



**Public Service Company of New
Hampshire
Docket No. DE 10-195**

Data Request IPP-02

Dated: 10/18/2010

Q-IPP-071

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Witness: Richard C. Labrecque
Request from: Wood-Fired Small Power Producers

Question:

Regarding Q2-20

- a. Please provide forecasts of annual MWh sales used to determine the forecast for Class I NH RECs noted in Q. 2-20.
- b. Please identify all assumptions in producing the forecast in (a) above.
- c. Please provide all work papers, evaluations and analyses and sensitivities analyses pertaining to said forecasts.

Response:

- a. The response to Q-IPP-02-020 includes the requested MWh sales information.
- b. through c. The questions are seeking "all assumptions" and "all work papers" related to the PSNH's sales forecast. PSNH's sales forecasting practices are not a subject of this proceeding. PSNH objects to these questions as they are overly broad and unduly burdensome, and clearly intended to impair the orderly and prompt conduct of the proceedings. PSNH further objects to this question as the documents requested would not provide or lead to relevant or admissible evidence.