



November 16, 2011

BY OVERNIGHT MAIL AND E-MAIL

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

RE: DG 11-196

Dear Director Howland:

Northern Utilities, Inc. ("Unitil") submits this letter to assist the Commission in developing an appropriate procedural schedule for the resolution of the outstanding issues in the above-captioned docket. Notwithstanding their attempts to develop an agreed-upon procedural schedule, Commission Staff, the Office of Consumer Advocate ("OCA") and Unitil have been unable to do so. Unitil recommends that the appropriate procedural steps in this docket should be as follows:

Staff Prefiled Testimony; Data Requests by non-Staff parties; Non-staff parties' prefiled testimony; Data Requests upon Non-staff parties' prefiled testimony; Staff rebuttal testimony; and hearing. The OCA supports this procedural schedule.

Unitil believes that Staff should submit prefiled testimony because Staff's memorandum of April 21, 2011 was the catalyst for opening this docket, and therefore Staff has the initial burden of production at hearing. Moreover, the Staff memorandum contains several factual allegations and recommendations for Commission action that properly belong in prefiled testimony, so that the other parties can conduct discovery and cross-examination of the sponsoring witness under oath. It would be fundamentally unfair to Unitil and the other parties if Staff were to appear at a hearing in this docket to either testify or make recommendations to the Commission for the docket's disposition without having first submitted prefiled testimony. Similarly, Unitil and the other parties should also be provided the opportunity to submit prefiled testimony in response to Staff's prefiled testimony. All parties should be afforded the opportunity to conduct discovery on the

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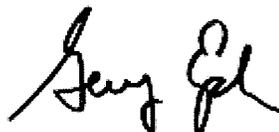
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prefiled testimony, and Staff should be given the opportunity to file rebuttal testimony if necessary.

The procedural schedule described above comports with due process principles and is consistent with the manner in which other Commission dockets are typically handled. Unitil sees no reason to depart from standard Commission practice, especially given that the Company is being threatened with civil penalties in this case.

Unitil appreciates the opportunity to provide its recommendations for the procedural schedule in this docket. Please contact me if you have any questions about this letter. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Epler". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Epler".

Gary Epler
Attorney for Northern Utilities, Inc.

cc: Lynn Fabrizio, Staff Counsel
Rorie Hollenberg, OCA
Shawn J. Sullivan, Esq.
Susan S. Geiger, Esq.