

July 29, 2015

*Via Electronic Mail*

**RE: Data Requests from Terry Cronin concerning:**

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

Docket No. DE 11-250, Investigation of Scrubber Costs and Cost Recovery

As defined in RSA 374-F:2,IV and implemented in RSA 374-F:4, V, Terry Cronin respectfully submits the following data requests to Public Service Company of New Hampshire d/b/a/ Eversource Energy ("PSNH"):

1. Please provide a detailed listing of all costs, together with a detailed description of the purpose of the costs, associated with the installation and operations of the wet flue desulphurization project (Scrubber) project at Merrimack Station located in Bow, New Hampshire, that PSNH seeks to recover as stranded costs. Did these project costs that you identified increase the generating capacity of Merrimack Station and if yes, by how much? Please indicate the date and accounting entries for how these costs were booked to the PSNH balance sheet, income statement and cash flow statements by month.
2. Please provide a detailed listing of all costs associated, together with a detailed description of the purpose of the costs, with the Capitalized Projects as well as the Projects Charged to Operation and Maintenance for the Merrimack Unit 2 during the major unit inspection outage that began on April 1, 2008 and ended on May 22, 2008. SEE Docket No. DE 08-145, Data Request TS-01, Dated: 02/09/09, Q-STAFF-002. Did these project costs that you identified increase the generating capacity of Merrimack Station and if yes, by how much? Please explain whether PSNH seeks or sought to recover these expenses as stranded costs. If considered stranded costs by PSNH, then please indicate the date and accounting entries for how these costs were booked to the PSNH balance sheet, income statement and cash flow statements by month.
3. Please provide a detailed listing of all legal costs associated with Docket No. DE 14-238, Determination Regarding PSNH's Generation Assets and Docket No. DE 11-250, Investigation of Scrubber Costs and for any civil actions related to the matters in these dockets that PSNH has recovered or seeks to recover from ratepayers.

**EXHIBIT**

4. Please provide a breakdown by month and summarize by year the PSNH costs recovered under the State of New Hampshire Public Utilities Commission Order Granting Temporary Rates, Order Number 25,346 (dated April 10, 2012) and breakout of the carrying costs or rate of return costs recovered. Please indicate the date and accounting entries for how these costs were booked to the PSNH balance sheet, income statement and cash flow statements. Also, please breakout any recovered costs by ratepayer class.
5. Please provide the annual cost breakdown of how remaining stranded costs are expected to be paid by ratepayer classes as outlined in the Joint Motion for Expedited Approval of Settlement Agreement and Rate Adjustments dated June 10, 2015.
6. Please provide the actual power consumption of the Scrubber in megawatts by year since 2009.
7. Please explain the changes in resource capabilities at Merrimack Station (1 and 2) by year since 2009 as detailed on the attached excel spreadsheet (TC-1).

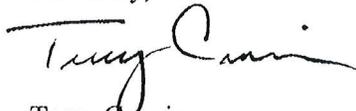
Additionally, Terry Cronin respectfully submits the following request to all settling parties in the Joint Motion for Expedited Approval of Settlement Agreement and Rate Adjustments dated June 10, 2015:

1. Please provide a record by year of any settling party donations or in-kind contributions made to any other settling party involved in this case since Electric Utility Restructuring of 1999.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,



Terry Cronin  
643 Briar Hill Road  
Hopkinton, New Hampshire 03229  
E-Mail: [terry.cronin@tds.net](mailto:terry.cronin@tds.net)

Enclosure

Cc: Discovery Materials Service List, DE 14-238 (electronic mail only)  
Discovery Materials Service List, DE 11-250 (electronic mail only)

### Merrimack Station Generating Facility - Resource Capability (Years 2007-014)\*

Merrimack Station - Winter Capability (MW)							Total Resource Capability - Change from Prior Year
Year	Merrimack 1	Merrimack 2	Merrimack (J1 or CT1)	Merrimack (J2 or CT2)	Total Resource Capability		
2007	114.00	321.53	21.68	21.30	478.51		NA
2008	114.00	321.75	21.68	21.30	478.73		0.22
2009	114.00	321.75	21.68	21.30	478.73		0.00
2010	114.00	337.20	21.70	21.30	494.20		15.47
2011	114.00	343.00	21.70	21.30	500.00		5.80
2012	108.10	330.50	21.70	21.30	481.60		-18.40
2013	108.10	330.50	21.70	21.30	481.60		0.00
2014	108.10	330.50	21.70	21.30	481.60		0.00

Merrimack Station - Summer Capability (MW)							Increase or Decrease from Prior Year
Year	Merrimack 1	Merrimack 2	Merrimack (J1 or CT1)	Merrimack (J2 or CT2)	Total Resource Capability		
2007	112.50	320.00	16.83	16.80	466.13		NA
2008	112.50	320.00	16.83	16.80	466.13		0.00
2009	112.50	320.00	16.83	16.80	466.13		0.00
2010	112.50	338.40	16.80	16.80	484.50		18.37
2011	112.50	338.40	16.80	16.80	484.50		0.00
2012	108.00	330.00	16.80	16.80	471.60		-12.90
2013	108.00	330.00	16.80	16.80	471.60		0.00
2014	108.00	330.00	16.80	16.80	471.60		0.00

\*Source: NH PUC Dockets for PSNH Annual Reconciliations of Energy Services and Stranded Cost

Docket	Date	Testimony and/or Attachments
DE 15-132	5/1/2015	Frederick B. White
DE 14-120	5/1/2014	Frederick B. White
DE 13-108	5/9/2013	Frederick B. White
DE 12-116	5/1/2012	Frederick B. White
DE 11-094	5/2/2011	Frederick B. White
DE 10-121	4/30/2010	David A. Errichetti
DE 09-091	5/1/2009	Richard C. Labrecque
DE 08-66	5/1/2008	Richard C. Labrecque



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**Robert A. Bersak**  
Chief Regulatory Counsel

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August 3, 2015  
Via E-Mail and U.S. Mail

Mr. Terry Cronin  
643 Briar Hill Road  
Hopkinton, NH 03229

**Re: NHPUC Docket No. DE 14-238  
Objections to Data Requests of Terry Cronin**

Dear Mr. Cronin:

On July 29, 2015, you submitted discovery questions to PSNH in the above-captioned docket. Pursuant to Rule Puc 203.09(f), PSNH objects to a number of your questions for the reasons set forth below. In addition, the Settling Parties jointly object to your second question number 1 for the reasons specified below.

**PSNH OBJECTIONS**

**1. Please provide a detailed listing of all costs, together with a detailed description of the purpose of the costs, associated with the installation and operations of the wet flue desulphurization project (Scrubber) project at Merrimack Station located in Bow, New Hampshire, that PSNH seeks to recover as stranded costs. Did these project costs that you identified increase the generating capacity of Merrimack Station and if yes, by how much? Please indicate the date and accounting entries for how these costs were booked to the PSNH balance sheet, income statement and cash flow statements by month.**

PSNH objects to Q-Cronin-1 based upon relevance and materiality. The information sought is beyond the scope of this proceeding, and was included and examined by the Commission as part of Docket No. DE 11-250. Moreover, the question will not reveal information material to this proceeding. *See* RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence." To the extent that Mr. Cronin wishes to examine these costs and accounting details, they may be found at: <http://puc.nh.gov/Regulatory/Docketbk/2011/11-250.html>

**EXHIBIT**

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**2. Please provide a detailed listing of all costs associated, together with a detailed description of the purpose of the costs, with the Capitalized Projects as well as the Projects Charged to Operation and Maintenance for the Merrimack Unit 2 during the major unit inspection outage that began on April 1, 2008 and ended on May 22, 2008. SEE Docket No. DE 08-145, Data Request TS-01, Dated: 02/09/09, Q-STAFF-002. Did these project costs that you identified increase the generating capacity of Merrimack Station and if yes, by how much? Please explain whether PSNH seeks or sought to recover these expenses as stranded costs. If considered stranded costs by PSNH, then please indicate the date and accounting entries for how these costs were booked to the PSNH balance sheet, income statement and cash flow statements by month.**

PSNH objects to Q-Cronin-2 based upon relevance and materiality. The information sought is beyond the scope of this proceeding, and was included as part of Docket No. DE 08-145 and was examined by the Commission in reaching its decision in that docket (add cite to order here). Moreover, the question will not reveal information material to this proceeding. *See* RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence." To the extent Mr. Cronin wishes to examine these costs he may refer to:

<http://puc.nh.gov/Regulatory/Docketbk/2008/08-145.htm>

**3. Please provide a detailed listing of all legal costs associated with Docket No. DE 14-238, Determination Regarding PSNH's Generation Assets and Docket No. DE 11-250, Investigation of Scrubber Costs and for any civil actions related to the matters in these dockets that PSNH has recovered or seeks to recover from ratepayers**

PSNH objects to Q-Cronin-3 based upon relevance and materiality, and because the question requires speculation. Legal costs of the instant docket (DE 14-238) will not be known until the proceeding has been completed, and any estimate of such legal costs would require speculation regarding the outcome of this proceeding, potential rehearing proceedings, judicial appeals, and the like. The information sought relating to Docket No. DE 11-250 is beyond the scope of this proceeding and because the docket is still open those costs cannot be finally determined. Moreover, the question will not reveal information material to this proceeding. *See* RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence."

**6. Please provide the actual power consumption of the Scrubber in megawatts by year since 2009.**

PSNH objects to Q-Cronin-6 based upon relevance and materiality. The actual power consumption of the Scrubber in megawatts has no relevance to the scope of this proceeding. Moreover, the question will not reveal information material to this proceeding. *See* RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence."

**7. Please explain the changes in resource capabilities at Merrimack Station (1 and 2) by year since 2009 as detailed on the attached excel spreadsheet (TC-1).**

PSNH objects to Q-Cronin-7 based upon relevance and materiality. Any changes in resource capabilities at Merrimack Station have no relevance to the scope of this proceeding. Moreover, the question will not reveal information material to this proceeding. See RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence."

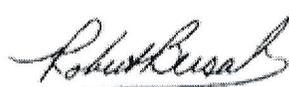
**JOINT OBJECTION OF SETTLING PARTIES**

**1. Please provide a record by year of any settling party donations or in-kind contributions made to any other settling party involved in this case since Electric Utility Restructuring of 1999.**

PSNH and the other Settling Parties jointly object to the second Q-Cronin-1 which was addressed to all of the Settling Parties, based upon relevance and materiality, and because information related to the question is publically available. The nature and extent of any donations or contributions made by or between the Office of Energy and Planning, Designated Advocate Staff of the New Hampshire Public Utilities Commission, the Office of Consumer Advocate, New Hampshire District 3 Senator Jeb Bradley, New Hampshire District 15 Senator Dan Feltes, the City of Berlin, New Hampshire, Local No. 1837 of the International Brotherhood of Electrical Workers, the Conservation Law Foundation, the Retail Energy Supply Association, TransCanada Power Marketing Ltd., TransCanada Hydro Northeast Inc., New England Power Generators Association, Inc., the New Hampshire Sustainable Energy Association d/b/a NH CleanTech Council, Public Service Company of New Hampshire d/b/a Eversource Energy and Eversource Energy over the past sixteen year period has no relevance to the scope of this proceeding. Moreover, the question will not reveal information material to this proceeding. See RSA 541-A:33, "the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence." In addition, political contributions, if any, are reported publically as required by relevant state and federal campaign laws.

Thank you for your consideration of these objections. If you have any questions, please let me know.

Sincerely,



Robert A. Bersak  
Chief Regulatory Counsel

cc: Service List, per Rule Puc 203.09(d), via email.