

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
INVESTIGATION OF SCRUBBER COSTS AND COST RECOVERY
DOCKET NO. DE 11-250

MOTION TO CONTINUE

NOW COMES the Office of the Consumer Advocate (OCA), a party in this docket, and moves the New Hampshire Public Utilities Commission (Commission) to continue the Procedural Schedule adopted in Order No 25,546 on July 15, 2013 in the above-captioned case.

In support of this Motion the OCA states:

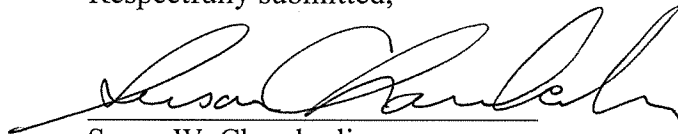
1. On July 15, 2013 the Commission directed Staff and Intervenor testimony in DE 11-250 to be filed on August 23, 2013.
2. The OCA is working with an outside consultant. As a result of various motions filed by the parties and resulting changes in deadlines, our consultant could not anticipate the new deadline and set aside, in advance, time to prepare.
3. The Commission's order allows that the schedule "is subject to amendment if dates identified conflict with preexisting commitments." Order 25,546 at 10.
4. Due to previous commitments, the consultant cannot meet the August 23, 2013 deadline for testimony.
5. The OCA requests that testimony be due no sooner than September 20, 2013.

6. The OCA will work with Staff and the Parties to develop the rest of the schedule, recognizing that the Commission's calendar is full in December due to January 1 rate implementation dates.
7. The OCA also requests the Commission add a deadline for filing written briefs approximately three weeks after the hearing transcript becomes available. The record will be more thoroughly developed on the significant legal questions occurring in the case if parties may submit legal arguments in writing.
8. TransCanada, Conservation Law Foundation and Sierra Club support the Motion to Continue. Staff takes no position. NEPGA, Mr. & Mrs. Dannis and PSNH did not respond to the OCA's request for a position.

WHEREFORE, the OCA respectfully requests this honorable Commission:

- A. Continue the deadline for Staff and Intervenor testimony to no sooner than September 20, 2013;
- B. Add a due date for filing written legal arguments after the Hearing on the Merits;
- C. Direct the parties and Staff to collaborate on a procedural schedule;
- D. Grant any other such relief as the Commission deems appropriate.

Respectfully submitted,

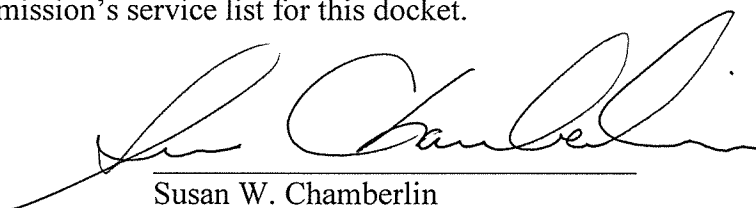


Susan W. Chamberlin
Consumer Advocate
Office of the Consumer Advocate
21 South Fruit Street, Suite 18
Concord, NH 03301
(603) 271-1174
Susan.chamberlin@oca.nh.gov

7-17-13

Certificate of Service

I hereby certify that a copy of this Motion was provided via electronic mail to the individuals included on the Commission's service list for this docket.

A handwritten signature in black ink, appearing to read "Susan W. Chamberlin", is written over a horizontal line. The signature is fluid and cursive, with the first name "Susan" and last name "Chamberlin" being clearly legible despite the stylized script.

Susan W. Chamberlin