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STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION
DE-06-061
Energy Policy Act – Smart Metering

COMMENTS OF THE OFFICE OF ENERGY AND PLANNING

The Office of Energy and Planning (OEP) hereby submits the following comments regarding the issues raised in the October 10, 2007 hearing on “smart metering,” specifically, time of use and real time pricing options for New Hampshire’s regulated electric utilities.

OEP supports trial of time of use and real time pricing technologies for different classes of customers. Without trials we will be unable to assess the extent of customer interest, the potential for a meaningful shift in peak load and the likelihood for customers to save on their electric bills. Trials will also allow us to evaluate the costs of various programs to weigh against the benefits, to develop balanced time of use and/or real time pricing programs. It would be premature at this time to determine whether any new smart metering programs time should be mandatory or optional.

OEP also supports working groups to evaluate true costs of time of use and real time pricing programs. As stated by Mr. Hall, preliminary estimates are not precise and cover a broad range of possible expenditures. Working groups could narrow those ranges to closer estimates of the cost of particular programs.

OEP does not support moving to full deployment of real time a time of use programs for all customers of all utilities at this time. It does, however, support an accelerated commitment on the part of the states’ utilities to embrace these technologies and service offerings and work creatively to determine if such programs would be in the best interest of customers and the system as a whole. Pilot programs proposed by the utilities and working groups to explore these and other program options should be approved.

Balanced, cost effective programs that shift peak load and give customers price signals that reflect, if not track, the cost of energy is our goal. Study of the available technologies and program design options are critical steps to reach that goal.

We appreciate the opportunity to make these comments.

Respectfully submitted,

OFFICE OF ENERGY AND PLANNING



Amy Ignatius, Esq.
Director

Certificate of Service

I certify that on this date a copy of the foregoing was hand-delivered to PUC staff and the Office of Consumer Advocate, and sent via first-class United States mail to the Commission's service list in this docket.

October 26, 2007



Amy Ignatius, Esq.