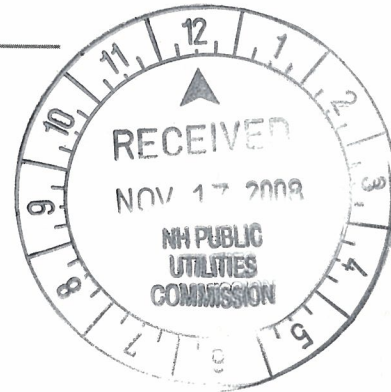




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Knowledge Creating Value

DRM08-127



November 14, 2008

Debra Howland, Executive Director
NH Public Utilities Commission
South Fruit Street
Concord, NH 03301

Dear Ms. Howland:

The Retail Merchants Association of New Hampshire (RMANH) is interested in participating in the development of the Public Utilities Commission's rules governing the distribution of the Greenhouse Gas Emissions Reduction Fund (RSA 125-O: 23) authorized by the legislature through HB 1434. As the rulemaking process at the Commission develops, we would appreciate it if you could keep us informed of opportunities to comment on the policy and to offer input on the final administrative rules.

The RMANH is a statewide, not-for-profit, trade organization representing over 800 businesses in the Granite State. Our members range from small independent business owners to major corporations, all with a single goal - to promote the success of the New Hampshire retail community.

The Association will be working with The Dupont Group in this process and while there is no service list associated with the rulemaking process at this time, could you please forward any draft rules, comments or commission actions to:

James Monahan
The Dupont Group
114 North Main Street
Concord, NH 03301

E-Mail: jmonahan@dupontgroup.com

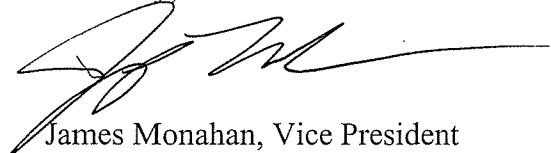
In reviewing the temporary rule, we note that the Commission has recently developed PUC 2600. There are two areas of concern which impact our members and on which we want to comment. In both instances, it is an absence of policy, rather than a detailed rule that concerns us. Specifically, we would urge the Commission to consider the following:

- (1) Allocation of energy efficiency resources should be proportional to the customer class contribution to the Fund.
 - a. The cost of RGGI compliance is borne by all rate payers, as such, the benefits of the program should similarly be shared by all customers. In establishing such a goal, the Commission should strive to ensure that the programs are developed and targeted by customer class. The RMA's members primarily come from the commercial class of electric customers, which we assume account for approximately 45% of electric load, and thus 45% of the RGGI Fund. It would be our expectation that the allocations be structured in a fashion that will ensure that roughly 45% of the Fund is targeted to commercial customers.
- (2) The Commission should invite requests for energy efficiency education and support programs.
 - a. In order to succeed, and meet the goals established in the legislation, energy efficiency investments must be widely accepted and understood. In the early stages of these efforts, programs that support public education about the Fund, how it is different from previous programs, and its benefits to customers need to be amplified.
 - b. HB 1434 specifically authorized the Commission to include in the program "support energy efficiency, conservation, and demand response programs ..." The final rule should detail this section and invite organizations that will ensure the success of the program through wide participation.

I hope these comments are helpful to the Commission in the development of its final administrative rules which will govern the Greenhouse Gas Emissions Reduction Fund.

Thank you for your consideration of these comments.

Sincerely,



James Monahan, Vice President
The Dupont Group

cc:

Nancy Kyle, Executive Director, NH Retail Merchants Association
Office of the Consumer Advocate
Richard Ober, Chair Energy Efficiency and Sustainable Energy Board