

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

National Grid USA, et al.

- and -

Liberty Energy Utilities Co. et al.

Docket No. DG 11-040

REQUEST FOR EXTENSION OF TIME TO FILE ESCROW RELEASE REQUEST

Pursuant to N.H. Code of Admin. Rule 202.04, National Grid USA (“National Grid”) hereby requests that the time for submitting its request for a release of escrow funds for the second calendar quarter of 2014 be extended from August 29, 2014 to September 8, 2014. In support of its request, National Grid states as follows:

1. In compliance with the provisions of the settlement approved by the Commission in this docket in its Order No. 25,370, National Grid, the staff of the Commission (“Staff”), and Liberty Energy Utilities Co. and certain of its affiliates (collectively referred to below as “Liberty”) entered into an Agreement Regarding Process for Release of Escrow Funds (“Escrow Release Agreement”). The Escrow Release Agreement was not itself subject to the Commission’s approval, but the form of the Agreement was filed with the Commission on June 26, 2012 in conjunction with other documents filed in compliance with Order No. 25,370.

2. Section 2 of the Escrow Release Agreement provides in relevant part that “National Grid and [Liberty] shall jointly submit to Staff within sixty (60) days after the end of each three-month interval” certain forms specified in the agreement in order to obtain a release of escrow funds for the transition services that were terminated during the relevant three-month interval. The three-month intervals referred to in the Escrow Release Agreement coincide with

calendar quarters. The sixty-day period following the most recent calendar quarter (i.e., the period ending June 30, 2014) expires August 29, 2014.

3. Because of vacation schedules and the impending Labor Day weekend, National Grid has been unable to obtain all of the necessary signatures for the escrow release submission that would normally be due August 29. National Grid believes that an extension of the August 29 date until September 8 will be sufficient to enable it to obtain these signatures.

4. The only consequence of which National Grid is aware that would result from a delay in filing the request for release of escrow funds relating to the most recent calendar quarter is that it will result in a delay in National Grid receiving the funds. National Grid is not aware of any harm that will be incurred by any other party in this proceeding or to any member of the public and does not believe there will be any.

5. Counsel for National Grid has attempted to contact counsel for Staff, the Office of Consumer Advocate (“OCA”), and Liberty regarding this request. As of the time of filing this request, the OCA has indicated that it consents to National Grid’s request. Counsel for Staff and Liberty were unable to respond prior to the filing of this motion. While it is not clear whether Commission action is required in order to extend the time for filing the escrow release request, National Grid is submitting this motion as a means of notifying the Commission of the delay in filing the request to release escrow funds and to ensure that any necessary approval has been sought.

WHEREFORE, National Grid respectfully requests that the Commission approve this request to extend until September 8, 2014 the time for filing the escrow release request for the second quarter of 2014.


Respectfully submitted,

National Grid USA, et al.

By Its Attorneys

MCLANE, GRAF, RAULERSON
& MIDDLETON, P.A.

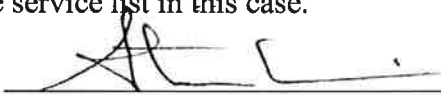
Dated: August 29, 2014

By: 
Steven V. Camerino, Esq.
11 South Main Street, Suite 500
Concord, NH 03301
Telephone (603) 226-0400
Email: steven.camerino@mclane.com

Celia B. O'Brien, Esq.
National Grid NH
40 Sylvan Road
Waltham, MA 02451
Telephone (781) 907-1520
Email: celia.obrien@us.ngrid.com

Certificate of Service

I hereby certify that a copy of this Request for Extension of Time to file Escrow Release Request has been electronically served to the service list in this case.


Steven C. Camerino