

REDACTED

DE 11-184

## Joint Petition for Approval of Power Purchase Agreements and Settlement Agreement

## Whitefield's Response to Staff's Data Requests to PSNH – Set 1

Date Received: August 23, 2011

Date of Response:

Request No.: Staff to PSNH 1-1

Witness: None

Request: Reference Settlement, Release and Support Agreement. With respect to the fact that all but one (i.e., Whitefield) of the Wood IPPs who have appealed certain Commission orders to the New Hampshire Supreme Court have entered into PPAs with PSNH, please describe what, if any, other consideration was provided to Whitefield by any other party in exchange for Whitefield's agreement to withdraw the Supreme Court Appeals. If no other consideration was provided, please explain why Whitefield has agreed to withdraw the appeals.

Objection: This data request seeks confidential financial and proprietary information pertaining to non-jurisdictional transactions which are not the subject of this docket. Without intending to waive this objection, Whitefield provides the following response.

Response: Whitefield was asked to withdraw from the Supreme Court appeals by Cate Street Capital and others. [REDACTED]

Cate Street Capital and others.

...the fact that the *Journal of Management Studies* is a leading journal in the field of management studies, and that the *Journal of Management Studies* is a leading journal in the field of management studies.

[REDACTED]

Pursuant to Rule Puc 203.08(d), DG Whitefield LLC has a good faith basis for seeking confidential treatment of this response and intends to submit a motion for confidential treatment regarding such documents at or before the commencement of the hearing in this proceeding.

REDACTED

DE 11-184

**Joint Petition for Approval of Power Purchase Agreements and Settlement Agreement**

**Wood IPPs Responses to Staff's  
Data Requests to PSNH – Set 1**

Date Received: August 23, 2011  
Request No.: Staff to PSNH 1-2

Date of Response:  
Witness: None

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Request: Reference Settlement, Release and Support Agreement, Section 2. Please identify all other "separate agreement[s]" between any of the Wood IPPs and Cate Street.

Objection: This data request seeks confidential financial and proprietary information pertaining to non-jurisdictional transactions which are not the subject of this docket. Without intending to waive this objection, the Wood IPPs provide the following individual responses.

Response: Bridgewater Power Company, L.P., entered no separate agreements with Cate Street Capital.

Response: Pinetree Power, Inc. entered no separate agreements with Cate Street Capital.

Response: Pinetree Power-Tamworth, Inc. entered no separate agreements with Cate Street Capital.

Response: Springfield Power, LLC entered no separate agreements with Cate Street Capital.

Response: DG Whitefield, LLC, d/b/a Whitefield Power & Light Company: Please see Whitefield's response to data request Staff to PSNH 1-1.

Response: Indeck Energy-Alexandria, LLC



Pursuant to Rule Puc 203.08(d), Indeck Energy-Alexandria has a good faith basis for seeking confidential treatment of this response and intends to submit a motion for confidential treatment regarding such documents at or before the commencement of the hearing in this proceeding.

**REDACTED**

**DE 11-184**

**Joint Petition for Approval of Power Purchase Agreements and Settlement Agreement**

**Bridgewater Power Company's Response to Staff's  
Data Requests to PSNH – Set 1**









Date Received: August 23, 2011  
Request No.: Staff to PSNH 1-18

Date of Response:  
Witness: None

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Request: For each of the Wood IPP facilities with a proposed PPA, please provide the following:

Response:

- a. Annual capacity factors for the period 2005-2010
  - 2005: 101%
  - 2006: 101.4%
  - 2007: 98.31%
  - 2008: 94.63%
  - 2009: 99.76%
  - 2010: 90.71%
  - (Based on 15 MW capacity)
- b. Annual MWh generation for the period 2005-2010
  - 2005: 132,720
  - 2006: 133,240
  - 2007: 129,185
  - 2008: 124,684
  - 2009: 131,081
  - 2010: 119,194
- c. The quarterly delivered wood price for the period 2009-2010
  - 2009:
    - Q1 
    - Q2 
    - Q3 
    - Q4 
  - 2010:
    - Q1 
    - Q2 
    - Q3 
    - Q4 

Pursuant to Rule Puc 203.08(d), Bridgewater Power Company has a good faith basis for seeking confidential treatment of this response and intends to submit a motion for

confidential treatment regarding such documents at or before the commencement of the hearing in this proceeding.