

APPENDIX A

Data Requests

Constellation 1 - 28

Question:

28. Was PSNH's proposal to purchase renewable energy certificates the only proposal received by the Lempster project? If not, please indicate how many other proposals Lempster received for the purchase of renewable energy certificates and the reason that the PSNH proposal was accepted instead of the others.

Response:

PSNH does not have this information.

Constellation 2 - 11

Question:

11. Please explain the reason that the Lempster Project requested the right to repurchase renewable energy certificates, the specific reason that PSNH agreed to such a proposal or found it beneficial or desirable (i.e., it is not necessary to state that PSNH believed it was necessary to reach agreement). If a complete explanation is provided in response to another data request, it is sufficient to refer to that response.

Response:

PSNH does not have any information concerning the Lempster Project's motivation for requesting the right to repurchase RECs. The repurchase agreement was entered into as part of the overall negotiation. See also Mr. Wicker's prefiled testimony, page 6, line 21 through 26.

Constellation 2 - 12

Question:

12. Please indicate whether any party offered the same or better financial terms to the Lempster Project than PSNH did for the sale of renewable energy certificates by Lempster, other than with regard to the terms of any interconnection or transmission or distribution upgrades. If so, please provide the name of any such party.

Response:

PSNH does not have any information responsive to the question of what other offers Lempster Wind may have received to sell energy, capacity and/or REC's.

Constellation 2 - 13

Question:

13. Please explain the value that each of the parties to the transaction placed on PSNH's ability to provide any transmission or distribution system upgrades necessary for the Lempster Project to deliver power. If no specific value was assigned to the upgrades, please explain the extent to which the ability to provide the upgrades was taken into consideration in deciding whether and on what terms to enter into the transaction. Your response should include a copy of any documents, including emails, memos, studies, analyses, notes and any other written or electronic materials that refer to such value or consideration.

Response:

PSNH does not have any information on what value Lempster Wind placed on the electrical interconnection. PSNH, in conjunction with the NHEC, provided the interconnection at cost to be paid for by the Project.

Freedom Energy Partners 2 – 1

Question:

1. If Lempster's repurchases the RECs, will it be necessary for Lempster to establish a Non-NEPOOL participant Holder Account at NEPOOL-GIS?

Response:

Lempster's status related to its current or future participant in the NEPOOL-GIS system is better asked of Lempster Wind LLC or its parent Iberdrola.

Freedom Energy Partners 2 – 2

Question:

2. In what states has Lempster applied for certification as a renewable energy provider? If Lempster has applied for such certification in New Hampshire, provide a copy of the application.

Response:

PSNH is not aware of what states Lempster Wind has applied for certification for a RPS program.