

Date: Wed, 12 Apr 2017 03:03:20 PM EDT
From: "Michael Gfroerer" <mgfroerer@usa.net>
To: <debra.howland@puc.nh.gov>
Subject: Docket DG 16-827 Joint Petition of Concord Steam's Non-Governmental Customers

Debra A. Howland, Executive Director
NH PUC
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: Docket DG 16-827 Joint Petition of Concord Steam's Non-Governmental Customers

Dear Ms Howland:

I write on behalf of South Congregational Church to respond to the Staff Proposal dated April 3, 2017. Please note that we do NOT support the Proposal, but submit these remarks in the event that the Commission nevertheless adopts the Proposal in some form. We believe that the Proposal falls far short of adequately addressing the predicament that Concord Steam customers found themselves in when the closure deal with Liberty was announced last summer, apparently without meaningful public participation or consideration of customers' needs. We further believe that the manner in which Concord Steam is being allowed to terminate as a public utility fails to satisfy its obligations to its abandoned customers, including South Church.

That being said, we have the following response to the Staff Proposal:

1. Total funding should not be limited to \$200T but rather up to \$1M as suggested by the Commission in its 2/23/17 communication. Our cost of conversion at South Church exceeds \$80T. There should be enough funding available to assist all fourteen potentially eligible parties, even with a reasonable cap on the amount of assistance available to each party.
2. No "needs test" should be applied to determine eligibility; the only eligibility criteria should be whether the customer is residential or non-profit. We all found ourselves in the same boat last summer, needing to devise, on short notice, a brand new heating system to replace Concord Steam. South Church chose to make a larger investment "up front" and to convert our steam system to more efficient forced hot water. The increased efficiency would likely disqualify us from any assistance according to the "needs test" proposed by the staff, which seems counter-intuitive. You have a limited and well-defined class seeking assistance; treat us all the same.
3. If a "needs test" is nevertheless applied, it should not be based upon "current energy rates" for Concord Steam. Concord Steam's rates have been high but bearable for a number of years as they have struggled to survive. However, since the closure deal was announced last summer their rates have sky-rocketed in order to sustain them through May 31. For example, our heat bill at South Church exceeded \$9T for the month of January alone, which is stunning and also unreasonable. Consequently, to be fair and reasonable in calculating any "needs test," the Concord Steam rates in effect when their closure was announced last summer should be used.

Thank you for considering these comments.

Very truly yours,



Michael G. Gfroerer