



November 4, 2009

Lynn Fabrizio, Esq.
Staff Attorney/Hearing Examiner
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

Re: New Hampshire December 2008 Ice Storm Assessment Report

Dear Ms. Fabrizio:

New Hampshire Electric Cooperative (the "Co-op") has completed its review of the second NEI Ice Storm Assessment report dated October 30, 2009. We find that the extensive clarification information and factual corrections provided by the Co-op to NEI on October 16, 2009 from our review of the first NEI report were not utilized in the second report.

We view the second report to be inconclusive and misleading by not utilizing/incorporating our clarification information and factual corrections. For example, NHEC was the second utility to restore power to all members and then provided assistance to two of the other electric utilities. Coinciding with this timely restoration work was an effective communication program keeping the state, towns, media and individual members informed about our progress to restore power. These efforts required great cooperation and individual initiative throughout our company.

As you know, the Co-op voluntarily participated in the Ice Strom Assessment process, with the hope that the information gained through such a process would provide valuable insights and lessons which would help the Co-op better serve its members and allow all of the utilities and state and local government agencies to better serve the public. Indeed, we believe that this process has done much to identify the strengths, weaknesses and opportunities for improvement which are relevant to all of New Hampshire's organizations which must prepare for and respond to the types of challenges presented by the December 2008 Ice Storm. Likewise, this process clearly revealed that the strengths, weakness and opportunities for improvement differ substantial from one organization to another. We believe that recognizing and acknowledging these differences is a fundamental element of any process by which the organizations can learn from one another. In this respect, we are disappointed that the conclusions and recommendations of the latest draft of the NEI report fail to address or incorporate the factual corrections and clarifications provided by the Co-op. Our concerns relating to the overly generalized nature of the report's conclusions and recommendations are not merely the product of institutional pride. Rather, they reflect a fear that such undifferentiated conclusions and recommendations diminish the strength of the report as a resource for identifying and implementing lessons learned from last December's difficulties.

Please do not hesitate to contact me should you have any questions or concerns.

Best Regards,

James T. Bakas

Vice President of Operations & Engineering