

STATE OF NEW HAMPSHIRE

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September 25, 2013

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

RE: DE 13-215
Petition by Public Service Company of New Hampshire to Waive Puc 305.03, Test
Schedules for Watt-Hour Meters and Demand Devices

Dear Ms. Howland:

On July 17, 2013, Public Service Company of New Hampshire (PSNH or Company) filed a petition pursuant to New Hampshire Code of Administrative Rules Puc 201.05 requesting the Commission waive certain requirements of PUC 305.03 relative to the testing schedules for watt-hour meters and demand devices. The waiver request raises questions regarding the impact of PSNH metering changes on residential consumer bill accuracy, choice of competitive energy supplier, and the prudence of implementing meters that are not capable of measuring Time of Use rates or other options possible with more advanced meters, as discussed below.

On September 20, 2013, Thomas Frantz, Director of the PUC's Electric Division filed a letter identifying Staff concerns and recommending that the Commission grant PSNH's waiver request. The OCA takes no position on the waiver request. The OCA supports Staff concerns about PSNH's meter replacement plan and adds the following questions:

1. Are the meters which the Company plans to install sufficiently advanced to accommodate implementation of time-based rates which would comply with the Commission's statement that "it is appropriate to implement some form of smart metering and time-based rates as set forth in the federal standard in the instant docket." The Commission raised this issue in DE 06-061, *In Re Investigation into Implementation of The Energy Policy Act of 2005*, Order No. 24,819 (January 22, 2008) at 15.

2. Will the Company's existing C2 billing system implemented in July 2008 , in conjunction with these new meters together comprise a meter data management (MDM) system which is sufficiently flexible and robust to process available metering data for use in other than existing rate structure offerings such as time-based or real-time pricing?
3. While the Company itself may not be interested in offering time-based rate structures, the recent growth of the competitive energy service market for residential customers suggests the possibility that competitive marketers may be interested in developing and offering such rates. Can the Company's MDM system handle data to bill customers properly if time-based rates are offered?

While the OCA agrees with Staff's statement that "[t]hese types of managerial decisions are the province of the utility," the OCA wishes to raise these questions in advance of PSNH's significant investment in a meter replacement plan which may not support the public policy objectives identified herein.

Respectfully,



Susan W. Chamberlin
Consumer Advocate