

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

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S
REQUEST FOR WAIVER OF PUC 305.03**

Docket No. DE 13-XXX

NOW COMES, Public Service Company of New Hampshire ("PSNH" or "Company") and, pursuant to New Hampshire Code of Administrative Rules Puc 201.05, requests that the Commission waive certain requirements of Puc 305.03, relative to the testing schedules for watt-hour meters and demand devices. In support of this filing, PSNH says the following:

1. Puc 305.03 sets out certain scheduling requirements for the testing of watt-hour meters and demand devices. Under Puc 305.03(c)(1)b.1. PSNH is required, on an annual basis, to select a sample test group of meters for testing and to repair, recalibrate or retire the meters it tests as may be necessary. In addition, pursuant to Puc 305.03(c)(1)b.2. and Puc 305.03(d), PSNH is to select additional meters, beyond those in the sample test group, for testing, and is to repair, recalibrate or retire those meters as may be necessary.
2. PSNH has begun a process of transitioning from its existing fleet of meters to new Automated Meter Reading ("AMR") meters. As part of that process, around 540,000 customer meters will be replaced with new meters, over approximately a 3-year period beginning in 2013. As the AMR meters are new meters, upon installation they will have recently gone through a calibration and testing process by the manufacturer. In addition, as the new meters are installed they will be sample tested by PSNH or its contractors. In light of this transition, PSNH is requesting that the testing schedule requirements of Puc 305.03 be waived during the transition

period and that it be permitted to resume regular testing on the schedule required in Puc 305.03 in October of the year following completion of the AMR meter installations.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. In that this request for a waiver does not pertain to any matters currently pending before the Commission, PSNH avers that granting the waiver will not disrupt the orderly and efficient resolution of matters before the Commission. As to the public interest, PSNH believes that compliance with the rule would be onerous or inapplicable in these circumstances, and that the purpose of the rule is satisfied by another method. The purpose of the testing schedule required by Puc 305.03 is to ensure that the Company will inspect and test its installed meters on a regular basis to confirm that they are working properly, and to repair or remove from service those meters not working properly. In that the existing meters will all be replaced as part of the Company's upgrade to AMR meters, the need to continue to test the existing meter fleet is greatly diminished, and requiring PSNH to continue to abide by the testing schedule for those meters would serve little use, and would be an inefficient use of resources. In these circumstances, the costs and planning difficulties of continuing to test existing meters, while installing new meters, would be onerous. In addition, each of the AMR meters is a new meter that will have gone through a quality control process by the manufacturer and the meters will be

subject to sample testing by PSNH or its contractors as they are installed. Accordingly, the purpose of the rule would be satisfied by another method.

WHEREFORE, PSNH respectfully requests that the Commission grant a waiver of Puc 305.03 as described above, and order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire



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By:

Matthew J. Fossum
Counsel
780 North Commercial Street
Post Office Box 330
Manchester, New Hampshire 03105-0330
(603) 634-2961
Matthew.Fossum@nu.com