

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire
Investigation Into Customer Migration and Power Procurement

Docket No. DE 10-160

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S MOTION FOR
EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Pursuant to N.H. Code Admin. Rule Puc §202.04, Public Service Company of New Hampshire ("PSNH" or "the Company") hereby requests an extension of time to file rebuttal testimony in this proceeding. In support of its request, PSNH says the following:

1. By Secretarial Letter dated July 2010, the Commission approved the procedural schedule in this proceeding calling for rebuttal testimony to be filed by the parties on October 26, 2010.

2. On September 27, 2010, PSNH served data requests on Constellation NewEnergy, Inc., Constellation Energy Commodities Group ("Constellation") and the Retail Energy Supply Association ("RESA"), TransCanada Power Marketing, Ltd and TransCanada Hydro Northeast Inc. ("TransCanada") and New England Power Generators Association ("NEPGA"). NEPGA did not respond to PSNH's data requests as of this date; however, NEPGA has represented that PSNH will have responses by close of business on October 22, 2010.

3. PSNH believes some of Constellation's/RESA's and TransCanada's responses were unresponsive, and PSNH will be discussing those responses with counsel or filing a Motion to Compel.

4. PSNH will need at least one calendar week following receipt of complete responses from these parties before it can file its rebuttal testimony. All parties should be afforded the same extension of time for filing rebuttal testimony. There is no deadline for this proceeding to be completed; therefore, the request would not unduly delay the proceeding or adversely affect the rights of any party.

5. On October 19, 2010, PSNH circulated a draft of this Motion to all the parties seeking their concurrence. The parties responded as follows:

The OCA has no objection. Constellation, RESA, Clean Power Development, LLC, Freedom Logistics, LLC, and Halifax-American Energy Company, LLC do not object to an extension of time until October 29, 2010. Staff and CLF take no position.

WHEREFORE PSNH respectfully requests the Commission to grant the extension of time to file rebuttal testimony and grant such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

October 20, 2010

Date

By: Gerald M. Eaton

Gerald M. Eaton

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Motion for Extension of Time to be served pursuant to N.H. Code Admin. Rule Puc §203.11.

October 20, 2010

Date

Gerald M. Eaton

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