

TENs are a nascent utility implementation. When considering rate structures, ownership, and markets, I would encourage the State to pursue a tapered regulatory framework. Begin with allowing gas utilities, electric utilities, private entities (housing cooperatives, planned communities, etc.), and energy service companies to be the owners and operators from the outset. Do not overburden these entities with public service commission exposure. Let them fail to improve long term learning. The ones that last will be scalable examples which may then come under the purview of the PSC, or not, at a future date. Encourage adoption by providing funding in the prefeasibility phases of the system development.

Best wishes,

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