

software developers, risk managers, energy brokerage firms, information technology providers and both manufacturers and suppliers of advanced distributed generation. Our membership has both affiliated and unaffiliated companies.

This regionally diverse, broad-based coalition of energy and technology firms have come together under the NEM auspices to forge consensus and to help eliminate as many issues as possible that would delay competition. NEM is committed to working with representatives of state and federal governments, large and small consumer groups and utilities to devise fair and effective ways to implement restructuring of natural gas and electricity markets.

NEM asserts that to most rapidly bring the benefits of true price competition to consumers, each monopoly service historically bundled in a utility's bill should be unbundled from products and services that can be offered by competitive suppliers and subjected to the rigors of the marketplace. NEM urges the Commission to immediately unbundle the fully embedded monopoly costs associated with metering and related information technology functions and to make these costs known to consumers and the competitive marketplace. Additionally, NEM recommends that the Commission provide shopping credits to consumers equal to the fully embedded costs of all metering services and related information technologies including ownership, installation, servicing of equipment, maintenance, testing, reading, data management, validation, editing, estimations, pulse output transmission via Internet and billing.

The state should not grant utilities a monopoly or competitive advantage to provide competitive products, services, information and technology. Utilities should perform solely natural monopoly functions. Essentially, regulated utilities should sell regulated distribution services on a "no frills" cost of service basis. Regulations, tariff structures, and operational protocols should be designed to permit

competitive, non-utility suppliers to provide each of the products, services, information and technologies that are not natural monopoly functions.

NEM reiterates our commitment to working with the Commission and the other stakeholders to devise fair and effective ways to implement the competitive restructuring of Maryland's electric markets.

Respectfully submitted,

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