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July 2, 2007

VIA HAND DELIVERY

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

RE: Docket No. DE 07-064: Rate Mechanisms for Energy Efficiency

Dear Ms. Howland,

Please find enclosed a memorandum regarding the scope of proceeding in the docket referenced above. I am submitting the original and seven (7) copies to be filed with the Commission.

Thank you for your attention in this matter and please feel free to contact me with any questions or concerns at (443) 848-8358.

Best regards,

Patrick J. Arnold
Executive Director

Enclosure

Cc: Docket Service List, DE 07-064



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STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

IN RE:

RATE MECHANISM FOR
ENERGY EFFICIENCY

Docket No. DE 07-064

**MEMORANDUM REGARDING SCOPE OF PROCEEDING
SUBMITTED BY INTERVENOR CAMPAIGN FOR RATEPAYERS RIGHTS**

On June 18, 2007, the Public Utilities Commission (“Commission”) held a prehearing conference in the above-captioned docket. Following the prehearing conference, Commission staff (“staff”) and parties attended a technical session to discuss a possible schedule for the docket proceedings, positions of the parties, as well as scope of the proceeding. The parties provided differing views regarding the scope of this docket. Due to the lack of agreement on this issue by the parties, Campaign for Ratepayers Rights (“CRR”) submits to the commission the following comments for consideration.

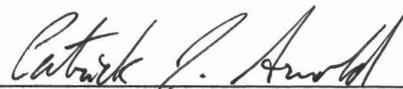
According to the Order of Notice, the Commission opened this docket “to investigate the merits of instituting, for electric utilities, appropriate rate mechanisms, such as revenue decoupling, which would have the effect of removing obstacles to, and encouraging investment in, energy efficiency.” CRR is concerned with the practical effects that such a new rate mechanism may have on utility consumers. To this end, it seems appropriate that investigations or testimony regarding any effects of a decoupled system be considered within the scope of this investigation.

In the Order of Notice, the Commission stated twelve questions for which answers are sought during the course of this docket. Question #10 reads: "What alternatives are there (such as real time or critical peak pricing) to revenue decoupling which achieve similar policy goals?" CRR agrees with the Commission that alternatives to revenue decoupling must be considered before proposing any changes in utility rate mechanisms. However, all effects of such alternatives – both those directly related to energy efficiency efforts as well as those related to other concerns – must be considered.

Some parties have expressed concern regarding the effects that revenue decoupling (or alternatives) will have on consumers, utilities, future energy efficiency initiatives, and other related interests. CRR believes that this docket is the appropriate venue to express such concerns to the Commission.

WHEREFORE, CRR respectfully requests that the Commission allow for a scope of proceeding that is broad enough to allow parties to study, testify or comment on effects and concerns of revenue decoupling that may not be directly related to energy efficiency efforts.

Respectfully submitted
For Campaign for Ratepayers Rights,



Patrick J. Arnold, *Executive Director*
Campaign for Ratepayers Rights
P.O. Box 563
Concord, NH 03302
(443) 848-8358

Dated: July 2, 2007

CERTIFICATE OF SERVICE

I hereby certify on this 2nd day of July 2007, a copy of the foregoing is being forwarded to all persons on the service list.



Patrick J. Arnold

Dated: July 2, 2007