

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

DE 11-250

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

INVESTIGATION OF MERRIMACK STATION SCRUBBER PROJECT AND COST RECOVERY

**CONSERVATION LAW FOUNDATION'S MOTION TO EXTEND TIME TO
RESPOND TO DATA REQUESTS**

NOW COMES the Conservation Law Foundation ("CLF") and hereby respectfully requests that this Commission extend the time for the parties to respond to data requests served by the Public Service Company of New Hampshire (PSNH) from February 4, 2014 to a date to be determined by the Commission, after it rules upon CLF's pending Motion to Direct PSNH to Serve a Reasonable Number and Scope of Requests and the Office of Consumer Advocate's (OCA) and TransCanada's similar motions. In support of this Motion, CLF states as follows:

1. On January 16, 2014, PSNH served 104 data requests on CLF, many of which contain detailed subparts for a total of 187 requests. PSNH also served many data requests on the OCA and TransCanada.
2. On January 27, 2014, CLF filed a Motion seeking an Order limiting both the scope and number of data requests PSNH may serve on pre-filed testimony submitted by CLF. At the same time, CLF served objections to the Data Requests on PSNH. The OCA filed a similar motion on January 22, 2014 and TransCanada filed a similar motion on January 24, 2014.
3. The current deadline for responding to PSNH's Data Requests is February 4, 2014.

4. Puc 202.04 authorizes a party to request an extension of time if the request is in writing to the executive director before the expiration of the period originally prescribed. The request shall be granted if: (1) the party demonstrates circumstances that would cause undue hardship or inconvenience and (2) the extension would not unduly delay the proceeding or adversely affect the rights of any party.

5. CLF will suffer undue hardship and inconvenience if forced to answer the 187 pending data requests. CLF is a non-profit environmental advocacy organization with limited resources. CLF fully expects to answer some reasonable set of data requests from PSNH following ruling by the Commission on CLF's January 27 Motion, but would be strained to answer the 187 data requests (many of which are irrelevant and beyond the scope of the docket) and then to later answer a different set of data requests that the Commission deems proper for PSNH to propound to CLF. Moreover, some of the requests ask CLF to reveal information it considers work product or far outside of this docket. CLF does not wish to answer these questions without guidance from the Commission concerning the scope of information it must reveal.

6. Granting the relief will not *unduly* delay the proceeding. The issues raised by CLF, the OCA and TransCanada are ripe for review by the Commission and can be expediently addressed by consolidating the Commission's consideration of the three pending Motions.

7. CLF has conferred with PSNH who takes no position with response to this Motion. TransCanada, the OCA and Sierra Club support this Motion.

WHEREFORE, for the reasons set forth above, CLF respectfully requests that the Commission extend the time for the parties to respond to data requests from PSNH until a further date to be determined by the Commission after it rules upon CLF's pending Motion to Direct

PSNH to Serve a Reasonable Number and Scope of Requests and the OCA's and TransCanada's similar motions.


Dated: January 30, 2014

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January 2014, a copy of the foregoing Motion was sent electronically or by First Class Mail to the service list.



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