

Appendix 1
to
KeySpan's Response to Staff's Motion to Reopen Record

EnergyNorth Natural Gas, Inc. d/b/a KeySpan Energy Delivery New England]

Indirect Gas Costs

DG 07-050

**Responses of the New Hampshire Public Utilities Commission
To EnergyNorth Natural Gas, Inc. (ENGI) First Set of Data Requests**

Date Received: July 2, 2007
Data Request No.: 1-28

Data of Response: July 16, 2007
Respondent: George McCluskey

REQUEST:

With regard to the statements in lines 2-9 on page 4 of Mr. McCluskey's testimony, is it the Staff's position that KeySpan intended to waive the right to raise additional arguments concerning the working capital issues litigated in DG 07-033 or was the statement merely intended to indicate that Staff reserves the right to respond in its rebuttal testimony in this docket to arguments that KeySpan may make in its prefiled testimony regarding the working capital issue?

RESPONSE:

It is not Staff's position that KeySpan waived its right to raise additional arguments on the issue of carrying costs related to cash working capital. The referenced statement simply preserves Staff's right to respond to any KeySpan rebuttal testimony on that issue.