



DG10-245
opened on 9/13/10
del

July 9, 2010

BY OVERNIGHT MAIL

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



RE: Docket No. DG 10-245

Dear Director Howland:

Pursuant to its petition filed on April 13, 2009, in this docket, Northern Utilities, Inc., ("Unitil") requested a temporary waiver of the requirement of N.H. Admin. Rule Puc 505.07 that the Company maintain facilities and equipment necessary for accurately testing all types and sizes of meters employed for the measurement of gas to its customers. The Company stated that it would contract with qualified outside service companies for this testing for a period of 12 months, during which time it would analyze whether it would be more cost-effective to pursue purchasing meter testing equipment and facilities. The New Hampshire Public Utilities Commission ("Commission") granted the temporary waiver by Secretarial Letter dated July 22, 2009.

Unitil has completed the above-described analysis, and finds that the estimated annual operating costs of \$116,500 would exceed the current annual expenditures of \$85,785 paid to vendors for performing testing. Accordingly, the Company concludes that it is not economical at this time to pursue establishing a gas meter testing facility. A memorandum describing the study is enclosed for Commission review.

Based upon the results of the study, Unitil requests a waiver from the requirements of Puc 505.07 for a period of five years, or until such time as the Company determines that it is economical to establish its own testing facility, whichever occurs first. The five year waiver would be renewable, upon the Company demonstrating to the Commission's satisfaction that such renewal serves the public interest, and does not interfere with the orderly and efficient resolution of matters before the Commission. Additionally, while the Commission and its Staff are

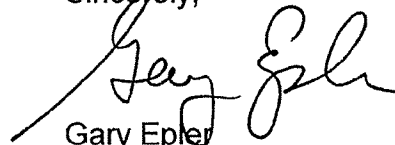
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reviewing this request, Unitil requests an extension of the temporary waiver of Puc 505.07 previously granted, until such time as a determination is made.

Please do not hesitate to contact me if you have any questions or concerns. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Epler", written over a horizontal line.

Gary Epler
Attorney for Northern Utilities, Inc.

Enclosure

cc: Randy Knepper, Director, Safety Division
Steve Frink, Assistant Director, Gas and Water Division
Amanda Noonan, Director, Consumer Affairs
Meredith Hatfield, Consumer Advocate