



BRIAR HYDRO ASSOCIATES

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April 15, 2105

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,


Briar Hydro Associates ("Briar") provides the following comments on Staff's "Guiding Principles" provided to the Parties by Staff on March 23, 2105.

In line (g) of the Guiding Principles document, Staff notes, *"We do not find consideration of QF usage as appropriate, nor do we wish to constrain freedom of choice in the selection of bidders."*

Briar respectfully disagrees with Staff's position and requests that Staff elaborate on why they do not find consideration of QF usage appropriate. Further, Briar is not aware of any evidence or data that indicates allowing QF generation to act as a load reducer would constrain freedom of choice in the selection of bidders. Currently, suppliers of default service face the possibility of a default service customer switching to a competitive supplier and thereby reducing the load.¹ Given suppliers face the possibility of load reduction in the current default service bidding process, Briar does not believe the possible reduction in load due to QF generation would constrain or reduce the number of bidders. If such evidence or data to the contrary is available, Briar asks that it be made available as a part of this proceeding.

Briar appreciates the opportunity to contribute these comments.

Sincerely,

BRIAR HYDRO ASSOCIATES
By: Essex Hydro Associates, L.L.C.
A General Partner

Andrew Locke
President

¹As an example, Unitil's Winter 2014/2015 Power Supply Agreement ("PSA") requires the supplier to accept increases and decreases in load (Sections 3.2 and 3.3).