STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH

Docket No. DG 12-128

MOTION FOR LATE FILING OF HEARING EXHIBIT

NOW comes the Staff of the Public Utilities Commission, and moves to include the attached Appendix as a late-filed hearing exhibit in Docket No. DG 12-128, pursuant to N.H. Admin. Rules Puc 203.30 and Puc 203.07, as follows:

- 1. Staff, for the purposes of the Commission's consideration of the filing made by EnergyNorth Natural Gas, Inc. d/b/a National Grid NH (National Grid) in this docket, finds it advisable that a data response made by National Grid to Staff Data Request 1-4, prepared by National Grid's witness Ms. Mindy Rosen, be included in the hearing record for this case. Staff would request that this data response, attached as an Appendix to this motion, be marked as Exhibit 5 in Docket No. DG 12-128.
- 2. This data response would provide confirmation that, consistent with past adjustments, National Grid has reduced all rate components on an equal basis for its Fiscal Year 2012 Cast Iron Bare Steel Program (CIBS) results. This information is of probative value to the Commission in its analysis of National Grid's CIBS filing.
- 3. Inclusion of this late-filed exhibit, and reopening of the record, would not prejudice the positions of National Grid, disrupt the orderly administration of this proceeding, or impair National Grid's right to cross-examination, as this information presents the response of National Grid's witness Rosen to a Staff inquiry that is satisfactory to Staff on its face.
 - 4. National Grid supports Staff's motion for late filing of this material.

WHEREFORE, Staff respectfully states and requests:

- A. The Commission grant this motion to designate the attached material as Hearing Exhibit 5 in Docket No. DG 12-128, pursuant to N.H. Admin. Rules Puc 203.30 and Puc 203.07; and
- B. Grant such other and further relief as justice may require.

Respectfully submitted,

Staff of the N.H. Public Utilities Commission

Date: June 13, 2012

By:

Alexander F. Speidel

Staff Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded to all parties on the official service list for Docket No. DG 12-128.

Date: June 13, 2012

By:

Alexander F. Speidel

Staff Attorney

APPENDIX

ENERGYNORTH NATURAL GAS, INC. d/b/a NATIONAL GRID NH DG 12-128 NATIONAL GRID NH's REPONSES TO STAFF SET 1

Date Request Received: 05/23/12

Request No. Staff 1-4

Date of Response: June 4, 2012

Witness: Mindy Rosen

REQUEST:

Please explain the rate design to recovery the proposed increase in the revenue requirement and provide a copy of the proposed tariff pages that reflect the changes (redline of current tariff).

RESPONSE:

See Attachment Staff 1-4(a) for the proposed tariff pages.

The Company has designed rates which will result in a reduction in annual revenues by \$44,226. This decrease in revenue is a result of the inclusion of a one-time credit of \$98,794 associated with the overbilling for the period July 2011-June 2012 referred to in Ms. Rosen's testimony. Specifically, the incremental cumulative revenue requirement for fiscal year 2012 amounts to \$1,055,920 (as shown on Attachment C, Page 1 of 5, Line 35, Column (d)), or \$54,568 more than the \$1,001,352 which is currently being billed. However, as indicated in the testimony of Ms. Rosen, the cumulative revenue requirement for fiscal year 2011 should have been \$902,558, or \$98,794 less than the cumulative revenue requirement calculation of \$1,001,352 previously submitted to the Commission and currently being billed by the Company. Consequently, the net revenue change being proposed in this proceeding is \$(44,226), comprised of the incremental cumulative revenue requirement of \$54,568 less a one-time credit for the FY 2011 revenue requirement over billing of \$98,794. See Attachment Staff 1-4(b). This is a one-time credit of \$98,794 intended to correct the overbilling that will not be included in next year's filing. Therefore, the incremental revenue to be billed to customers for fiscal year 2013 is currently estimated at \$406,799. See Attachment Staff 1-4(b).

Consistent with past adjustments, the Company has reduced all rate components on an equal basis.