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June 22, 2009

Debra Howland  
Executive Director & Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, New Hampshire 03301-7319

RE: DG 09-053 Northern Utilities, Inc. d/b/a Unitil – Gas Energy Efficiency Programs

Dear Ms. Howland:

I am writing to follow up on our recent discussion about portions of the final Order (No. 24,968) in the above-referenced docket which we believe are in error. I appreciate your willingness to consider our request that the Order be corrected to accurately reflect the OCA’s position in the docket. The two specific corrections that we seek are discussed below.

There are two references to OCA positions in the Order that are not accurate. The first, on p. 6 in Section D of the Order, states that the “OCA supports Northern’s filing and recommends the Commission approve it.” This was not our position. It is important to note that the only time during the very quick docket for parties to state their position was at the final hearing. On p. 88 of the final hearing transcript I stated on behalf of the OCA that we had not had sufficient time to review Northern’s proposal. I stated that we believe that “it is important to continue offering cost-effective gas efficiency programs to Northern’s customers,” and that we “support” the company’s willingness to file a 20-month program, but I specifically did not say that we supported the company’s proposal because our Office did not have sufficient time to review the company’s proposal (which I did note in my closing). We would like to have the Order accurately reflect this but having the first sentence of Section D removed.

Second, on p. 9 the Order states “We note that Staff, OCA, and the parties do not object to how the low-income budget is funded.....” Again, this does not reflect the OCA’s position, as we stated at the hearing that we had several concerns about the company’s proposal. Beginning on p. 88 of the transcript I stated “we are troubled and are watching very closely” the low income funding proposal, and I go on to explain why the OCA did object, though we did not use that term specifically. This is a critical issue for our Office, and we specifically raised it and referenced the long-standing precedent for funding low income programs due to Staff’s recent

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position in the Core program docket that the Commission should change its policy on the funding of low income programs. Therefore, it is very important to us to have our position, and our concerns as reflected in our closing statement, correctly reflected in the Order.

I appreciate your consideration of our requests. As always, please do not hesitate to contact me if you need more information.

Respectfully,

A handwritten signature in black ink, appearing to read 'MAH', written in a cursive style.

Meredith A. Hatfield  
Consumer Advocate

cc: Service List via electronic mail