



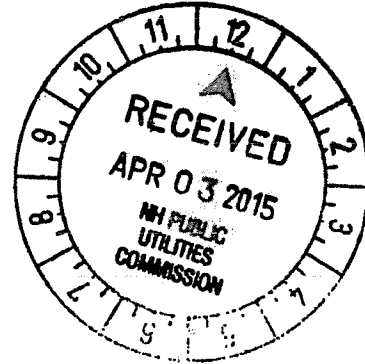
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**VIA OVERNIGHT DELIVERY**

April 2, 2015

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



Re: PS1501NU (Dover Low Pressure System)  
PS1502NU (Portsmouth Intermediate Pressure System)

Dear Ms. Howland:

Northern Utilities, Inc. ("Northern" or the "Company") has received the above-referenced Notices of Violation ("NOVs") issued by Commission Staff on March 26, 2015.

Northern disputes the NOVs. Pursuant to N.H. Code of Administrative Rules Puc 511.09(b) and 511.10(b), Northern respectfully requests that the Commission commence an adjudicatory proceeding for the purpose of deciding the NOVs. Consistent with Part Puc 203 (Adjudicative Proceedings) et seq., Northern requests that the following procedural components of an adjudicatory proceeding be adopted: prefiled testimony, discovery, evidentiary hearings and briefing.

In addition, as Staff notes in the NOV for PS1502NU (at pp. 3-4), Northern has requested from the Pipeline and Hazardous Materials Safety Administration ("PHMSA") a formal interpretation of whether the events related to PS1502NU constitute a violation of 47 U.S.C. Part 192 as alleged by Staff. Northern believes that the impending PHMSA interpretation is material to the Company's defense to the Staff's allegations. Specifically, although the Company's request for a formal interpretation is based on the facts of PS1502NU, PHMSA's interpretation may include analysis that is also applicable to PS1501NU (both NOVs allege violations of identical provisions of federal code, namely 47 U.S.C. §§ 192.619 and 192.195). Moreover, the Company intends to use the same witnesses to provide testimony on the two NOVs. Given the common alleged federal code violations and witnesses between the two NOVs, the Company requests that the NOVs be consolidated for purposes of the adjudicatory proceedings.

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Finally, the Company was advised by PHMSA earlier this week that the formal interpretation is being finalized and will issue soon. Accordingly, Northern requests that all proceedings on the NOVs be stayed until April 30, 2015 to allow PHMSA to finalize its interpretation and the Company and Commission Staff time to assess the implications of the interpretation with regard to the NOVs.

Please do not hesitate to contact me if you have any questions concerning this matter.

Very Truly Yours,

  
William D. Hewitt

And

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