

**Mark Dean**

Attorney

NH PUC 28 APR 16 PM 2:41

April 28, 2016

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-24229

**RE: DE 14-078 Electric Assistance Program
NHEC Implementation of Advisory Board Recommendation**

Dear Director Howland:

By letter dated April 7, 2016, the Electric Assistance Advisory Board (the "Advisory Board") made certain recommendations to the Commission concerning changes to EAP discounts, with a recommendation that those changes become effective July 1, 2016. New Hampshire Electric Cooperative, Inc. ("NHEC") participates on the Advisory Board and fully supports the April 7, 2016 recommendations.

I am writing on behalf of NHEC to request that any Commission order approving the Advisory Board recommendations recognize that NHEC may implement the approved changes on a "bills-rendered" basis rather than a "service-rendered" basis. There are two reasons for this request.

First, because of its deregulated status and pursuant to NH Puc 1201.02, NHEC is not subject to the service-rendered requirements for rate change implementation under NH Puc 1203.05. However, NHEC is concerned that without this advance request for clarification, the Commission may issue an order which does not recognize the impact of NHEC's regulatory status on service-rendered requirements. Such an order may require subsequent readings by NHEC.

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Secondly, NHEC has historically implemented rate changes on a bills-rendered basis, but is currently in the process of transitioning its billing process from bills-rendered to service-rendered. NHEC's new process will utilize its AMI infrastructure and will use actual interval reads instead of a pro-ration methodology. This transition will require significant process changes and thorough testing. Making a change of this magnitude will also require several months of member communication to introduce and explain the new process. Under no circumstances will these activities be completed prior to July, 1, 2016.

If you have any questions concerning this matter please do not hesitate to contact me.

Electronic copies of this letter have been provided to the service list.

Sincerely,

A handwritten signature in blue ink, appearing to be 'M. Dean', with a long horizontal flourish extending to the right.

Mark W. Dean