Public Service Company of New Hampshire Docket No. DE 11-250

Date Request Received: 09/16/2013

Request No. DEPOSITION-004

Request from:

TransCanada

Witness:

Gary A. Long

Date of Response: 11/14/2013

Page 1 of 5

## Request:

Who prepared the \$11 per MMBtu price assumption that appears in Deposition Exhibit 9, Part E, page 15? Please provide any underlying materials relied upon by the person preparing the MMBtu price in the report.

## Response:

The referenced \$11 per MMBtu price assumption was based on actual reported Natural Gas Prices for dispatch at PSNH generating units at the time the analysis was performed (2008), as prepared by the NU Fuel Purchasing Department, rather than any specific forecast. The \$11 was assumed to continue until 2012, after which it was escalated at 2.5%. Forecasts available at the time (including those relied upon by FERC Staff in its presentation to the FERC Commissioners dated June 19, 2008, which are included in Deposition Exhibit 9 at Bates pages 21 and 22) support the base assumption and escalation, but were not used directly nor relied upon in preparing the referenced MMBtu price.

### **NEW HAMPSHIRE UNITS ONLY INCLUDES SO2 ADDER**

15-Jan-08

Reported Nepool

Price

		Barrel, Dollars per eplacement \$/MBtu		w/o ADDE	R	Replace.		w/o adders	Nom.
			Sulfur	Delivd	Btu	\$/MBtu	Btu/kWh	\$/MBtu	\$/MWh
498									
557	Schiller 5	Coal	0.62	69.36	13,122	3.203	11,172	2.643	\$35.79
558	Schiller 6	Coal	0.62	69.36	13,122	3.187	10,998	2.643	\$35.05
556	Schiller 4	Coal	0.62	69.36	13,122	3.187	11,041	2.643	\$35.19
	Merrimack 2	Coal	1.24		13,046	3.637	9,682	3.173	\$35.21
489 481	Merrimack 1	Coal	1.34	77.91	13,422	3.315	9,721	2.902	\$32.23
508 480 397	Newington blend	. oil/gas	100%oll&0	11.66		12.064	10,793	11.656	\$130.21
481									
390									
391									
390	•								
480									•
493									
493									
520									
519									
508	Vewington	Oi	1.09	76.44	156,149	12.058	10,793	11.656	\$130.14
508	Newington /	Gas		11		11	10,793	11	\$118.72
390	,					ري	4		
391	•								
493									
493									
481									
480									
494									
494									
	Schiller	Oil	1.09	76.44	156,149	12.066	10,887	11.656	\$131.36
557 S 482	Schiller 5 NWP	Wood	0	31	4,274	4.078	13,078	3.627	\$0.00 **

Per A. Dall 09/21//2004: effective 09/22//2004 NOX Ash/Slag Maint NX-4 Fuel Fuel Fuel So2 Oper. Date Adder/ MBtu Add'tve Unload Handle Dispose Costs Adder Adj. Adders Changed 0 Oil 0.1968 0.0757 2.6368 27-Sep-05 Newington 0 0.31 0.054 2.0003 Schiller 0 01 2.0003 2.6903 28-Jan-93 0.14 0.05 0.05 0.35 0.1 0.9673 11.0886 28-Aug-07 Merrimack 0 Coal 1.0088 7.758 0 0 1.3546 28-Aug-07 Merrimack 0 Coal 0.3924 0 1.0306 2.5038 0.9882 7.175 12.09 Schiller 4 0 Coal 0.359 1.87 1.87 5.5 1.0847 3.595 14.2787 24-Jul-06 Schiller 5 0 Coal 0 1.87 1.87 6.2835 1.0847 3.595 14.7032 24-Jul-06 Schiller 6 0 Coal 0.359 1.87 1.87 14.2787 24-Jul-06 1.0847 5.5 3,595 Schiller 5 1.355 3.855 17-May-06 Wood 1.25 1.25 0 Gas Included in \$/MWh is an inefficiency rate of 3.7% Newington

\$289,00 per ton SO2 - Allowance Price

\$520.00 per ton SO2 - Allowance Market Price (Newington)

\$0.00 per ton NOX - Allowance Market Price (Newigton)

\$0,00 per ton NOX - Emission Rate

The NWPP dispatch price is inclusive of a production tax credit of \$10/MWh and realized (and forecast) REC revenue of approximately \$50/MWh. (The dispatch price without REC and PTC = \$53.33/MWh.)

## NEW HAMPSHIRE UNITS ONLY

15-Feb-08

INCLUDES SO2 ADDER

Reported Nepool

Price Note: Dollars per Barrel, Dollars per Ton, Dollars per MBtu

calculate the Re	eplacement \$/MBtu		w/o ADDE		Replace.	HeatRate.	w/o adders	Nom.
		Sulfur	Delivd	Btu	\$/MBtu	Btu/kWh	\$/MBtu	\$/MWh
400								
498 557 Schiller 5	Coal	0.63	80.5	13,077	3.643	11,172	3.078	\$40.70
558 Schiller 6	Coal	0.63						\$39.88
556 Schiller 4	Coal	0.63						\$40.04
490 Merrimack 2	Coal	1.2						\$36.60
489 Merrimack 1	Coal	1.72					2.992	\$33.89
481	000.	1.72	00.0	10,710	0.400	0,124.1	2.002	Ψ00.00
508 Newington blend	oil/gas	100%oil&0	11.16		. 11.518	10,793	11.16	\$124.32
480	2.11.900					10,100	,,,,,	4,4
397								
481								
390								
391								
390								
480								
493								
493								
520								
519								
508 Newington	Oil	1.09			11.512	10,793	11.16	\$124.25
508 Newington	Gas )		10.96		10.96	<b>)</b> 10,793	10.96	\$118.29
390		e .		. `				
391								
493								
493								
481								•
480			,					
494			•					
494	Oil	4.00	79 40	150 140	44.50	40 007	44.40	@40E 40
556 Schiller 557 Schiller 5 NWP	Oil Wood	1.09	73.19 31		11.52 4.078	10,887	11.16 3.627	\$125.42
482	γγορα	0	31	4,274	4.078	13,078	3,027	\$0.00 ***
404								

NO: Add	X der/ MBtu	Fuel Add'tve	Fuel Unload	Fuel Handle	Ash/Slag Dispose	Maint Costs	So2 Adder	Oper. Adj.	NX-4 Adders	Per A. Dall 09/21//2004 : effective 09/22//2004 Date Changed
Newington	0 Oil	0.1968	:0	0.0757	. 0,31	0.054	1.6724	ļ	2.3089	27-Sep-05
Schiller	0 Oil	0.14	0.05	0.05	0,35	0.1	1.6724	i	2.3624	28-Jan-93
Merrimack	0 Coal	. 0	0	1.0088	1.3546	0.9673	9.93	<b>:</b>	13.2606	28-Aug-07
Merrimack	0 Coal	0.3924	. 0	1,0306	2.5038	0.9882	6.944		11.859	28-Aug-07
Schiller 4	0 Coal	0.359	1.87	1,87	5.5	1,0847	3.662	!	14.3457	24-Jul-06
Schiller 5	0 Coal	. 0	1.87	1.87	6.2835	1.0847	3.662	1	14.7702	24-Jul-06
Schiller 6	0 Coal	0.359	1,87	1.87	5.5	1.0847	3.662	2	14.3457	24-Jul-06
Schiller 5	Wood	1,355	1.25	1.25					3.855	17-May-06
Newington	0 Gas	Included in	\$/MWh is	an inefficien	cy rate of 3.	7%			•	•
	0000				-					

\$289.00 per ton SO2 - Allowance Price

\$435.00 per ton SO2 - Allowance Market Price (Newington)
\$0.00 per ton NOX - Allowance Market Price (Newigton)
\$0.00 per ton NOX - Emission Rate

The NWPP dispatch price is inclusive of a production tax credit of \$10/MWh and realized (and forecast) REC revenue of approximately \$50/MWh. (The dispatch price without REC and PTC = \$53,33/MWh.)



### NEW HAMPSHIRE UNITS ONLY INCLUDES SO2 ADDER

14-Mar-08

Reported Nepool

Price

		Barrel, Dollars per			<b>-</b>	<b>D</b> 1	tt am t	d balance	N1
	calculate the R	eplacement \$/MBtu	u. Sulfur	w/o ADDE Delivd	R Btu	Replace. \$/MBtu	Btu/kWh	w/o adders \$/MBtu	\$/MWh
498									
557	Schiller 5	Coal	0.64	72.25	13,163	3.307	11,172	2.744	\$36.95
558	Schiller 6	Coal	0.64	72.25	13,163	3.291	10,998	2.744	\$36.20
	Schiller 4	Coal	0.64				11,041	2.744	\$36.34
	Merrimack 2	Coal	1.2				9,682	3.326	\$36.60
489 481	Merrimack 1	Coal	1.37	80.87	13,473	3.418	9,721	3.001	\$33.22
480 397 481 390 391 390 480 493 493 520	Newington blend	oil/gas	100%oii&0	11.34		11.701	10,793	11.343	\$126.29
	Newington Newington	Oil Gas	1.09	74.39 10.81	156,149	11.695	10,793 10,793	11.343 10.81	\$126.23 \$116.67
556	Schiller Schiller 5 NWP	Oil Wood	1.09 0	74.39 31	156,149 4,274	11.703 4.078	10,887 13,078	11.343 3.627	\$127.42 \$0.00 ***

	OX dder/ MBtu	Fuel Add'tve	Fuel Unload	Fuel Handle	Ash/Slag Dispose	Maint Costs	So2 Adder	Oper. Adj.	NX-4 Adders	Per A. Dall 09/21//2004 effective 09/22//2004 Date Changed
Newington	0 Oil	0.1968	0	0.0757	0.31	0.054	1.6724		2.3089	27-Sep-05
Schiller	0 Oil	0.14	0.05	0.05	0.35	0.1	1.6724		2.3624	28-Jan-93
Merrimack	0 Coal	0	0	1.0088	1.3546	0.9673	7.895		11.2256	28-Aug-07
Merrimack	0 Coal	0.3924	0	1.0306	2.5038	0.9882	6.944		11,859	28-Aug-07
Schiller 4	0 Coal	0.359	1.87	1.87	5.5	1,0847	3,712		14,3957	24-Jul-06
Schiller 5	0 Coal	0	1.87	1.87	6.2835	1.0847	3.712		14.8202	24-Jul-06
Schiller 6	0 Coal	0.359	1.87	1.87	5.5	1.0847	3.712		14.3957	24-Jul-06
Schiller 5	Wood	1.355	1.25	1.25					3.855	17-May-06
Newington	0 Gas	Included in	\$/MWh is a	an inefficien	cy rate of 3.	7%				
-	ባለ ወደናዎ	nor ton SO	2 - Allowan	oo Drico	•					

\$289.00 per ton SO2 - Allowance Price

\$435.00 per ton SO2 - Allowance Market Price (Newington) \$0.00 per ton NOX - Allowance Market Price (Newigton)

\$0.00 per ton NOX - Emission Rate

The NWPP dispatch price is inclusive of a production tax credit of \$10/MWh and realized (and forecast) REC revenue of approximately \$50/MWh. (The dispatch price without REC and PTC = \$53.33/MWh.)

NEW HAMPSHIRE UNITS ONLY

INCLUDES SO2 ADDER

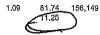
15-Apr-08 Reported Nepool

Note: Dollars per Barrel, Dollars per Ton, Dollars per MBtu calculate the Replacement \$/MBtu. w/o ADDER

Delivd \$/MBtu Btu/kWh \$/MBtu 498 557 Schiller 5 0.66 70.07 13,163 3.229 11,172 2,662 \$36.07 558 Schiller 6 Coal 0,66 70.07 13,163 3.212 10,998 2.662 \$35.33 556 Schiller 4 490 Merrimack 2 Coal 0.66 70.07 13,163 13,064 3.212 3.827 11,041 9.682 2,662 3.374 \$35.47 \$37.06 Coal 88.16 489 Merrimack 1 Coal 1.28 82.5 13,509 3.452 9,721 3.054 \$33.56 481 508 Newington blend 480 oil/gas 100%ail&0 12,46 12.772 10,793 12.464 \$137.85 397 481 390 391 480 493 493 520

519 508 Newington 508 Newington 391





12.766 10.793 11.25

12.464 11,25 10,793

Replace. HeatRate. w/o adders Nom,

\$137.78 \$121.42

493	
493	
481	
480	
494	
494	

556 Schiller 557 Schiller 5 NWP 482

Oil. Wood 1.09 81.74 0 31

156,149 4,274 4.078

10,887 12.464 13,078 3.627

\$139.07 \$0.00 \*\*\*\*

Per A. Dall 09/21//2004 at 9:00 A.M.

										effective 09/22//2004	NOX Adde NOX Adders	
١	4OX	Fuel	Fuel	Fuel	Ash/Slag	Maint	So2	Oper.	NX-4	Date		
A	Adder/ MBtu	Add'tve	Unload	Handle	Dispose	Costs	Adder	Adj.	Adders	Changed	0	
											Em. Rate	
Newington	0 QII	0.1968	0	0.0757	0.31	0.054	1.3444		1.9809	27-Sep-05	0.21	
Schiller	0 011	0.14	0.05	0.05	0.35	0.1	1.3444		2.0344	28-Jan-93	0.3	
Merrimack	0 Coal	0	0	1.0088	1,3546	0.9673	7.43	1	10.7606	28-Aug-07	0.15	
Merrimack	0 Coal	0.3924	. 0	1.0306	2.5038	0.9882	6.924		11.839	28-Aug-07	0.15	
Schiller 4	0 Coal	0.359	1.87	1,87	5.5	1.0847	3,817		14,5007	24-Jul-06	O ·	
Schiller 5	0 Coal	0	1.87	1.87	6.2835	1.0847	3.817		14,9252	24-Jul-06	.0.	
Schiller 6	0 Coal	0.359	1.87	1.87	5.5	1.0847	3,817		14.5007	24-Jul-06	0	
Schiller 5	Wood	1,355	1.25	1.25					3,855	17-May-06		
Newlngton	0 Gas	Included in	\$/MWh is a	an inefficien	cy rate of 3	.7%					0,15	

\$289.00 per ton SO2 - Allowance Price \$350.00 per ton SO2 - Allowance Market Price (Newington)

\$0.00 per ton NOX - Allowance Market Price (Newigton)
\$0.00 per ton NOX - Emission Rate

The NWPP dispatch price is inclusive of a production tax credit of \$10/MWh and realized (and forecast) REC revenue of approximately \$50/MWh. (The dispatch price without REC and PTC = \$53.33/MWh.)



## In Re:

DE 11-250 PUBLIC SERVICE COMPANY OF N.H.
INVESTIGATION OF SCRUBBER COSTS AND COST RECOVERY

DEPOSITION OF: GARY LONG September 16, 2013

SUSAN J. ROBIDAS, N.H. LCR (603) 622-0068 shortrptr@comcast.net (603) 540-2083 (cell)



Original File 091613GaryLong.txt
Min-U-Script® with Word Index

GA	RYL	ONG - 9/16/13 Page 69	YEARY	LONG - 9/16/13 Page 71
		"draft" on it. But this was part of the	1	industry that even had natural gas companies
1 2		input to the management team, you know, to	2	not certain, but in the case of TransCanada,
3		help understand why the costs have changed	3	certainly projecting five-year price
4		over time.	4	increases in natural gas in that '09, '10,
5	Q.	So you didn't think it was important enough	5	'11 time frame. So we would look at the
6	Q.	to include it in those presentations?	6	reports of companies like theirs and others.
i	A.	I'm not sure that's a fair characterization.	7	But I think our main conclusion would be it's
8	Q.	Okay. Well, you can characterize it however	8	very volatile.
9	Q.	you want.	9 Q	· · · · · · · · · · · · · · · · · · ·
	A.	Well, we obviously thought it was important	10	for developing for reviewing those
11	7.7.	to enlist PowerAdvocates to look at these	11	forecasts, first of all, I guess I'd say?
12		questions. So, obviously, it's important.	12 A	· · · · · · · · · · · · · · · · · · ·
13	Q.	Okay. But not important enough to mention it	13	I said, we typically don't perform those
14	Q.	to the RaCC or the board of trustees, or	14	forecasts. We look at what others have done.
15		ultimately the PUC in September.	15	We obviously, in the day-to-day bidding
	A.	Now, what point are you thinking that is	16	process, need to look at short-term prices,
17	Α.	excluded? Because we've listed a number of	17	what's posted out there. But long-term
18		facts and risks to the RaCC Committee and	ſ	prices were changing quite a bit, and still
19		summaries of what the price the cost	18 19	are.
20		change were. So I would say this report was	_	
21		used.	20 Q	I'm trying to understand.
	Q.	Okay. Well, I didn't see anything in those	22 A	
22	Q.	presentations, so I'm just asking why it	22 A	group and generation personnel who bid
24		wasn't there.	24	generation in the market on a daily basis,
44		wash t there.	24	generation in the market on a daily basis,
ļ			1	
GAF	RY LO	ONG - 9/16/13 Page 70	GARY	LONG - 9/16/13 Page 72
				ű
1		I can't answer that question any better than	1	who plan for how we'll meet our customers'
1 2	A.	I can't answer that question any better than I just answered it.	1 2	who plan for how we'll meet our customers' needs in the next week, the next month, the
1 2 3		I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of	1 2 3	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.
1 2 3 4	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early	1 2 3 4 Q	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be
1 2 3 4 5	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you	1 2 3 4 Q 5	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and
1 2 3 4 5 6	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked	1 2 3 4 Q 5 6	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the
1 2 3 4 5	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and	1 2 3 4 Q 5 6	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?
1 2 3 4 5 6 7 8	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in	1 2 3 4 Q 5 6 7 8 A	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are
1 2 3 4 5 6 7 8 9	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How	1 2 3 4 Q 5 6 7 8 A	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining
1 2 3 4 5 6 7 8 9	A.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities?	1 2 3 4 Q 5 6 7 8 A 9	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not
1 2 3 4 5 6 7 8 9 10	A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that.	1 2 3 4 Q 5 6 7 8 A 9	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts
1 2 3 4 5 6 7 8 9 10 11	A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices?	1 2 3 4 Q 5 6 7 8 A 9 10 11 12	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.
1 2 3 4 5 6 7 8 9 10 11 12 13	A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in
1 2 3 4 5 6 7 8 9 10 11 12 13	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections.	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves.	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time frame, was questioning decisions based on	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18 19	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the summer of '08, and that was filed with the
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time frame, was questioning decisions based on short-term prices and had been altering its	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18 19 20	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the summer of '08, and that was filed with the Commission in September of '08; correct?
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time frame, was questioning decisions based on short-term prices and had been altering its forecast when it considered its McKenzie	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18 19 20 21 A	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the summer of '08, and that was filed with the Commission in September of '08; correct?  I don't know what forecasts I'm not
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time frame, was questioning decisions based on short-term prices and had been altering its forecast when it considered its McKenzie Project, its Keystone Project and then the	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18 19 20 21 A 22	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the summer of '08, and that was filed with the Commission in September of '08; correct?  I don't know what forecasts I'm not familiar with their forecasts. It's you
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q.	I can't answer that question any better than I just answered it. Okay. In that time frame, in the summer of '08 and the fall of '08, and actually early into '09, what was the way in which you personally, and PSNH more generally, checked and evaluated natural gas and coal prices and price projections? What did you have in place? Who was the one that did that? How did that relate to your responsibilities? I'd like a little bit of background on that. On commodity prices? Natural gas and coal prices and price projections. Well, those projections were changing. We don't typically project gas prices ourselves. We look at what others are forecasting. I mean, your own client, during that time frame, was questioning decisions based on short-term prices and had been altering its forecast when it considered its McKenzie	1 2 3 4 Q 5 6 7 8 A 9 10 11 12 13 Q 14 15 16 17 18 19 20 21 A	who plan for how we'll meet our customers' needs in the next week, the next month, the next six months.  And so they're the ones who would be responsible for reviewing those forecasts and then presumably reporting to others in the company, including yourself?  The forecasts that you're thinking here are posted prices for the purpose of determining how to manage our power portfolio. It's not long-term forecasts or five-year forecasts like TransCanada puts together.  Okay. Well, I'm not interested in those, in terms of managing the portfolio that you referenced. I'm interested more in the natural gas and coal prices and price projections as they relate to Merrimack Station, because clearly that was done in the summer of '08, and that was filed with the Commission in September of '08; correct?  I don't know what forecasts I'm not

	E 11-250 PUBLIC SERVICE COMPANY OF N.H. I ONG - 9/16/13 PAGE 73		LONG - 9/16/13 Page 75
1	reliable, and particularly in that time frame	1	that it isn't.
2	where they were changing. Like I say, even		BY MR. PATCH:
3	TransCanada was changing its forecast every	3 Q.	
4	year, and they're in the business. So we're	4	guess, is what you're telling me.
5	not in the I'm not in the practice of		I haven't I didn't prepare that response.
6	directing my subordinates to do a long-term	6	I didn't prepare the forecasts.
7	forecast and then depending on it. It's more	7 Q.	
8	of managing what we have and complying with	8	minute and tell me whether well, first of
9	the law.	9	all, have you ever looked at fuel price
10 Q.	I'd like you to take a look at the response	10	forecasts in your career as president of
11	to TransCanada 1-2.	11	PSNH?
12 A.	Has been that previously been marked?	12 A.	Yes. I've never done a fuel price forecast,
13 Q.	Not yet. I don't think we've marked this.	13	but I have seen results of fuel price
14	(Long Deposition Exhibit 8 marked	14	forecasts.
15	for identification.)	15 Q.	
16 Q.	And the question was: "Please provide all	16	Would there be a narrative accompanying them?
17	fuel price forecasts available to PSNH at the	17	Would they have a company identifier? Would
18	time of its initial decision to construct the	18	they be marked "proprietary"?
19	flue gas scrubber at Merrimack Station."	19	MS. ROSS: Could you ask one
20	You objected. Commission ordered a	20	question at time, please.
21	response, and then you responded. You, PSNH,	1	BY MR. PATCH:
22 .	responded. And it says, "The fuel price	22 Q.	
23	forecasts available to PSNH at that time are	23	like?
24	provided in the attached, which includes	24 A.	Again, I don't prepare them. But, you know,
		1	
GARY L	ONG - 9/16/13 Page 74	GARY I	LONG - 9/16/13 Page 76
GARY L	ONG - 9/16/13 Page 74  NYMEX and broker forward fuel price	GARY I	LONG - 9/16/13 Page 76 seeing a table like on Page 2 of 68, that
	NYMEX and broker forward fuel price quotations from June '08," and then it goes		seeing a table like on Page 2 of 68, that might be a typical summary of a forecast.
1	NYMEX and broker forward fuel price	1	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast.  Could be in graphical form. As I said, I've
1 2	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were	1 2	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in
1 2 3	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.	1 2 3	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of
1 2 3 4	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of	1 2 3 4	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel
1 2 3 4 5	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of all, are these the kind of fuel price	1 2 3 4 5 6 7	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.
1 2 3 4 5 6 7 8	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally	1 2 3 4 5 6 7 8 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically
1 2 3 4 5 6 7 8	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?	1 2 3 4 5 6 7 8 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?
1 2 3 4 5 6 7 8 9	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.	1 2 3 4 5 6 7 8 Q. 9	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.
1 2 3 4 5 6 7 8 9 10 A. 11 Q.	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you
1 2 3 4 5 6 7 8 9 10 A. 11 Q.	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what you submitted to the Commission in September	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request.  And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18 19	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include Mr. Long.	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18 19 A.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?  Not always.
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18 19 20	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include Mr. Long.  MR. PATCH: I don't think Mr.	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18 19 A. 20 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?  Not always.  Are they marked "proprietary," typically?
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18 19	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include Mr. Long.  MR. PATCH: I don't think Mr. Long's name is on any of the responses to	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18 19 A. 20 Q.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?  Not always.  Are they marked "proprietary," typically? If they are. You know, if they're public
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18 19 20 21	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No. But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include Mr. Long.  MR. PATCH: I don't think Mr.	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18 19 A. 20 Q. 21 A.	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?  Not always.  Are they marked "proprietary," typically? If they are. You know, if they're public information, they wouldn't be.
1 2 3 4 5 6 7 8 9 10 A. 11 Q. 12 13 14 15 16 17 18 19 20 21 22	NYMEX and broker forward fuel price quotations from June '08," and then it goes on from there.  So, attached to this are what we were provided in response to that data request. And I guess I would like to ask, first of all, are these the kind of fuel price forecasts that you would have personally reviewed?  No.  But this was part of the attachment to what you submitted to the Commission in September of '08. So you just didn't review them?  MR. BERSAK: I would just like to note that the witnesses for this response that has been identified as and marked as No. 8 were Frederick Wright, Jody J. TenBrock and Terrence J. Large, and did not include Mr. Long.  MR. PATCH: I don't think Mr. Long's name is on any of the responses to data requests, is it?	1 2 3 4 5 6 7 8 Q. 9 10 A. 11 Q. 12 13 14 A. 15 16 Q. 17 18 19 A. 20 Q. 21 A. 22	seeing a table like on Page 2 of 68, that might be a typical summary of a forecast. Could be in graphical form. As I said, I've looked at TransCanada ones which were in graphical form. Those are summaries of studies. As I said, I haven't done a fuel forecast myself.  When you've looked at them, do they typically have a narrative accompanying them?  Like I said, Page 2 doesn't.  Well, I know. But I'm asking you, when you typically looked at them, not necessarily these.  Sometimes there are tables, sometimes there's words. Could be either.  Do they typically have company identifiers on them indicating which company actually made the projection?  Not always.  Are they marked "proprietary," typically? If they are. You know, if they're public information, they wouldn't be.

	LONG - 9/16/13 PAGE COMPANY OF N.H. I			ONG - 9/16/13 Page 79
1	attached to that letter was a report. And I	1		different assumptions different places.
2	guess I'd like to have that marked next.	2	Q.	That's right. But this
3	(Long Deposition Exhibit 9 marked	3	À.	This is a statement of an assumption. I
4	for identification.)	4		think you called it a forecast. It says a
5 Q.		5		price was used. It doesn't say it was
~	Generally.	6		forecasted. It just explains what was used
7 Q.	•	7		in the analysis.
8	else at PSNH checked the price of natural gas	8	O.	It's a pretty critical assumption, isn't it?
9	and projections for those prices prior to	9	•	One of many.
10	this submission on September 2nd?	10	Q.	•
11 A.		11	ν.	impact on customers, would you say?
12 Q.	<del>=</del>		A.	
-	I don't know.	13	2 % .	important.
14 Q.		14	Q.	
15	months? Was it six months? One month?		_	Not sitting here today, no.
16 A.		16	Q.	Is there any documentation you could check so
16 A. 17	don't know.	17	Ų.	that you could find out who was responsible
				for doing this?
18 Q. 19	this report with anyone prior to the	18	A.	<del>-</del>
	September 2nd submission?	1	Α.	MR. PATCH: I'd like to make a
20		20		
21 A.		21		data request of the Company, that they answer
22 Q.	1 3	22		the question of who prepared the \$11 per
23	natural gas prices was done?	23		MMBtu price that was used as an "assumption,"
24 A.	Again, you're referring to forecasts. I	24		as Mr. Long says, in this particular report,
GARY L	ONG - 9/16/13 Page 78	GAF	RY LO	DNG - 9/16/13 Page 80
1	don't know which forecast you're referring	1		referenced on Page 15, Paragraph E.
2	to.	2		MR. BERSAK: We've been
3 Q.	Okay. Well, let's look at	3		through discovery for several years. This
4 A.	And they're not forecasts that I personally	4		report has been out there for over five
5	did, so	5		years. If you're going to depose Mr. Long
6 Q.	Okay. Let's look at Page 15 of this. And	6		about what he knows about this project, I
7	there's a Part E on Page 15 in the lower	7		think we've completed discovery, and I would
8	right-hand corner of Page 15. There's a lot	8		object to further discovery.
9	of different page numbers on here. Yeah, and	9		MR. PATCH: And then I would
10	Part E, or Paragraph E at the bottom of the	10		also like to ask for any of the underlying
11	page, it says, "In the market purchase and	11		materials
12	combined cycle natural gas scenarios, a year	12		MR. BERSAK: May we have a
13	2012 price of \$11 per MMBtu was used as the	13		ruling on this one, please?
14	first-year price of natural gas." This value	14		MR. PATCH: Well, I thought
15	was escalated at a rate of 2.5 percent per	15		what had been indicated was that those
16	year for future years of the analysis." Did	16		rulings were going to be reserved until
 17	I read that correctly?	17		MS. ROSS: I wasn't planning
1.8 A.	Yes.	18		on ruling, but I would recommend production
19 Q.	Do you know who did this forecast?	19		of this because it is a critical piece of
20 A.	No.	20		information in this docket.
21 Q.	You have no idea who prepared this?	21		(Court Reporter interjects.)
22 A.	I don't have a recollection of who prepared	22		MR. BERSAK: I'm just asking,
23	it. I think it's a statement of an	23		when does discovery stop?
~ ~	an a manife to be between the till			minut does apported probi
24	assumption. So, you know, you could use	24		MS. ROSS: Whenever the

# DEPOSITION OF: GARY LONG - September 16, 2013 DE 11-250 PUBLIC SERVICE COMPANY OF N.H. INVESTIGATION OF SCRUBBER COSTS AND COST

					GÄTION OF SCRUBBER COSTS AND COST
GΑ	RY L	ONG - 9/16/13 Page 85	A RAYK	Ϋ́L	DNG - 9/16/13 Page 87
1		any report circulated within PSNH that	1		decision?
2		provided spot and future fuel prices prepared	2 /	A.	Well, that's a topic that I'm sure we talked
3		for management review?	3		about. I can't recall when or how or where.
4	A.	I don't know.	4		I had conversations multiple times every day.
5	Q.	You don't know if there were any you don't	5		So, you know, you asked me specifically about
6	`	know if it would be a typical thing to do.	6		a specific conversation. Well, I don't
7		You have no knowledge of that?	7		recall. But certainly that topic was
8	A,	Well, it certainly may have occurred, but	8		discussed.
9		within our service providers. Fuel	ļ	Q.	With who?
10		forecasting was not an area under my	1	•	Well, that's what I'm saying. It could have
11		responsibility.	11		been with any it could have been with an
12	Q.	Okay. So you didn't feel it was one of your	12		analyst. It could have been with anybody on
13		responsibilities to be aware of spot and	13		the generation team. It could have been with
14		future fuel prices. Not part of your	14		anybody who's involved with company
15		responsibility as president of PSNH.	15		operations.
	A.	I didn't manage that function. Would I be	1	Q.	Was there any documentation provided of any
17		generally aware? Would they inform me of	17		of those discussions?
18		changes? Yes. But I didn't manage that,	1	۸.	Not that I recall, but I don't recall.
19		forecast that process. I did not manage the	1		Okay.
20		day-to-day market interactions of the company	20 A	-	As I said earlier, we typically don't
21		within the ISO-New England market.	21	_,	these are oral discussions. You know, you
22	Q.	How frequently would they have informed you	22		asked me early on my style of management. It
23	ζ.	of you that?	23		is to communicate with people often, but we
1	A.	Of what?	24		don't record those conversations. We don't
1					
GAI	RY LO	DNG - 9/16/13 Page 86	GARY	/ LC	DNG - 9/16/13 Page 88
		· ·			ű
	Q.	You just said, you know, you were informed by	1.		have a need to.
1		You just said, you know, you were informed by people within the company of this. So I'm	1.	<b>Q</b> .	have a need to. But if somebody thought that it was
1 2		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was	1 2 (	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was
1 2 3		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular	1 2 ( 3	Q.	have a need to. But if somebody thought that it was
1 2 3 4		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did	1 2 (	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the
1 2 3 4 5		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you	1 2 3 4 5	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done
1 2 3 4 5		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did	1 2 3 4 5 6 7	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally.
1 2 3 4 5 6 7 8		You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.	1 2 3 4 5 6 7	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done
1 2 3 4 5 6 7 8	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that	1 2 3 4 5 6 7 8 A	). A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us
1 2 3 4 5 6 7 8	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry	1 2 3 4 5 6 7 8 4	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll
1 2 3 4 5 6 7 8 9	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.	1 2 3 4 5 6 7 8 9	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO
1 2 3 4 5 6 7 8 9 10	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly	1 2 3 4 5 6 7 8 A 9	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors,
1 2 3 4 5 6 7 8 9 10 11 12 13	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did	1 2 C 3 4 5 6 7 8 A 9 10 11 12	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision
1 2 3 4 5 6 7 8 9 10 11 12 13	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas
1 2 3 4 5 6 7 8 9 10 11 12 13	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14 15	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.	1 2 C 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A. Q. A.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.  Did you ever ask for this?	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14 15 16 17 18	Q.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO communicated to investment communities. So,
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A. Q. A. Q. A.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.  Did you ever ask for this?  I may have. I don't recall.	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14 15 16 17 18 19	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO communicated to investment communities. So, we were no different. Although we weren't in
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A. Q. A.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.  Did you ever ask for this?  I may have. I don't recall.  Do you remember anyone, at any point in that	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO communicated to investment communities. So, we were no different. Although we weren't in the gas business, we understood that you
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A. Q. A.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.  Did you ever ask for this?  I may have. I don't recall.  Do you remember anyone, at any point in that time frame, in the summer of '08 and the fall	1 2 C 3 4 5 6 7 8 A 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO communicated to investment communities. So, we were no different. Although we weren't in the gas business, we understood that you don't look at a short-term forecast and
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A. Q. A.	You just said, you know, you were informed by people within the company of this. So I'm trying to understand the frequency. Was there some protocol? Was there some regular occurrence? Did they inform you weekly? Did they inform you daily? Did they inform you monthly? I'm trying to understand how that was done.  Well, they'd certainly inform me upon inquiry or as we're considering analysis like this.  There was no protocol for immediate weekly reports or daily reports. As I said, I did not manage that function.  So, on request they would inform you, you said? So, in other words, if you asked for it, they'd give it to you.  Oh, yes.  Did you ever ask for this?  I may have. I don't recall.  Do you remember anyone, at any point in that time frame, in the summer of '08 and the fall of '08, anyone at PSNH or NU voicing concern	1 2 3 4 5 6 7 8 A 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	have a need to. But if somebody thought that it was significant enough that the gas price was dropping and the projections were going down and the effect that would have on the scrubber, presumably they would have done more than just communicate with you orally. It's well known it was well known by us that gas prices were very volatile. I'll give you your own client's example. The CEO of TransCanada, in talking to his investors, said you don't make an investment decision based on a one-month or short-term gas prices, that you have to look at the long term. And TransCanada projected steadily increasing prices when they looked at their own projects. And that's what the CEO communicated to investment communities. So, we were no different. Although we weren't in the gas business, we understood that you don't look at a short-term forecast and assume that's the way it's going to be