



Sarah B. Knowlton
Assistant General Counsel
Phone: 603/328-2794
E-Mail: sarah.knowlton@libertyutilities.com

November 13, 2013

Via Hand Delivery and Electronic Mail

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

Re: DRM 13-090: Proposed Changes to Puc 300 Rules for Electric Service

Dear Ms. Howland:

I am writing on behalf of Granite State Electric Company d/b/a Liberty Utilities ("Liberty" or the "Company") regarding the proposed Puc 300 rules that were the subject of the November 6 public comment hearing. Liberty offers the following comments in addition to those made at the hearing:

Puc 307.10: The Company participated in the technical session on November 6 and is working with the Staff and parties on a proposed amendment to Puc 307.10 regarding Tree-Pruning Standards. As soon as the proposed language is available, it will be provided to the Commission.

Puc 311.01(d): The Company requests that this provision be deleted in its entirety. Currently, if a customer wants to stop taking service from a Competitive Supplier ("CEPS"), the customer contacts the CEPS to drop service, and the CEPS notifies the utility. If the rule as proposed is adopted, the utility would not be able to act on a request from a CEPS to terminate service to a customer but rather would have to wait for a customer to contact the utility. This is impracticable and puts the utility between the CEPS and the customer.

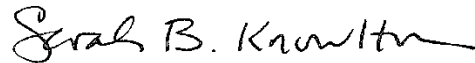
Waivers: As the Company indicated at the hearing, it will be requesting waivers from certain of the proposed rules should they take effect prior to the Company's cutover from National Grid's systems in May 2014. These include waivers of: (a) Puc 306.10 regarding physical and cyber security for SCADA systems since the Company will not have a SCADA system until cutover; (b) Puc 306.06 to the extent it creates new time frames for notification to the Commission of certain events. Until cutover, the Company is receiving dispatch services from National Grid as a transition service, and cannot readily change the current dispatch procedures. As soon as the Company has its own systems in place, it will operate its dispatch in

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accordance with the time frames reflected in any final rule. In addition, the Company will need a long term waiver of Puc 311.01(c) as neither National Grid's nor the Company's systems post-cutover will maintain recordings of customer calls for more than one year.

Thank you for your consideration of the Company's comments.

Very truly yours,

A handwritten signature in black ink, reading "Sarah B. Knowlton". The signature is written in a cursive, flowing style.

Sarah B. Knowlton

cc: Service list