## THE STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE Meredith A. Hatfield

ASSISTANT CONSUMER ADVOCATE
Kenneth E. Traum

June 16, 2010



OFFICE OF THE CONSUMER ADVOCATE

21 S. FRUIT ST., SUITE 18 CONCORD, NEW HAMPSHIRE 03301-2429

Debra A. Howland Executive Director and Secretary New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, New Hampshire 03301-7319



TDD Access: Relay NH

1-800-735-2964

Tel. (603) 271-1172

RE: DG 10 - 017 EnergyNorth Gas, Inc. d/b/a/ National Grid NH Rate Case Agreement between National Grid and the OCA on Disputed Set 1 Discovery

Dear Ms. Howland:

I write to inform the Commission of an agreement between the Office of Consumer Advocate (OCA) and National Grid New Hampshire (National Grid) in the above-captioned proceeding related to set 1 discovery disputes.

The OCA propounded data requests upon National Grid and received answers to some of those requests that the OCA considers to be unresponsive or otherwise appropriate to include in a motion to compel. The first deadline for such a motion is June 17. The OCA has been working with National Grid in good faith to resolve discovery disputes informally. In those discussions, National Grid has indicated that it will provide supplemental responses to certain data requests in the near future and possibly after the first deadline for a motion to compel. After reviewing National Grid's responses, it may not be necessary for the OCA to file a motion to compel. However, in the event that the OCA believes that the supplemental responses are unresponsive, the OCA hereby reserves its right to file a motion to compel within fifteen business days of receiving the response. National Grid has agreed that it will not object to such a motion on the basis that it is untimely.

Thank you for your assistance, and please do not hesitate to contact me if you require additional information.

Respectfully,

Meredith A. Hatfield Consumer Advocate

cc: Service list

