

LAW OFFICES
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June 25, 2012

Debra A. Howland
Executive Director and Secretary
Public Utilities Commission
21 South Fruit Street
Concord, NH 03301-2429



Re: Public Service Company of New Hampshire, DE 10-261

Dear Secretary Howland:

I have the June 22, 2012, letter from Sarah B. Knowlton representing Public Service Company of New Hampshire [PSNH] regarding the Closing Argument of the New Hampshire Sierra Club [NHSC]. Attorney Knowlton argues that the Closing Argument is procedurally infirm.

NHSC rejects the Knowlton argument. The evidentiary matter regarding the Sargent & Lundy study¹ and the veracity of PSNH witness William H. Smagula and the NHSC RSA 365:38 - a fee and expense reimbursement demand, based on the testimony of PSNH witness Terry Large, are matters of merit hearing record. Each is a proper subject for closing argument.

NHSC would have no objection to granting PSNH leave to address the matters in a reply to the NHSC Closing Argument. Indeed, the matters raised by NHSC are of such substantial concern that PSNH should be required to respond.

Very truly yours,

A handwritten signature in black ink, appearing to be "A. B. Cunningham".

Arthur B. Cunningham

cc: Service list

¹ The Commission, pursuant to Puc 203.27, may take administrative notice of the Sargent & Lundy study filed in DE 08-103.