



**Public Service
of New Hampshire**

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The Northeast Utilities System

DE 11-074

April 4, 2011

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



Re: Waiver of Puc 305.03 Test Schedules for Watt-hour Meters and Demand Devices

Dear Ms. Howland:

Pursuant to Puc Rule 201.05, Public Service Company of New Hampshire ("PSNH") is requesting a limited waiver from Puc Rule 305.03(c)(4) requiring that each polyphase transformer-rated meter be tested no less than once every four years. PSNH's request for waiver applies only to a specific group of meters, and only for a limited period of time.

In June 2007, PSNH installed polyphase transformer-rated meters on 125 customer accounts for the purpose of gathering load research data. These accounts are customers served under PSNH's General Delivery Service Rate G. Customers taking service under Rate G do not normally require meters that can measure consumption in thirty minute intervals; however, the load research requires the data to be collected in thirty minute intervals. The load research data gathering on these accounts is scheduled to continue through August 2011. At that time, the meters will be removed and replaced with non-recording meters.

Two of the load research meters are due for testing pursuant to Puc 305.03 (c)(4) in April 2011 and forty of the meters are due for testing in May 2011. PSNH is requesting a waiver of that portion of the rules to allow it to defer testing on these forty-two meters until November 2011. Absent a waiver, PSNH will have to remove the meters for testing in April and May, respectively, and replace them with interval meters that have been tested to complete the load research data gathering. Once the gathering of load research data is completed in August 2011, PSNH will then remove the load research meters and replace them with standard non-recording meters.

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The reason that PSNH is requesting a waiver is to avoid the need to remove and replace the load research meters in April and May, and then remove and replace them again during the period September through November when the sampling is complete. If PSNH's request for waiver is granted, the forty-two meters will then be tested pursuant to Puc 305.03 (c)(4) when they are removed from service during the period September 2011 through November 2011.

For the reasons stated above, PSNH requests that the Commission grant PSNH a waiver from Puc 305.03 (c)(4).

Very truly yours,



Stephen R. Hall
Rate & Regulatory Services Manager

HMA: kd
Enclosures
cc: Meredith Hatfield