

THE STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

DE 10-188

ELECTRIC AND GAS UTILITIES

2011-2012 CORE Electric Energy Efficiency Programs and Natural Gas Energy Efficiency Programs

**NATIONAL GRID NH'S MOTION FOR AN EXTENSION OF TIME TO FILE
SHAREHOLDER INCENTIVE CALCULATION REPORT**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH ("the Company"), hereby requests an extension of time to June 21, 2012 to file its Shareholder Incentive Calculation Report for the calendar year 2011, due on June 1, 2012. In support of this Motion, the Company states as follows:

1. In the process of preparing its Shareholder Incentive Calculation Report, the Company discovered a coding error in its Energy Efficiency program database, InDemand, which causes the database to incorrectly calculate the energy savings achieved for the participants in the Company's Home Performance with Energy Star program. Since energy savings achieved is a component of the shareholder incentive calculation, the Company is unable to prepare the report until this issue is resolved.

2. The coding error is in the process of being resolved, but to ensure the accuracy of the information reported to the Commission, the Company requires additional time to complete the process of correcting the code and, subsequently, to test and verify the accuracy of the data before compiling and including it in the shareholder incentive report.

3. In light of this issue, the Company respectfully requests that the Commission grant an extension until June 21, 2012 to file the report. If the system issue is resolved more quickly than anticipated, and the Company is able to prepare the report prior to that date, it will file it as soon as the information is available to it.

4. N.H. Code of Admin. Rule Puc 202.04(c) provides that the Commission shall grant an extension when:

- (1) The party making the request has demonstrated that circumstances would cause undue hardship or inconvenience unless the request were granted; and
- (2) The extension would not unduly delay the proceeding or adversely affect the rights of any party.

As discussed above, due to a recently discovered coding error, the Company has been unable to extract the data necessary to calculate accurately its annual shareholder incentive in a timely fashion. Therefore, requiring the Company to file its report without an extension is likely to cause inconvenience to the Commission and the parties to this proceeding because the Company's report may include inaccurate or incomplete information. The requested extension will not unduly delay the proceeding, since the filing does not relate to matters with impending deadlines or matters on which the Commission or others must take immediate action. Similarly, the requested extension will not adversely affect the rights of any party to the proceeding.

5. The public interest will be served by this extension because it will enable the Company to ensure that the data included in its filing is accurate.

WHEREFORE, National Grid NH respectfully requests that the Commission:

- A. Issue an order granting its request for an extension of time until June 21, 2012 to file its Shareholder Incentive Calculation Report; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC.
D/B/A NATIONAL GRID NH

By its Attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON,
PROFESSIONAL ASSOCIATION

Date: May 31, 2012

By:



Carol J. Holahan
McLane, Graf, Raulerson & Middleton, P.A.
11 South Main Street, Suite 500
Concord, NH 03301
(603) 226-0400
email: carol.holahan@mclane.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been forwarded to all parties on the service list in this docket.

Dated: May 31, 2012



Carol J. Holahan