

Attachment A

OCA Responses to PSNH's Data Requests that are the Subject of this Motion

DE 11-250
Public Service Company of New Hampshire
Investigation of Scrubber Costs & Cost Recovery
OCA's Responses to PSNH's Data Requests – Set #1

Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-83

Witness: Legal

Request: Please provide a copy of any document provided to any elected or appointed government official in New Hampshire by OCA related to "An ACT relative to the reduction of mercury emissions" that took effect on June 8, 2006.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Request No.: PSNH 1-84

Date of Response: February 7, 2014

Witness: Legal

Request: Please identify any individual employed by or otherwise compensated by OCA to work on its behalf concerning "An ACT relative to the reduction of mercury emissions" that took effect on June 8, 2006.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014
Request No.: PSNH 1-85

Date of Response: February 7, 2014
Witness: Legal

Request: Please provide a copy of any document provided to any elected or appointed government official in New Hampshire by OCA related to Senate Bill 152 and House Bill 496 in 2009.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-86

Witness: Legal

Request: Please identify any individual employed by or otherwise compensated by OCA to work on its behalf concerning Senate Bill 152 and House Bill 496 in 2009.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-87

Witness: Legal

Request: Please provide all documents exchanged between OCA and the U.S. Environmental Protection Agency from 2006 to the present related to the "affected sources" as defined in RSA 125-O:12, I.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-88

Witness: Legal

Request: Please provide copies of any and all correspondence that OCA had with NHDES that pertains to the "affected sources" as defined in RSA 125-O:12, I.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-89

Witness: Legal

Request: Please provide copies of any and all documents that OCA provided to DES, any legislator or any state official concerning the "affected sources" as defined in RSA 125-O:12, I.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-93

Witness:

Request: Who if anyone attended hearings or testified before the Legislature on behalf of OCA relating to the consideration of House Bill 1673 during the 2006 legislative session? Provide copies of all documents provided to the legislature by OCA.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-94

Witness:

Request: Who if anyone testified before the Legislature on behalf of OCA relating to the consideration of House Bill 496 and/or Senate Bill 152 during the 2009 legislative session? Provide copies of all documents provided to the legislature by OCA.

Response: Objection. The request is not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-103

Witness:

Request: The purpose clause of the Scrubber Law, RSA 125-O:11 finds installation of the scrubber to be in the public interest of the citizens of New Hampshire and the customers of the affected sources; it also refers to the careful and thoughtful balancing of the cost and benefits. OCA discusses some of the costs, but not the potential benefits.

- a. Please provide a listing of all possible "benefits" that the Legislature may have included in the referenced "balancing."
- b. Do you agree that maintenance of a tax base for state and property taxes is such a potential "benefit"? If your response to this question is no, please explain.
- c. Do you agree continued viability of the rail line from Nashua to Concord is such a potential "benefit"? If your response to this question is no, please explain.
- d. Do you agree fuel diversity in electric generation in the region is a potential "benefit"? If your response to this question is no, please explain.
- e. Do you agree reliability of the electric grid in the region is a potential "benefit"? If your response to this question is no, please explain.
- f. Do you agree the lessening of the state's dependence upon other sources of electrical power which may, from time to time, be uncertain is such a potential "benefit"? If your response to this question is no, please explain.
- g. Do you agree the retention in-state of energy expenditures is a potential "benefit"? If your response to this question is no, please explain.
- h. Do you agree the creation of jobs is such a potential "benefit"? If your response to this question is no, please explain.
- i. Do you agree the retention of jobs is such a potential "benefit"? If your response to this question is no, please explain.

Response: Objection. The requests require speculation and are not reasonably calculated to lead to the discovery of information that is relevant and admissible in this proceeding.

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Date Received: January 16, 2014

Date of Response: February 7, 2014

Request No.: PSNH 1-104

Witness:

Request: Is OCA intending to challenge in any manner the final reports produced by Jacobs Consultancy Inc. which was retained by the NHPUC to monitor and report on PSNH's Clean Air Project at Merrimack Station? If so, please explain and identify in detail all areas of the Jacobs' reports you are challenging.

Response: Objection. The question is overly broad.