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October 25, 2007

By Electronic and Overnight Mail

Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
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**RE: Post-Hearing Comments of Wal-Mart Stores East, L.P.,
Investigation of EPAct Standards, Docket No. DE 06-061**

Dear Ms. Howland:

Wal-Mart Stores East, LP (“Wal-Mart”) submits these comments as permitted by the Secretarial Letter issued on September 21, 2007 in the above-captioned matter.

Wal-Mart urges the Commission to establish in this proceeding, policy directives intended to make available appropriately designed time-based rate structures and customer choice with advanced metering services and options. Wal-Mart recognizes that a one-size fits all rate approach may not be appropriate or even feasible for all customer classes at this time. Wal-Mart also recognizes that some important design and implementation issues still need to be resolved. However, without repeating its testimony and prior comments here, the evidence in this case shows that appropriately designed real time pricing and other time-based rate structures can be effective tools for a wide variety of customers for managing energy consumption and reducing energy bills, which in turn, will result in significant benefits to the environment and the transmission grid.

Wal-Mart submits that real-time pricing structures generally are preferred over other time-based pricing models. Given that the utilities and energy suppliers in New Hampshire are much closer to being able to offer real-time pricing structures to large customers than originally envisioned, Wal-Mart urges the Commission to move towards the implementation of a real-time pricing program. Wal-Mart cautions, however, that for such pricing models to be effective, the real-time pricing program must be structured to send accurate price signals and should be

designed to promote competitive advanced metering, in order to give customers the greatest opportunity and flexibility to manage their energy consumption based on their particular business operations and needs.

Wal-Mart appreciates the opportunity to have participated in this proceeding and hopes that the Commission will continue in the direction of implementing time-based rates, and particularly real-time pricing. In its initial order, the Commission clearly set out its intention to move towards real-time pricing. In this rehearing phase, the Commission sought to develop the record further to facilitate the larger process of investigating and implementing a policy regarding time-based rates and advanced meters. See Investigation into Implementation of the Energy Policy Act of 2005 (Order on Motion for Rehearing of Order No. 24,763), Order No. 24,785, at 3 (August 31, 2007). Over the last several weeks, Wal-Mart and other parties have provided evidence which supports the Commission's policy goals. Although some issues associated with the design and implementation of such rate programs may remain, Wal-Mart is confident that the details can be resolved through a cooperative effort. Wal-Mart looks forward to participating in further technical sessions with the parties to work out some of these details.

Respectfully submitted,
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