

Public Service Company of New Hampshire
Docket No. DE 11-250

Data Request PSNH
Dated: 01/16/2014

Question:

135. Please provide copies of all economic analyses performed by TransCanada relating to the relicensing of the Wilder, Bellows Falls, and Vernon Hydroelectric Projects on the Connecticut River.

Answer:

Objection for the reasons set forth in the General Objections above. More specifically, the Companies object to the request on the basis that it is beyond the scope of and not related to the testimony that Mr. Hachey filed in this docket, and providing a response to the data request would either require Mr. Hachey to conduct further research than what he did to prepare and proffer his testimony or it would require the Companies to put forth another witness to respond and substantiate a response. The Companies therefore object to the request as beyond the scope of this proceeding and this witness's testimony in this proceeding; the Companies object to the request on the basis that it is overly broad, unduly burdensome and are not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding; the Companies object to the request on the basis that it seeks confidential and proprietary information from entities that are not a party to the docket. Confidential and proprietary information is protected under RSA 91-A:5 and Commission rules and precedent. The Companies' witness, Mr. Hachey, has no knowledge of the information being requested; the Companies' witness, Mr. Hachey, is asked questions he may not even seek the answer to due to regulated codes of conduct that prevent him from having any access to or knowledge of the information being requested; the Companies object to the request on the basis that it is to an entity that is not a party to the docket; the Companies object to the request on the basis that it seeks information that is irrelevant to this proceeding—a proceeding to determine whether PSNH's actions with regard to a specific investment in a scrubber project in a specific geographic region and market were prudent; the Companies object to the request on the basis that it is not relevant to the determination of the prudence of PSNH's investment in the scrubber at Merrimack Station and is not relevant to the policy aspects of this docket. (See *Re Investigation into Whether Certain Calls are Local*, 86 NH PUC 167, 168-169 (2001) (where the Commission, based on a recommendation from Staff, required answers to some but not all discovery questions, following an analysis that denied questions that were too narrow or too broad because they were "not relevant to the policy aspect of the docket.")); and the Companies object to the request on the basis that it is unnecessarily argumentative; it is seeking an admission on an issue that is contested in the docket, which will be decided by the Commission.