

The State of New Hampshire
before the
Public Utilities Commission
Jim Snyder
Line Extension Charges
Docket # DE 12-307
Jim Snyder's Objection to Motion to Dismiss

I hereby object to the motion to dismiss by PSNH with respect to DE 12-307. Attorney Fossum discusses the changes to the tariff resulting from the settlement of Docket DE 08-135. He points out that before the change, the policy resulted in

1. Existing customers subsidizing new customers
2. Elements intended to promote fairness were "difficult to administer"
3. Customer difficulty understanding

First, in the development of the delivery infrastructure, it seems at some point all customers shared in the cost of that infrastructure. It covered most but not all public roads. I never suggested that new customers should not be responsible for lines extended on private property, only that those on public roads should not be penalized because of gaps in the existing infrastructure.

Secondly, regarding the prior policy being difficult to administer, what was gained in ease of administration was clearly at the expense of fairness and reasonableness. Now not only does the new customer have to bear the entire cost of the extension before they can even get temporary service to begin a project, if a neighbor across or down the street requests new service it is provided to them at the first customers expense. It seems like we have taken a big step backwards with respect to fairness.

Lastly, I don't think either the prior policy or the current one is all that difficult to understand. If you are a big developer you can in most cases fold the cost into your project without a lot of impact. If you are an owner-builder, the cost of initiating a service that others take for granted can be cost prohibitive. If a policy is wanted that is fair, easy to administer and easy to understand, we should make all persons owning land on public roads equal. Developing a policy based on a settlement of parties is an effort to satisfy and compromise between those parties. If we want a policy that's fair to everyone we need a broader approach.

Respectfully Submitted,



Jim Snyder
November 24, 2012

Certificate of Service

I hereby certify that I have caused this Objection to be served pursuant to NH Code Administrative Rule PUC 203.11



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