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March 2, 2015

Ms. Debra A. Howland
Executive Director and Secretary
State of New Hampshire
Public Utilities Commission
21 S. Fruit St, Suite 10
Concord, NH 03301-2429
Re: IR 14-338

Dear Ms. Howland,

I am submitting my comments as a consumer and someone who opposes building additional Natural Gas pipeline infrastructure in New Hampshire. I attended the hearing in January and signed in as a member of New Hampshire Pipeline Awareness Network (NHPLAN). My comments, however, are mine alone and don't necessarily reflect the opinions of NHPLAN.

First, I applaud the PUC and ISO-NE on the success seen with the Winter Reliability Program through this very cold month. Unfortunately, most consumers still believe that their high electricity prices this season are related to pipeline constraints and/or funds spent to support the Regional Greenhouse Gas Initiative and Renewable Portfolio Standard.

I have read through the proposals and was struck by the comments from Briar Hydro Associates regarding the way that Power Service Agreements (PSAs) are structured. This seems to me to be an excellent example of how renewable suppliers may find themselves without contracts or forward capacity payments that could be used to build their capacity in the same way the fossil fuel generated suppliers do. Perhaps I misunderstand how this works, but I think I read that Forward Capacity Payments will help suppliers build 3 Natural Gas generated electricity plants in New England to meet demand for 2018? Is this program offered to hydro, wind, biomass or solar suppliers?

Several proposals mentioned shortening the time between bidding and awarding contracts. I am on the Rindge Energy Commission and our municipality purchases electricity through the Monadnock Buying Collaborative (MBC) run by Rodney Bartlett of Peterborough. The MBC watches the market and tells the various towns and school districts that they have 24 hours to "pull the trigger" once Rodney thinks the market is right. This has worked quite well for the participants. Last year, we purchased 100% Wind generated electricity for nine months at about \$.08 per KWh. We returned to Eversource at \$.105 per KWh for January, February and March, but have signed on with Integrys at \$.0726 per KWh for 100% Wind starting in April and continuing until December of 2016. This is an enormous help to the participating municipalities and school districts since they can make budgeting decisions

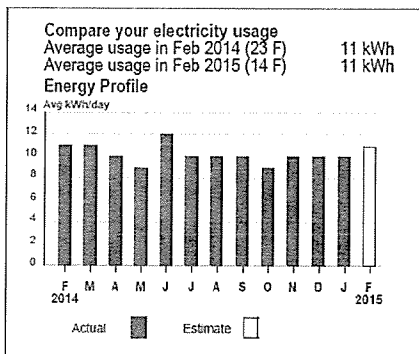
with a greater degree of confidence. Shortening the time between accepting bids and awarding contracts seems essential.

I can understand that contracts longer than six months or ladder solutions have their advantages...and problems too. Just as the Winter Reliability program evolved over a couple of years, perhaps once the time between bid and contract is shortened, the advantages/disadvantages of longer term contracts could be discussed?

Another topic that came up in the proposals was regarding people "gaming" the system by switching between the default and competitive independent suppliers. The focus seemed to be on discouraging switching. While it's understandable that this switching is problematic for planning purposes, referring to people studying the market and making informed decisions as "gaming" the system is, I think, an unfortunate term and implies a basic dishonesty which I find inappropriate.

I do support Eversource maintaining some of its generating facilities since I think that if the coal plant with the scrubber is sold, it will be shut down and ratepayers forced to eat the losses. Until we have sufficient diversity in our supply so that we don't wind up wholly dependent on Natural Gas, I would discourage its sale. I understand that holding onto this infrastructure does cause consumers who stick with the default supplier to share an ever greater portion of the operating costs. On the other hand, having the coal and oil plants filling peak demand appears to have resulted in Eversource customers benefiting from lower electricity prices compared with other utility customers.

I am one of the 50% of residential customers who have contracts with independent electricity suppliers. I'm inserting a screenshot of my latest bill to show that my bill remains quite low (I purchase the coal free option from eNH). I recently tried to upgrade to 100% renewable energy, but my current contract is in effect until August 2015. As you can see, the larger part of my bill is for Delivery Services.



Delivery Services Detail		RATE R RESIDENTIAL SVC	
Customer Chrg			\$12.50
KWH Distribution Chrg	300.00KWH	x \$0.040790	\$12.24
Transmission Chrg	300.00KWH	x \$0.017860	\$5.36
Strnded Cst Recovery Chrg	300.00KWH	x \$0.001220	\$0.37
System Benefits Chrg	300.00KWH	x \$0.003300	\$0.99
Subtotal			\$31.46
Electricity Supply Detail		ENH POWER	
Generation Svc Chrg***	300.00KWH	x \$0.086500	\$25.95
Subtotal			\$25.95
Taxes			
Electricity Consumption Tax (calculated by rate \$0.00055/kWh)			\$0.17
Total Taxes			\$0.17

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While I am concerned about “greenwashing,” it is WORTH it to me to pay a little more knowing that I’m supporting the building of renewable energy infrastructure (although it’s probably being built out of State). Since our State Legislature seems determined to cut funding for renewable energy and energy efficiency projects, the people of New Hampshire will have to find ways to step up in the market if we want our State to catch up with the renewable revolution that is happening across the country and around the world.

I was heartened to read that only Liberty Utilities sounded the drumbeat of pipeline constraint. Theirs was the only proposal that brought this up and they mentioned it (including the ISO-NE paper) more than 40 times.

In an ideal world, New Hampshire electricity suppliers and ISO-NE would be attempting to tackle peak demand with storage (battery and/or pumped), energy efficiency and an intelligent grid. They would be thinking of ways to help consumers build a more diverse, renewable, efficient and distributed power network.

What helps me most as a consumer are the energy efficiency measures that keep my electric bill so low. Even if I were paying \$0.12 per KWh, my total bill would only be \$67.63. I have energy efficient appliances and am conscious of turning lights off when I leave a room, but operate a desktop and three laptops, a large screen tv, and all the usual conveniences. We heat our water off our boiler, but operate an electric dryer during the cold months. I know many people with fewer conveniences paying over \$100 per month and some with old electric hot water heaters and resistive heating paying close to \$1000. Most of them can’t afford to make the needed changes yet don’t qualify for fuel assistance. Expanding energy efficiency programs would be the biggest help for default users. Offering 100% renewable options at attractive pricing and then supporting that development would certainly bring me back as a default customer.

In closing, thank you for allowing me to comment on IR 14-338 and I look forward to the hearing on March 18 at 1:30.

Sincerely,

Pat Martin