony) with substantially fewer redactions (the current redactions, combined, would fill 2 or 3 pages whereas the original filing redacted over 150 pages), and has filed an appropriately modified motion for confidential treatment.

This delayed filing has not prejudiced any party.

WHEREFORE, Liberty respectfully asks that the Commission:

- A. Deny Mr. Chaffee's motion for contempt; and
- B. Grant such other relief as is just and reasonable and consistent with the public interest.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp.
d/b/a Liberty Utilities

By its Attorney,



Date: April 11, 2018

By: _____

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Certificate of Service

I hereby certify that on April 11, 2018, a copy of this objection has been electronically forwarded to the service list.



By: _____
Michael J. Sheehan