

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**DOCKET NO. DG 12-001**

**RE: ENERGYNORTH NATURAL GAS, INC. d/b/a NATIONAL GRID NH**

**Investigation into Excess Capacity**

**Assented-to Motion for Extension of Time to File Prefiled Testimony**

NOW COMES EnergyNorth Natural Gas, Inc. d/b/a National Grid NH (“EnergyNorth”) and moves the New Hampshire Public Utilities Commission (the “Commission”) pursuant to Puc 202.04 to extend the period of time for National Grid to file its prefiled testimony in the above-referenced matter from April 13, 2012 to April 24, 2012. The Commission staff (“Staff”) and the Office of Consumer Advocate (“OCA”)<sup>1</sup> assent to this motion. In support of this motion, National Grid states as follows:

1. On February 22, 2012, the Commission issued an Order of Notice opening a proceeding to investigate EnergyNorth’s projected supply / demand balance, the extent to which EnergyNorth retains more gas supply capacity than it needs to meet forecasted design-day peak demands, and whether EnergyNorth ought to take actions to reduce excess capacity.

2. The Order of Notice required that EnergyNorth file prefiled testimony regarding, *inter alia*, the extent of excess capacity, the prudence of retaining excess capacity, and whether actions should be taken to reduce excess capacity no later than April 13, 2012.

3. Due to constraints placed upon EnergyNorth and undersigned counsel as a result of other concurrently pending dockets, EnergyNorth requires the additional requested time to

---

<sup>1</sup> The OCA filed notification that it will participate in the above-referenced docket on March 1, 2012.

complete and file its prefiled testimony. EnergyNorth will experience undue hardship and inconvenience if the request for additional time is not granted.

4. The extension will not unduly delay this proceeding or adversely affect the rights of the parties to this docket. Staff and the OCA have indicated their assent to the requested extension of time.

WHEREFORE, EnergyNorth respectfully requests that:

A. The Commission grant an extension of time pursuant to Puc 202.04 to file prefiled testimony in this matter from April 13, 2012 to April 24, 2012; and

B. Grant such other relief as may be consistent with the public interest.

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC.  
d/b/a NATIONAL GRID NH

By its Attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON,  
PROFESSIONAL ASSOCIATION

Date: April 11, 2012

By: 

Steven V. Camerino  
Patrick H. Taylor  
11 South Main Street, Suite 500  
Concord, NH 03301  
Telephone: (603) 226-0400  
Email: [steven.camerino@mclane.com](mailto:steven.camerino@mclane.com)  
[patrick.taylor@mclane.com](mailto:patrick.taylor@mclane.com)