## national**grid**

Alexandra E. Blackmore Senior Attorney

July 27, 2007

## VIA HAND DELIVERY & 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: <u>DE 06-061; Response of Granite State Electric Company d/b/a National Grid to PSNH's</u>

<u>Motion for Rehearing of Order No. 24,763</u>

Dear Ms. Howland:

On behalf of Granite State Electric Company d/b/a National Grid ("National Grid" or "Company"), I am submitting this response in support of Public Service Company of New Hampshire's ("PSNH") Motion for Rehearing of Order No. 24,763 filed on July 23, 2007 ("Motion") in the above-captioned proceeding.

Although National Grid did not formally join in PSNH's Motion, National Grid concurs with many of the substantive and procedural issues raised by PSNH in the Motion. In addition, National Grid shares PSNH's concerns about the unintended impacts to customers, particularly residential customers, of the Commission's Order No. 24,763 ("Order").

National Grid anticipates that in order to implement the Order's requirement that the Company implement time-based rates, a full replacement of virtually all customer meters will be necessary at a significant cost. The costs of undertaking such a replacement need to be taken into account to determine whether the benefits of implementing time-based rates for all customers outweigh these costs. As PSNH correctly states in the Motion, data to support this undertaking has not been developed as part of the record in this proceeding. *See* Motion pp. 12.

National Grid respectfully suggests that the Commission should grant PSNH's Motion.

Thank you for your time and attention to this matter. If you have any questions, please feel free to contact me at 508-389-3243.

Very truly yours,

Alexandra E. Blackmore

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cc: Service List (via electronic mail)