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Environmental Law ▪ *Utility Law*

October 4, 2023

VIA ELECTRONIC DELIVERY

Andrew J. Harmon, Hearings Examiner
New Hampshire Department of Energy
21 S. Fruit Street, Suite 10
Concord, N.H. 03301

Re: Rulemaking – En 600 Rules for Water Service
Written Public Comment

Dear Attorney Harmon,

Pursuant to the Department's Initial Rulemaking Notice, below please find comments related to the Department's proposed En 600 rules for Water Service.

I understand that this comment has been previously raised but I will reiterate it here. En 605.04 contains the old Puc rule regarding meter testing and calibration. In talking with my clients, now that meters have fewer moving parts and come with warranties of up to 20 years, the testing schedule should be updated. I recommend removing Table 6.5.2 and instead inserting that the meters should be tested per the manufacturer's suggested schedule.

The second benefit of the testing table has been informing customers and regulators of the testing frequency. This can be accomplished by requiring that water utilities file the manufacturer's testing schedule as an appendix to their tariff or post it on their website. That way, the information is still easily available to customers and regulators looking for the testing table information.

Thank you in advance for the Department's consideration of these comments.

Very Truly Yours,

A handwritten signature in black ink that reads "Marcia A. Brown".

Marcia A. Brown

cc: N.H. Public Utilities Commission Docket No. DW 23-082