

DE 10-195

U.S. DISTRICT COURT DISTRICT OF NEW HAMPSHIRE	DE 10-195
Exhibit No. ## #17	
Witness K Traum	
DO NOT REMOVE FROM FILE	

**PSNH Petition for Approval of Power Purchase Agreement with
Laidlaw Berlin BioPower, LLC**

**Office of the Consumer Advocate Responses to
PSNH's Data Requests – Set 1**

Date Received: December 26, 2010
Request No.: PSNH to OCA 1-5

Date of Response: January 6, 2011
Witness: Kenneth E. Traum

REQUEST: Ref. pg. 6 – The 2010 RPS requirement for Class I RECs is 1%, and the 2025 requirement is 16%. Using OCA's expectations for load-growth in New Hampshire over that period, what multiple of the 2010 Class I REC requirement would be required to meet 2025 needs?

RESPONSE: Objection. The request is argumentative, seeks additional testimony from the witness, and is unduly burdensome in that it seeks information that is equally if not more available to the requester. The Company, not the OCA, bears the burden of proving that its proposal is authorized by the RPS law and will result in just and reasonable rates. Subject to and without waiving these objections, Mr. Traum responds as follows:

The OCA has not performed these calculations.