DE 10-121 #6 CMARKET IS Panal 1 Witness PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE 2792 **DE 10-121**

NH PUC Staff Responses To Data Requests of Conservation Law Foundation

Date Received: December 3, 2010	Date of Response: December 17, 2010
Request: $CLF - 4$	Witness: Michael D. Cannata, Jr.

REQUEST:

As provided in Staff's Direct Testimony of Michael D. Cannata, Exhibit – MDC-2, page 49, Footnote 11, please explain:

a) The basis for the statement that, "[a]lthough forecasted to be economic in 2009, all PSNH base-load units, except Schiller-5, were placed on reserve shut-down at least once during 2009."

b) Please explain what analysis, if any, was undertaken by Staff to determine those hours in 2009 during which lower cost power was available in the day-ahead market, but during which times PSNH supplied its load using its higher cost output. If staff did not undertake any such analysis, please explain why.

RESPONSE:

- a) Please see PSNH's Response to Data Requests CLF 1-7 and CLF 2-2.
- b) Staff performed no analysis.

The decision to place a unit into reserve shut-down is a complicated one. The decision is influenced by unit and market price differentials, cycling design capability of the unit, operability of other units on the system, day of week, shut-down time of the unit, startup time of the unit, length of the expected shut-down, operating condition of the unit's components, operating condition of other units on the PSNH system, needed maintenance, and maintenance that can be accomplished within the unit's startup time. There may also be other factors. Accion performed a review of unit outages. Accion also reviewed the decision-making process used by PSNH to determine if a unit should be placed in reserve shut-down status, and found it to be both reasonable and prudent. An analysis of each event as suggested is beyond the scope of this review.