

Richard M. Husband
10 Mallard Court
Litchfield, NH 03052
(603)883-1218
RMHusband@gmail.com

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VIA EMAIL

The Honorable Carol McGuire, Chairwoman
Executive Departments and Administration Committee

**RE: [HB 610](#), relative repealing the office of the consumer advocate
Hearing Date: March 5, 2025; Time: 10:00 a.m.
Testimony -- OPPOSE**

Dear Chairwoman McGuire and Other Honorable Committee Members:

Thank you for accepting this testimony on [HB 610](#).

Please recommend that [HB 610](#) be voted inexpedient to legislate, as its proposal to dissolve the Office of the Consumer Advocate (“OCA”) and transfer its duties to the New Hampshire Department of Energy (“DOE”) would substantially harm New Hampshire ratepayers and the state itself in two ways.

My perspective is as a New Hampshire attorney who participated in a number of Public Utilities Commission (“PUC”) proceedings between 2015-2023, both solely as a citizen representing myself and as *pro bono* counsel for others. See PUC Docket Nos. [DG 14-380](#), [DE 16-241](#), [DG 16-770](#), [DG 16-852](#), [DG 17-068](#), [DG 17-152](#), [DG 18-092](#), [DW 20-156](#), [DG 21-036](#) and [DG 22-064](#). While not obligated to participate, the OCA involved itself in all but one of these cases, and the current Consumer Advocate, Attorney Donald M. Kreis, was almost “the” OCA in everything involving his office, so I know both the OCA and Attorney Kreis well.

Other testimony will focus on the harm to ratepayers the enactment of [HB 610](#) would cause, so I will primarily direct you to that testimony in support of my position, including the opposing testimony already submitted by Timothy P. Duane, JD/PhD and Adam M. Finkel, Sc.D., CIH. The DOE will not advocate on behalf of ratepayers, only the OCA will, it is that simple and my experience in every PUC proceeding that I and the OCA were involved in. The DOE’s concern is carrying out administrative policy, and that often involves protecting the interests of utilities as much (sometimes it seems more, although I hate to think that) than consumers. Only the OCA can be counted on to always keep ratepayer interests forefront in its advocacy before the PUC (and in other government proceedings), so its service is critical and indispensable to citizens.

In terms of the state harm enactment of [HB 610](#) would cause, my concern is, again, twofold. First, almost without exception, Attorney Kreis was the sharpest knife in the drawer (I include myself in the cutlery) in any proceeding we were mutually involved in. He is always prepared, always knows the subject matter, always has a counter. Second, and perhaps more importantly he even takes it beyond work hours: when citizens were concerned with the potential Northeast Energy Direct pipeline in the 2015-2016 time frame, he met with them at night to answer questions; when citizens were concerned with high water rates in my hometown of Litchfield, he held an after-hours webinar to answer questions. Kreis brings a high commitment to his duties that is rare, and the state would be worse in losing him.

Thank you for your time and consideration.

Sincerely,

//s//Richard M. Husband