BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Re: Liberty Utilities (EnergyNorth Natural Gas) Corp.

Docket DG 14-380

PLAN'S MOTION TO RESCHEDULE HEARING

Pursuant to Puc 203.13(a), Pipe Line Awareness Network of the Northeast, Inc. ("PLAN") respectfully requests that the dates and times of the hearing be changed to July 21, 2015 (commencing at 9:00 a.m. or such other time as the Commission may provide) and July 22, 2015 (commencing at 9:00 a.m. or such other time as the Commission may provide), if necessary. In support of this motion, PLAN states as follows:

- 1. By Secretarial Letters of June 29 and July 13, 2015, the Commission scheduled the hearing to occur on July 22, 2015, commencing at 2:00 p.m., and to continue on July 23, 2015, at 10:00 a.m., if necessary.
- 2. PLAN's counsel has a longstanding, pre-existing commitment on July 23, 2015, and therefore proposes moving the hearing from July 22 and 23, to July 21 and 22, 2015.
- 3. Due to the modest movement requested by PLAN, and given the practical effect of actually expediting (rather than delaying) the hearing, PLAN believes that granting this motion will promote the orderly and efficient conduct of the proceeding, pursuant to Puc 203.13(c).
- 4. Pursuant to Puc 203.13(b), PLAN's counsel has sought the concurrence of the other parties to the request. Counsel for Staff, the Company, and OCA all have indicated that they do not have any objection to the relief requested in this motion.

WHEREFORE, PLAN respectfully requests that the Commission:

- (A) Reschedule the hearing to commence on July 21, 2015, at 9:00 a.m.(or such other time as the Commission may provide), and continue to July 22, 2015, at 9:00 a.m. (or such other time as the Commission may provide), if necessary; AND
 - (B) Grant such other and further relief as the Commission deems appropriate.

RESPECTFULLY SUBMITTED,

PIPE LINE AWARENESS NETWORK FOR THE NORTHEAST,

By its attorneys,

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Dated: July 15, 2015

Certificate of Service

I hereby certify that on July 15, 2015, pursuant to Puc 203.02 & 203.11, I served an electronic copy of this Motion on each person identified on the Commission's service list for this docket and with the Office of the Consumer Advocate, by delivering it to the email address specified on the commission's service list for the docket.

Richard Kanoff

4830-7378-1285.2