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July 7, 2007

Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, New Hampshire 03301-7319



RE: DE 07-064 Electric Utilities – Energy Efficiency Rate Mechanisms

Dear Ms. Howland:

We are writing on behalf of the OCA and the Office of Energy and Planning to provide comments in response to Unitil's Motion for Clarification/Motion for Expansion of Scope, and related comments of other parties filed in the above-referenced docket.

We agree that the exploration of whether it is necessary to address disincentives or remove obstacles for utilities to promote energy efficiency could result in mechanisms which address similar issues related to promoting efficient, clean, renewable distributed generation for use by customers. However, we are concerned that broadening the scope of the docket beyond a focus on energy efficiency could result in an unwieldy process that does not produce useful results in a timely fashion. As a result, we believe that the docket should be conducted under the existing scope, but that the parties should consider the potential application of mechanisms to promote energy efficiency on distributed generation. Findings from this docket could be applied to distributed generation, or a future phase could consider those issues if further investigation is warranted.

We also agree with the Campaign for Ratepayers Rights that, in accordance with the Order of Notice in this docket, the parties must also consider alternatives to decoupling in order to achieve the goals set forth in the Commission's Order of Notice.

Lastly, we agree with the Conservation Law Foundation that if this docket includes an exploration of ways to remove barriers to utilities promoting distributed generation, it should be limited to efficient, clean, renewable distributed generation. In addition, any distributed generation clearly must meet the state's environmental goals.

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The Department of Environmental Services Air Resources Division concurs with these comments. Thank you for your consideration.

Sincerely,



Meredith A. Hatfield
Consumer Advocate



for

Jack K. Ruderman
Deputy Director
Office of Energy and Planning

cc: Service list (via email)