

LAW OFFICES
ARTHUR B. CUNNINGHAM
79 Checkerberry Lane, Hopkinton, NH 03229

April 27, 2010

Debra A. Howland
Executive Director and Secretary
Public Utilities Commission
21 South Fruit Street
Concord, NH 03301-2429



Re: Public Service Company of New Hampshire, Docket No.10-261

Dear Secretary Howland:

The New Hampshire Sierra Club concurs with the Objection to the PSNH Motion for a Protective Order re: Five Year Capital Budgets filed on April 18, 2011, by TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast, Inc.

You are further advised that the New Hampshire Sierra Club strongly objects to the Public Service Company of New Hampshire April 22, 2011, proposal in the email from Gerald M. Eaton to N. Jonathon Perress of the Conservation Law Foundation stating that the attachments to OCA-039 and OCA-049 would be provided on the condition that the Conservation Law Foundation execute a Confidentiality Agreement similar to the Confidentiality Agreement executed by Conservation Law Foundation attorney Melissa Hoffer in PUC DE 10-121.

The New Hampshire Sierra Club will not enter any agreement that compromises the public process regarding matters properly before the Public Utilities Commission. New Hampshire Sierra Club believes that no intervenor with substantial interests adverse to petitioner Public Service Company of New Hampshire should ever enter such an agreement.

Public Service Company of New Hampshire uses confidentiality claims to frustrate discovery and to avoid full, transparent, public review of its compliance with law.

On February 23, 2011, New Hampshire Sierra Club filed Data Requests, consistent with RSA 378:38, regarding pollution controls and the capital and operating costs for such controls for the Public Service Company of New Hampshire fossil fleet.

Apropos its practice, Public Service Company of New Hampshire objected to the first three Data Requests and provided evasive answers to the remaining nine Data Requests.

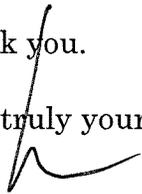
The March 10, 2011, New Hampshire Sierra Club Motion to Compel is pending before the Commission.

The second round of intervener Data Requests is due on April 29, 2011.

New Hampshire Sierra Club respectfully requests that the time for filing the second round of Data Requests be extended until such time as its Motion to Compel is ruled upon. It is the expectation that the Commission will provide clarity regarding the scope of this proceeding regarding environmental compliance and pollution control costs in this planning docket consistent with RSA 378:38.

Thank you.

Very truly yours,



Arthur B. Cunningham

Cc: Service list