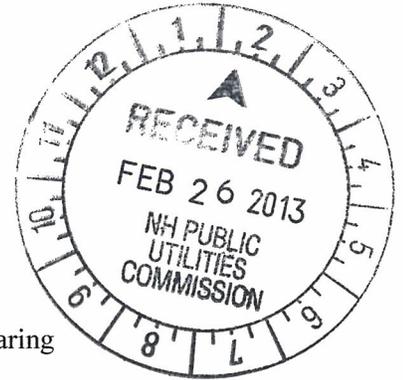


The State of New Hampshire
before the
Public Utilities Commission
Jim Snyder
Line Extension Charges
Docket # DE 12-307



Jim Snyder's Response to PSNH's Objection to Motion For Rehearing

February 23, 2013

I respectfully respond in disagreement with three points made in PSNH's Objection to my motion for rehearing.

In paragraph 5, Attorney Fossum states "Mr. Snyder's motion for rehearing does not point to any new evidence or to any matters that were overlooked or mistakenly conceived by the Commission, and, as such, provides no basis upon which to grant rehearing. Instead, Mr. Snyder contends that the Commission should "assume the premise that electricity should be available on all Class V or higher roads". Based upon that assumption, Mr. Snyder then requests that the Commission reevaluate its conclusions about subsidization. There is, however, no basis for the assumption Mr. Snyder requests the Commission to make. He provides no support or justification for his assumption. Therefore, any arguments emanating from that assumption are insufficient to grant rehearing."

Attorney Fossum takes issue with the assumption that electricity is available on all public roads when in reality it is a *fact* that it is available. PSNH never questioned whether it was possible to provide it, the only question on the table is about who pays the cost of the infrastructure. The argument that the cost of all infrastructure should be shared by all who enjoy it emanates directly from that fact. Perhaps if I had said "assume the fact" instead of "premise" It would have been clearer.

In paragraph 7, Attorney Fossum states "In addition, Mr. Snyder contends that: "If landowners are required to bear the cost of extending lines in areas not served, *it is in fact they who are subsidizing future customers who will benefit from that line extension, but also existing customers enjoy the use of existing lines without having to pay anything for their construction.*" (emphasis in original). Mr. Snyder's argument relative to future customers assumes that there will be future customers. That is not an assumption upon which costs should be allocated or recovered. Also, it is not clear how the extension of lines to new customer locations provides any benefits or enjoyments for existing customers."

Attorney Fossum contends that since it's possible in some cases that there might not be future customers the entire argument falls apart. If you want to argue that current policy is fair, you have to assume the opposite, that no future user will benefit from the extension without sharing in its cost. He also speculates that existing customers may not enjoy benefits from a line extension. They are in fact already enjoying previous line extensions whether they paid for them or not. And the argument stands whether or not a particular extension eventually serves other customers who also will benefit and be subsidized by the original extender; it is only more egregious in that case.

Finally in paragraph 8, Attorney Fossum states "Lastly, relative to administrative ease and customer understanding, Mr. Snyder contends that "nothing could be more straightforward and easy to understand than the idea that *all of us on public roads have access to electrical service at*

the end of our driveways and that we all share in the cost of ensuring that access." (emphasis in original). This is merely an extension of Mr. Snyder's assumption that electricity should be available on all Class V or higher roads. As noted above, this is an unfounded assumption and it ignores the principle that the costs of constructing lines to new customer locations should be allocated to those causing the costs."

Electricity is available on all public roads. This is a fact, not an unfounded assumption. At some point in time construction of utility lines stopped and those not yet served were left to finance the infrastructure on their own. This is unfair and discriminatory and should be reversed irrespective of how hard it is to do. Again, all of us who have electricity made available at the end of our driveway should share equally in the cost of delivering it there.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jim Snyder". The signature is written in a cursive style with a large initial "J".

Jim Snyder

February 23, 2013

Certificate of Service

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