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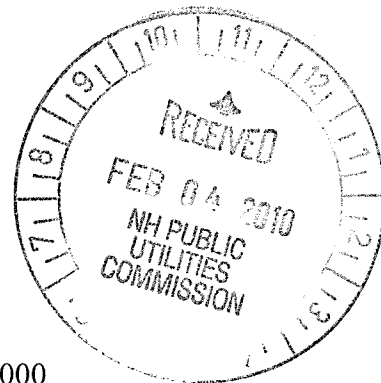
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February 3, 2010

Matthew Fossum, Staff Attorney
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301



RE: DRM 10-015: Comments on Proposed Changes to Puc ch. 3000

Dear Mr. Fossum,

Granite State Electric Company and EnergyNorth Natural Gas, Inc. (collectively, "National Grid") are providing these comments on N.H. Code of Administrative Rules Puc ch. 3000 in order to give the Commission staff an opportunity to consider them prior to the technical session scheduled for February 5, 2010. Specifically, National Grid requests that the Commission staff consider including the following revision to the proposed draft recently circulated by you:

1. Draft Puc ch. 3000 currently contains provisions governing "Telephone Solicitation of Customers by or for Competitive Natural Gas Suppliers," Puc 3004.03, but does not contain protocols for in-person solicitation of customers by or for such suppliers. Based upon National Grid's experience in New York, it is concerned that the use of unethical or misleading marketing tactics and other consumer abuses will occur if the Commission does not adopt similar standards for in-person solicitation by competitive suppliers or their agents. National Grid requests that the Commission include such protocols in Puc ch. 3000, based upon the provision set forth in Attachment A to this letter.

National Grid appreciates the opportunity to provide these comments to the Commission staff. National Grid intends to participate in technical sessions and other aspects of the rulemaking process as it progresses, and therefore may supplement these comments during the course of that process. Thank you for your assistance in this matter, and please feel free to contact me with any questions you may have.

Very truly yours,

Patrick H. Taylor

February 3, 2010

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cc: Debra Howland
Steven V. Camerino
Sarah B. Knowlton
Juliana Griffiths

ATTACHMENT A:

3004.04: In-Person Solicitation of Customers by or for Competitive Natural Gas Suppliers

(a) CNGS marketing representatives who contact customers in person at a location other than the CNGS's place of business for the purpose of selling any product or service offered by the CNGS will, as soon as possible and prior to describing any products or services offered for sale by the CNGS:

(1) Produce identification, to be visible at all times thereafter, which:

- a. Prominently displays in reasonable size type face the full name of the marketing representative;
- b. Displays a photograph of the marketing representative and depicts the legitimate trade name and logo of the CNGS they are representing;
- c. Provides the CNGS's telephone number for inquiries, verification and complaints.

(2) Shall identify the CNGS which they represent as an independent energy marketer, and shall identify him or herself as a representative of that specific CNGS. During the sales presentation, the marketing representative must also state that if customer purchases natural gas from the CNGS, that the customer's utility will continue to deliver their energy and will respond to any leaks or emergencies. This requirement may be fulfilled either (a) by an oral statement by the CNGS marketing representative, or (b) written material left by the CNGS marketing representative.

(3) A CNGS marketing representative shall leave the premises of a customer when requested to do so by the customer or the owner or occupant of the premises.

(4) A CNGS marketing representative shall provide the customer with written information immediately upon request setting forth the CNGS's name and telephone number for inquiries, verification and complaints.

(5) Where it is apparent that the customer's English language skills are insufficient to allow the customer to understand and respond to the information conveyed by the CNGS representative or where the customer or another third party informs the CNGS marketing representative of this circumstance, the CNGS marketing representative shall either find a representative in the area who is fluent in the customer's language to continue the marketing activity in his/her stead or terminate the in-person contact with the customer. The use of translation services and language identification cards is permitted.