



September 3, 2014

BY OVERNIGHT MAIL and E-MAIL

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

RE: Request for Waiver of Puc 505.07

Dear Director Howland:

Please accept this letter as the request of Northern Utilities, Inc. ("Northern") for a waiver, pursuant to N.H. Code Admin. Rule Puc 201.05, of the requirement of Rule Puc 505.07 that the Company maintain facilities and equipment necessary for accurately testing all types and sizes of meters employed for the measurement of gas to its customers, and to allow it to have such testing done elsewhere.

The New Hampshire Public Utilities Commission ("Commission") previously granted Northern a three year waiver of Puc 505.07(a) by Secretarial Letter of October 28, 2010 in docket DG 10-245. With the expiration of the waiver, Northern has performed an analysis, similar in scope and detail to that performed and submitted in DG 10-245, as to whether it would be more cost-effective to pursue purchasing meter testing equipment and facilities or to continue to contract with qualified outside service companies for this testing.

Unitil has completed the above-described analysis, and finds that the estimated annual operating costs of \$127,740 would exceed the current annual expenditures of \$62,621 paid to vendors for performing testing. Accordingly, the Company concludes that it is not economical at this time to pursue establishing a gas meter testing facility. A memorandum describing the study is enclosed for Commission review.

In addition to this study, and for administrative efficiency, the Company has updated its responses to data requests promulgated by the Commission Staff and responded to by the Company in DG 10-245. The Company has enclosed these updated responses as additional support for its request for a waiver.

Gary Epler
Chief Regulatory Counsel
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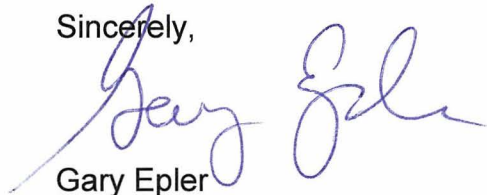
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Based upon the results of the study, Unitil requests a waiver from the requirements of Puc 505.07 for a period of three years, or until such time as the Company determines that it is economical to establish its own testing facility, whichever occurs first. The three year waiver would be renewable, upon the Company demonstrating to the Commission's satisfaction that such renewal serves the public interest, and does not interfere with the orderly and efficient resolution of matters before the Commission.

Please do not hesitate to contact me if you have any questions or concerns. Thank you for your attention to this matter.

Sincerely,



Gary Epler
Attorney for Northern Utilities, Inc.

Enclosures

cc: Randy Knepper, Director, Safety Division, NHPUC
Steve Frink, Assistant Director, Gas and Water Division, NHPUC
Susan Chamberlin, Consumer Advocate