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November 20, 2015

NHPLC 20NOV15PM3:26

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

**Re: Docket No. DE 14-238, Determination Regarding PSNH's Generation Assets
Withdrawal of PSNH's Motion to Compel GSHA to Respond to Data Requests**

Dear Director Howland:

On November 3rd, Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") filed a Motion to Compel Granite State Hydropower Association ("GSHA") to Respond to Data Requests. In that Motion PSNH sought responses to nine data request questions that GSHA had found objectionable and refused to provide responses. On November 12th, GSHA filed an Objection to PSNH's Motion.

Contained in GSHA's Objection, GSHA provided "Supplemental Responses" to the majority of the questions at issue in PSNH's Motion. (GSHA had not, and has not, provided these additional responses outside of its Objection.)

In light of GSHA's responses provided within its Objection, and given the filing of rebuttal testimony by PSNH yesterday, further litigation over the few remaining questions unanswered by GSHA is deemed by PSNH to be unnecessary and not likely to impact the outcome of this proceeding.

Therefore, PSNH withdraws its Motion to Compel and deems discovery complete.

Please let me know if you have any questions.

Sincerely,

Robert A. Bersak
Chief Regulatory Counsel

cc: Service List, Docket No. DE 14-238

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

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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FILING INSTRUCTIONS:

- 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
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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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