



February 5, 2010

Mr. Matthew Fossum  
Staff Attorney  
New Hampshire Public Utilities Commission  
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**Re: DRM 10-014: Initial Comments of TransCanada Power Marketing Ltd. on proposed changes to Competitive Electric Power Supplier rules (Puc 2000)**

Dear Mr. Fossum:

TransCanada Power Marketing Ltd. (“TransCanada”) appreciates the opportunity to provide comments on Commission Staff’s proposed changes to Competitive Electric Power Supplier Rules (Chapter Puc 2000). Generally speaking, the proposed changes are very helpful in clarifying or updating many sections of the rules. TransCanada therefore has only a few suggestions for changes.

1. Draft rule Puc 2003.01(c)(10) – In comments filed with the Commission on February 3, 2010, National Grid requests that language in this section be amended to require CEPS to include the zip codes in which an applicant intends to operate. TransCanada believes that this is an overly burdensome requirement and not necessary in New Hampshire. National Grid’s suggestion may arise out of the unique nature of business activities in New York where it also operates, where there are tax implications at the local level (i.e., at the zip code level). Such issues are not germane to New Hampshire. We certainly welcome further discussion with Staff and National Grid to better understand what information National Grid would like to have to better facilitate business activities with CEPS.
2. Draft rule Puc 2003.01(f) – Section Puc 2003.01(f) would be a new requirement for CEPS to file with the Commission quarterly reports on sales activity. TransCanada does not object to a new reporting requirement and appreciates Staff’s recognition of the competitive sensitivity of such information by stating explicitly in the proposed rule that the Commission shall treat such information as confidential. TransCanada however requests Staff reconsider the requirement to provide sales activity down to the utility rate class level. The primary information source for kilowatt hour sales is metered usage, which is transmitted electronically (via electronic data interchange, or “EDI”) to CEPS

by the utilities. EDI transactions in New Hampshire do not contain rate class designations. Consequently, CEPS do not have an accurate means to report sales activity at the rate class level. As an alternative, CEPS could provide separate sales information for two categories: residential and non-residential. TransCanada also requests that this reporting requirement be made on an annual basis rather than quarterly.

3. Puc 2004.04(f)(6) – Language in this existing provision requires in the written authorization form authorizing a change from one competitive supplier to another that it identify *each* CEPS by name. TransCanada requests Staff recommend removing the requirement to name the CEPS that is being replaced, because a CEPS almost never knows the name of the supplier that it is replacing.
4. Puc 2004.06(b) -- In comments filed with the Commission on February 3, 2010, National Grid requests the inclusion of qualifications with respect to utilities' obligations to comply with CEPS request for off-cycle meter reads. Rather than granting to the utilities full discretion as to whether or not they will comply with a request, TransCanada suggests making it a requirement that a utility shall provide an off cycle meter read upon request, but only for customer accounts with time of use meters. This greatly reduces the accounts that would qualify, and greatly reduces utilities' potential work load.

Please let me know if you have any questions or concerns.

Regards



Stuart Ormsbee  
Manager, Power Marketing