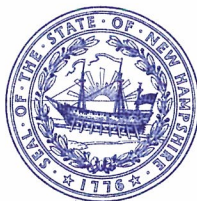


STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE
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21 S. Fruit St., Suite 18
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October 1, 2014

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-7319

NHPUC OCT01'14 AM10:01

RE: DRM 14-234
Request for Rulemaking Pursuant to Puc 205.03 of the Rules of the New Hampshire
Public Utilities Commission

Dear Ms. Howland:

The Office of the Consumer Advocate (OCA) writes in support of the request to open a rulemaking regarding affiliate transactions, filed by the New England Power Generators Association ("NEPGA"), dated September 15, 2014.

New England's competitive marketplace continues to evolve and transform. As transmission providers seek to enter the marketplace and compete to build infrastructure, it is imperative that there be a level playing field for all competitors. It is important to the development of a successful marketplace that affiliate rules are appropriately structured to prevent the subsidization by energy service ratepayers of competitive affiliates.

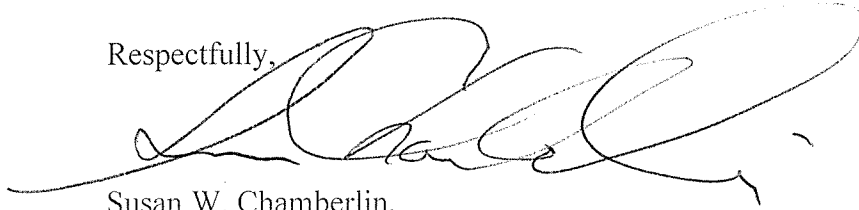
The OCA does not take a position on the specific rule changes requested at this time. The resulting rules will apply to all entities under Public Utility Commission jurisdiction, not only the relationship between Northeast Utility regulated and competitive affiliates. Therefore the impact of the proposed rule changes must be broadly considered.

The OCA looks forward to participating with interested parties in drafting and revising the affiliate rules. Consistent with the Inter-agency Memorandum of Understanding dated April 28, 2000 between the Office of Consumer Advocate (OCA) and the Commission, the OCA hereby notifies the Commission that it will be participating in the above-referenced matter on

behalf of residential ratepayers consistent with RSA 363:28. Please add Susan Chamberlin and Jim Brennan to your service list.

Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read 'Susan Chamberlin', written in a cursive style. The signature is positioned above the typed name and title.

Susan W. Chamberlin,
Consumer Advocate

cc: Service List via electronic mail