STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

Docket DG 10-017

MOTION FOR WAIVER

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 (the "Commission") to waive certain 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 certain instances. If a utility filing a proposed tariff as part of a full rate case is a subsidiary entity, Puc 1604.01(a)(25) requires the utility to submit duplicates of all items required by Puc 1604.01(a) for its parent company. In all instances, the Company's filing in this case contains the information requested as it relates to the Company itself. However, information pertaining to the Company's parent (the "Parent") is, in the instances set forth below, not relevant to the Commission's review of the Company's request for rate relief and therefore is unnecessarily burdensome for the Company to produce. Furthermore, providing such information would increase the size of an already voluminous filing. The

Company is therefore seeking a waiver of those filing requirements in Puc 1604.01(a) set forth below:

1604.01(a)(1)--Internal Financial Reports

1604.01(a)(3)--Federal Income Tax Reconciliation for the Test Year

1604.01(a)(4)--Detailed Computation of New Hampshire and Federal Income Tax Factors

1604.01(a)(7)--Cost of Service Study

1604.01(a)(8)--Construction Budget

1604.01(a)(12), (13)--Management Audits and Depreciation Studies

1604.01(a)(18)--Balance Sheets and Income Statements

1604.01(a)(19)--Quarterly Income Statement for the Previous Five Years

1604.01(a)(20)--Quarterly Sales Volumes for the Previous Five Years

1604.01(a)(21)--Description of Projected Need for External Capital

1604.01(a)(22)--Capital Budget with a Statement of Source and Use of Funds

1604.01(a)(23)--Provisions of Sinking Funds Associated with Senior Capital

1604.01(a)(24)-- Short Term Indebtedness

1604.01(a)(27)--Uniform Statistical Reports

2. National Grid NH's request for waiver of Puc 1604.01(a)(25), to the extent that the rule is intended to require production of the information identified above, is in the public interest. The information is not relevant to the Company's rate request and its production would result in a waste of resources for the Company, the Commission, and the Office of the Consumer Advocate. Granting of this request will not disrupt the orderly proceeding of the Commission.

3. National Grid NH also seeks a waiver of the requirements of Puc 1203.02(d) to the extent that it requires that notice to customers regarding the Company's rate case filing be

given within thirty days of the Company's initial filing. The Company has provided a form of notice with its initial filing which, upon approval by the Commission's Consumer Affairs Division, it proposes to include in mailings to customers as part of its regular cycle billing. Undertaking a separate mailing to customers would be unreasonably costly. Because the Company does not plan to begin mailing the notice to customers until the Consumer Affairs Division has approved it and appropriate changes have been made to the Company's billing system, some customers will not receive the notice until after the expiration of the 30-day period mandated by Puc 1203.02(d). Because the Commission will be considering the Company's rate filing over a period of up to a year, the additional time requested will not affect customers' rights or interests. Providing notice in the manner set forth above will be less costly and will safeguard customers' interest in timely notice.

4. National Grid NH also seeks a waiver of the requirements of Puc 1604.07(a)(5) and Puc 1604.07(j) to the extent that they require a separate schedule setting forth payroll figures categorized by Operation, Maintenance, Construction, Plant Removal, and other accounts related to payroll. Payroll figures related to Operations and Maintenance are provided in the Company's cost of service exhibits (*see* Exhibit EN 2-2-2); however, the Company does not maintain separate payroll figures with respect to Construction and Plant Removal, and requiring the Company to provide this information would be burdensome. Based on prior rate proceedings, the Company believes that the information being provided in its filing is sufficient to satisfy the needs of the Commission staff and Consumer Advocate in reviewing the Company's rate request.

5. For the foregoing reasons, the waivers requested above are in the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission.

Furthermore, compliance with the rules for which the Company seeks a waiver will be unnecessarily onerous.

WHEREFORE, National Grid NH respectfully requests that the Commission:

A. Grant this Motion for Waiver; 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 26, 2010

By: _____

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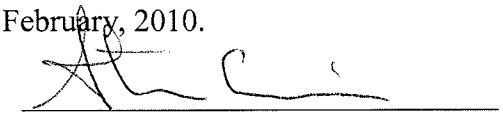
Certificate of Service

I hereby certify that a copy of this Motion for Waiver has been hand-delivered to Meredith A. Hatfield, Esq. this 26th day of February, 2010.



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