DE 08-016

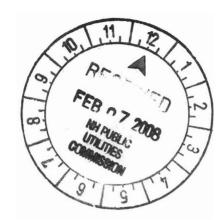
## national**grid**

Alexandra E. Blackmore
Counsel

February 6, 2008

VIA OVERNIGHT & ELECTRONIC MAIL

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



Re: DE 06-145; Filing to Revise Definition of Peak and Off-Peak Hours Under Certain Rate Schedules

Dear Ms. Howland:

On behalf of Granite State Electric Company d/b/a National Grid ("National Grid" or "Company"), I am submitting a request for Commission approval of proposed revisions to the Company's tariff. By this filing, the Company is proposing changes to the definition of peak and off-peak hours as contained in its tariff. The proposed changes to the definition of peak hours are for a limited time resulting from legislative changes to Daylight Savings Time ("DST"). The Company requests approval of the revised language contained in the attached tariff pages to become effective March 9, 2008.

On October 3, 2006, the Company filed a similar request with the Commission to revise the definition of peak and off-peak hours in the Company's tariff for the year 2007. As part of the federal Energy Policy Act of 2005 ("EPACT"), beginning in March 2007, DST occurred three weeks earlier in the spring (from the first Sunday in April to the second Sunday in March), and one week later in the fall (from the last Sunday in October to the first Sunday in November). In addition, EPACT provides Congress with the right to revert back to today's DST schedule in the spring of 2008. The Commission approved the Company's request pursuant to Order No. 24,729 in Docket DE 06-145 dated February 9, 2007.

Currently, the internal clocks in the Company's time-of-use ("TOU") meters are programmed to reset to the appropriate hour in October and April under the 2006 DST schedule (i.e. the first Sunday in April and the last Sunday in October). Thus, to respond to the EPACT changes to DST, the Company would have needed to reprogram any affected meters to reset the internal clock at the time dictated under the new DST schedule. This would have required significant deployment of resources and funds to reset the affected meters. Moreover, the ability of Congress to revert back to the 2006 DST schedule caused concern to the Company because the Company would be deploying resources and expending significant funds in one year to implement a change that may likely be spent in the following year to, in effect, un-do what was done in the prior year. Therefore, in order to clearly communicate the correct billing periods to customers, the Company revised the definition of the peak and off-peak hours in its tariff.

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Pursuant to Section 110 (c) of the EPACT, no later than nine months after the effective date of that section, the Secretary of Energy is to conduct a study and report to Congress on the impact of this section on energy consumption in the United States. As of the date of this filing, the Secretary of Energy has not completed this study. As such, Congress has not yet determined whether to continue the current DST schedule indefinitely or invoke its right to revert the DST back to the 2006 time schedules. Therefore, in order to provide customers with adequate notice of the peak and off-peak hours for the spring of 2008, the Company is requesting a revision to the tariff's definition of peak and off-peak hours to reflect that the DST schedule for 2008 will begin on the second Sunday in March and end on first Sunday in November.

If Congress makes a different determination of the DST schedule for 2008 prior to March 9, 2008 (the second Sunday in March), the Company will revise its tariffs accordingly.

Please feel free to contact me at (508) 389-3243 with any questions.

Very truly yours,

Alexandra E. Blackmore

alexandra E. Blackmore

cc: Meredith A. Hatfield, Esq.