

**THE STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

Docket No. DE 11-250  
Investigation of Merrimack Station Scrubber Project and Cost Recovery

Docket No. DE 14-238  
Determination Regarding PSNH's Generation Assets

**MOTION TO STAY PROCEEDINGS**

Pursuant to Rule Puc 203.07, Public Service Company of New Hampshire (“PSNH” or the “Company”) respectfully moves the New Hampshire Public Utilities Commission (“Commission”) to stay the proceedings in Docket Nos. DE 11-250, Investigation of Merrimack Station Scrubber Project and Cost Recovery, and DE 14-238, Determination Regarding PSNH's Generation Assets (collectively, the “Dockets”), to allow collaborative and legislative efforts to progress that may resolve the myriad issues that are currently under consideration in these dockets.

In support of this Motion, PSNH states as follows:

1. The subject Dockets both were instituted as a result of specific legislative enactments and directives, to wit: 2006 N.H. Laws, Chapter 206, the “Scrubber Law,” (codified as RSA 125-O:11-18) for Docket No. 11-250, and 2014 N.H. Laws, Chapter 310, “Relative to the Divestiture of PSNH Assets.” (codified as an amendment to RSA 369-B:3-a, RSA 369-B:3-b and RSA 374-F:2, IV).

2. A Legislative Service Request, LSR #2015-S-0928-R, entitled “relative to electric rate reduction financing and commission action” sponsored by Senate Majority Leader Jeb Bradley has been filed for consideration by the General Court during its upcoming 2015 session.

3. Both Senator Bradley and the Company desire an opportunity to seek a collaborative resolution to the myriad issues that are under consideration in the Dockets.

4. Senator Bradley supports this Motion and has expressly permitted PSNH to represent his support to the Commission in this Motion. Senator Bradley also has indicated that he believes that such discussions, along with requisite legislation, have the potential to provide significant rate, reliability, and public interest benefits.


5. The dynamics affecting the ability to reach a collaborative resolution to the myriad issues would be negatively impacted if the Dockets were to proceed at this time. Hence, the Company and Senator Bradley respectfully request that the Commission stay any further proceedings in the Dockets to allow such a collaborative settlement and legislative initiative to proceed unimpaired.

6. If this Motion is granted, PSNH will update the Commission as to the status of the collaborative process at such intervals as the Commission deems appropriate, and, if such process is unsuccessful, will expeditiously seek a re-initiation of Commission proceedings in both Dockets.

7. PSNH avers that the collaborative process envisioned by the Company and Senator Bradley would promote the orderly and efficient conduct of the proceeding and will not impair the rights of any party. To the extent deemed necessary by the Commission, PSNH requests that the Commission waive the requirements of Rule Puc 203.20 in order to allow the collaborative process discussed herein to proceed.

Respectfully submitted this 26th day of December, 2014.

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**

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### CERTIFICATE OF SERVICE

I hereby certify that on December 26 2014, I served an electronic copy of this filing with each person identified on the Commission's service lists for Docket Nos. DE 11-250 and DE 14-238 pursuant to Rule Puc 203.02(a).



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