

April 30, 2014

For a thriving New England

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MHP16: APR30/14 PM 4:08

VIA HAND DELIVERY AND EMAIL

Debra Howland Executive Director & Secretary New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, New Hampshire 03301-7319

RE: DE 11-250 PSNH Investigation of Scrubber Costs and Cost Recovery

Dear Ms. Howland,

Recently, on April 23, 2014, I submitted two revised exhibits prepared by Dr. Stanton in support of her pre-filed testimony. In essence, Dr. Stanton discovered that she incorrectly used 2008 emission rates for SO₂ for all years. She has now corrected her error and used emission reductions per EPA IPM v4.1 Appendix 5-1a (Sargent & Lundy). She revised exhibits 4 and 7 accordingly, which has caused there to be a very slight change in her testimony. That change occurs on pp. 14 and 15 of her testimony as follows:

As shown in Exhibit 7, at Merrimack's 2008 capacity factor of 72 percent four out of five of these scenarios resulted in negative net benefits (that is, net costs) for ratepayers. The only scenario in which building the scrubber resulted in net benefits for ratepayers was one in which both gas prices were high (resulting in high energy replacement costs for PSNH in the Merrimack retirement case) and environmental control requirements were low (resulting in low capital addition costs for PSNH in the continued operation of Merrimack case). In this scenario, net benefits to ratepayers would be expected as long as the Merrimack's capacity factor did not drop below 60-40 percent.

In other words, she now intends to testify that in the high gas price low environmental control scenario "net benefits to ratepayers would be expected as long as the Merrimack's capacity factor did not drop below 40 percent" rather than "net benefits to ratepayers would be expected as long as the Merrimack's capacity factor did not drop below 60 percent", the figure in her original pre-filed testimony.

Per the suggestion of Attorney Amidon, I am enclosing revised pp. 14-15 to be inserted in to Dr. Stanton's pre-filed testimony. Thank you for your attention to this matter, and please do not hesitate to contact me with any questions or concerns by electronic mail or at (207) 210-6439.

Very truly yours,

Ivy L. Frignoca, Staff Attorney Conservation Law Foundation Maine Advocacy Office 47 Portland Street, Suite 4 Portland, ME 04101 (207) 210-6439 x 5011 ifrignoca@clf.org

cc: Service List in DE 11-250