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MIDDLETON

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March 10, 2017

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

**Re: National Grid Affiliate Contract**

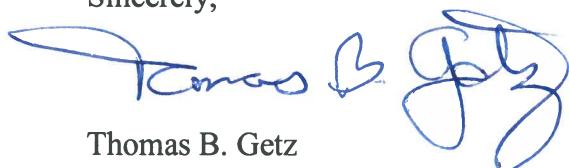
Dear Ms. Howland:

Consistent with past practice, enclosed herewith are seven copies of an Accession Agreement between National Grid USA Service Company, Inc. and certain National Grid USA (“National Grid”) affiliates. National Grid filed a similar agreement in Docket No. DA 11-003, but seeks clarification whether such filings, which customarily have been filed in reference to RSA 366:3, continue to be required.

Since the time of the filing in DA 11-003, the Public Utilities Commission (“Commission”), in Docket No. DG 11-040, approved the transfer of National Grid’s distribution company subsidiaries, Granite State Electric Company and EnergyNorth Natural Gas, Inc. to Liberty Energy NH. See Order No. 25,370 (May 30, 2012). The Commission’s Affiliate Transaction Rules, Puc Chapter 2100, make clear that the definition of public utility for purposes of those rules applies only to companies that provide “natural gas or electric distribution services subject to the commission’s jurisdiction.” See, Puc 2102.11. Inasmuch as National Grid no longer provides natural gas or electric distribution services in New Hampshire, it appears that the Commission’s Affiliate Transaction Rules do not apply to National Grid. Accordingly, it would seem to follow that the filing of agreements such as the Accession Agreement is no longer required.

Pursuant to Puc 203.02 (a) (4), an electronic copy of this filing has been provided to the Consumer Advocate. Thank you for your attention to this matter.

Sincerely,



Thomas B. Getz

TBG:slb  
Enclosures

McLane Middleton, Professional Association  
Manchester, Concord, Portsmouth, NH | Woburn, Boston, MA

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