

Public Service Company of New Hampshire  
Docket No. DE 08-077

Data Request CONST-01  
Dated: 07/08/2008  
Q-CONST-014  
Page 1 of 1

**Witness:** Tod Wicker  
**Request from:** Constellation New Energy and Constellation Energy Commodities Group

**Question:**

How many renewable energy certificates are projected to be generated by any other generation resources owned by PSNH for 2008 and thereafter? For each such resource please list the number of certificates that PSNH expects to receive and the class of certificates pursuant to RSA 362-F.

**Response:**

PSNH objects to the question as beyond the scope and irrelevant to the issue of whether the agreements with Lempster Wind LLC are in the public good.

In spite of its objection and not waiving its objection, PSNH says the following. PSNH has applied for Class I certification for the Schiller Unit 5 converted boiler and for the incremental output from upgrades made to the hydroelectric generator at Smith Station in Berlin, New Hampshire. PSNH has applied for Class 4 certification for several of its other small hydroelectric generators. Until those certifications are approved and when they become effective, PSNH cannot determine how many RECs will be generated.

Public Service Company of New Hampshire  
Docket No. DE 08-077

Data Request CONST-01  
Dated: 07/08/2008  
Q-CONST-016  
Page 1 of 1

**Witness:** Tod Wicker  
**Request from:** Constellation New Energy and Constellation Energy Commodities Group

**Question:**

Ref. Wicker testimony at page 9, lines 7-8. Please explain and provide supporting documentation for the statement that the contract price for the renewable energy certificates is less than current market prices. (Among other things, your response should specify the market prices for renewable energy certificates that is referred to.) Please specify the form and value of the consideration given by PSNH to be able to obtain the renewable energy certificates at less than market price.

**Response:**

Responding to this request would reveal the pricing terms of the agreement, which Constellation is not entitled to receive pursuant to the Commission granting PSNH's Motion for Confidential treatment in this docket.

Public Service Company of New Hampshire  
Docket No. DE 08-077

Data Request CONST-01  
Dated: 07/08/2008  
Q-CONST-017  
Page 1 of 1

**Witness:** Tod Wicker  
**Request from:** Constellation New Energy and Constellation Energy Commodities Group

**Question:**

Ref. Wicker testimony at page 10, lines 1-6. Please explain and provide supporting documentation for the statement that PSNH believes that the contract prices for capacity and energy are below market. (Among other things, your response should specify the market prices for capacity and energy that are referred to.) Please specify the form and value of the consideration given by PSNH to be able to obtain capacity and energy at less than market prices.

**Response:**

Please see the response to CONST-01, Q-CONST-016.

**Public Service Company of New Hampshire**  
**Docket No. DE 08-077**

**Data Request CONST-01**  
**Dated: 07/08/2008**  
**Q-CONST-023**  
**Page 1 of 1**

**Witness: Tod Wicker**  
**Request from: Constellation New Energy and Constellation Energy Commodities Group**

**Question:**

Please provide a copy of any document that contains any analysis, study or discussion concerning PSNH's decision to enter into a contract with the Lempster project, including but not limited to the decision to enter into a long term arrangement. Please specify how the specific term of the power purchase agreement was arrived at.

**Response:**

Please see the responses to NOCA-01, Q-NOCA-009 and CONST-01, Q-CONST-016.

Public Service Company of New Hampshire  
Docket No. DE 08-077

Data Request CONST-02  
Dated: 07/15/2008  
Q-CONST-007  
Page 1 of 1

Witness: Tod Wicker  
Request from: Constellation New Energy and Constellation Energy Commodities Group

Question:

To the extent not previously provided in response to any other data request by Constellation, please provide a table showing the number of renewable energy certificates, by class and year, that PSNH projects it will need to acquire during the period 2008-2023. If PSNH does not have a projection for the entire period, provide the best information available at this point.

Response:

PSNH objects to this question on the ground that the information it seeks is not relevant to the issue pending before the Commission. Notwithstanding this objection, the answer to the number of NH Class I RECs is provided in my testimony at page 7, lines 5 through 10.

Witness: Tod Wicker  
Request from: Constellation New Energy and Constellation Energy Commodities Group

Question:

To the extent not previously provided in response to any other data request by Constellation, please provide a table showing the number of renewable energy certificates, by class and year, that PSNH currently has the right to obtain (whether from its own assets or those under contract) during the period 2008-2023. Your response should specify the source of each certificate and the number from each such source for each such year and class and should include the certificates attributable to the Lempster Project.

Response:

PSNH objects to this question on the ground that the information it seeks is not relevant to the issue pending before the Commission. Notwithstanding this objection, the number of Class I RECs available from this Project is covered in my testimony on page 7, lines 11 through 18. PSNH has filed for (but not yet been certified for) NH RECs for its Northern Wood Power plant and the upgrade to Smith Hydro. It is possible these projects, if approved, could produce between 300,000 to 350,000 Class I RECs annually.

**Public Service Company of New Hampshire  
Docket No. DE 08-077**

**Data Request CONST-03  
Dated: 07/31/2008  
Q-CONST-004  
Page 1 of 1**

**Witness: Tod Wicker  
Request from: Constellation New Energy and Constellation Energy Commodities  
Group**

**Question:**

Ref. Data Request Constellation 1-14. Please specifically identify each PSNH generating unit referred to in the response and for each provide the number and class of renewable energy certificates that PSNH is seeking.

**Response:**

PSNH renews its objection originally noted in its response to CONST 01-014. See also the response to CONST 02-008.

**Public Service Company of New Hampshire  
Docket No. DE 08-077**

**Data Request CONST-03  
Dated: 07/31/2008  
Q-CONST-005  
Page 1 of 1**

**Witness: Tod Wicker  
Request from: Constellation New Energy and Constellation Energy Commodities  
Group**

**Question:**

Ref. Data Request Constellation 1-16. Please provide a complete detailed written response. If it is necessary to redact specific portions of the response in order to comply in good faith with the Commission's order in this case regarding PSNH's motion for protective order, please provide Constellation and Freedom Energy Partners with an appropriately redacted version of the response and provide Staff and OCA with an unredacted version of the response.

**Response:**

The Commission Staff and OCA already have this information available by virtue of having a copy of the unredacted testimony and contracts. Constellation and Freedom have the redacted information in their possession, so there is nothing more to be provided.



**Public Service Company of New Hampshire  
Docket No. DE 08-077**

**Data Request CONST-03  
Dated: 07/31/2008  
Q-CONST-006  
Page 1 of 1**

**Witness: Tod Wicker  
Request from: Constellation New Energy and Constellation Energy Commodities  
Group**

**Question:**

Ref. Data Request Constellation 1-17. Please provide a complete detailed written response. If it is necessary to redact specific portions of the response in order to comply in good faith with the Commission's order in this case regarding PSNH's motion for protective order, please provide Constellation and Freedom Energy Partners with an appropriately redacted version of the response and provide Staff and OCA with an unredacted version of the response.

**Response:**

Please see the response to CONST-03, Q-CONST-005.

**Public Service Company of New Hampshire**  
**Docket No. DE 08-077**

**Data Request CONST-03**  
**Dated: 07/31/2008**  
**Q-CONST-007**  
**Page 1 of 1**

**Witness: Tod Wicker**  
**Request from: Constellation New Energy and Constellation Energy Commodities Group**

**Question:**

Ref. Data Request Constellation 1-23. Please provide all documents that are responsive to this request. If it is necessary to redact specific portions of the documents in order to comply in good faith with the Commission's order in this case regarding PSNH's motion for protective order, please provide Constellation and Freedom Energy Partners with an appropriately redacted version of the documents and provide Staff and OCA with an unredacted version. Also, please respond to the last sentence of the request.

**Response:**

See response to CONST-03, Q-CONST-005. The specific term was arrived at through negotiation.