

**STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**ELECTRIC UTILITIES
Rebate of Excess Regional Greenhouse Gas Initiative Allowance
Auction Proceeds to all Electric Ratepayers**

DE 14-048

NHPUC 6/10/14 11:15

Comments of the Retail Energy Supply Association

In the Notice of Opportunity to Comment (“NOC”) issued in this docket on February 12, 2014 the New Hampshire Public Utilities Commission (“Commission”) noted that the NH Legislature in 2013 had amended the Regional Greenhouse Gas Initiative (“RGGI”) statute effective January 1, 2014 regarding rebates to customers of all amounts in excess of one dollar for each RGGI allowance received as a result of RGGI auctions (conducted on a quarterly basis in March, June, September and December of each year). The amendment to the law provides that the rebates shall be made to all retail electric customers, not just default service ratepayers as provided under the prior law, on a per kilowatt hour basis in a timely manner. The NOC indicated that the issues implicated by the change in the law on which the Commission is seeking comments included: (1) the method by which the Commission should allocate the excess RGGI allowance among all electric providers; (2) how frequently this allocation should be made; (3) depending on the method of rebate, what verification or proof should be required to assure the rebates are being made to customers; and (4) whether the Commission should require the rebate on an annual or more frequent basis.

RESA submits that the PUC should endeavor to make the refund process as simple as possible by crediting customers on the delivery services portion of the bill on a per kilowatt hour basis, consistent with what the law says. This credit should be transparent, should be noted as such on the bill, and should be implemented so that all customers, regardless of who they receive their energy from, benefit from the rebate.

In terms of each of the specific issues on which the Commission is seeking comment:

(1) the method by which the Commission should allocate the excess RGGI allowance among the customers of all electric providers is on a per kilowatt basis on the distribution portion of the bill;

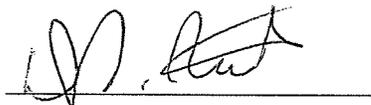
(2) the frequency with which this allocation should be made, RESA defers to the utilities and the Commission to accommodate any practical or efficiency considerations;

(3) the verification or proof that should be required to assure the rebates are being made to customers, RESA suggests a report from each distribution company in the month following the rebate, though it would defer to the utilities and Commission to accommodate any practical or efficiency considerations; and

(4) whether the Commission should require the rebate on an annual or more frequent basis, RESA defers to the utilities and Commission to accommodate any practical or efficiency considerations.

RESA appreciates the opportunity to provide these comments to the Commission.

Respectfully submitted,



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