

THE STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 11-250  
Investigation of Merrimack Station Scrubber Project and Cost Recovery

Docket No. DE 14-238  
Determination Regarding PSNH's Generation Assets

**OFFICE OF ENERGY AND PLANNING RESPONSE**  
**TO PSNH MOTION TO STAY PROCEEDINGS**

NOW COMES the State of New Hampshire Office of Energy and Planning ("OEP"), by and through counsel, the Office of the Attorney General, and submits this response to the Motion to Stay Proceedings filed by Public Service Company of New Hampshire ("PSNH"). OEP states as follows:

1. Pursuant to its motion, PSNH seeks a stay of proceedings in both Docket DE 11-250, Investigation of Merrimack Station Scrubber Project and Cost Recovery (the "Scrubber Docket") and DE 14-238, Determination Regarding PSNH's Generation Assets (the "Divestiture Docket") to allow the parties to engage in a collaborative discussion aimed at resolution of both Dockets. Further, PSNH indicates Senator Jeb Bradley's express support for such a collaborative negotiation, which may include legislative action.

2. OEP interprets PSNH's request as an indication that PSNH is prepared to propose settlement terms that would provide significant economic and other benefits to the State, ratepayers and other interests.

3. OEP is an intervenor in the Divestiture Docket, but was not a party to the Scrubber Docket. OEP's interests in the Divestiture Docket include ensuring that residential and

business customers have access to affordable, reliable electricity that allows for innovation and economic growth, protecting the state's natural resources, and fairly apportioning among ratepayers and utility shareholders the costs and risks of operating and/or divesting PSNH's generation assets.

4. OEP is open to good faith settlement negotiations that include all parties who are willing to participate and that offer the potential for a quicker and more efficient resolution of complex issues in each docket. To be successful, such negotiations will require substantive compromise and a willingness by PSNH to offer settlement terms that provide concrete, meaningful benefits to ratepayers, workers, the environment, and other interests.

5. Accordingly, OEP does not object to PSNH's request for a stay of proceedings in both dockets while the parties pursue a negotiated settlement that reduces electricity rates, decreases ratepayer responsibility for the post-restructuring costs of PSNH's generation assets, and provides other important benefits as referenced above.

6. OEP respectfully suggests that any stay of proceedings be conditioned on regular status reports to the Commission to allow the prompt resumption of proceedings if settlement negotiations are not progressing in a timely and good faith manner.

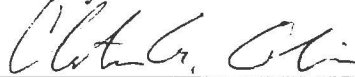
Respectfully submitted,

STATE OF NEW HAMPSHIRE,  
OFFICE OF ENERGY AND PLANNING

by its attorney,

Joseph A. Foster  
Attorney General

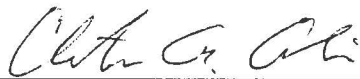
Dated: January 2, 2015

  
\_\_\_\_\_  
Christopher G. Aslin (NH Bar # 18285)  
Attorney  
Environmental Protection Bureau  
33 Capitol Street  
Concord, New Hampshire 03301-6397  
(603) 271-3679  
[Christopher.aslin@doj.nh.gov](mailto:Christopher.aslin@doj.nh.gov)

Certificate of Service

I hereby certify that a copy of the foregoing Appearance has been sent by e-mail this day to the members listed on the service lists in dockets DE 11-250 and DE 14-238.

Dated: January 2, 2015

  
\_\_\_\_\_  
Christopher G. Aslin