

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

PNE ENERGY SUPPLY, LLC D/B/A POWER NEW ENGLAND

Petition for Review of Public Service Company of New Hampshire's Services and Charges to
Competitive Electric Suppliers
Docket No. DE 12-295

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S MOTION TO STAY
PENDING DECISIONS ON ITS MOTIONS TO COMPEL**

NOW COMES Public Service Company of New Hampshire ("PSNH" or the "Company") and respectfully requests that the Commission stay the above-referenced docket pending resolution of its motions to compel responses to certain data requests. In support hereof, PSNH says the following:

1. On October 10, 2012, PNE Energy Supply LLC requested that the Commission open a docket for the purpose of reviewing certain charges assessed by PSNH to competitive electric power suppliers operating in PSNH's service territory. Consistent with the procedural schedule in the docket, on March 26, 2013 various competitive suppliers, including North American Power and Gas, LLC ("NAPG") and Electricity N.H. LLC d/b/a E.N.H. Power ("ENH"), submitted pre-filed testimony. On April 18, 2013, PSNH submitted data requests to NAPG and ENH and on April 26, both objected to certain of PSNH's requests. On April 30, both NAPG and ENH responded to certain requests, but elected to maintain their objections on others. Contemporaneous with this motion, on May 13, 2013, PSNH filed motions to compel relating to various questions asked of NAPG and ENH and to which they had objected.

2. According to the procedural schedule in this docket, the next event scheduled is the filing of testimony of Staff and Intervenors, including PSNH, on May 28, 2013. Without

decisions from the Commission on the outstanding motions to compel, PSNH is not able to effectively prepare such testimony. As a result, PSNH requests that the Commission stay the procedural schedule in Docket No. DE 12-295 pending the Commission's decisions on the outstanding motions.


WHEREFORE, PSNH respectfully requests that the Commission:

- A. Stay the procedural schedule pending resolution of the outstanding motions to compel;
- and
- B. Order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

May 13, 2013
Date

By: 
Matthew J. Fossum
Counsel
780 North Commercial Street
Post Office Box 330
Manchester, New Hampshire 03105-0330
(603) 634-2961
Matthew.Fossum@nu.com

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Motion to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

May 13, 2013
Date


Matthew J. Fossum