

McLane

McLane, Graf,
Raulerson & Middleton
Professional Association

900 Elm Street | P.O. Box 326 | Manchester, NH 03105-0326
Tel: 603.625.6464 | Fax: 603.625.5650 | www.mclane.com

OFFICES IN:
MANCHESTER
CONCORD
PORTSMOUTH
WOBURN, MA

PATRICK H. TAYLOR
Direct Dial: (603) 628-1266
Email: patrick.taylor@mclane.com
Licensed in NH and MA

July 22, 2010

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



RE: DRM 10-015: Comments on Proposed Changes to Puc ch. 3000

Dear Ms. Howland,

EnergyNorth Natural Gas, Inc. (“National Grid” or “the Company”) hereby respectfully submits comments on proposed changes to N.H. Code of Administrative Rules Puc ch. 3000. National Grid initially submitted written comments on proposed changes to Puc 3000 on February 17, 2010, and appreciates that the Commission has given serious consideration to the Company’s input.

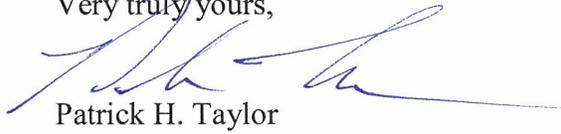
National Grid requests that the Commission staff consider the following comments and revisions to the current proposed draft of Puc 3000:

1. At the July 15 Public Hearing on N.H. Code of Administrative Rules Puc ch. 2000 (Competitive Electric Power Supplier and Aggregator Rules), Gerald Eaton, Senior Counsel for Public Service New Hampshire, expressed concern that the \$350,000 limit on security required of a CEPS upon initial registration, *see* Puc 2003.03(a), is not sufficient for certain competitive electric power suppliers, and suggested that the Commission remove the proposed cap. Though PSNH did not address the corresponding security requirement for competitive natural gas marketers, Puc 3003.03(a), National Grid believes that PSNH’s concern regarding the \$350,000 cap on security applies in equal measure to this requirement and requests that the proposed cap be removed from the rule.

July 22, 2010
Page 2

Please feel free to contact me with any questions you may have.

Very truly yours,



Patrick H. Taylor

cc: Service List (via electronic mail)
Steven V. Camerino
Juliana Griffiths