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N.H.P.U.C. Case	DE 12-295
Exhibit No.	17
Witness	Panel 2
DO NOT RE-FILE	

Public Service Company of New Hampshire  
Docket No. DE 12-295

Data Request NAPG-01  
Dated: 08/07/2013  
Q-NAPG-016-SP01  
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Witness: Charles R. Goodwin, Heather M. Tebbetts  
Request from: North American Power & Gas

**Question:**

Please identify:

- a. All supplier charges imposed by Connecticut and Massachusetts regulators in territories served by PSNH's distribution affiliates;
- b. For each, indicate methodology used to establish such charge, including in particular whether or not the charge is set based on fully embedded costs;
- c. Supplier charges that PSNH is aware of in jurisdictions open to competition other than New Hampshire, Connecticut and Massachusetts that are set based on fully embedded costs.

**Response:**

Original response: Objection: PSNH objects to all parts of this question on the bases that the information sought by the question is not relevant to the docket and is not reasonably calculated to lead to the discovery of admissible evidence in the proceeding. Moreover, to gather the information sought by the question would require a special study or analysis on behalf of the requestor.

Supplemental response:

- a. See PNE-01, Q-PNE-009.
- b. PSNH maintains its objection on the basis that it would require a special study or analysis on behalf of the requestor to gather the requested information.
- c. PSNH has not conducted a study of other states and utilities to determine whether charges assessed by other utilities are based upon embedded costs. Accordingly, PSNH is not aware of whether any charges in other states are based on embedded costs.