



October 26, 2012

**BY OVERNIGHT DELIVERY AND E-MAIL**

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



**Re: Docket No. DT 12-246**

Dear Secretary Howland:

Please accept this letter as the comments of Unitil Energy Systems, Inc. ("Unitil"), to the recommendations contained in the October 9, 2012 report of the New Hampshire Public Utilities Commission Staff ("Staff") concerning the technical session in the above-referenced docket.

1. Unitil supports and joins in the comments of Public Service Company of New Hampshire ("PSNH") that it may be premature to move forward with this docket until the pending motions to dismiss or stay are ruled upon and the proceeding in docket DT 12-107 has been adjudicated, or at least more fully investigated.
2. Unitil supports and joins in the comments of PSNH as well as those of Liberty Utilities with respect to the requirement that attachments be located 40 inches below the neutral. This requirement is critical to maintaining safe vertical clearance between electric supply lines and any other cables or equipment on a pole structure. Since this requirement is part of the National Electrical Safety Code, and the Commission's Rules already require that all attachments be installed in accordance with Code, there is no reason to consider Staff's recommendation for a rulemaking to address this issue.

Thank you for your attention to this matter.

Sincerely,

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