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June 25, 2009

**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 08-148; Comments of National Grid on Initial Proposal**

Dear Ms. Howland:

On behalf of Granite State Electric Company d/b/a National Grid ("National Grid" or "Company"), I am submitting comments on the proposed Puc 900 Rules (Net Metering for Customer Owned Renewable Energy Generation Resources of 100 Kilowatts or Less).

The Company's primary concern regarding the proposed rules is that under Puc 905.01(a), a utility cannot require a customer-generator to install and maintain a manual disconnect switch. Although Puc 905.01(b) provides the utility with options for disconnecting a customer-generator from the electric grid, in many instances these options are not cost effective, will impact other customers, and are likely to cause delays.

The proposed rules permit a utility to disconnect the customer-generator's service at the site transformer. In order to isolate a customer by cutting service, a utility will often be required to use a bucket truck and rated lineman wearing high voltage personal protective equipment. When service is cut, other customers may also lose power. On the other hand, a manual disconnect switch can be operated at ground level without high voltage gear. In addition, only the customer-generator will be impacted. Thus, the ability to use a manual disconnect switch would frequently save time and resources and not cause unnecessary power outages for the utility's customers.

GALLAGHER, CALLAHAN & GARTRELL, P.C.

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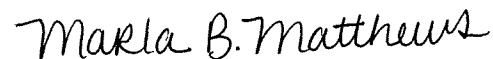
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For these reasons, National Grid respectfully suggests that Puc 905.01 be revised to provide the utility with the discretion to require an external manual disconnect switch on: (a) all customer generator facilities that are not UL 1741 listed inverter based systems regardless of size; and (b) all UL 1741 listed inverter based systems with aggregate capacity of over 10 KW.

National Grid appreciates the opportunity to comment on the proposed rules. If you have any questions, please do not hesitate to call me.

Respectfully submitted,

Granite State Electric Company  
d/b/a National Grid

A handwritten signature in black ink that reads "Marla B. Matthews". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Marla B. Matthews

cc: Alexandra E. Blackmore, Esq.  
Timothy R. Roughan  
Arthur D. Larson  
Service List (via electronic mail)