

ORIGINAL	
N.H.P.U.C. Case No.	DE 11-250
Exhibit No.	# 72
Witness	DE Ranajit Sahu
DO NOT REMOVE FROM FILE	
Data Request PSNH-SC-001	
Dated: January 16, 2014	
Q-PSNH-SC-005	

New Hampshire PUC Docket DE 11-250

Witness: Ranajit Sahu
Request from: Public Service Company of New Hampshire

Question 5:

5. Page 3: You state that PSNH "did not consider these risks." Please provide any and all evidence you possess or rely upon that you assert in any way supports this statement.

Response to Question 5:

Sierra Club objects to Question 5 on the grounds that it is unduly burdensome in that it seeks production of materials either already in the possession of PSNH or which are publicly available.

Subject to and without waiving the objections above, Sierra Club responds that documents do not appear to be in the record indicating that PSNH did consider these risks as part of its decision to move forward with the scrubber project; Gary Long discussed the decision to move forward with the scrubber project during his September 2013 deposition, and he gave no indication that the risks Ranajit Sahu discusses in his testimony entered into the decision.