

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

Docket DG 08-009

**MOTION FOR WAIVER OF CERTAIN PROVISIONS OF
PUC 1604.01(a)**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH ("National Grid NH" or the "Company"), in accordance with Puc 201.05, hereby moves the New Hampshire Public Utilities Commission to waive certain of the Puc Chapter 1600 rules of the New Hampshire Code of Administrative Rules in order to avoid duplication and the imposition of an unreasonable burden. In support of its motion, National Grid NH states as follows:

1. For the reasons set forth below, National Grid NH seeks a waiver of the requirements of Puc 1604.01(a)(25) in limited instances. Puc 1604.01(a)(25) requires the filing of information required by Puc 1604.01(a) on the parent of any utility applying for rate relief. In all instances, the Company's filing in this case contains the information requested as it relates to the Company itself. In limited instances, information on the Company's parent (the "Parent") is not relevant to the Commission's review of the Company's request for rate relief and therefore would impose an unnecessary burden on the Company to produce. In addition, providing such information would increase the size of an already voluminous filing. Thus, the Company is seeking a waiver of those filing requirements in Puc 1604.01(a) set forth below to the extent they relate to the Parent.

1604.01(a)(1)(a)--Internal Financial Reports: The Company seeks a waiver of Puc 1604.01(a)(1)(a) to the extent it seeks financial reports of the Parent for the first and last month of the test year because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(3)--Federal Income Tax Reconciliation for the Test Year: The Company seeks a waiver of Puc 1604.01(a)(3) for federal income tax reconciliation information on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(4)--Detailed Computation of New Hampshire and Federal Income Tax Factors: The Company seeks a waiver of Puc 1604.01(a)(4) for a detailed computation of New Hampshire and federal income tax factors on the increment of revenue needed to produce a given increment of net operating income on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(19)--Quarterly Income Statement for the Past Three Years: The Company seeks a waiver of Puc 1604.01(a)(19) to the extent the rule seeks more information on the Parent than is contained in the 10-Q forms produced in response to Puc 1604.01(a)(10). Such additional information would be burdensome to produce and is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(21)--Description of Projected Need for External Capital: The Company seeks a waiver of Puc 1604.01(a)(21) to the extent the rule seeks information on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(22)--Capital Budget with a Statement of Source and Use of Funds: The Company seeks a waiver of Puc 1604.01(a)(22) to the extent the rule seeks information on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(23)--Provisions of Sinking Funds Associated with Senior Capital: The Company seeks a waiver of Puc 1604.01(a)(23) to the extent the rule seeks information on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

1604.01(a)(24)--Amount of Short Term Indebtedness Outstanding: The Company seeks a waiver of Puc 1604.01(a)(24) to the extent the rule seeks information on the Parent because such information is not relevant to the evaluation of the Company's request for rate relief.

2. National Grid NH's request for waiver of Puc 1604.01(a)(25), to the extent that the rule would otherwise require production of the information identified in the rules cited above, is in the public interest because compliance with these provisions would require production of information that is not relevant to the Company's rate request and thus would be unduly and unnecessarily burdensome. Moreover, granting of this request will not disrupt the orderly proceeding of the Commission.

WHEREFORE, National Grid NH respectfully requests that the Commission:

- A. Grant this Motion for Waiver of Certain Provisions of Puc 1604.01(a); and
- B. Such other relief as is just and equitable.

Respectfully submitted,

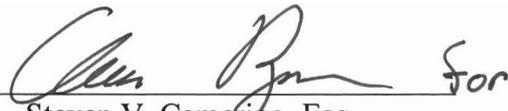
EnergyNorth Natural Gas, Inc.
d/b/a National Grid NH

By Its Attorneys

MCLANE, GRAF, RAULERSON &
MIDDLETON, PROFESSIONAL
ASSOCIATION

Dated: February 25, 2008

By:

A handwritten signature in black ink, appearing to read "Steven V. Camerino", is written over a horizontal line. To the right of the signature, the word "for" is written in a cursive script.

Steven V. Camerino, Esq.
Sarah B. Knowlton, Esq.
11 South Main Street, Suite 500
Concord, NH 03301
(603)226-0400
Email: steven.camerino@mclane.com
sarah.knowlton@mclane.com

Thomas P. O'Neill, Esquire
Senior Counsel
EnergyNorth Natural Gas, Inc.
d/b/a National Grid NH
25 Research Drive
Westborough, MA 01582
Telephone (508) 389-2947

Email: Thomas.P.ONeill@us.ngrid.com

Certificate of Service

I hereby certify that a copy of this Motion for Waiver of Certain Provisions of Puc 1604.01(a) has been hand-delivered to Meredith A. Hatfield, Esq. this 25th day of February, 2008.

 For

Steven V. Camerino