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October 21, 2015

NHPUC 220CT'15AM10:40

Ms. Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, New Hampshire 03301

**Re: Docket No. DE 14-238, Determination Regarding PSNH's Generation Assets**

Dear Director Howland:

Pursuant to the procedural schedule for Docket No. DE 14-238, on October 2, 2015, Public Service Company of New Hampshire ("PSNH") issued discovery questions to the Granite State Hydropower Association ("GSHA"). On October 12, 2015, GSHA notified PSNH of its objections to those data requests.

Per Puc 203.09 (i)(4), PSNH and GSHA desire to make a good-faith effort to resolve those objections. However, the discussions between PSNH and GSHA are difficult in that the Commission has not yet ruled on GSHA's Motion to Compel dated August 12, 2015 and PSNH's Objection thereto dated August 21, 2015. The resolution of that outstanding discovery issue would provide guidance to PSNH and GSHA that may help resolve the current discovery contest and perhaps negate the need for the filing of an additional Motion to Compel.

PSNH, with the concurrence of GSHA, requests that the Commission waive the filing requirements in Puc 203.09 governing Motions to Compel (15 business days from the receipt of the objections) and provide in its place a period of ten business days from the date that the Commission issues its order on the August 12 GSHA motion to compel. This would allow PSNH and GSHA to consider the Commission's decision in the good-faith discussions concerning the present discovery disputes, minimizing and potentially avoiding another pleading.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Bersak", written over a horizontal line.

Robert A. Bersak  
Chief Regulatory Counsel

cc: Service List, Docket No. DE 14-238

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**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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Docket #: 14-238-1      Printed: October 21, 2015

**FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**

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