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February 17, 2010

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

NHPUC FEB18'10 PM12:22

RE: DRM 10-014: Comments on Proposed Changes to Puc ch. 2000

Dear Ms. Howland,

Granite State Electric Company and EnergyNorth Natural Gas, Inc. (collectively, "National Grid") are providing additional comments on N.H. Code of Administrative Rules Puc ch. 2000 following the technical session on February 5, 2010.¹ Specifically, National Grid requests that the Commission staff consider the following comments and revisions to the current proposed draft:

1. In its initial set of comments, National Grid requested that draft rule Puc 2003.01(c)(10) be amended to require the inclusion of zip codes in which an applicant intends to operate in registration applications governed by Puc 2003.01(a). TransCanada Power Marketing Ltd. ("TransCanada") objects to this amendment as being overly burdensome and not necessary in New Hampshire. National Grid respectfully disagrees with TransCanada. As National Grid explained in its initial set of comments, there can be multiple zip codes within a particular town or region and frequently applicants do not plan to operate throughout a utility's service territory. By requiring the inclusion of zip codes in a registrant's application, the Commission and utilities will know with greater precision the areas in which a CEPS intends to operate.
2. TransCanada suggests limiting the application of draft rule Puc 2004.06(b), which states that "[n]othing shall prevent a CEPS from requesting an off-cycle meter reading," to

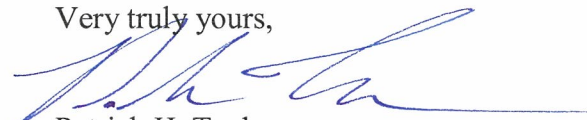
¹ National Grid originally submitted these additional comments on February 12, 2010 in a letter addressed to staff attorney Matthew Fossum.

requests related to customer accounts with “time of use meters.” While National Grid welcomes such a limitation in the scope of the rule, it remains concerned that without further clarification a utility may be required to respond to off-cycle meter reading requests by competitive suppliers without limitation or compensation. It therefore requests that Puc 2004.06(b) be modified to either state that it imposes no obligation upon any utility, or:

- a. State that a utility may deny such requests if certain reasonable prerequisites are not met;
 - b. Require a CEPS requesting an off-cycle meter reading to provide at least five business days’ notice of the request; and
 - c. Permit the utility to impose a reasonable charge for the service. National Grid notes that Granite State Electric Company’s tariff (N.H.P.U.C. 17 – Electric) allows the utility to charge customers for off cycle meter reads. A copy of the relevant tariff page is attached hereto as Attachment A.
3. At the February 5, 2010 technical session, there was discussion as to whether Puc ch. 2000 applies to electricity “brokers” operating in the state of New Hampshire. The Commission staff indicated that Puc ch. 2000 as it is currently written does not apply to such brokers. National Grid believes that amending the rules to define and apply to electricity brokers will benefit consumers in New Hampshire and therefore National Grid encourages such an amendment.

National Grid appreciates the opportunity to provide these comments to the Commission staff. National Grid intends to participate in technical sessions and other aspects of the rulemaking process as it progresses, and therefore may supplement these comments during the course of that process. Thank you for your assistance in this matter, and please feel free to contact me with any questions you may have.

Very truly yours,



Patrick H. Taylor

cc: Service List (via electronic mail)
Steven V. Camerino
Sarah B. Knowlton
Juliana Griffiths

ATTACHMENT A

N.H.P.U.C. No. 17 – ELECTRICITY
GRANITE STATE ELECTRIC COMPANY

First Revised Page 92
Superseding Original Page 92
Off Cycle Meter Read for Switch of Supplier Provision

GRANITE STATE ELECTRIC COMPANY OFF CYCLE METER READ FOR SWITCH OF SUPPLIER PROVISION

An Off Cycle Meter Read under this provision is available to customers receiving metered retail delivery service from the Company under the Company's Rate G-1, General Service Time-of-Use rate. Customers who receive unmetered retail delivery service must request metered retail delivery service in accordance with the Company's Terms and Conditions. The availability of this service will be subject to the Company's ability to render such service.

Description of Service

A Customer requesting an Off Cycle Meter Read agrees to pay the Off Cycle Meter Read Charge included in this provision. An Off Cycle Meter Read will be performed by the Company at the request of the Customer to facilitate the transfer of generation service between the Company-supplied Default Service and Competitive Supplier generation service. There will be a separate Off Cycle Meter Read Charge for a Customer who is telemetered and for a Customer who is non-telemetered. The Company will assess an Off Cycle Meter Read Charge for each off cycle meter read performed at a Customer's service location.

Schedule of Charges

The Off Cycle Meter Read Charge is as follows:

Telemetered Customer	\$78.00
Non-telemetered Customer	\$102.00

The Company's terms and conditions in effect from time to time where not inconsistent with any specific provisions hereof, are a part of this Off Cycle Meter Read for Switch of Supplier Provision.

Issued: March 29, 2006

Issued by: /s/Cheryl A. LaFleur
Cheryl A. LaFleur

Effective: May 1, 2006

Title: President

(Issued in Compliance with Order No. 24,609 in Docket No. DE 05-126 dated March 28, 2006)