STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: July 11, 2009 **AT (OFFICE):** NHPUC

FROM: Randy Knepper for Safety Division

SUBJECT: DG 09-073 Northern Utilities Waiver Request for Meter Testing

TO: Debra Howland Steve Frink Amanda Noonan

The Safety Division has reviewed the April 13, 2009 temporary waiver request of NH-Admin Rule 505.07.

Northern Utilities has proposed contracting out its meter testing to Austin International out of York, South Carolina for meters that are less than 1000 cf. Northern Utilities' inventory of meters that are less than 1000 cf consist of approximately 27,500 meters out of an approximate 28,500 total meters (97%) in New Hampshire. The quantity annually tested of this meter size category is approximately 250.

For the remaining 3% of the company's meters inventory, Northern Utilities intends to use IMAC Systems out of Tullytown, PA. The quantity annually testef of this meter size category is approximately 85.

Northern Utilities has also stated that any witnessing of tests can take place at Unitil's gas facilities in Fitchburg, Massachusetts where contractors can perform the tests if required.

The temporary waiver request does not specify the starting and ending dates of the period. Considering this request is for a temporary 12 month period and is to evaluate the cost effectiveness and performance of the meter testing companies, the Safety Division has no objections to granting of this temporary waiver request.

At this point in time, the Safety Division can not see any potential degradation in safety levels nor harm to customers wanting to witness any tests. We do expect Northern Utilities to assume full responsibility for the procedures and equipment used in testing, qualification of personnel used, and results of such testing.