



Sarah B. Knowlton
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February 22, 2013

Via Overnight Mail and Electronic Mail

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429



**Re: DRM 11-077: EnergyNorth Natural Gas, Inc. d/b/a Liberty Utilities
Comments on Proposed Changes to Puc 500 Rules for Gas Service**

Dear Ms. Howland:

I am writing on behalf of EnergyNorth Natural Gas, Inc. d/b/a Liberty Utilities (“Liberty” or the “Company”) regarding the Annotated Final Proposal of the Puc 500 rules that was circulated last night at 5:00 p.m. My understanding is that the Commission is finalizing the Puc 500 Rules today to submit to JLCAR for Monday’s deadline.

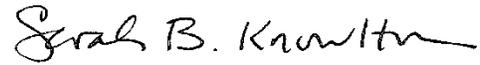
The Company remains extremely concerned about the lack of a meaningful opportunity to review and comment on the draft rules, particularly given that there were changes to the rules that were circulated last night for the first time. While the Company is very appreciative of the Commission’s time at the February 15, 2013 public hearing, we believe that there are areas of the rules that warrant further discussion. Given that the Company has not had the opportunity to sufficiently review the new provisions, the Company is requesting that the Commission only finalize those portions of the Puc 500 rules where there is agreement, and to hold back for further consideration those rules that are in dispute. As the Company indicated at the hearing, the rules are fundamental to the operation of the Company’s business and it is important given the seriousness of the matters they implicate that the provisions be given adequate time for consideration. Specifically, the Company is requesting that the Commission hold back for further consideration the following provisions: Puc 502.14, 502.20, 504.06(a)(1), 505.04(h), 506.01(e) and (f), 506.01(l)(regarding multi-service installations, assuming that provision is in the proposed final rule), 506.02(t), 506.03(a), 508.04(m)(3)(a), and 508.04(p), (q), (r).

Specifically, we propose a January 1, 2015 effective date for the Leak Classification proposal. This would allow us enough time to reduce the significant cost and resource impacts, yet, reduce our Grade 3 leak population during this period. Further, it avoids a process cutover in the middle of our maintenance season as well as the need for a waiver.

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Thank you for your consideration of the Company's request.

Very truly yours,

A handwritten signature in black ink that reads "Sarah B. Knowlton". The signature is written in a cursive style with a long, sweeping underline.

Sarah B. Knowlton

cc: Service list