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September 2, 2014

## VIA HAND DELIVERY AND EMAIL

Debra Howland Executive Director & Secretary New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, New Hampshire 03301-7319

MHPUC SEP02'14 pm 4:05

RE: DE 11-250, Public Service Company of New Hampshire Investigation of Merrimack Station Scrubber Project and Cost Recovery

Dear Ms. Howland,

Enclosed for filing in the above-referenced docket please find an original and seven copies of Conservation Law Foundation and Sierra Clubs' Objections to PSNHs' Motions in Limine as follows:

- 1. Conservation Law Foundation and Sierra Club's Objection to PSNH's Motion in Limine to Exclude Evidence Relating to Potential Retirement of Merrimack Station as a Means of Avoiding the Installation of Scrubber Technology; and
- 2. Conservation Law Foundation and Sierra Club's Objection to PSNH's Motion in Limine for Limitation of the Participation of the Sierra Club and the Conservation Law Foundation in this Proceeding due to the Issue Preclusion Doctrines of Collateral Estoppel and Res Judicata.

Should you have any questions, please contact me by electronic mail or at (207) 210-6439, ext. 5011. Thank you.

Very truly yours,

Ivy L. Frignoca, Staff Attorney Conservation Law Foundation Maine Advocacy Office 47 Portland Street, Suite 4

Portland, ME 04101 (207) 210-6439 x 5011 ifrignoca@clf.org

cc: Service List in DE 11-250