



October 22, 2010



BY OVERNIGHT MAIL AND E-MAIL

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

RE: **Response to Staff Recommendation**
Docket No. DG 10-245

Dear Director Howland:

Please accept this letter as the response of Northern Utilities, Inc. ("Northern" or "the Company") to the October 18, 2010 Memorandum and Recommendations of the Safety Director ("Recommendations") in the above-captioned matter.

Northern has reviewed the Recommendations and has no objections. Accordingly, Northern hereby amends its request for a waiver from the requirements of Puc 505.07 from a period of five years to the Safety Director's recommendation of three years; the Company accepts that any waiver granted would terminate in the event of a change in corporate control; the Company accepts that it will be required to notify the Commission of any significant change in its testing practices or capabilities, such as pricing; the Company accepts that the Commission is reserving its rights to reassess, revise or revisit the waiver in the event of changes or development in gas metering; and Northern agrees that it will supplement its E-7 Report, filed pursuant to Puc 509.09, to include:

- 1) Meter address location, meter identity, meter type sent for testing;
- 2) Age of each meter tested; and
- 3) Exact number and class of meters tested per testing facility.

Gary Epler
Chief Regulatory Counsel

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Please do not hesitate to contact me if you have any questions concerning this response. Thank you for your attention to this matter.

Debra A. Howland, Executive Director
DG 10-245
October 22, 2010
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Sincerely,

/s/ Gary Epler

Gary Epler
Attorney for Northern Utilities, Inc.

Lynn Fabrizio, Staff Attorney
Randy Knepper, Safety Director