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I. Ionescu
35-31 85th Street
Queens, NY 11372

May 25, 2016, 2 pm

Meeting on Stranded Costs
New Hampshire Public Utilities Commission
21 South Fruit Street, suite 10
Concord , NH 03301-2429

Re: DE 15-132 - 2014 Reconciliation of Stranded Costs and energy cost charges.

Subject: Inclusion of seasonal service in tariff applicable to Public Service of New Hampshire (Eversource)

Gentlemen:

This is a statement by a PSNH electric power customer to have the Commission consider lack of seasonal service provisions in the tariff for electric power.

Seasonal customers are not recognized in the tariff. Thus, PSNH treats seasonal customers in an unfair, capricious and arbitrary manner, extracting excess profits, inconsistent with Public Utility Commission (PUC) regulations.

As it stands, the tariff treats seasonal customers the same as regular customers. The tariff does not address needs of the seasonal customer. The monthly minimum is applied regardless of consumption. The monthly minimum skews significantly the cost per kw-hr for this seasonal user because of low usage. Where usage is under 100 kw-hr/month, the monthly fixed cost typically doubles the billed cost per kw-hr to the consumer.

For example, monthly fees are now \$ 12.75, and cost per kw-hr is 16.487 cents (assuming PSNH Eversource supplier).

Thus, for a seasonal user using 20 kw-hr month, total cost is $3.29 + 12.75 = \$ 16.04$, or \$ 0.80 per kw-hr for the supplied 20 kw-hrs.

The tariff does not have 25 Kw-Hr monthly threshold (about \$ 3.00) to avoid fixed fees for low electric usage

Meter connect fees are \$ 35.00, further raising the cost/kw-hr.

For this seasonal user, PSNH charges excess fees for low delivery of electricity.

The other option, to disconnect, faces re-connect charges and delays. That is not in accordance with the spirit of the law and reflects PSNH unfair approach to seasonal customers.

Pursuant to RSA 369-B:3 IV (b) (1) (A), customers taking power from PSNH are supposed to be billed "PSNH's actual, prudent and reasonable costs of providing power" as approved by the Commission. For example, in accordance with PUC order number 25,448, dated December 28, 2012, the cost of power is 8.97 cents/kw-hr. In contrast, PSNH charges this consumer a fixed \$ 12.75 even if consumption is a modest 20 kw-hr.

This implies an excessive cost per Kw-Hr. PSNH can do this because the applicable tariff does not include provisions for seasonal customers, thus arbitrary and capricious fees cannot be challenged.

To rectify this, this customer petitions the PUC to consider provisions for seasonal customers in the tariff.

PSNH zero power consumption threshold for seasonal accounts is against public policy. Lack of a minimum threshold discourages visits to a seasonal property and a presence in New Hampshire (NH). Because PSNH suggests disconnecting power to avoid minimum fees, owner visits to a seasonal property are discouraged, encouraging theft, break-ins, vandalism, etc. Reduced visits to NH also reduces tourist income to NH from visits there.

PSNH current zero threshold policy also frustrates energy saving measures by the customer, suggesting the use of an inefficient, small, emergency style generator to avoid fixed monthly fees.

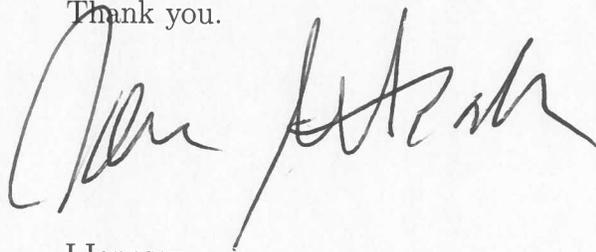
PSNH current arbitrary and capricious policies do not reflect historical precedent. Historically, a minimum threshold for power consumption was provided before a monthly "delivery service" was invoiced to allow for short visits to the seasonal property. PSNH own historical precedents are not reflected in the tariff.

In view of the above, PUC is hereby petitioned by this PSNH customer to revise the applicable tariff to reflect seasonal usage, institute a minimum usage policy before fixed fees are charged by PSNH. PSNH's approach of charging fixed fees during no significant power delivery (25 Kw-Hr) is unfair, capricious and arbitrary.

This customer petitions to have the tariff require a minimum electricity monthly usage threshold before PSNH invoicing of "delivery service" monthly fees is imputed. For example, if a usage of 200 kw-hr minimum threshold per month (about \$ 33) was set before applying monthly fixed "delivery service" charges, a balance may be achieved. This \$ 33 threshold would be commensurate with the minimum monthly fee of \$ 12.75. If the minimum threshold is not met during any month of the year, of course, customer is to pay for cumulative (total) actual consumption on Nov 1 of the year.

It should be noted that this consumer's dissatisfaction stems from paying very high Kw-hr prices because fixed charges are applied to low consumption. Fixed monthly charges should reflect power consumption, not an arbitrary value set to maximize PSNH profits. The required KW-hr price parity is reflected in RSA 369-B:3 IV (b) (1) (A), where customers taking power from PSNH are supposed to be billed "PSNH's actual, prudent and reasonable costs of providing power" as approved by the Commission, not artificial monthly fixed charges, unrelated to power consumption.

Thank you.

A handwritten signature in black ink, appearing to read 'I. Ionescu', written over a horizontal line.

I.Ionescu