THE STATE OF NEW HAMPSHIRE

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PUBLIC UTILITIES COMMISSION

21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429

January 29, 2016

Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 S. Fruit Street Suite 10 Concord, NH 03301

Re: DE 14-238 Public Service Company of New Hampshire

Determination Regarding PSNH's Generation Assets Objection to Request for Administrative Notice

Dear Ms. Howland:

The undersigned, on behalf of Staff Advocates in this proceeding, files this objection to the request for administrative notice, filed on January 21, 2016, by intervenor, Terry Cronin.

Staff Advocates assent to the request that the Commission take administrative notice of the report prepared by La Capra Associates and titled "PSNH Generation Asset and PPA Valuation Report" dated March 31, 2014, and filed in Docket IR 13-020 as part of item number 25 on April 1, 2014. Staff Advocates, pursuant to Puc 203.27(c), reserve the right to contest any attempts by intervenor Cronin to claim any prior Commission findings concerning the analysis, assumptions or conclusions contained in the report.

Staff Advocates object to the request that the Commission take administrative notice of the Deposition of La Capra Associates held on October 26, 2015, because the transcript of that deposition was already filed in this docket on November 12, 2015, as item number 155. As a result the deposition does not fall into Puc 203.27(2) or any other sub-section of the Commission's administrative notice rule.

Finally, Staff Advocates object to the request that the Commission take administrative notice of the August 15, 2015 update report prepared by La Capra Associates. That update is not filed in Docket IR 13-020. As a result the report does not fall into Puc 203.27(2) or any other sub-section of the Commission's administrative notice rule.

Very truly yours,

F. Anne Ross, Esq.

cc: Arthur B. Cunning ham, Esq.

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Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with: DEBRA A HOWLAND

EXEC DIRECTOR

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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.

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