

NH PUC Docket No. DE 11-250
Conservation Law Foundation Responses to
PSNH Data Requests, Set 1

ORIGINAL	
N.H.P.U.C. Case No.	DE 11-250
Exhibit No.	85
Witness	Elizabeth A. Stanton
DO NOT REMOVE FROM FILE	

Date of Request: January 16, 2014

Date of Response: February 13, 2014

Q-PSNH-36. Pages 15-16: Please provide the complete basis for your opinion that it would have been economically prudent for PSNH to consider retirement and/or divestiture for Merrimack in early 2009. Please explain, in detail, what you think would have occurred if PSNH had chosen to pursue either or both of those strategies.

[Note: this question is asked subject to PSNH's pending Motions to Strike. If the Commission rules in PSNH's favor on the relevant Motion, PSNH will withdraw this question].

Witness: Dr. Elizabeth Stanton

Objection: CLF objects to the extent that this request is overbroad, unduly burdensome and not reasonably calculated to lead to admissible evidence. Moreover this question asks Dr. Stanton to speculate and mischaracterizes her testimony which is that PSNH had a duty to investigate these two scenarios at that point in time and to model them then.

Response: Without waiving the objection and to the extent that a response is required, Dr. Stanton's opinion that PSNH should have considered retirement is set forth in her pre-filed testimony.