

Before the New Hampshire Public Utilities Commission

DG 06-105

EnergyNorth Natural Gas, Inc. d/b/a KeySpan Energy Delivery New England
2006 Integrated Resource Plan

OFFICE OF CONSUMER ADVOCATE'S CLOSING STATEMENT

The Office of Consumer Advocate (OCA) takes no position on the adequacy of the 2006 Integrated Resource Plan ("IRP") filed by EnergyNorth Natural Gas, Inc. d/b/a Keyspan Energy Delivery New England ("EnergyNorth"). Rather, the OCA recommends that the New Hampshire Public Utilities Commission ("Commission") require EnergyNorth to include additional information in its next IRP filing. These additional requirements are discussed further below.

Since EnergyNorth filed its 2006 IRP in August 2006, a significant development has occurred. Specifically, on September 14, 2007, EnergyNorth filed a petition for approval of a firm transportation agreement with Tennessee Gas Pipeline Company (TGP). The Commission docketed this filing and opened a proceeding to review it, DG 07-101. *See* Order of Notice, October 9, 2007. The OCA participated in this docket.

As originally proposed, the agreement between EnergyNorth and TGP would provide additional capacity of 30,000 MMBtu/day on the Concord Lateral, a TGP pipeline which extends from Dracut, Massachusetts to Concord, New Hampshire, and would cost EnergyNorth ratepayers over \$4 million per year. Commission Staff and the parties to DG 07-101 engaged in a detailed investigation and analysis of EnergyNorth's Concord Lateral proposal, the scope of which by necessity went beyond a traditional IRP analysis.¹

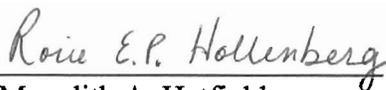
¹ On February 8, 2008, Staff and EnergyNorth filed a settlement agreement in DG 07-101. The Commission held a hearing on this settlement agreement on February 14 but has not yet issued an order.

Given the circumstances of this docket and DG 07-101, the OCA takes the position that the outcome of this IRP docket should focus on how to improve EnergyNorth's next IRP filing. To this end, the OCA recommends that the Commission require EnergyNorth to include a full analysis of all cost-effective Demand Side Management (DSM) and Energy Efficiency (EE) opportunities in its next IRP. The depth and scope of this DSM/EE analysis should be comparable to any analysis of supply-side options, and, to the extent not otherwise required, should include a comprehensive assessment of all benefits and costs. With regard to any remaining requirements of the next IRP, the OCA defers to the recommendations of Staff and the judgment of the Commission.

The OCA believes that continued analyses by the Commission of EnergyNorth's general forecasting methodologies and procurement and planning processes are lawful, necessary and reasonable. The OCA disagrees with any arguments to the contrary.

Thank you for the opportunity to make this closing statement and for consideration of the OCA's recommendations for EnergyNorth's next IRP.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was forwarded this day to the parties by electronic mail.

February 21, 2008



Rorie E.P. Hollenberg