## STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire Investigation of PSNH Installation of Scrubber Technology Station Docket No. DE 08-103

## **MOTION FOR LEAVE TO REPLY TO JOINT OBJECTION**

Public Service Company of New Hampshire ("PSNH" or the "Company"), in accordance with Puc 203.07, hereby seeks leave to reply to the Joint Objection filed on January 30, 2012 in the above-captioned proceeding. In support hereof, PSNH states as follows:

1. On January 30, 2012, the Office of Consumer Advocate, the Conservation Law Foundation, the Sierra Club, TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast Inc. and New England Power Generators filed a Joint Objection to PSNH's Motion for Protective Order and Confidential Treatment regarding the June 2011 JACOBS Consultancy report.

2. The Company now seeks leave to reply to the Joint Objection so that it can address a number of issues raised in the Joint Objection, including the release of the JACOBS Report to the Office of Consumer Advocate which occurred after the Company filed its Motion, as well as the procedural ability of other signatories to join in the pleading given their lack of status in this docket, among other issues. It is in the public interest to allow this reply so that the Commission can fully consider all of the issues raised by the Motion and Joint Objection. WHEREFORE, PSNH respectfully requests that the Commission:

- A. Grant this Motion for Leave to Reply; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

By Its Attorneys

Bv:

Dated: February 1, 2012

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## Certificate of Service

I hereby certify that a copy of this Motion for Leave to Reply has been served electronically on the persons on the Commission's service list in this docket in accordance with Puc 203.11 this 1<sup>st</sup> day of February, 2012.

Sarah B. Knowlton