



Community Action Program Belknap-Merrimack Counties, Inc.

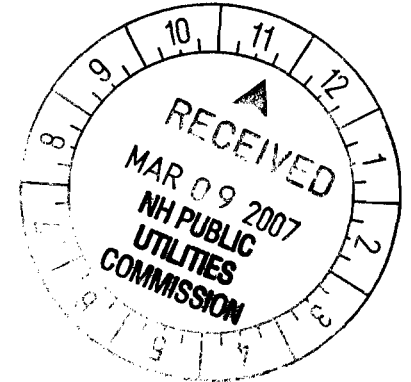


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March 6, 2007

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

Re: DG 06-107
National Grid USA and Keyspan Corporation
Petition for Approval of Merger Transaction



Comment of Community Action Agencies

Dear Ms. Howland:

The Community Action Agencies(CAAs) submit the following comments with respect to the proposed merger of National Grid USA and Keyspan Corporation (Keyspan). The Community Action Program Belknap-Merrimack Counties, Inc.(BMCAP) and Southern New Hampshire Services Inc.(SNHS) make up the CAAs that service the clients in the Keyspan territory of New Hampshire. As we describe in more detail, we ask that any merger approval include a more defined plan for the utilities' low-income energy efficiency programs, and an increase in budget for these programs.

The CAAs have had the opportunity to work with both National Grid and Keyspan for several years in other proceedings before this Commission. The CAAs and National Grid are each members of the Electric Assistance Program Advisory Board, which originated in 1997 as part of the Electric Restructuring docket in DR 96-150. Both the CAAs and National Grid are parties to the current Electric Assistance Program (EAP) docket, DE 07-009. In addition, the CAAs and National Grid have worked collaboratively as parties to the statewide Core Electric Energy Efficiency dockets. As a result of working with National Grid, the CAAs are aware of National Grid's firm support for the EAP, as well as National Grid's support for the low income Energy Efficiency program in DE 06-135, the current Core Electric Energy Efficiency Program docket. The CAAs are also the deliverers of energy efficiency programs to low income clients.

ALTON Elderly 875-7102 Prospect View Housing 875-3111	CONCORD Center 225-6880 Head Start/EHS 224-6482 Elderly 225-9092 Concord Area Transit 225-1989 Horseshoe Pond Place 228-6956 WIC/CSFP 225-2050	FRANKLIN Center 934-3444 Head Start 934-2161 Elderly 934-4151 Family Planning 934-4905 STD/HIV Clinics 934-4905 Riverside Housing 934-5340	LACONIA Center 524-5512 Head Start 528-5334 Early Head Start 528-5334 Elderly 524-7689 Family Planning 524-5453 Prenatal 524-5453 STD/HIV Clinics 524-5453	OSSIPEE Family Planning 539-7552 Prenatal 539-7552 STD/HIV Clinics 539-7552	PLYMOUTH Family Planning 536-3584 STD/HIV Clinics 536-3584
BELMONT Elderly 267-9867 Heritage Terr. Housing 267-8801	EPSOM Meadow Brook Housing ... 736-6250	KEARSARGE VALLEY Center 458-2207 Head Start 456-2208 Kearsarge Housing 456-3398	MEREDITH Center 279-4096 Elderly 279-5631	PITTSFIELD Elderly 435-8482 Head Start 435-6818	SUNCOOK Center 485-7824 Elderly 485-4254
BRADFORD Elderly 938-2104					TILTON/NORTHFIELD Head Start 286-3435

The CAAs have also worked collaboratively with Keyspan in the Gas Energy Efficiency docket, DG 06-032, and are aware of Keyspan's firm support for the low income Gas Energy Efficiency program. Keyspan has worked closely with the CAAs to assure that quality energy efficiency measures and services are delivered expeditiously to as many low income households as possible within the limits of the low income energy efficiency budget.

Upon inspection of the Joint Petition it appears that going forward with the merger energy efficiency programs will still be a part of the goals. The CAAs would like to stress the importance of these programs. The language in the Joint Petition is general in nature. We ask that there be a more defined plan outlining the commitment to these programs, with particular reference to the low income programs.

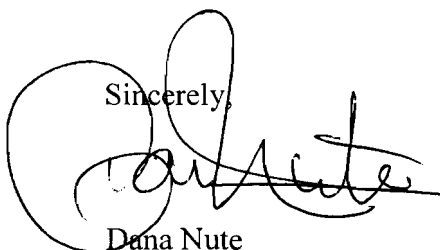
We also request that the Joint Applicants be required to increase the budget for the low income energy efficiency programs as part of the merger. Currently the CAAs service over 5400 Keyspan low income clients as part of the Fuel Assistance Program. These clients are also eligible for the electric efficiency program (CORE) and the Weatherization Assistance Program(WAP). During this current program year (5/1/06-4/30/07) the CAAs have found themselves depleting the budget in the month of January. At this current rate of production the program funding (3 year budget) will be depleted by October of 2008. This creates a major problem when entering a heating season with no funding.

A budget increase is also needed to assist the CAAs in reducing the size of the "waiting list." The current budget for the Keyspan low income energy efficiency program is approximately \$280,000 per year, which is planned for 140 -150 clients. During the first 3-year program period (5/1/03-4/30/06) the CAAs serviced 623 clients for approximately \$795,000. This low income energy efficiency program works in collaboration with the electric utilities' low income energy efficiency program and with the Department of Energy's Weatherization Assistance Program . The CAAs have combined the 3 funding sources/programs to maximize the collaboration efforts. There is now a long waiting list for these services. A large portion of the "waiting list" is comprised of elderly, handicapped, and children and is comprised of both homeowners and renters. The program also addresses health and safety issues for families in need of safe and operable heating systems, as many clients are unable to purchase a system due to lack of finances. It would be highly beneficial to the program and low income clients if there was a budget increase specified in the merger plan.


For the past 4 years the CAAs have met with Keyspan and other interested parties on a quarterly basis to review the progress of the program. As shown above it is apparent that there is a high customer demand for the low income energy efficiency program. Although the CAAs are not a party to the proceedings, we hope that the information provided here will educate the involved parties as to the importance of the program and a need to increase the future budget of the low income energy efficiency program.

The CAAs appreciate the opportunity to submit the above information and comments and are willing to assist in any way to continue and increase the performance of the energy efficiency programs. In summary there is a need for an increased budget to meet the growing demands due to rising energy costs and increased numbers of income eligible clients.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dana Nute', written over the word 'Sincerely,'.

Dana Nute
Director, Housing Rehabilitation and Energy
Conservation
Community Action Program of Belknap-
Merrimack Counties, Inc.

A handwritten signature in black ink, appearing to read 'Ryan Clouthier', written below the first signature.

Ryan Clouthier
Weatherization Director
Southern New Hampshire Services, Inc.

DN:dcn

Enclosure

Cc:

Service List DG 06-107

Executive Directors CAAs

Rita Carvalho, Program Director, Action Inc.