



**Public Service
of New Hampshire**

PSNH Energy Park
780 North Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire
P.O. Box 330
Manchester, NH 03105-0330
(603) 669-4000
www.psnh.com

The Northeast Utilities System

Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street Suite 10
Concord, New Hampshire 03301-2429



Re: PSNH 2010 Least Cost Integrated Resource Plan
NH PUC Docket No. DE 10-261

Dear Secretary Howland:

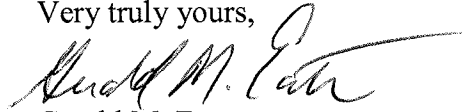
This letter is sent in response to a letter filed with the Commission on May 31, 2011 by the New Hampshire Sierra Club (NHSC). In that letter, NHSC requests “the Public Utilities Commission ask the New Hampshire Department of Environmental Services, Air Resources Division, to submit written testimony regarding the programs addressed in the New Hampshire Sierra Club Data Requests.” As previously stated in Public Service Company of New Hampshire’s (PSNH) objections to NHSC data requests and its answer to NHSC’s motion to compel, the data requests address standards that have not been finalized and were certainly not in any reasonably predictable final form to allow PSNH to address them in its least cost plan formation in the summer of 2010. Furthermore, introduction of this testimony would expand the scope of this proceeding:

“We are not a substitute for proceedings at the Environmental Services Department of the state, and we don't want to be caught in a position in which we are both trying the same issues or taking other things that are related to what we do, but are not directly under our jurisdiction. So, there are significant environmental issues for this docket, but we have to not end up, in effect, trying those cases in this proceeding at the same time.” Comments of Commissioner Ignatius sitting as Hearing Examiner). Transcript of Prehearing Conference, at 22 (November 18, 2010).

The Commission is only required to consider the “potential environmental, economic and health-related impacts of each proposed option” and is merely “encouraged to consult with appropriate state and federal agencies”. RSA 378:39. There is no requirement for the Commission to make a finding as to exactly what the environmental standard will be and how PSNH shall address that standard in the future. PSNH’s Least Cost Plan does consider reasonably foreseeable regulatory requirements. (Sections IX, XII). For all of the above reasons, the NHSC’s request for testimony from DES to be filed should be denied.

Letter to Debra A. Howland
June 9, 2011
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Very truly yours,

A handwritten signature in black ink, appearing to read "Gerald M. Eaton", with a long, sweeping horizontal line extending to the right.

Gerald M. Eaton
Senior Counsel

cc: Service List