

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DRM 13-090

RULEMAKING

New Hampshire Code of Administrative Rules
PART Puc 300, Rules for Electric Service

Written Comments of the New Hampshire Office of the Consumer Advocate

The Office of the Consumer Advocate (OCA) files the following comments in response to Staff's proposed changes to the 300 rules for Electric Service dated September 9, 2013. Other OCA suggestions may arise in response to comments filed by other stakeholders or during the stakeholder process in this rulemaking. Consistent with other rulemakings, the OCA will discuss its proposed refinements with the stakeholders in an effort to reach consensus on them.

The OCA makes the following suggestions:

PART Puc 302 DEFINITIONS

Puc 302.20 - Strike "Regional Transmission Operator" in its entirety and insert "Independent System Operator of New England" (ISO-NE) as Puc 302.11.

PART Puc 303 SERVICE PROVISIONS

Puc 303.04 (b) - End the first sentence after "affected," Strike the second sentence and add, "The utility may request a residential customer contribution by petition to the Commission with notice to the OCA".

PART Puc 305 METER ACCURACY AND TESTING

Puc 305.05 (e) - Change 6 to 3 months.

Puc 305.05 (h) - Change 6 to 3 months.

Puc 305.05 (i) - Change 6 to 3 months.

PART Puc 306 EQUIPMENT AND FACILITIES

Puc 306.01 (a) – Add: (4) Once a pole is no longer in use, the utility shall promptly remove the pole, no later than 4 months after discontinued use.

Puc 306.01 (a) – Add: (5) When a utility receives a “make ready” request from any lawful pole occupant, the utility shall complete the “make ready” work within 4 months of the request.

Puc 306.06 – Add: (h) The utility shall also provide notice to the proper authority in the municipality which owns the public way in which the affected pole is located.

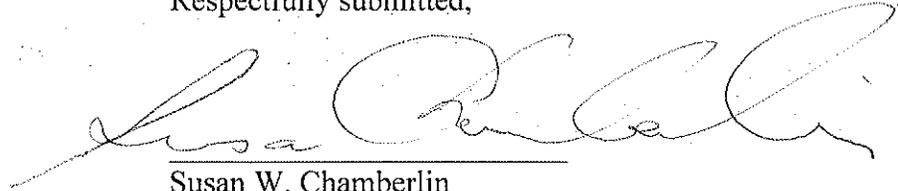
PART Puc 307 RECORDS AND REPORTS

Puc 307.03 – Add: (d) Upon request a utility shall file a copy of any report filed at the Commission to the Office of the Consumer Advocate.

Puc 307.10 - The Office of the Consumer Advocate agrees to a 5 year cycle of tree pruning, as a standard. Utilities, Staff or the Office of the Consumer Advocate may propose alternatives on a case by case basis.

The OCA appreciates the Commission’s commencement of this rulemaking proceeding and the effort and thought that went into the drafting of the initial proposal. We look forward to working with the Commission Staff and other stakeholders to finalize a draft for Commission approval and promulgation. Thank you again for this opportunity to provide comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Susan W. Chamberlin', written in a cursive style. The signature is positioned above a horizontal line.

Susan W. Chamberlin
Consumer Advocate
N.H. Office of the Consumer Advocate
21 S. Fruit St., Ste. 18
Concord, NH 03301
(603) 271-1174