THE STATE OF NEW HAMPSHIRE

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PUBLIC UTILITIES COMMISSION

21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429

May 12, 2011

Stephen R. Hall Rate & Regulatory Services Manager Public Service Company of New Hampshire P.O. Box 330 Manchester, New Hampshire 03105-0330

Re:

DE 11-074, Public Service Company of New Hampshire

Request for Waiver of Puc 305.03, Test Scheduled for Watt-hour Meters and

Demand Devices

Dear Mr. Hall:

On April 5, 2011, Public Service Company of New Hampshire (PSNH) filed a letter with the Commission requesting a limited waiver of N. H. Code Admin. Rules Puc 305.03(c)(4) requiring each polyphase transformer-rated meter be tested no less than once every four years.

According to the waiver request, PSNH installed polyphase transformer-rated meters on 125 customer accounts in June 2007 for the purpose of gathering load research data. The subject accounts are customers served under PSNH's General Delivery Service Rate G that, according to PSNH, do not "normally require meters that can measure consumption in thirty minute intervals; however, the load research requires the data to be collected in thirty minute intervals." PSNH further states that the load research data gathering on these accounts is scheduled to continue through August 2011 at which time the meters will be removed and replaced with non-recording meters.

Pursuant to Puc 305.03(c)(4), two of the load research meters are due for testing in April 2011 and forty of the meters are due for testing in May 2011. PSNH requests a waiver of the rule to allow it to defer testing on the 42 meters until November 2011. PSNH explained that, absent a waiver, PSNH will have to remove the meters for testing in April and May and replace them with interval meters that have been tested to complete the load research data gathering. When the research is completed in August 2011, PSNH will have to remove the load research meters and replace them with standard non-recording meters.

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PSNH stated that the waiver will permit PSNH to avoid the need to remove and replace the load research meters in April and May, and then repeat the process in September and November once the load research is completed. With the waiver, PSNH would be able to remove and replace the meters one time only when the sampling is concluded. If the Commission grants the waiver, PSNH said it would test the 42 meters as they are removed from service pursuant to Puc 305.03(c)(4).

On April 15, 2011, Staff filed a memorandum recommending that the Commission approve the waiver subject to PSNH being required to submit the results of the testing on the 42 meters once those tests have been completed in November 2011. Staff noted that the OCA did not object to Staff's recommendation.

Under Puc 201.05, the Commission may waive Puc 305.03(c)(4) if it finds a waiver serves the public interest and does not disrupt the orderly and efficient resolution of matters before the Commission. Determination of the public interest requires consideration of whether (1) compliance with the rule would be onerous given the circumstances; or (2) the purpose of the rule is satisfied by the alternative method proposed. The Commission has determined that the applicable standards for a waiver are satisfied and that granting a waiver, subject to the conditions recommended by Staff, is consistent with the public good.

Sincerely,

Debra A. Howland

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Executive Director

cc:

Service List

Office of Consumer Advocate