



June 25, 2009

**BY HAND-DELIVERY**

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. DRM 08-148 Net Metering Rules**

Dear Director Howland:

Please accept this letter as the comments of Unitil Energy Systems, Inc. ("UES"), on the proposed revisions and amendments to Puc 900, Net Metering Rules, as set forth in New Hampshire Public Utilities Commission ("Commission") Rulemaking Notice Form filed with the Office of Legislative Services on May 12, 2009.

Proposed revisions to Puc 905.01: Unitil recommends that the disconnect switch be required for systems greater than 10kW, as provided in the original 900 rules. At times a utility is required to disconnect all possible sources of current on a given circuit. For sources up to 10 kW, utility crews are able to pull the customer meter to disconnect the customer generator. For sources greater than 10kW, utility crews are not confident in breaking the current by pulling the meter. Therefore, a disconnect switch should be required in order to disconnect the single customer. Removing taps on the circuit would be much more costly and time consuming, since this would require the use of a bucket truck and a two-person crew. This action would also affect a greater number of customers.

UES has no further comments on the proposed rules, other than to note its appreciation for the work of the Commission Staff and other interested parties during the course of this docket.

Sincerely,

Gary Epler  
Attorney for Unitil Energy Systems, Inc.

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