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February 27, 2015

Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord New Hampshire 03301

RE: DG 14-380 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a/ Liberty Utilities
Reply to Company's Response to Record Request

Dear Ms. Howland:

This letter is submitted in reply to Liberty Utilities' (the "Company") February 26, 2015 response (the "Response") to the Commission's record request issued on February 13, 2015 (the "Record Request").

The Record Request directed PLAN to "produce an affidavit attesting that its membership includes customers of the Company." The February 17, 2015 affidavit of Kathryn R. Eiseman – issued in her capacity as President of PLAN – satisfies the Commission's directive in every respect.

The Company's Response ignores the clear and unequivocal language of the Record Request. Indeed, the Company's Response implicitly acknowledges that PLAN produced exactly what was required (an affidavit attesting that its membership includes customers of Liberty). The Company's tacit acknowledgement of PLAN's compliance undercuts any further objection to PLAN's intervention. Accordingly, the Company's objection is without merit.

For these reasons, and those set forth more fully in its underlying Petition to Intervene, PLAN respectfully requests that it be permitted to participate in this proceeding with full rights as a party.

Sincerely,



Richard A. Kanoff

cc: Service List