



conservation law foundation

For a thriving New England

CLF New Hampshire

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June 15, 2011

Debra Howland
Executive Director & Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, New Hampshire 03301-7319

RE: DE 10-261 PSNH
2010 LCIRP, Reservation of Rights for DR CLF-02

Dear Ms. Howland:

I write to inform the Commission of a discovery issue in the above-captioned proceeding which Conservation Law Foundation (CLF) and the Public Service Company of New Hampshire (PSNH) are working in good faith to resolve.

PSNH's response to data request CLF-02 was due on May 20, 2011. PSNH's initial response, however, was not provided until June 1, 2011. PSNH has indicated that it will provide certain responsive information for said data requests upon execution by PSNH and CLF of a Nondisclosure Agreement and return of all documents under a previous Confidentiality Agreement between said parties. The parties are working on mutually acceptable language for a Nondisclosure Agreement and are hopeful that it will not be necessary for the CLF to file a motion to compel. However, in the event that the CLF and PSNH are unable to reach an agreement on confidential treatment or the response filed under the confidentiality agreement is insufficient, CLF hereby reserves its right to file a motion to compel within fifteen business days after June 1, 2011 (i.e., June 22, 2011). Counsel for PSNH has assented to the foregoing extension of time for a motion to compel, if necessary.

Thank you for your assistance, and please do not hesitate to contact me if you require additional information.

Sincerely,

N. Jonathan Peress
Conservation Law Foundation

NHPUC JUN15'11 PM 3:55

cc: Service list (via email)