

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

DE 12-097

ELECTRIC AND GAS UTILITIES

**Investigation into Purchase of Receivables, Customer Referral and Electronic
Interface for Electric and Gas Distribution Utilities**

**Objection to Public Service Company of New Hampshire's Motion to Stay the
Procedural Schedule**

NOW COMES the Retail Energy Supply Association ("RESA"), an intervenor in this docket, and objects to Public Service Company of New Hampshire's ("PSNH") August 24, 2012 Motion to Stay the Procedural Schedule ("Motion"). In support of this objection RESA states as follows:

1. On August 24, 2012 PSNH filed one motion covering five topics in two separate dockets. Last among the five requests was a motion to stay the procedural schedule in DE 12-097. In paragraph 31 of the Multiple Motion PSNH averred that it could not effectively prepare testimony without decisions from the Commission on outstanding procedural motions. PSNH did not seek concurrence for its Motion. See Admin. Rule 203.13(b).

2. RESA files this objection to the Motion to Stay. PSNH waited until the last day possible (August 24, 2012) to file a Motion to Compel. Granite State Electric Company filed their Motion to Compel on August 20, 2012. As RESA has indicated in its Objections to both Motions to Compel, the information that PSNH and GSEC are seeking is not relevant to the specific issues noted by the Commission in the order of

notice in this docket and are not discoverable for the additional reasons explained in the Objections. Thus, PSNH should be able to prepare any testimony it wishes to offer by the September 10, 2012 deadline. In addition as RESA has pointed out in its Objection to the Motion to Compel, PSNH's affiliates in Connecticut and Massachusetts have much experience with POR, customer referral and electronic interface programs and issues in those states. PSNH thus should be very familiar with the programs that are at issue here and any issues it wants to raise in prefiled testimony.

3. RESA believes that it is important for the development of the competitive market for small customers in New Hampshire that this docket remain on schedule so that there is no further delay in bringing the benefits of the competitive market to all customer classes in New Hampshire on an equitable basis as RESA believes was intended in the New Hampshire restructuring law. See RSA 374-F:1,I and RSA 374-F:3,VI.

4. For the reasons cited above RESA believes that PSNH's Motion to Stay the procedural schedule in this docket should be denied.

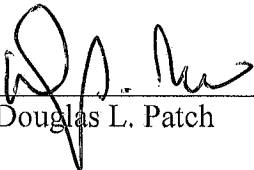
WHEREFORE, RESA respectfully requests that this honorable Commission:

- A. Deny PSNH's Motion to Stay the Procedural Schedule; and
- B. Grant such further relief as it deems appropriate.

Respectfully submitted,

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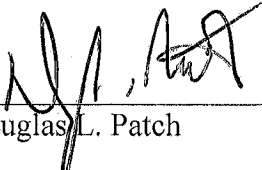


Douglas L. Patch

September 4, 2012

Certificate of Service

I hereby certify that on this 4th day of September, 2012 a copy of the foregoing motion was sent by electronic mail to the Service List.



Douglas L. Patch

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