

DRM 04-149
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Date: October 15, 2004

To: Whom it may concern

Re: PUC Docket # 04-149

Proposed rule # PUC 512.01 (a) (4) Application of Rules



Eastern Propane & Oil objects to this rule for the following reason:

If we are the only operator in this case, it becomes a jurisdictional system. If we only supply gas to one portion of the building, and another operator supplies gas to the other side, it is not a jurisdictional system. This proposed rule adds a fourth scenario that will create an unnecessary burden to the Industry. We are 100% behind having safe installations for our customers and the general public. We believe we can accomplish this without this fourth scenario in NH.

Proposed rule # PUC 512.15 (2) (5) Leakage Surveys and Inspections

Eastern Propane & Oil objects to this rule for the following reason:

DOT requires us to conduct these surveys in a non-business district every 5 years and every year in a business district. We feel that NH should only require us to conduct these surveys every 5 years on a residential jurisdictional system and all other jurisdictional systems would have an annual leak survey conducted.

Thank you for the opportunity to voice our concerns. We hope that you will consider our requests. Please feel free to contact me with any questions or concerns.

Sincerely,

Lyndon Rickards
Safety & Training Manager
Eastern Propane & Oil