

EXHIBIT 1



CELEBRATING 30 YEARS OF SERVICE TO OUR CLIENTS

*Please respond to our Meredith offices*

October 16, 2015

To All Parties via Email

RE: Docket #DE 14-238  
Public Service Co. of NH d/b/a Eversource Energy  
Determination Regarding PSNH's Generation Assets

Good Afternoon All:

Attached please find a copy of the City of Berlin's and the Town of Gorham's List of Areas of Inquiry and Document Requests for the La Capra Witness in advance of the Tech Session/Deposition scheduled for Monday, October 26, 2015 at 9 a.m..

Very truly yours,  
**DONAHUE, TUCKER & CIANDELLA, PLLC**

Christopher L. Boldt, Esq.  
[cboldt@dtclawyers.com](mailto:cboldt@dtclawyers.com)

Enclosure

cc: Jim Wheeler, Berlin City Manager (via email)  
Robin Frost, Gorham Town Manager (via email)  
Service List Attached (via email)  
George E. Sansoucy (via email)

MICHAEL J. DONAHUE  
CHARLES F. TUCKER  
ROBERT D. CIANDELLA  
LIZABETH M. MACDONALD  
JOHN J. RATIGAN  
DENISE A. POULOS  
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DOUGLAS M. MANSFIELD  
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**The City of Berlin's and the Town of Gorham's  
Areas of Inquiry and Document Requests for La Capra Witness  
DE 14-238**

1. An unredacted copy of the original LaCapra report (dated March 31, 2014 – “the Original Report”) of which the report dated August 17, 2015 (“the Update”) previously provided is an update.
2. All unredacted comparable sales data considered or used in the creation of the Original Report;
3. All unredacted comparable sales data considered or used in the creation of the Update;
4. All unredacted DCF's used, prepared or considered in the creation of the Original Report;
5. All unredacted DCF's used, prepared or considered in the creation of the Original Report;
6. All unredacted documents supporting the increase in value of the Newington Station as reported in the Update;
7. All unredacted documents supporting the decrease in value of the Smith Station as reported in the Update; and
8. All unredacted documents supporting the decrease in value of the Gorham Station as reported in the Update.

**Please note that the City/Town's Attorney and consulting expert are willing to sign a comparable Non-Disclosure Agreement for this information as they did for the unredacted version of the Update.**

**We respectfully request that the documents be tendered before close of business on October 21, 2015 if at all possible.**

EXHIBIT 2

## Eric A. Maher

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**From:** Speidel, Alexander <Alexander.Speidel@puc.nh.gov>  
**Sent:** Wednesday, October 21, 2015 9:23 AM  
**To:** Christopher Boldt; Sheehan, Michael; PUC - Executive.Director; Noonan, Amanda; andrew.hamilton@mclane.com; catherine.corkery@sierraclub.org; Marsellos, Catherine; cholahan@nepga.org; christine.vaughan@nu.com; Christopher.aslin@doj.nh.gov; christopher.goulding@nu.com; dan.feltes@leg.state.nh.us; daniel.allegretti@exeloncorp.com; Shulock, David; ddolan@nepga.org; Dean.murphy@brattle.com; dpatch@orr-reno.com; Nixon, Elizabeth; elizabeth.tillotson@nu.com; eric.chung@nu.com; Ross, F. Anne; fedelblut@gmail.com; gilfavor@comcast.net; Siwinski, Grant; harringt@metrocast.net; howard.moffett@leg.state.nh.us; ifrignoca@clf.org; Brennan, James J; james.mccaffrey@sierraclub.org; Dudley, Jay E; jeb.bradley@leg.state.nh.us; kate@nhsea.org; kristi.davie@nu.com; Stachow, Leszek; lisa.cameron@brattle.com; mark.berkman@brattle.com; matthew.fossum@eversource.com; mayoac@nu.com; mayor@manchesternh.gov; melissa.lauderdale@constellation.com; Hatfield, Meredith; mike@ridgesend.com; nhlocal@ibew1837.org; PUC - OCA Litigation; pcrampton@gmail.com; pjaesd@comcast.net; Chattopadhyay, Pradip K; Chagnon, Richard; rick.white@nu.com; rmunnelly@davismalm.com; robert.bersak@nu.com; sgeiger@orr-reno.com; slamb@biaofnh.com; Chamberlin, Susan W; Amidon, Suzanne; terry.cronin@tds.net; tirwin@clf.org; Frantz, Tom; william.smagula@nu.com; zachary.fabish@sierraclub.org; Eric A. Maher  
**Subject:** RE: DE 14-238 La Capra technical session

Chris,

The Commission, at the recent hearing, plainly indicated that they granted the Non-Advocate Staff's request for a technical session along the lines proposed by Non-Advocate Staff. That means oral interrogatories only. Might I remind you that the original concept on the table was for Advocate/Settling Staff to take LaCapra on for its own purposes, without any opportunity for third parties to ask any questions of LaCapra at all, prior to the preparation of some sort of "rebuttal" testimonial presentation. LaCapra also did not present any testimony subject to discovery on behalf of Non-Advocate Staff. This entire process is a good-faith accommodation to enable the various parties to probe into the 2014 LaCapra report and 2015 update through oral questions on a written record, not a full round of document-production discovery.

To quote an old saying... "you give them an inch, and they'll take a mile"... please make use of the oral interrogatories on Monday to the best of your ability. Thank you.

Alex

Alexander F. Speidel, Esq.  
Staff Attorney/Hearings Examiner  
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(603) 271-6016  
[Alexander.Speidel@puc.nh.gov](mailto:Alexander.Speidel@puc.nh.gov)

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**From:** Christopher Boldt [mailto:CBoldt@dtclawyers.com]  
**Sent:** Tuesday, October 20, 2015 4:56 PM  
**To:** **Subject:** RE: DE 14-238 La Capra technical session  
**Importance:** High

I respectfully disagree, Alex. As you well know, not only are document productions frequently associated with depositions, I along with others specifically raised this issue during our discussions setting up this deposition; and I timely tendered my requests last Friday in compliance with those discussions. The Update is obviously an "update of something" and I for one need the underlying "something" to appropriately question the La Capra team. I would hate to have to file an Objection and/or Motion to Continue or Reconvene this deposition to a date that may not be as convenient to the La Capra team, which would have the undesired effect of delaying the hearing further. I respectfully request that you reconsider your position on this issue.

Chris Boldt, Esq.  
Donahue, Tucker & Ciandella, PLLC

Direct Dial: 766-4573 (Meredith, NH)

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**From:** Speidel, Alexander [mailto:Alexander.Speidel@puc.nh.gov]  
**Sent:** Tuesday, October 20, 2015 4:34 PM  
**To:** Christopher Boldt; Sheehan, Michael; PUC - Executive.Director; Noonan, Amanda; [andrew.hamilton@mclane.com](mailto:andrew.hamilton@mclane.com); [catherine.corkery@sierraclub.org](mailto:catherine.corkery@sierraclub.org); Marsellos, Catherine; [cholahan@nepga.org](mailto:cholahan@nepga.org); [christine.vaughan@nu.com](mailto:christine.vaughan@nu.com); [Christopher.aslin@doj.nh.gov](mailto:Christopher.aslin@doj.nh.gov); [christopher.goulding@nu.com](mailto:christopher.goulding@nu.com); [dan.feltes@leg.state.nh.us](mailto:dan.feltes@leg.state.nh.us); [daniel.allegretti@exeloncorp.com](mailto:daniel.allegretti@exeloncorp.com); Shulock, David; [ddolan@nepga.org](mailto:ddolan@nepga.org); [Dean.murphy@brattle.com](mailto:Dean.murphy@brattle.com); [dpatch@orr-reno.com](mailto:dpatch@orr-reno.com); Nixon, Elizabeth; [elizabeth.tillotson@nu.com](mailto:elizabeth.tillotson@nu.com); [eric.chung@nu.com](mailto:eric.chung@nu.com); Ross, F. Anne; [fedelblut@gmail.com](mailto:fedelblut@gmail.com); [gilfavor@comcast.net](mailto:gilfavor@comcast.net); Siwinski, Grant; [harringt@metrocast.net](mailto:harringt@metrocast.net); [howard.moffett@leg.state.nh.us](mailto:howard.moffett@leg.state.nh.us); [ifrignoca@clf.org](mailto:ifrignoca@clf.org); Brennan, James J; [james.mccaffrey@sierraclub.org](mailto:james.mccaffrey@sierraclub.org); Dudley, Jay E; [jeb.bradley@leg.state.nh.us](mailto:jeb.bradley@leg.state.nh.us); [kate@nhsea.org](mailto:kate@nhsea.org); [kristi.davie@nu.com](mailto:kristi.davie@nu.com); Stachow, Leszek; [lisa.cameron@brattle.com](mailto:lisa.cameron@brattle.com); [mark.berkman@brattle.com](mailto:mark.berkman@brattle.com); [matthew.fossum@eversource.com](mailto:matthew.fossum@eversource.com); [mayoac@nu.com](mailto:mayoac@nu.com); [mayor@manchesternh.gov](mailto:mayor@manchesternh.gov); [melissa.lauderdale@constellation.com](mailto:melissa.lauderdale@constellation.com); Hatfield, Meredith; [mike@ridgesend.com](mailto:mike@ridgesend.com); [nhlocal@ibew1837.org](mailto:nhlocal@ibew1837.org); PUC - OCA Litigation; [pcramton@gmail.com](mailto:pcramton@gmail.com); [pjaesd@comcast.net](mailto:pjaesd@comcast.net); Chattopadhyay, Pradip K; Chagnon, Richard; [rick.white@nu.com](mailto:rick.white@nu.com); [rmunnelly@davismalm.com](mailto:rmunnelly@davismalm.com); [robert.bersak@nu.com](mailto:robert.bersak@nu.com); [sgeiger@orr-reno.com](mailto:sgeiger@orr-reno.com); [slamb@biaofnh.com](mailto:slamb@biaofnh.com); Chamberlin, Susan W; Amidon, Suzanne; [terry.cronin@tds.net](mailto:terry.cronin@tds.net); [tirwin@clf.org](mailto:tirwin@clf.org); Frantz, Tom; [william.smagula@nu.com](mailto:william.smagula@nu.com); [zachary.fabish@sierraclub.org](mailto:zachary.fabish@sierraclub.org); Eric A. Maher  
**Subject:** RE: DE 14-238 La Capra technical session

Chris,

Just by way of clarification, this is a deposition-type platform through which oral questions will be answered on a transcript record for the benefit of the parties, not a document-production exercise. Therefore, there is no obligation for LaCapra to provide these documents in response to your inquiry. However, you may wish to probe issues related to the hydro asset valuations' update through interrogatories on Monday.

Thanks,

Alex

Alexander F. Speidel, Esq.

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**From:** Christopher Boldt [<mailto:CBoldt@dtclawyers.com>]  
**Sent:** Tuesday, October 20, 2015 4:26 PM  
**To: Subject:** RE: DE 14-238 La Capra technical session

Thanks, Mike. What about prior access to the La Capra documents we requested last week? As we stated, we're happy to sign off on a similar Non-Disclosure Agreement to the one signed for the Update to gain access to these underlying related documents.

Chris

P.S. I have still not received a pass from Carroll County Superior Court on my Jury Duty call for Monday morning. Accordingly, I respectfully request to go at the end of the "remaining parties" line in the hopes of being able to actually attend. I will be sending one of my Associates to observe in my stead. Thanks for the flexibility under the circumstances. C

Chris Boldt, Esq.  
Donahue, Tucker & Ciandella, PLLC

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**From:** Sheehan, Michael [<mailto:Michael.Sheehan@puc.nh.gov>]  
**Sent:** Tuesday, October 20, 2015 3:55 PM  
**To:** PUC - Executive.Director; Speidel, Alexander; Noonan, Amanda; 'andrew.hamilton@mclane.com'; 'catherine.corkery@sierraclub.org'; Marsellos, Catherine; Christopher Boldt; 'cholahan@nepga.org'; 'christine.vaughan@nu.com'; 'Christopher.aslin@doj.nh.gov'; 'christopher.goulding@nu.com'; 'dan.feltes@leg.state.nh.us'; 'daniel.allegretti@exeloncorp.com'; Shulock, David; 'ddolan@nepga.org'; 'Dean.murphy@brattle.com'; 'dpatch@orr-reno.com'; Nixon, Elizabeth; 'elizabeth.tillotson@nu.com'; 'eric.chung@nu.com'; Ross, F. Anne; 'fedelblut@gmail.com'; 'gilfavor@comcast.net'; Siwinski, Grant; 'harringt@metrocast.net'; 'howard.moffett@leg.state.nh.us'; 'ifrignoca@clf.org'; Brennan, James J; 'james.mccaffrey@sierraclub.org'; Dudley, Jay E; 'jeb.bradley@leg.state.nh.us'; 'kate@nhsea.org'; 'kristi.davie@nu.com'; Stachow, Leszek; 'lisa.cameron@brattle.com'; 'mark.berkman@brattle.com'; 'matthew.fossum@eversource.com'; 'mayoac@nu.com'; 'mayor@manchesternh.gov'; 'melissa.lauderdale@constellation.com'; Hatfield, Meredith; Sheehan, Michael; 'mike@ridgesend.com'; 'nhlocal@ibew1837.org'; PUC - OCA Litigation; 'pcramton@gmail.com'; 'pjaesd@comcast.net'; Chattopadhyay, Pradip K; Chagnon, Richard; 'rick.white@nu.com'; 'rmunnely@davismalm.com'; 'robert.bersak@nu.com'; 'sgeiger@orr-reno.com'; 'slamb@biaofnh.com'; Chamberlin, Susan W; Amidon, Suzanne; 'terry.cronin@tds.net'; 'tirwin@clf.org'; Frantz, Tom; 'william.smagula@nu.com'; 'zachary.fabish@sierraclub.org'  
**Subject:** DE 14-238 La Capra technical session

To the parties,

I write to describe the process Staff expects to follow at next Monday's technical session, at which we will make our consultant La Capra available for questions as recently ordered by the Commission.

First, both Dick Hahn and Dan Koehler plan to attend from La Capra and will sit as a panel. I have provided them with your filings from last week regarding the expected areas of inquiry.

Second, the session will be conducted much like a deposition in civil litigation. Messrs. Hahn and Koehler will be sworn, a court reporter will record the entire session, and a transcript will be prepared in the normal course. We propose that no objections need to be lodged during the session in order to preserve a later argument about admissibility, although Alex or I will likely step in if we think the questioning is too far off course. I trust we can resolve any scoping issues during the session.

Third, parties will have the opportunity to ask questions in the following order: Non-Advocate Staff, Settling Staff, Eversource, OCA, OEP, and the remaining parties with questions in alphabetical order (using the first letter of last names for natural persons, and the first letter of corporation, municipal or organizational names). Non-Advocate Staff will likely ask limited follow-up questions at the end of the session.

Fourth, although the Commission did not appoint a hearings examiner, David Shulock (Director of the Legal Division at the Commission) will be available later in the morning to help resolve any disputes that may arise.

Finally, if a question or its response implicates information subject to the recent La Capra motion for confidential treatment or other proprietary business information of La Capra, there will be confidential segments of the session at which parties that do not have access to such information by agreement or by right will be required to leave the hearing room.

Staff looks forward to a productive session.

Mike

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