

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

Response to PSNH's
Motion to Stay Proceedings

NOW COME TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast Inc. (together, "TransCanada"), intervenors in this proceeding, and, pursuant to Admin. Rule Puc 203.07, submit this response to the "Motion to Stay Proceedings" filed by Public Service Company of New Hampshire ("PSNH") in Docket DE 14-238 and DE 11-250.

1. PSNH filed a Motion to Stay Proceedings ("Motion") in this docket and DE 14-238¹ on December 26, 2014. The Motion seeks a stay of the Commission's order in DE 11-250 to allow collaborative and legislative efforts that may resolve the issues under consideration in this docket and in the divestiture docket.

2. The Motion argues that a collaborative process would "promote the orderly and efficient conduct of the proceeding and will not impair the rights of any party." Motion at ¶ 7. It also states that if the Motion is granted, PSNH will update the Commission on the status of the collaborative process and "expeditiously seek a re-initiation of Commission proceedings in both Dockets" if the effort is not successful. Motion at ¶ 6.

¹ TransCanada Power Marketing Ltd. and TransCanada Hydro Northeast Inc. are also intervenors in docket DE 14-238 and support a similar motion being made by the RESA and NEPGA in that related docket.

3. The Motion provides few, if any, details about the collaborative effort.

4. TransCanada is a party to DE 11-250 and has actively participated in the proceeding throughout. While TransCanada does not oppose an effort to resolve the docket through settlement discussions, it submits that the Motion raises a number of questions that should be resolved before the Commission rules on the Motion. Among those questions are: which parties or entities would participate in a collaborative process; how would the process be facilitated; are there time frames for conducting the process; would there be a deadline for completion or for re-initiation of the docket if the settlement effort is unsuccessful; and under whose authority would the settlement process be conducted; are there any parameters for the scope of settlement discussions?

5. While TransCanada does not oppose attempting a collaborative effort to resolve the scrubber docket, it is important that the ground rules and the process be clarified before the Motion is granted. TransCanada also requests, as a party to and active participant in DE 11-250, that it be allowed to fully and fairly participate in any settlement process.

WHEREFORE, TransCanada respectfully requests that the Commission:

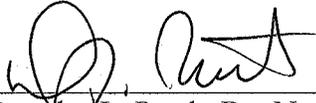
Grant such relief as the Commission deems just and equitable consistent with the issues raised above.

Dated: January 5, 2015

Respectfully submitted,
TransCanada Power Marketing Ltd.
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By Their Attorneys
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Certificate of Service

I hereby certify that on this 5th day of January, 2015 a copy of the foregoing motion was sent by electronic mail to the Service List.



Douglas L. Patch

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