

**SMIGEL, ANDERSON  
& SACKS** LLP  
ATTORNEYS AT LAW

SCOTT H. DEBROFF, ESQUIRE

PHONE: (717) 234-2401

TOLL FREE: 1-800-822-9757

FACSIMILE (717) 234-3611

EMAIL: sdebloff@sasllp.com

www.sasllp.com

File No.  
8997-12-3

September 28, 2006

Debra A Howland  
Executive Director & Secretary  
NHPUC  
21 S. Fruit St., Suite 10  
Concord, NH 03301-2429

Re: New Hampshire Public Utilities Commission, Investigation of Implementation of Federal Standards of The Domenici-Barton Energy Policy Act of 2005. Docket #DE 06-061

Dear Secretary Howland:

Enclosed please find an original and 9 copies of the "Comments of Hunt Technologies, Inc."

Please stamp and return the 9<sup>th</sup> copy in the enclosed self-addressed stamped envelope.

Sincerely,



Scott H. DeBroff  
Counsel for Hunt Technologies, Inc.

Smigel, Anderson & Sacks  
River Chase Office Center  
4431 N. Front Street  
Harrisburg, PA 17110

SHD/ddm  
Enclosures  
cc: Certificate of Service



**BEFORE THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

NEW HAMPSHIRE PUBLIC UTILITIES  
COMMISSION, INVESTIGATION OF  
IMPLEMENTATION OF FEDERAL  
STANDARDS OF THE DOMENICI-BARTON  
ENERGY POLICY ACT OF 2005.

DOCKET No. DE 06-061

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**INITIAL COMMENTS  
OF  
HUNT TECHNOLOGIES, INC.  
TO THE  
COMMISSION ORDER INSTITUTING PROCEEDINGS  
AND NOTICE SOLICITING COMMENTS**

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**SCOTT H. DEBROFF, ESQUIRE**  
SMIGEL, ANDERSON & SACKS, LLP.  
RIVER CHASE OFFICE CENTER  
4431 NORTH FRONT STREET  
HARRISBURG, PA 17110

TEL: (717) 234-2401  
FAX: (717) 234-3611  
EMAIL: [SDEBROFF@SASLLP.COM](mailto:SDEBROFF@SASLLP.COM)

**DATED: SEPTEMBER 28, 2006**

**COUNSEL FOR HUNT TECHNOLOGIES, INC.**

**BEFORE THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

NEW HAMPSHIRE PUBLIC UTILITIES  
COMMISSION, INVESTIGATION OF  
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AND NOW COMES **Scott H. DeBross, Esquire** of Smigel, Anderson, & Sacks LLP on behalf of his client, **Hunt Technologies, Inc.** ("Hunt"), for the purpose of these "Initial Comments" on the Time Based Metering and Communications Standards with respect to this docket of the New Hampshire Public Utilities Commission ("NHPUC" or the "Commission") regarding the investigation into Implementation of Federal Standards of The Domenici-Barton Energy Policy Act of 2005 and avers the following:

1. Hunt Technologies, Inc. ("Hunt") is a party in the above-captioned docket and is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005, specifically addressing the Smart Metering and Demand Response provisions beginning at Section 1252 of the Electricity Title of the Act.

2. Hunt Technologies delivers industry-leading advanced metering infrastructure (AMI) solutions to the electric, water and natural gas utilities markets. Based in central Minnesota, Hunt develops and supports hardware and software for more than 480 customers worldwide.

3. On August 8, 2005, President Bush signed the Energy Policy Act of 2005 into law. EPACT 2005 amends PURPA and requires state regulatory authorities, with respect to electric utilities, to consider and make a determination regarding net metering, smart metering, cogeneration and small production purchase and sale requirements and interconnection.

4. The above-captioned Investigation proceeding was docketed by the Commission and an Order setting a date for a Pre-Hearing Conference and a Technical Session to discuss the Investigation and establish a proposed procedural schedule was filed on April 24, 2006.

5. On May 16, 2006, a Pre Hearing Conference was held at the Commission and a transcript of such was filed on May 31, 2006.

6. On June 6, 2006, a Letter of three outlines of discussion topics to consider the five new Federal standards was submitted to the Commission and other documents were subsequently filed on July 13, 2006.

7. On July 25, 2006, the Staff's Recommendation was filed to the docket.

8. Regarding whether the Time Based Metering and Communications standards should be implemented, we believe that the promotion of the federal standard will provide benefits to the ratepayer as well as provide operational efficiencies to New Hampshire's utilities in the process. We also are supportive of a strong alignment to the Federal standards when promotion of such

policy also includes language that advanced metering technologies should be deployed if they reduce the utilities' costs and will not increase stranded costs.

9. We are aware that a number of utilities are at this time seeking out and deploying advanced meters and advanced metering capabilities in New Hampshire and it is essential that those activities are supported through this process. We believe that a closer examination of the Federal Standards by this Commission and the parties to this docket is necessary and we support it.

10. In addition, we believe that a strong advanced metering infrastructure will not only expand the potential for offering of time-differentiated rates to customers, but could also widen availability of a variety of other products and services as well.

11. This Commission has also asked how the Time Based Metering and Communications standards should be implemented. Our answer is that this Commission should use the procedural process, as outlined in its September 14, 2006 Letter to the Parties, to include and undertake "technical sessions" in which to sit down and discuss the details around how the Commission, the utilities and the other parties to this proceeding address the very substantial technical details that revolve around the creation of time-variant pricing options in tariffs as well as a discussion regarding the functionality issues regarding advanced meters and creation of advanced metering infrastructures (AMI) that support and facilitate the time-variant tariff rates.

12. This may not be a quick process, but it is one that will facilitate advantages for utilities and customers alike for a long time, and the technical work will certainly take more than one or

two meetings to complete. We are committed to playing a significant role and providing our expertise in these types of processes to New Hampshire.

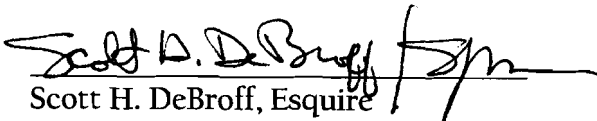
13. Regarding the Commission's scoping document on Time Based Metering and Communications, Hunt believes that most of the questions posed on pages 3-4 are just the kind of questions best suited for "technical workshop sessions" as opposed to simply taking responses from parties at this time. Hunt has participated in over 15 state EPACT rulemakings just like this one, and our experience has been that the technical details are so highly important to the successful outcome of this process and investigation that it is necessary to include a series of workshops and discussions in order to move things to the next level. One state, among several who have taken this approach, is Texas. They included a series of working group meetings in order to explore the technical details. We would be happy to provide further information to the Commission on the Texas activities or other state processes as you are interested.

### CONCLUSION

Hunt Technologies looks forward to working with the New Hampshire PUC, the various utilities and other parties to this proceeding in exploring the development of next steps towards creation of an advanced metering infrastructure and the development of even more significant time-variant pricing and tariff offerings that provide benefits to the customer and operational efficiencies to the utilities.

Respectfully submitted,

Dated: **September 28, 2006**

By:   
Scott H. DeBroff, Esquire  
Smigel, Anderson, & Sacks, LLP  
River Chase Office Center  
4431 North Front Street  
Harrisburg, PA 17110-1778

Tel: (717) 234-2401

Fax: (717) 234-3611

eMail: [sdebroff@sasllp.com](mailto:sdebroff@sasllp.com)

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IMPLEMENTATION OF FEDERAL  
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BARTON ENERGY POLICY ACT OF 2005.

DOCKET NO. DE 06-061

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been sent by U.S. First Class mail, facsimile, electronically or hand delivery, to all parties of record in this proceeding:

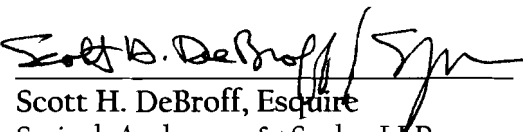
Pentti Aalto PJA Energy Systems Design 720 Batchelder Rd. Pembroke, NH 03275	Douglas Debski Unitil Energy Systems, Inc. 6 Liberty Lane West Hampton, NH 03842
Roy Morrison Roy Morrison & Associates, LLC PO Box 201 Warner, NH 03278	Karen Asbury Unitil SVC Corp 6 Liberty Lane West Hampton, NH 03842-1720
Dan Delurey Demand Response and Advanced Meteny Coalition PO Box 957 Winchester, MA 01890	K Nolin Public Service Company of New Hampshire PO Box 330 Manchester, NH 03105
Angela Beehler Sam M Walton Development Complex 2001 SE 10 <sup>th</sup> St Bentonville, AR 72716-0550	Allen Desbiens Public Service Company of New Hampshire 780 N. Commercial St. PO Box 330 Manchester, NH 03105-0330
Donald Pfundstein Gallagher Callahan & Gartrell 214 N. Main St. PO Box 1415 Concord, NH 03302	Alexandra E. Blackmore Granite State Electric Company 25 Research Dr. Westborough, MA 05182
Karla J. Doukas Rubin and Rudman, LLP 50 Rowes Wharf Boston, MA 02110	Meabh Purcell LeBoeuf Lamb Greene & MacRae, LLP 260 Franklin St. Boston, MA 02110-3173
Philip Braley Brown Olson & Gould, PC 201 Denta Dr., Ste 301 Concord, NH 03301	Gerald M Eaton Public Service Company of New Hampshire 780 N. Commercial St. PO Box 330 Manchester, NH 03105-0330



James T. Rodier Attorney at Law 1500 A Lafayette Rd., No. 112 Portsmouth, NH 03801-5918	Michael Cannata Liberty Consulting Group 65A Ridge Rd. Deerfield, NH 03037
Gary Epler Unitil Energy Systems, Inc. 6 Liberty Lane West Hampton, NH 03842-1720	James H. Watts Ingersoll-Rand Energy Systems 30 New Hampshire Ave. Portsmouth, NH 03801
Michael B. Coit Public Service Company of New Hampshire 1250 Hooksett Rd Hooksett, NH 03106	Amy Ignatius Office of Energy and Planning 57 Regional Dr. Ste. 3 Concord, NH 03301-8519
Jack R. Ruderman Office of State Planning and Energy 57 Regional Dr. Ste. 3 Concord, NH 03301-8519	Mark W. Dean Devine Millmet & Branch 49 N. Main St. PO Box 3610 Concord, NH 03302
Heather Kaufman New Hampshire Electric Cooperative 579 Tenney Mt. Highway Plymouth, NH 03264	Robert D. Shapiro Rubin and Rudman, LLP 50 Rowes Wharf Boston, MA 02110-3319
David J. Sherlock Brown Olson & Gould PC 2 Delta Dr. Ste 301 Concord, NH 03301-7426	Ken E Taum Office of the Consumer Advocate 21 South Front St. Ste 18 Concord, NH 03301-2429

Respectfully submitted,

Dated: **September 28, 2006**

By:   
 Scott H. DeBroff, Esquire  
 Smigel, Anderson, & Sacks, LLP  
 River Chase Office Center  
 4431 North Front Street  
 Harrisburg, PA 17110-1778

Tel: (717) 234-2401  
 Fax: (717) 234-3611  
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