



MARLA B. MATTHEWS

214 N. Main Street
Concord, NH 03301

Ph: (603) 545-3604
Fax: (603) 228-6204
matthews@gcglaw.com

December 5, 2008

VIA HAND DELIVERY AND ELECTRONIC MAIL

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



Re: DRM 08-004; Comments and Proposed Language of National Grid

Dear Ms. Howland:

At the technical session in the above-captioned docket held on November 21, 2008, Attorney Fabrizio invited interested parties to submit proposed language changes and comments on the amended utility pole attachments rule. In response to this invitation, I am submitting the proposed language changes and comments of Granite State Electric Company d/b/a National Grid ("National Grid" or "Company").

National Grid's suggested language changes are included in the redlined version of the amended rule attached hereto as Exhibit 1. The remainder of this letter will provide a brief explanation of those proposed changes.

National Grid's proposed changes to sections 1301.02 and 1302.01 reflect its concern with the broad applicability of the rules. These concerns were outlined in a letter from Attorney Blackmore dated March 5, 2008 and are incorporated herein.

The proposed change to section 1303.03 is consistent with the Company's position that both the pole owner and the attaching entity should be required to negotiate in good faith. The Company changed section 1303.04 so that a pole owner will not be required to respond to a request for access to a utility pole until 45 days after the pole owner has received a completed application. The Company's proposed changes to section 1303.05 capture those situations where there is an unauthorized attachment to a pole.

National Grid's proposed changes to section 1303.06(a) are consistent with the comments made by the Company and other interested parties at the technical session on November 21, 2008. Section 1303.06(b) has been modified to capture additional

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situations in which an attaching entity should be required to provide the pole owner or owners with prior written notice of its intent to make changes to an existing attachment.

The Company's proposed changes to section 1303.07 reflect the Company's position that in addition to the publications listed in the amended rule, attachments must also be installed in accordance with the Telecordia Manual of Construction Procedures and applicable pole owner construction standards.

National Grid has proposed changes to sections 1303.10 and 1303.11 to make clear that boxing and extension arms should only be used in the limited circumstances that are set forth in the rule.

National Grid also added language to part 1304 relative to dispute resolution. It is the Company's position that a pole owner and an attaching entity should attempt to resolve a dispute on their own prior to bringing the dispute to the commission. The Company also added language that captures the situations where work should continue even though a dispute has arisen.

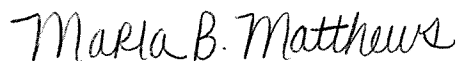
The Company proposes to add language to section 1304.03. The language suggested by National Grid establishes certain rights of pole owners and provides clarity around the remedies available to pole owners when an unauthorized attachment is discovered.

National Grid also made minor changes to sections 1303.01, 1303.12, and 1304.05. Since these are minor wording changes, additional explanation is not required.

National Grid appreciates the opportunity to provide proposed language changes and comments on the amended rule. If you have any questions, please do not hesitate to call me.

Respectfully submitted,

Granite State Electric Company
d/b/a National Grid



Marla B. Matthews

Enclosure

cc: Alexandra E. Blackmore, Esq.
Joseph H. Snyder
Service List (via electronic mail)