

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION
DE 12-358
OFFICE OF THE CONSUMER ADVOCATE'S
MOTION FOR EXPEDITED REVIEW

Now Comes the Office of Consumer Advocate (OCA) and respectfully moves the Public Utilities Commission (Commission) For Expedited Review of Public Service Company of New Hampshire's (PSNH) Petition to Adjust Renewable Default Energy Service (RES) Rate. In support of this pleading the OCA states:

1. On December 19, 2012, PSNH filed a petition to adjust its renewable energy service rate (RES). PSNH requested the Commission increase its RES rate to 5.558 cents per kilowatt hour (kWh) for customers electing the 100% option, 2.779 cents per kWh for customers electing the 50% option and 1.395 cents per kWh for customers electing the 25 % option. In addition, PSNH seeks to establish a minimum number of customers required to continue the RES rate.
2. To provide service under this rate, PSNH purchases and retires renewable energy certificates (RECs) from renewable sources of generation in New England that match either all or a portion of those customers' actual use. The RES rate is billed to the participating customer as an additional charge, in cents per kWh, based on the renewable option chosen.
3. According to PSNH's petition, the RES rate option has only 173 customers, or 0.04 percent of eligible customers. Due to low enrollment, with the

Commission's approval, PSNH proposes to end the RES program and reconcile any over-or under-recovery in PSNH's default service rate.

4. Upon information and belief, PSNH is under-recovering approximately \$28,000 in its collections for the RES customers due to increases in costs of supply.
5. The RES authorizing statutes arguably limits cost recovery to customers choosing the RES rate. RSA 374-F:3(V)(f)(2) states:

“...Costs associated with selecting an RES option should be paid for by those customers choosing to take such option. A utility may recover all prudently incurred administrative costs of RES options from all customers, as approved by the commission...”

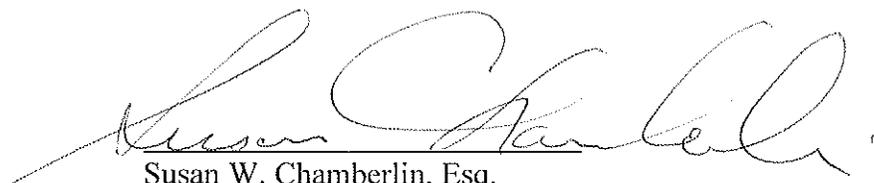
6. If RSA 374-F:3(V)(f)(2) is interpreted to require RES costs to be paid by the 173 customers choosing that option, \$28,000 plus interest is a significant impact on those customers' rates.
7. To prevent the continuing accrual of the RES under-recovery the OCA requests the Commission immediately establish a procedural schedule and have Staff and the parties propose expedited action to prevent rate shock for RES customers.¹
8. Staff and PSNH take no position on this motion.

Wherefore the OCA respectfully requests the Commission:

- A. Schedule a hearing date in this case as soon as possible,
- B. Grant such other relief as justice requires.

¹ On February 20, 2013 the Commission held a duly noticed prehearing conference for the above-captioned case. After the prehearing conference the parties attended a technical session, where the parties agreed to submit discovery questions on March 6, 2013.

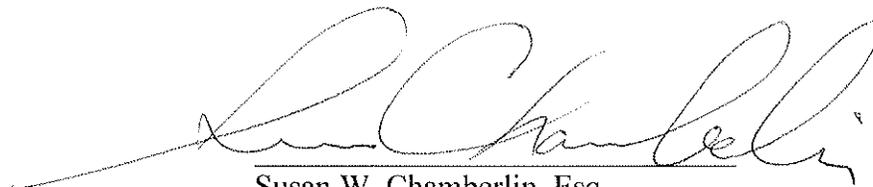
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was forwarded this day to the parties by electronic mail.



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