

DE 06-015

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



Re: New Hampshire Electric Cooperative, Inc.
2006 Least Cost Integrated Plan

Dear Secretary Howland:

I am writing on behalf of the New Hampshire Electric Cooperative, Inc. ("NHEC") to request that the Commission initiate a docket concerning NHEC's 2006 Least Cost Integrated Plan pursuant to RSA 378:38 ("LCIP").

I have recently come to realize that NHEC erroneously discontinued annual LCIP filings subsequent to the 1997 enactment of legislation which substantially reduced the scope of the Commission's jurisdiction over NHEC. The discontinuance of these filings was mistaken. The provisions of RSA 378:37-39 continue to apply to NHEC despite its "deregulated" status.

Because NHEC has not recently submitted either an LCIP or any waiver requests which became available subsequent to electric utility restructuring, and in light of the significant changes to both NHEC's regulatory status and the electric utility industry's structure since its last LCIP, NHEC requests that the Commission initiate proceeding prior to NHEC's formal submission of a LCIP so that issues concerning the scope and content of that plan can be resolved or narrowed at the outset. NHEC believes this preliminary process to be particularly important given the disputes and uncertainty associated with the scope of LCIPs which have emerged in DE 04-072.

Very truly yours,

Mark W. Dean
MWD/tp

cc: Office of the Consumer Advocate