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NHPUC 20MAY'16AM11:34

May 18, 2016

Via First Class and Electronic Mail

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DE 15-491: PNE Energy Supply, LLC et al. v. PSNH d/b/a Eversource Energy

Dear Ms. Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, I am writing to provide comments regarding the obligation of an electric distribution company to provide off-cycle meter readings upon request to competitive electric power suppliers pursuant to Puc 2004.07(b) to the extent this issue is raised in the above-captioned docket.

Given that the word "customer" is used in the singular in Puc 2004.07(b), it is unclear whether the rule was intended to apply to situations requiring numerous off-cycle meter readings where there is the transfer of a large number of customers from a competitive electric power supplier to default service. This is an important issue which requires clarification given the significant resources that would be required to accomplish meter readings in this situation.

As the Commission may be aware, in the normal course of business, meter readings are conducted on planned routes which are created to be efficient given the often large geographic territory that a meter reader must cover. If a large number of meter readings needed to occur in a very short period of time other than on the typical meter reading route, this could require a significant diversion of resources to accomplish the task. Depending on the outcome of potential negotiations with the CEPS, it could be impossible to accomplish, depending on the number of such readings, since utilities may not have sufficient staff resources to accommodate such requests. Liberty Utilities believes this is an important issue that should be considered in Docket DRM 13-151 in which the Commission is repromulgating the Puc 2000 rules. To the extent that the Commission rules on a utility's obligation to conduct off-cycle meter readings in this docket, Liberty Utilities requests that the Commission make clear that any such ruling applies only to the particular circumstances of this case.

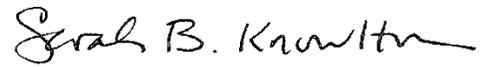
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Thank you for consideration of these comments.

Very truly yours,

A handwritten signature in black ink that reads "Sarah B. Knowlton". The signature is written in a cursive style with a long, sweeping underline.

Sarah B. Knowlton

cc: Service List