

**DE 07-013**

**UNITIL ENERGY SYSTEMS, INC.**

**Petition for Approval of Default Service Solicitation  
And Proposed Default Service Tariffs**

**Order Approving Petition**

**ORDER NO. 24,735**

**March 26, 2007**

**APPEARANCES:** Gary M. Epler, Esq. on behalf of Unitil Energy Systems, Inc.; Rorie Hollenberg, Esq. on behalf of the Office of Consumer Advocate; and Suzanne G. Amidon, Esq. on behalf of the Staff of the Public Utilities Commission.

**I. PROCEDURAL HISTORY**

On March 16, 2007, Unitil Energy Systems, Inc. (UES) filed with the New Hampshire Public Utilities Commission (Commission) a petition requesting approval of its solicitation and procurement of default service for its G1 and Non-G1 customers for the period beginning May 1, 2007. The filing was made pursuant to the terms of the Settlement Agreement approved by the Commission in Docket No. DE 05-064, *UES' Proposal for the Solicitation of Default Service Supply for G1 and Non-G1 Customers* (90 NH PUC 378 (2005)). In support of the Petition, UES filed the testimony and related exhibits of Robert S. Furino and Karen M. Asbury. In addition, UES filed the testimony of Robyn A. Tafoya together with UES' 2006 Purchased Power Lead/Lag Study. On March 19, 2007, UES also filed an updated report regarding customer migration to competitive energy supply.

The Settlement Agreement approved in Docket No. DE 05-064 provides that UES shall solicit power supplies on a quarterly basis for 100% of the default service requirements for its G1 customers at fixed monthly prices that vary from month to month. The Settlement Agreement further provides that UES solicit Non-G1 supply in four blocks on a ladder portfolio basis,

each block consisting of 25% of the power supply requirements for Non-G1 customers, with retail prices based upon a simple average of the wholesale prices for each of the four blocks. Pursuant to the Settlement Agreement, retail prices for Non-G1 customers are reset every six months, effective May 1 and November 1, as composition of the portfolio changes.

As a result of its solicitation process, UES selected Consolidated Edison Energy, Inc. (CEEI) to supply 100 percent of three months of default service energy requirements for G1 customers. Based on this selection, UES will fix monthly default service energy rates, which vary from month to month, for G1 customers for the months of May, June and July 2007 as follows:

Month	May, 2007	June, 2007	July, 2007
Price per kWh	\$0.07736	\$0.07952	\$0.08578

UES states that the overall bill impact for G1 customers will be a reduction of about 11.3 percent.

The current Non-G1 portfolio includes one 18-month supply block approved by Order No. 24,541 (November 2, 2005), one three-year supply block approved by Order No. 24,607 (March 24, 2006) and one twelve-month supply block approved by Order No. 24,676 (September 29, 2006). In the instant petition, UES seeks approval of a second 12-month Non-G1 supply block for the period beginning May 1, 2007. UES selected TransCanada Power Marketing, Ltd. (TCPM) for the twelve-month contract. When the rates from the 12-month contract are averaged with the prices for the other three blocks of default service supply, UES calculates an overall reduction of about 11 percent in Non-G1 default service energy charges, resulting in an average fixed monthly rate of \$0.09437 per kWh. The current Non-G1 rate is \$0.11264 per kWh.

With its Petition, UES filed a Motion for Confidentiality and Protective Order (Motion) for certain information, which it asserts is consistent with RSA 91-A:5, IV and prior Commission orders. The information for which UES seeks confidential treatment is contained in Tab A of Schedule RSF-1, the testimony of Mr. Furino and includes UES' Bid Evaluation Report.

In addition to requesting protective treatment for the material contained in Tab A, UES also requests confidential treatment for the "Wholesale rate," and "Supplier Charges," found on Pages 5 and 6 of Schedule KMA-2, the "Wholesale rate," "Current Month Supplier Charges," the total of the "Supplier Charges (Lines 1 and 12), "Provision for Uncollected Accounts," and "Supply Related Working Capital Costs," and the same supplier charges, working capital costs and "Working Capital Requirement" found on Page 7 of Schedule KMA-3. UES is requesting protective treatment of this information for a limited period of time. Finally, UES seeks protection from public disclosure of the indicative bid information provided in an e-mail to Commission Staff and the Office of Consumer Advocate (OCA) on March 6, 2007 and Exhibit 4, a one page spreadsheet introduced at hearing.

In support of its request for confidential treatment of information related to wholesale rates, UES states that a wholesale supplier is obligated, pursuant to certain reporting requirements, to report to the Federal Energy Regulatory Commission (FERC) the price and volume of its wholesale contractual sales during each quarter and to identify the party to whom the sale has been made, within 30 days of the end of that quarter. *See* FERC Docket No. RM01-8-000, Order No. 2001, 99 FERC ¶ 61, 107, 18 CFR Parts 2 and 35, issued April 25, 2002. UES attests that FERC makes this information available to the public through Electronic Quarterly Reports. UES, therefore, requests that the "Wholesale Rate" and "Supplier Charges" as well as the contract rate information provided in Appendices to the Power Supply Agreements (PSA) be

maintained as confidential until the information becomes publicly available at FERC. UES avers that until this pricing information is required by FERC to be made public, the winning suppliers will keep the information confidential so as to avoid disclosing price information that may be leveraged against it in other negotiations. UES also states that it is critical that the wholesale rate in the PSA and as reported on Schedules KMA-2 and KMA-3 be protected from disclosure.

UES states that with respect to the information consisting of UES' analysis and evaluation of the bids received, UES considers this to be confidential and proprietary commercial information and has not publicly disclosed the information in any other forum. UES asserts that disclosure of the information could compromise UES' bargaining position and ability to achieve the lowest possible price, reasonable credit quality provisions and other material terms in a competitive solicitation, to the detriment of UES and its customers, and that suppliers may completely refuse to participate in the New Hampshire market if their confidential information is publicly disclosed.

Tab A also included an unredacted copy of a contract amendment with CEEI<sup>1</sup> and an unredacted copy of the PSA negotiated between UES and TCPM. UES maintains that the disclosure of the PSA or the contract amendment would reveal the terms and conditions UES and the winning bidders were willing to agree to in order to achieve final agreement and thereby harm each party's ability to negotiate in the future. UES contends that providing even partial disclosure of the final PSA or contract amendment would disclose information that may be leveraged against either party to the PSA or contract amendment by showing what was not changed during the negotiation process and by focusing attention on what was changed. UES insists that disclosure of this information could compromise UES' bargaining position and ability

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<sup>1</sup> UES negotiated with CEEI to amend the existing PSA between CEEI and UES dated June 14, 2006 and approved by Order No. 24,639 on June 22, 2006.

to achieve the lowest possible price, reasonable credit quality provisions and other material terms in a competitive solicitation to the detriment of UES and its customers. UES asserts that the information contained in Tab A is “confidential, commercial or financial information” which is exempt from public disclosure under the Right-to-Know law, RSA 91-A:5, IV and that disclosure of this information would impair both UES’ and the responding bidders’ bargaining position with respect to future participation in the energy market.

The OCA notified the Commission on February 7, 2007, of its participation in the docket on behalf of residential ratepayers, consistent with RSA 363:28. An Order of Notice was issued on March 8, 2007, scheduling a hearing for March 21, 2007 at 9:00 a.m. On March 13, 2007, the Commission issued a Secretarial Letter which stated that the hearing would commence on the day scheduled at 10:00 a.m.

## **II. POSITIONS OF THE PARTIES AND STAFF**

### **A. Unitil Energy Systems, Inc.**

UES testified that, consistent with Order No. 24,522 (90 NH PUC 378 (2005)), the company conducted an open solicitation process, actively sought interest among potential suppliers and provided access to sufficient information to enable them to assess the risks and obligations associated with providing the services sought. UES declared that it effected market notification of the RFPs by electronically announcing its availability to all participants in the New England Power Pool (NEPOOL) and to the members of the NEPOOL Markets Committee. UES affirmed that it also announced the issuance of the RFPs to a list of contacts from energy companies who had expressed previous interest in receiving notices of solicitations. In addition, UES issued a media advisory to the power markets trade press announcing the RFPs.

In order to gain the greatest level of market interest, UES attested that it provided potential bidders with appropriate and accessible information. According to its filing, UES provided bidders with historic hourly load, historic monthly retail sales and customer counts, large customer concentration data and the evaluation loads, which are the estimated monthly volumes that UES would use to weight bids in terms of price. UES testified that it used its website to make this information available to potential suppliers.

UES issued the RFPs on February 1, 2007. On February 27, 2007, UES received proposals and indicative bids from several different respondents that included detailed background information on the bidding entity, proposed changes to the contract terms, and indicative pricing. UES stated that it reviewed the proposals and worked with the bidders to establish and evaluate their creditworthiness, their extension of adequate credit to UES to facilitate the transaction, their capability of performing the terms of the PSA in a reliable manner and their willingness to enter into contractual terms acceptable to UES. UES negotiated with potential suppliers who submitted proposals in order to obtain the most favorable contract terms each supplier was willing to offer. All bidders were invited to submit final bids.

On March 13, 2007, UES received final pricing from bidders and conducted its evaluation which included both the quantitative and qualitative criteria specified above. UES selected the lowest bids that included fixed energy-and-capacity costs for both G1 and Non-G1 default service. UES selected and notified TCPM and CEEI as the respective winners of the Non-G1 and G1 service requirements. UES avers that it followed the solicitation and bid evaluation process set forth in the Settlement Agreement and approved by the Commission, and that its analysis of the bids and choice of suppliers is reasonable.

UES testified that it determined the implied cost of capacity reflected in the energy-and-capacity bids by calculating the difference between the energy-and-capacity prices and the energy-only prices. On March 7, 2007, UES provided Staff and the OCA with the company's initial analysis of the implied cost of capacity reflected in the indicative bids. UES stated that the company then evaluated the implied cost of capacity reflected in the bids by comparison to its own estimates of the capacity costs, which are detailed in the confidential material in Tab A. As a result of this analysis, UES determined that it would be in the best interest of both its G1 and Non-G1 customers to select a bid that provides a fixed all-inclusive energy-and-capacity cost.

UES testified that, for customers on default service, the overall price changes resulting from are: the residential class will decrease about 11.0 percent; the small commercial and industrial class will decrease about 11.3 percent; large commercial and industrial class will decrease about 13.5 percent and outdoor lighting will decrease about 6.9 percent. For a typical residential customer using 500 kWh per month, bills will decrease \$9.14 from \$84.72 to \$75.58. UES stated that the electricity consumption tax was not included in this calculation.

UES pointed out that the reconciliation of over/under-collections of default service energy costs used in this filing include calculations for the period commencing May 2006. UES recalled that Staff and the OCA had expressed concerns in a prior default service filing<sup>2</sup> regarding UES' calculation of reconciliation amounts and associated interest. UES noted that Staff and the OCA contended that UES had mismatched five and one-half months of revenues to six months of expenses and had inappropriately claimed interest on the under-collected amounts. As a result of this disagreement, the Commission, in Order No. 24,716 (December 15, 2006) required the Staff, OCA and UES to file a report recommending the method for UES to account

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<sup>2</sup> See Order No. 24,676 (September 29, 2006) in Docket No. 06-123, *Unitil Energy Systems, Inc. Petition for Approval of Default Service Solicitation and Proposed Default Service Tariffs*.

for reconciliation of over- and under-recoveries and associated interest “before UES’ next [default service] filing.” Order No. 24,716, slip op. at 10.

UES testified that Staff, the OCA and the company filed a Joint Report On UES’ Calculation Of Default Service-Related Working Capital Requirements (Joint Report) with the Commission on February 9, 2007 in Docket No. 06-123. UES stated that the Joint Report recommends that UES’ default service reconciliation calculation be modified such that monthly revenues are based on accrued revenues derived from the amount of electricity used by customers each month rather than billed revenues. The Joint Report further recommends that the modified reconciliation calculation be included in UES’ next default service filing for the period commencing May 2007. Consistent with the recommendations in the Joint Report, UES stated that the monthly revenues have been restated in the reconciliation calculation to reflect its estimate of the revenue derived from the amount of electricity used by customers each month. Specifically, UES stated that its monthly revenue estimates comprise two components: a billed revenue component and an unbilled revenue component. Under cross examination, UES clarified that the billed component included revenue associated with electricity consumption in both the current month and the previous month whereas the unbilled component only reflected consumption in the current month.

UES also testified that the calculation of supply related working capital was derived from the results of the 2006 Purchased Power Lead/Lag Study filed with the instant petition with the testimony of Ms. Tafoya. UES testified that the lead/lag study was filed pursuant to the Settlement Agreement<sup>3</sup> approved by the Commission in Docket No. DE 05-064. The Settlement Agreement stated that UES’ supply related working capital costs to be recovered through DS

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<sup>3</sup> The Settlement Agreement was filed on August 11, 2005 in Docket No DE 05-064, Re Unitil Energy Systems, Inc. See 90 NH PUC 378 (2005).

rates be “based on actual supply costs and an agreed upon lead/lag study or its equivalent.” *Settlement Agreement* at 6. UES stated that the filed lead/lag study is based upon data for the period January 1, 2006 through December 31, 2006 and results in net lags for G1 and Non-G1 customers to be 13.49 days and 10.25 days respectively. UES stated that the net lags based on the revised 2005 study filed in August, 2006 are 11.61 days for the G1 class and 7.17 days for the Non-G1 class, and represent an increase in lag days of 1.88 and 3.09 days respectively. UES attributed the increase in lag days to a number of factors including decreases in expense leads and increases in meter reading to billing lags.

According to UES, these changes in the net lags require working capital increases of \$29,799 for Non-G1 default service for the six months from May through October, 2007, and \$1,510 for G1 customers for the three months from May through July, 2007. UES stated that the results of the lead/lag study are reflected in the proposed rates for effect May 1, 2007. UES testified that the company will update the lead/lag study on an annual basis in the month of March and will include the calculations of working capital costs in future default service filings.

At hearing, UES also presented the Commission with default service rates based on the results of the revised 2005 lead/lag study filed in August, 2006. UES noted that if UES calculated rates based on the revised 2005 lead/lag study instead of the 2006 study filed with the instant petition, the bill difference for an average residential customer taking 500 kWhs per month is a reduction of \$0.03, or 0.04 percent, in the monthly bill; and for G1 customers, the difference for the three month period was a reduction \$6.66, or 0.03 percent, using a three-month average of the default service charge.

UES concluded by requesting that the Commission approve its petition and find that; UES has followed the solicitation process approved by the Commission; that its analysis of the

bids is reasonable; that it has demonstrated that the resulting power supply costs are reasonable; and that the resulting rates are reasonable. UES also requests that the Commission approve the proposed tariff changes, subject to further review and investigation of the updated 2006 lead/lag study and reconciliation, if necessary.

### **B. Office of Consumer Advocate**

Although the OCA did not present a witness at hearing, through cross-examination of UES and Staff, the OCA opined that UES had followed the solicitation process as required by the Commission in Order No. 24,511 and that its selection of the winning bidder and the resulting rates are reasonable.

The OCA opposed UES's initial proposal to base the default service working capital requirements on UES' 2006 lead/lag study because the study was not filed in time for the OCA and Staff to conduct a full investigation of the study's implications. The OCA recommended that the Commission approve UES' petition and to revise the resulting rates based on the revised 2005 lead/lag study filed by UES in August 2006 to allow more time for the OCA and Staff to investigate the study. The OCA also noted that UES had pointed out in its testimony that the lead/lag study was to be one "agreed upon" and that neither Staff nor the OCA had agreed to either the revised 2005 study filed in August 2006 or the 2006 study filed on March 16, 2007.

The OCA also questioned whether the 500 kWh reference used by UES to determine the typical residential customer bill was an accurate reflection of typical consumption. In response to questions by the OCA, UES testified that 650 kWh per month is more representative of typical monthly consumption of residential customers and referenced Schedule KMA-4, page 2, which displays a range of consumption and associated bills for residential customers.

The OCA inquired into the basis for legal expenses incurred by UES in the use of outside counsel claimed to be associated with the procurement of default service incurred in the months of December, 2006 and February, 2007 as displayed on Schedule KMA-2 page 5. The OCA made a record request for copies of the bills to outside counsel and information related to the work performed.

The OCA recommended that the Commission approve the petition with the modification that UES be required to adjust the final retail rates based on the 2005 revised lead/lag study filed with the Commission in August, 2006.

### **C. Staff**

Staff agreed that UES complied with the solicitation process approved by the Commission in Order No. 24,511 (90 NH PUC 378 (2005)) and that UES employed appropriate evaluation criteria in its selection of CEEI for the three-month power supply for G1 customers and of TCPM for twelve-month contract for 25 percent of the power supply for Non-G1 customers. Staff also testified that UES' selection of an all inclusive energy-and-capacity bid was based on a reasonable analysis of the implied cost of capacity. Staff opined that the bid process produced market based power prices.

Staff opposed UES' proposal to use the results of the 2006 lead/lag study to calculate the working capital adjustments to the G1 and Non-G1 default service rates. Staff had two major concerns with UES' proposal. First, because the 2006 study was filed only two business days prior to the hearing, Staff testified that it had insufficient time to conduct a review and determine whether the study's conclusions were reasonable. Second, Staff testified that the results of the study indicate an average net lag for small and large customers of just under 13 days. This compares with an average net lag for Granite State Electric Company d/b/a National Grid

(National Grid) of only 1.52 days based on its 2006 study. Staff questioned whether a difference of over 11 days in the net lag for default service reflected methodological differences or differences in business practices related to the payment of expenses and collection of revenues. Finally, Staff noted that the methodology underlying the 2005 and 2006 studies had not been approved.

Therefore, Staff recommended that the Commission require UES to recalculate its default service rates for effect May 1, 2007 based on the revised 2005 lead/lag study and to direct Staff to work with the OCA to conduct an investigation that would have the goal of understanding why: (i) UES' default service net lags for small and large customers increased by 1.88 days and 3.09, days respectively under the 2006 study; and (ii) the net lags for UES customers are significantly longer than the corresponding net lags for National Grid customers.

Staff also expressed some reservations as to whether the reconciliation calculations provided by UES in the filing were consistent with the agreement in the Joint Report filed with the Commission. However, Staff opined that the differences do not appear large enough to warrant an objection to the filed rates at this time. Nonetheless, Staff stated its intention to investigate further the modified reconciliation calculation and that it may propose changes in a future proceeding.

### **III. COMMISSION ANALYSIS**

#### **A. Confidentiality**

First, we address UES' Motion for Confidentiality and Protective Order. The materials in Tab A, which UES seeks to protect, include: details regarding the bidders; the all inclusive prices received from the bidders; the evaluation loads used by UES; ranking of each bidder in terms of financial security; and the redlined version of the negotiated PSA and contract amendment.

UES states that the information contained in the materials included in Tab A must be protected from public disclosure because it is confidential, commercial, or financial information. UES asserts that the information provided by bidders was offered under the express understanding that such information would be maintained as confidential and that suppliers will be reluctant to participate in future solicitations if their confidential bid information is disclosed. UES further argues that disclosure of the information could detrimentally impact the suppliers' ability to participate in other competitive solicitations in the market as well.

UES argues that disclosure of the Tab A materials, including the "Provision for Uncollected Accounts," "Wholesale Rate," and "Supplier Charges" information, would reveal the specific terms and conditions UES and the winning bidders were willing to agree to in order to reach a final agreement and, thereby, could harm each party's ability to negotiate with others in the future. UES states that the information it seeks to exempt from public disclosure qualifies as "confidential, commercial, or financial information," and such request is consistent with both the New Hampshire Right-to-Know law, RSA 91-A:5, IV and prior Commission orders.

The New Hampshire Right-to-Know law provides each citizen the right to inspect public records in the possession of the Commission. RSA 91-A:4, I. Section IV, however, exempts from disclosure certain "confidential, commercial, or financial information." In order to rule on the Motion, we have made an *in camera* review of Tab A which, as UES asserts, is a thorough analysis and evaluation of the price and non-price characteristics of the bids it received in response to the RFPs. We point out that UES stated that the information would not have been provided by the bidders absent its express assurance that the information would not be disclosed to the public. We also agree that the information on "Provision for Uncollected Accounts," "Wholesale Rate," and "Supplier Charges" taken in combination would reveal the wholesale cost

of power from the winning bidders and constitutes confidential, commercial, or financial information protected from disclosure by RSA 91-A.

We note that we have provided protective treatment to other PSAs. See *Granite State Electric Company*, Order No. 24,412 (December 22, 2004) at 8 (according protective treatment over power supply contract for 2005 default service rates); *Granite State Electric Company*, Order No. 24,318 (April 30, 2004) at 8 (according protective treatment over power supply contract for 2004 default service rates).

We do not find the public's interest in review of this financial, commercially sensitive information sufficient to outweigh the benefit derived from maintaining the confidentiality of such information insofar as it can redound to customers through lower rates. *Union Leader Corp. v. New Hampshire Housing Finance Authority*, 142 N.H. 540 (1997). We will, therefore, grant protective treatment to the information in Tab A, including the Bid Evaluation Report, "Provision for Uncollected Account," "Wholesale Rate," and "Supplier Charges" values and the PSA. Consistent with past practice, the protective treatment provisions of this Order are subject to the on-going authority of the Commission, on its own motion or on the motion of Staff, any party or other member of the public, to reconsider this protective order in light of RSA 91-A, should circumstances so warrant.

UES also requests confidential treatment for "Supply Related Working Capital," and "Internal Company Administrative Costs." We agree that the information related to "Supplier Related Working Capital" taken in combination with other information could reveal the wholesale costs of power from the winning bidders and constitutes confidential, commercial, or financial information protected from disclosure pursuant to RSA 91-A.

## **B. Default Service**

Regarding UES' analysis of the bids and its selection of the winning bidder, we find that it substantially complied with the procedures approved in Order No. 24,511 for the G1 default service solicitation for the three months beginning May 2007 through July 2007. We also find that UES substantially complied with the bid procedures regarding its selection of a supplier for one block of 25 percent requirements for Non-G1 default service customers for the six-month period beginning May 2007. We are satisfied that UES met all procedural requirements set forth in prior orders and the result is consistent with the requirement of RSA 374-F:3, V(c) that default service "be procured through the competitive market." We also find that UES' evaluation of the bids and its selections of CEEI as supplier for G1 supply, and TCPM as supplier for Non-G1 DS supply, are reasonable. We approve UES' request to include the wholesale power costs reflected in the winning bids in default service rates beginning May 1, 2007. The proposed retail rates must, however, be revised to reflect the working capital costs based on the results of the 2005 lead/lag study rather than the updated 2006 study, as further discussed below.

We base our decision on the two concerns described by Staff and the OCA: namely, that Staff and the OCA have had insufficient time to review the study and determine whether its conclusions are reasonable; and that the results are sufficiently different from the results of National Grid's 2006 study to require investigation into UES' methodology and business practices. Therefore, we direct Staff to investigate the underlying basis for the 2006 lead/lag study and file a report regarding the results of its investigation prior to November 1, 2007, which is the next scheduled rate change for Non-G1 customers. In the meantime, the default service rates for both G1 and Non-G1 classes should reflect the 2005 study results. When we examine

Staff's report we will determine the appropriate date for reconciling the G1 and Non-G1 rates but in no event will such date be earlier than May 1, 2007.

We also adopt the Joint Report on UES' Calculation of Default Service-Related Working Capital Requirements, submitted February 9, 2007, as the methodology to be used by UES in its reconciliation calculation. Recognizing that Staff has some continuing concerns about UES' compliance with the Joint Report, we authorize Staff to continue its review of UES' reconciliation calculation and, if necessary, recommend changes that make the calculation more reflective of the recommendations in the Joint Report.

**Based upon the foregoing, it is hereby**

**ORDERED**, that the amendment to the Power Supply Agreement between Consolidated Edison Energy, Inc. and Unitil Energy Systems, Inc. to provide 100 percent of the three month default service power supply to G1 customers for the period May 1, 2007 through July 31, 2007 is hereby APPROVED; and it is

**FURTHER ORDERED**, that the twelve-month Power Supply Agreement between TransCanada Power Marketing, Ltd. and Unitil Energy Systems, Inc. to provide one 25 percent block of default service power supply to Non-G1 customers is hereby APPROVED; and it is

**FURTHER ORDERED**, that UES shall develop rates to commence on May 1, 2007 for both G1 and Non-G1 customers based on the revised 2005 lead/lag study filed with the Commission in August, 2006; and it is

**FURTHER ORDERED**, that Staff shall investigate the 2006 lead/lag study filed by UES on March 16, 2007 for purposes of examining the methodology and making recommendations to the Commission regarding UES' business practices implicated by the study; and it is

**FURTHER ORDERED**, that the recommendations of the Joint Report On UES' Calculation Of Default Service-Related Working Capital Requirements are adopted; and it is

**FURTHER ORDERED**, that UES shall file conforming tariffs within 30 days of the Order consistent with N.H. Admin. Rules Puc 1606.02.

By order of the Public Utilities Commission of New Hampshire this twenty-sixth day of March, 2007.

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Thomas B. Getz  
Chairman

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Graham J. Morrison  
Commissioner

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Clifton C. Below  
Commissioner

Attested by:

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Debra A. Howland  
Executive Director & Secretary