



CONSERVATION LAW FOUNDATION

September 14, 2009

Ms. Debra A. Howland, Executive Director & Secretary
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 09-033
Petition for Approval of the Issuance of Long Term Debt Securities



Dear Director Howland:

Please find enclosed for filing with the Commission an original and seven (7) copies of the Conservation Law Foundation's Corrected Motion for Rehearing on the Commission's Order Denying Conservation Law Foundation's Motion to Compel PSNH's Responses to Data Requests. A copy of this filing has this day been sent electronically, and by First Class Mail, to all parties on the PUC's service list.

This will correct an error CLF identified and clarify an accompanying point in its Motion for Rehearing in the above-referenced docket, filed Friday, September 4; that same error appears in CLF's July 24 Motion to Compel and August 6 Reply to PSNH's Objection to CLF's Motion to Compel. The change is set forth in the Corrected Motion for Rehearing at paragraph twelve and (1) clarifies that PSNH's June 2009 projection of the sales—in megawatt hours—that will be lost to competitors in 2009 was 118% percent higher than its December 2008 projection; and (2) modifies the number of industrial sales PSNH expects to lose to competitive suppliers in 2009 from 54% to about 50% based on PSNH's forecasted sales.

CLF has also updated, as set forth in paragraph thirteen, PSNH's energy service rate to reflect the change that occurred after CLF's original Motion to Compel was filed on July 24. As of July 24, PSNH's energy service rate was 9.92 cents per kilowatt hour, as correctly stated by CLF in its Motion to Compel. *See* PUC Order No. 24,991 (July 24, 2009) ("PSNH's current energy service rate is \$0.0992 per kilowatt-hour."). That rate decreased as of August 1, 2009.

We apologize for any inconvenience. Please call me should you have any questions.

Sincerely,


Melissa A. Hoffer
Vice President and Director
New Hampshire Advocacy Center

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MAH/dlh

Encls.

cc: Service List DE 09-033