## BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Re: Liberty Utilities (EnergyNorth Natural Gas) Corp.

d/b/a Liberty Utilities - Keene Division

Docket No. DG 17-068

## NOTICE OF REQUEST TO AMEND PRAYERS FOR RELIEF IN JOINT MOTION FOR REHEARING UNDER R.S.A. 541

Pursuant to Puc 203.10, joint movants, (a) Terry Clark, and (b) Beverly Edwards, Elizabeth Fletcher, Douglas Whitbeck, Gwen Whitbeck, Susan Durling, Julia Steed Mawson and Marilyn Learner, as they collectively comprise the NH Pipeline Health Study Group, and Individually ("Movants"), hereby give notice of their request to be granted permission to amend the prayers for relief at the end of their motion for rehearing filed on November 16, 2017 to say as follows:

"WHEREFORE, the movants respectfully request that the Commission:

- A. Grant this motion for reconsideration of and a rehearing on the Order; and
- B. Vacate (or reverse) the Order; and
- C. Dismiss this proceeding; and
- D. Grant such other and further relief as is reasonable, lawful, just and otherwise appropriate."

As grounds for this request, the Movants first state that the amendment will "encourage the just resolution of the proceeding" as the amended prayers better comport with the relief sought by the movants in the motion for relief, which is appropriate to the just resolution of the proceeding for the reasons asserted in the motion. Second, the Movants state that the amendment "will not cause undue delay" as the Commission can either determine that it relates back to the original motion filing date and therefore does not extend deadlines triggered by the

filing of the motion or can extend such deadlines without causing undue delay: the Movants agree to any such extension the Commission deems appropriate.

Respectfully submitted,

Dated: November 20, 2017

//s//Richard M. Husband, Esquire Richard M. Husband 10 Mallard Court Litchfield, NH 03052 N.H. Bar No. 6532 Telephone No. (603)883-1218

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have on November 20, 2017, served an e-mail copy of this pleading on each person identified on the Commission's service list for this docket, by delivering it to the e-mail address identified on the Commission's service list for the docket.

//s//Richard M. Husband Richard M. Husband