national**grid**

Via UPS

June 19, 2008

Edward Damon, Esq. New Hampshire Public Utilities Commission 21 South Fruit Street Concord, NH 03301

Re: DG 06-107 Cast Iron Bare Steel Replacement Plan

Dear Mr. Damon:

I am writing to confirm the National Grid's understanding of the agreement reached at the technical session held on Friday May 9, 2008 regarding the Cast Iron Bare Steel Main Replacement Program, which was part of the May 15, 2007 Settlement Agreement approved by the Commission in Order No. 24,777 dated July 12, 2007.

On February 12, 2008, National Grid NH ("National Grid" or the "Company") submitted its initial list of proposed cast iron and bare steel main replacement candidates for fiscal year 2009. As noted in that filing, these replacement candidates were determined and prioritized in accordance with the Company's Procedure GENG-2050 (Identification, Evaluation and Prioritization of distribution Main Segments for Replacement). Over the course of several meetings between the Company and the Staff, this list was modified and refined. The final list of projects that resulted includes 4.07 miles (21,502 feet) at an estimated cost of \$3,635,605 dollars and is attached as Exhibit A (the "FY 2009 CIBS Plan"). Exhibit B is an updated Bill impact analysis based on the final proposal. In accordance with the Settlement Agreement dated May 15, 2007, the Plan does not include replacement of cast iron and bare steel pipes required in public works projects and/or carried pursuant to the main encroachment policy in effect on January 1, 2007, which the Company will continue in the ordinary course of business.²

¹ It also became apparent that GENG-2050 is an enterprise wide integrity management prioritized replacement policy containing many sections that are not pertinent to New Hampshire distribution systems and, as indicated below, a supplemental procedure specific to New Hampshire will need to be developed.

See Settlement dated May 15, 2007 at page 113 of 117.

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The Company has commenced work based on the priorities established in Exhibit A and will track all capital investments made in accordance with the FY 2009 CIBS Plan. On or before May 15, 2009, the Company will file a report with the Commission in accordance with the Settlement Agreement. The report will document the actual amount of capital investments made in accordance with the Plan during fiscal year 2009 and propose recovery of that amount less the agreed upon base spending amount of \$500,000. The purpose of the filing is to true up cost estimates of planned projects, with actual costs incurred, including latest loading factors.

As agreed during the May 9, 2008 technical session, the capital investments amount to be included for recovery under the Plan may include all prudently incurred direct and indirect³ costs associated with: (i) replacement or abandonment⁴ of cast iron and bare steel mains, including replacement of existing pipe with replacement pipe up to one diameter size larger than the existing pipe, (ii) replacement or abandonment of cast iron or bare steel service lines directly connected to bare steel or cast iron main replacement projects, and (iii) tie over of connected service lines not replaced or abandoned as part of a cast iron bare steel main replacement project.

Categories of costs that may not be included for recovery under the Plan include: (i) replacement or abandonment of plastic main, (ii) replacement or abandonment of coated steel main, regardless of vintage, (iii) replacement or abandonment of plastic or coated steel services connected to cast iron or bare steel main replacement projects, (iv) the differential in cost to replace existing cast iron or bare steel mains with pipe of a diameter that is more than one size greater than the existing main and the cost to replace that main with a pipe that is one diameter size larger than the existing main, (v) relocation of customer meters from inside to out and (vi) random cast iron or bare steel service replacements not connected to a cast iron or bare steel main replacement project.

The Company and Staff have determined preliminary dates and associated milestones during fiscal year 2009 to develop a New Hampshire specific procedure to supplement the National Grid procedure GENG-2050 which supplemental procedure will be taken into account when

Indirect costs mean overheads such as pension, OPEB's and other fringe benefits, payroll taxes, material handling costs and other general & administrative expenses that are loaded on all labor and material transactions. Categories of costs that may not be included for recovery under the Plan include: (vii) costs related to CIBS planning (other than normal engineering and project planning), reporting and filing.

For purposes of ii. and iii., abandonments such as mains that are not servicing a customer via a service will not be allowed. Other abandonments will be considered by Staff on a case by case basis.

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developing the National Grid, NH cast iron bare steel plan for fiscal year 2010 and beyond. Finally, bare steel segments that have been removed will be catalogued, photographed, and tested for remaining wall thickness and reported back to Staff.

Very truly yours,

Thomas P. O'Neill

Enclosures

cc: Randy Knepper

Stephen Frink

2008 New Hampshire Condition Main Replacement Candidates EXHIBIT A

<u>د</u> د	Paving Cate	Category Division	On Code	Locati n/Street	From	읩	Sano v	Exst Diameter M	Exst YOI	N System Pressure	m Relay		Abandon Footage	n Total	Aband	Recnet In Count	Relay/ Insert Services	Est	Estimated Direct Service	-1	Estimated Loaded	리크	LCost for Increased	AVG DCost / 1	AVG ation Cost / Factor	<u>iz</u>
											- 1	Footage					Count	Cost	Cost	- Direct Cost		Size	Size (60%)	F00t	F00t (Pr)	
First Group	First Group of \$500K Approved	proved	1				363											一							-	- 1
-	No PR(PROG NH - Cent	NH - Central MNC	Brown Av	O'Malley St	W Hillcrest Av	406-492	9	CI 1930	30 LP	8	510	0	510	0	0	1 1	\$39,553.69	\$1,395.53	3 \$40,949.22	\$65,518.75		\$0.00	\$80.29 \$128.47	_	
2 Yes	Yes-PEND PRO	PROG NH - North	orth CCD	Centre St	Merrimack St	N Spring St	54-74	4	CI 19.	32 LP AB to	1932 LP AB to 60 P; Relay/Abar	Abar 65	750	815	1	0	2 3	\$35,143.80	\$2,437.19	6 837,580.99	\$60,129.58	\$0.00	\$0.00	\$46.11 \$73	\$73.78 172.00	0 586407
<u>س</u>	No RNI	RNMC NH - South	uth NAS	Chestnut St	60 Chestnut St	82 Chestnut St	60-82	2	BS 19	38 LP AB to	1908 LP AB to 60 P; Abandon	don 0	700	700	2	_	8 11	\$19,674.74	\$10,548.76	76 \$30,223.50	\$48,357.60	\$0.00	\$0 .00	\$43.18 \$69	\$69.08	0 548871
4	No PRO	PROG NH - Central	ntral MNC	Varney St	Brock St	Precourt St	451	4	CI 1916	I6 LP	9	1085	0 9	1085	0	8	9 12	\$125,099.13	3 \$15,403.86	86 \$140,502.99	9 \$224,804.78	\$33,317.32	\$53,307.71	\$129.50 \$20	\$207.19 145.00	0 586547
31 Yes	Ð	RNMC NH - North		Holt St	School St	#2 Holt St	2-20	7	BS 1894	M LP	4	475	0	475	2	3	5 10	\$35,421.64	\$8,669.91	1 \$44,091.55	\$70,546.48	\$2,280.00	\$3,648.00	\$92.82 \$148.52	3.52 2.40	592301
3	l	, 					T					2135	1450	3585	2	7	25 37	\$254,893	\$38,455	5 \$293,348	\$469,357	835,597	926,928	\$130.92	1.92	
												0.40	0.27	89.0				Less Increased Sizing	sed Sizing	\$257,751	\$412,401				_	
Second Group Approved	p Approved						Г												SER.						\Box	
2	No PR(PROG NH - Central	ntral MNC	Shasta St	Lincoln St	S Hall St	584-642	4	CI 1954	54 LP	9	1200	0 (1200	0	9	10 16	\$81,986.78	\$18,755.30	30 \$100,742.08	8 \$161,187.33	\$0.00	\$0.00	\$83.95 \$13	\$134.32 145.00	0 586538
9	No PR(PROG NH - North	orth CCD	Concord St	exst 4" Plat #7	EOM	7-13	2	BS 1953	53 LP	4	145	0	145	_	-	1 3	\$19,752.13	\$1,841.66	6 \$21,593.79	\$34,550.06	\$836.65	\$1,338.64	\$148.92 \$23	\$238.28 102.40	
7 Yes	Yes-PEND PRO	PROG NH - Central	ntral MNC	Cedar St	Elm St			3	CI 1927	27 LP	4	260	0	260	0	0	1	\$44,031.39	\$1,496.62	52 \$45,528.01	\$72,844.82	\$1,500.20	\$2,400.32	\$175.11 \$28	\$280.17 68.00	586501
*	No RN	RNMC NH - South	uth NAS	DEXTER ST	43 DEXTER ST	49 DEXTER ST	43-49	7	BS 1927	27 LP	4	200	0	200	0	_	2 3	\$25,615.56	\$3,864.28	8 \$29,479.84	\$47,167.74	\$1,154.00	\$1,846.40	\$147.40 \$23	\$235.84 65.00	548877
6	No RN	RNMC NH - South	uth HUD	Gloria Av	Highland St	#11 Gloria Av	2-19	7	BS 1954	54 60	4	275	0	275	0	_	3 4	\$38,614.41	\$4,986.59	9 \$43,601.00	\$69,761.60	\$0.00	\$0.00	\$158.55 \$25	\$253.68 60.00	548872
10		PROG NH - Central	ntral MNC	Rosedale Av	#30 Rosedale Av	#33 Rosedale Av	33	2	BS 19.	1958 LP	Abandon	don 0	52	22	0	0	1 1	\$8,537.13	\$1,064.28	\$ \$9,601.41	\$15,362.26	\$0.00	\$0.00	\$184.64 \$29	\$295.43 60.00	586531
11		RNMC NH - South	uth NAS	Brook St	1-17 Brook St, Nas		1-17	7	BS 1921	21 LP	4	530	0	530	0	0	6 6	\$54,114.43	\$10,082.68	68 \$64,197.11	\$102,715.38	\$3,058.10	\$4,892.96	\$121.13 \$19	\$193.80 60.00	548884
12		PROG NH - Central	ntral MNC	Esty Av	Hall St	EOM	30-62	4	CI 1959	99 LP	9	455	0	455	0	_	3 4	\$36,509.02	\$4,894.79	9 \$41,403.81	\$66,246.10	\$0.00	\$0.00	\$91.00 \$14	\$145.60 60.00	586504
13 Yes	Yes-PEND PRO	PROG NH - Central	ntral MNC	Hall St & Lowell St	Concord St	E High St	829-265	3	CI 1893	33 LP	9	750	0	750	4	2	10 19	\$90,672.00	\$17,601.43	43 \$108,273.43	3 \$173,237.49	\$0.00	\$0.00	\$144.36 \$23	\$230.98 60.00	805985
14	No PR(PROG NH - South		Mulberry St	Elm St	Chestnut St	18-38	2	BS 19	1912 LP	4	009	0	009	0	2	10 15	\$78,521.41	\$18,897.72	72 \$97,419.13	\$155,870.61	1 \$3,462.00	\$5,539.20	\$162.37 \$25	\$259.78 52.40	
15	No PR(PROG NH - South	uth HUD	School St	Library St	First St	26- 46	4	BS 1947	17 LP	9	860	0	860	0	0		\$90,503.75	\$1,395.53	3 \$91,899.28	\$147,038.85	20.00	\$0.00	\$106.86 \$17	\$170.98 50.00	586493
16	No PR(PROG NH - Central	ntral MNC	Green St	Wilson St	Hall St	159-109	4	CI 1912	12 LP	4	400	0	400	~	5	6 12	\$36,170.29	\$12,373.18	18 \$48,543.47	\$77,669.55		\$3,072.00	\$121.36 \$19	\$194.17 43.33	905985
17	No RN	RNMC NH - South	uth HUD	Library St	Highland St	School st	2-18	2	BS 19	1908 LP, LP A	LP, LP AB to (Relay/Abar	Ahar 335	475	810	0	0	2 2	\$47,004.30	\$2,791.06	6 \$49,795.36	\$79,672.58	\$1,932.95	\$3,092.72	\$61.48 \$98	\$98.36 35.00	548886
18	No RN	RNMC NH - South		NAS New Dunstable Rd & Liberty St	Gaffney St	Kinsley St		2	BS 19	1955 LP to 60	LP to 60 PSIG Relay/Abar	4bar 805	245	1050	0	2	11 6	\$72,673.51	\$14,159.77	77 \$86,833.28	\$138,933.25	5 \$5,040.00	\$8,064.00	\$82.70 \$132.32	2.32 32.00	548885
19 Yes	Yes-PEND PRO	PROG NH - North	orth CCD	School St	Liberty St	Westbourne Rd	114-122	4	CI 1911	11 LP	9	925	0	925	_	6	13 23	\$72,633.76	\$26,141.89	89 \$98,775.65	\$158,041.04	\$4,440.00	\$7,104.00	\$106.78 \$17	\$170.86 30.18	586413
20	No PR(PROG NH - North	orth CCD	Warren St & N Spring St	Rumford St	Pleasant St		4	CI 1892	32 LP	9	066	0	066	2	2	14 21	\$89,954.79	\$20,706.46	46 \$110,661.25	\$177,058.00		\$0.00	\$111.78 \$178.85	8.85 27.50	586414
21	No PRO	PROG NH - South	uth NAS	Prescott Rd & Putnam St	Baldwin St	Putnam St	31-40	2	BS 1924	24 LP	4 & 6	6 480	0	480	_	3	4 8	\$65,139.17	\$7,274.38	8 \$72,413.55	\$115,861.68	\$1,442.50	\$2,308.00	\$150.86 \$24	\$241.38 26.00	586551
22	No PR(PROG NH - North	orth CCD	N Main St	Storrs St	Chapel St	143-204	9	CI 1892	32 LP	00	875	0	875	0	2	11 16	\$100,838.30	96.966.81\$ 0	96 \$119,835.26	5 \$191,736.42	\$0.00	\$0.00	\$136.95 \$219.13		586410
23	No PR(PROG NH - Central	ntral MNC	Belmont St	Massabesic St	Auburn St	394-411	3	CI 1893	3 LP	9	430	0	430	-	3	7 11	\$57,838.67	\$11,460.97	97 \$69,299.64	\$110,879.42	\$0.00	\$0.00	\$161.16 \$257.86	7.86 20.00	586496
24	No PR(PROG NH - Central	ntral MNC	Harrison St	Hall St	High Ridge Rd 2	239-387	4	CI 1901	OI LP	9	1280	0 (1280	0	2	14 19	\$146,495.32	2 \$23,581.40	40 \$170,076.72		\$0.00	\$0.00	8132.87 \$212.60	_	
25	No PR(PROG NH - Central	ntral MNC	Liwell St & Chestnut St	Rosciuszko Rd	Bridge St		3&4	CI 1914	14 LP	9	1100	0 (1100	4	2	6 12	\$120,111.84	4 \$9,619.31	\$129,731.15	\$ \$207,569.84	\$0.00	\$0.00	8117.94 \$188.70	8.70 15.82	
26	No PR(PROG NH - Central	ntral MNC	Sagamore St	Beech St	Russell St	49-219	4	CI 1917	17 LP	9	1250	0 (1250	3	6	21 33	\$169,848.39	9 \$35,798.39	39 \$205,646.78	8 \$329,034.85	\$0.00	\$0.00	\$164.52 \$263.23	15.13	586536
27	No RNI	RNMC NH - South	uth NAS	Reed Ct	1 Reed Ct		-	1.25	BS 1913	13 LP	4	100	0	100	0	_	1 2	\$17,901.06	\$2,195.53	3 \$20,096.59	\$32,154.54	\$0.00	\$0.00	\$200.97 \$321.55	13.40	548894
28	No RN	RNMC NH - South	uth NAS	Lovewell St	110 Lovewell St	119 Lovewell St	10-119	2	BS 1908	% LP	4	200	0	200	0	0	1 1	\$33,394.64	\$1,395.53	3 \$34,790.17	\$55,664.27	\$1,154.00	\$1,846.40	\$173.95 \$27	\$278.32 12.00	548870
29	No PR(PROG NH - North	orth CCD	N State St	Chapel St	Centre St	52-105	9	CI 1892	Γ_{P}	AB to 60 P. Relay/Abar	4bar 225	1030	1255	3	13	16 32	\$39,632.34	\$31,313.00	00 \$70,945.34	\$113,512.54	\$0.00	\$0.00	\$56.53 \$90.45	.45 11.67	586411
30	No PR(PROG NH - North	orth TIL	Winter St	Cedar St	Peabody St	5- 20	4	BS 1931	11 60	9	575	0	575	0	4	0 4	\$45,645.10	\$3,200.00	0 \$48,845.10	\$78,152.16	\$0.00	\$0.00	\$84.95 \$135.92	10.91	586554
32			CCD	Woodman St (at High Scho I)	#4 Woodman St	#8 Woodman St	8-4	2	BS 19.	1929 LP to 60 PSIG		295	0	295	0	3	0 3	\$15,936.84	\$2,156.22	2 \$18,093.06	\$28,948.90	\$0.00	\$0.00	\$61.33 \$98.13	.13 0.00	586416
33	No PR(PROG NH - South	HUD	Connell St	Library St	#10 Connell St	6- 10	2	BS 197	1928 LP to 60 PSIG	PSIG 2	575	0	575	0	0	9 9	\$24,302.26	\$8,019.31	1 \$32,321.57	\$51,714.51	\$0.00	\$0.00	\$56.21 \$89.94	.94 0.00	586417
cond Group Totals	p Totals											16,115		17,917	21	89	182 292	\$1,724,379	\$316,064	130		\$25,940	\$41,505	\$182.21	177	
							1					3.05	0.34	3.39			1	Less Increased Sizing	sed Sizing	ш.	-1	4	١		+	
Grand Totals								II	Reduced Re	lay Diamete	Reduced Relay Diameter from OE An Iys.	lys, 18250	0 3252	21502		7	207 329	S1,979,272 S354,5 Less Increased Sizing	\$354,519 sed Sizing	9 \$2,333,791	\$3,734,066 \$3,635,605	\$61,538	S98,460	\$173.6		
							1						١	•							L					

Bill Impacts due to Cast Iron and Bar	e Steel Replacement Program
Annual Increase due to REP Cap program	\$512,004
Annual Throughput (based on Nov 07 COG filing)	155,445,404 Therms
Increase Factor	\$0.0033 /therm
Typical Residential bill (Based on Nov 07 COG)	\$1,862
Typical Usage	1250 therms
Annual Increase for Residential Heating customer	\$4.12
Percent bill increase	0.22%
Annual Bayanua 2000 07 from Bata Casa	\$470.500.000
Annual Revenues 2006-07 from Rate Case	\$176,520,000
Annual percent increase	0.29%

Energy North Illustrative Cast Iron, Bare Steel Replacement Program Illustrative Computation of Revenue Requirement

		4/08-3/09 Year			
		1			
	Deferred Tax Calculation				
1	CIBS Progam Targeted Spend	3,635,605			
2	Base Spending Amount	500,000			
3	Incremental Amount	3,135,605			
4	Cumulative REP Program Spend	3,135,605			
5		2.222/			
6	Book Depreciation Rate (a)	2.23%			
7	15/20 YR MACRS Tax Depr. Rates	5.00%			
8	Vinatge Year Tax Depreciation:	101 700			
9	Year 1 Spend	181,780			
10	Year 2 Spend				
11	Year 3 Spend				
12	Year 4 Spend				
13	Year 5 Spend				
14	A	101 700			
15	Annual Tax Depreciation	181,780			
16	Cumulative Tax Depreciation	181,780			
17	n in 12	01.010			
18	Book Depreciation	81,013			
19	Cumulative Book Depreciation	81,013			
20	Deal (Terre Times)	100 7/7			
21	Book/Tax Timer	100,767			
22	Effective Tax Rate	40.53%			
23 24	Deferred Tax Reserve	40.026			
	Deterred Tax Reserve	40,836			
25	D . D . O				
26	Rate Base Calculation	2 125 (05			
27	Plant In Service	3,135,605			
28	Accum Depr	(81,013)			
29 30	Def Tax Reserve Year End Rate Base	(40,836)			
	rear End Rate base	3,013,756			
31	D D				
32	Revenue Requirement Calculation	2 012 756			
33	Year End Rate Base	3,013,756			
34	Pre-Tax ROR	12.30%			
35	Return and Taxes	370,787			
36 37	Book Depreciation	81,013 1.92% 60,204			
38	Property Taxes (b) Annual Revenue Requirement	512,004			
39	Annual Revenue Requirement	312,007			
40	Annual Rate Adjustment		Year 2		
41	Annual Rate Aujustment		Ital 4		
42	Incremental Annual Rate Adjustment		512,004		
43	merementar runar rune ragionient	=	312,004		
44					
45	Imputed Capital Structure			Weighted	
46	ANAPASSA CAPISM ON MEMICE	Ratio	Rate	Rate	Pre Tax
47	Long Term Debt (c)	50.00%	7.12%	3.56%	3.56%
48	Short Term Debt	0.00%	0.00%	0.00%	0.00%
49	Common Equity (d)	50.00%	10.39%	5.20%	8.74%
50	Common Equity (a)	50.5076	10,5770	5.2076	9.7470
51		100.00%		8.76%	12.30%
٠.		100.0070		0.7070	12.50/0

- (a) Composite (Actual/Rate Case) Depreciation for Energy North Mains
- (b) Actual 2007 ratio of municipal tax expense to net plant in service
- (c) Actual/Rate Case Composite LTD Rate
- (d) Last approved ROE. To be replaced with ROE ultimately approved in Energy North's First Rate Case or subsequent rate cases.

ALEXANDRA E BLACKMORE NATIONAL GRID 201 JONES RD WALTHAM MA 02451 SHAWN J SULLIVAN COOK & MOLAN PA 100 HALL ST PO BOX 1465 CONCORD NH 03302-1465

STEVEN V CAMERINO MCLANE GRAF RAULERSON & MIDD 11 SOUTH MAIN ST STE 500 CONCORD NH 03301 KEN E TRAUM OFFICE OF CONSUMER ADVOCATE 21 SOUTH FRUIT ST STE 18 CONCORD NH 03301-2429

MEREDITH A HATFIELD OFFICE OF CONSUMER ADVOCATE 21 SOUTH FRUIT ST STE 18 CONCORD NH 03301 DONALD WIGHTMAN
UTILITY WORKERS UNION OF AMERIC
815 16TH ST NW
WASHINGTON DC 20006-4101

CATHERINE L NESSER ENERGYNORTH NATURAL GAS INC D ONE METROTECH PLAZA BROOKLYN NY 11201

THOMAS O'NEILL KEYSPAN ENERGY DELIVERY NEW E 52 2ND AVE WALTHAM MA 02451-1127

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SCOTT H STRAUSS SPIEGEL & MCDIARMID 1333 NEW HAMPSHIRE AVE NW 2ND F WASHINGTON DC 20036

Docket #: 06-107

Printed: June 23, 2008

FILING INSTRUCTIONS: PURSUANT TO N.H. ADMIN RULE PUC 203.02(a),

WITH THE EXCEPTION OF DISCOVERY, FILE 7 COPIES (INCLUDING COVER LETTER) TO:

DEBRA A HOWLAND EXEC DIRECTOR & SECRETARY NHPUC 21 SOUTH FRUIT STREET, SUITE 10 CONCORD NH 03301-2429

PURSUANT TO N.H. ADMIN RULE 203.09 (d), FILE DISCOVERY

DIRECTLY WITH THE FOLLOWING STAFF

RATHER THAN WITH THE EXECUTIVE DIRECTOR

LIBRARIAN NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

EDWARD DAMON NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

THOMAS FRANTZ NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

STEPHEN FRINK NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

RANDY KNEPPER NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

GEORGE MCCLUSKEY NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

ROBERT WYATT NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

BULK MATERIALS:

Upon request, Staff may waive receipt of some of its multiple copies of bulk materials filed as data responses. Staff cannot waive other parties' right to receive bulk materials.

Docket #: 06-107 Printed: June 23, 2008

DISCOVERY

PURSUANT TO N.H. ADMIN RULE 203.09 (d), FILE DISCOVERY

DIRECTLY WITH THE FOLLOWING STAFF

RATHER THAN WITH THE EXECUTIVE DIRECTOR

AMANDA NOONAN CONSUMER AFFAIRS DIRECTOR NHPUC 21 SOUTH FRUIT ST, SUITE 10 CONCORD NH 03301-2429

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