

Witness: Terrance J. Large  
Request from: TransCanada

N.H.P.U.C. Case No.	DE 10-261
Exhibit No.	TransCanada 6
Witness	Pang L
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**Question:**

With respect to Mr. Large's testimony dated October 26, 2011 on Page 19, lines 27 - 31, and Page 20, lines 1 - 7,

- i) is it Mr. Large's testimony that the comments of Mr. Charles Shivery filed with the U.S. Securities and Exchange Commission on 11/01/10 that "We know we're going to build Hydro-Quebec." are in any way inaccurate or misleading?
- ii) if the answer to i), above, is not in the affirmative, please explain why Mr. Large's opinion should be given more weight than Mr. Shivery's;
- iii) does Mr. Large believe he is privy to more information about the Northern Pass Project than is Mr. Shivery?;
- iv) please list every approval the Northern Pass transmission line must receive from ISO-NE;
- v) among the approvals listed in iv), above, please state whether PSNH believes there are any for which such approval is in doubt; and the basis for such doubt;
- vi) please provide any documents that relate to NU's or PSNH's belief that such approvals are either likely or unlikely to be received;
- vii) please list every significant permit the Northern Pass transmission line must receive that it has not yet received;
- viii) among the permits listed in vii), above, please state whether PSNH believes there are any for which approval is in doubt, and the basis for such doubt;
- ix) please provide any documents that relate to NU's or PSNH's belief that such permits are either likely or unlikely to be received;
- x) please describe how the "likelihood of Cape Wind being built" has changed between "today" and "at the time the analysis was prepared";
- xi) please itemize any events relied on by Mr. Large to reach his conclusion described in x), above;
- xii) please describe how the "likelihood of..." Vermont Yankee retiring" has changed between "today" and "at the time the analysis was prepared";
- xiii) please itemize any events relied on by Mr. Large to reach his conclusion described in xii), above.

**Response:**

(i) through (ix): PSNH objects to the request on the basis that it is argumentative, and seeks information that is not reasonably calculated to lead to the discovery of information that would be admissible in this proceeding. The status of any given transmission project that was in an early planning stage in mid 2010 is not relevant to the Newington CUO. In addition, information regarding the status of such projects is equally available to the requestor which is a member of ISO-NE. To the extent any information is not public and relates to the Northern Pass transmission line, it is confidential and subject to the attorney-client privilege.

PSNH continues its objection to subparts (i) through (iii). "We remind the parties and Staff that the purpose of discovery is to develop and explore the facts at issue in a case. Discovery is not the time to argue policy or advocate for the final result but merely to seek and respond to factual matters that may lead to admissible evidence in determination of Nashua's petition to take property of PWW pursuant to RSA 38:9." *Re: City of Nashua*, 90 HNPUC Rep 289, 291 2005

Notwithstanding the objection, PSNH offers the following response to subparts (iv) through (xiii).

iv) The approvals that the Northern Pass Project must receive and have received are detailed on the Northern Pass website. Please refer to the following links:  
<http://www.northernpass.us/project-overview/project-milestones> and  
[http://www.northernpass.us/pdf/Permitting\\_and\\_Public\\_Input.pdf](http://www.northernpass.us/pdf/Permitting_and_Public_Input.pdf). In addition, the TSA submitted to and approved by FERC contains an appendix that lists all approvals (see Attachments C and D).

v) Neither Mr. Large nor PSNH possesses knowledge of any approvals that are in doubt by the Northern Pass entity.

vi) Neither Mr. Large nor PSNH possesses any documents responsive to this request.

vii) Please see the response to subpart iv.

viii) Neither Mr. Large nor PSNH possesses knowledge of any approvals that are in doubt by the Northern Pass entity.

ix) Neither Mr. Large nor PSNH possesses any documents responsive to this request.

x) through xiii) The references to Cape Wind, Vermont Yankee and Salem Harbor were intended to be examples of large resources whose final dispositions have changed both favorably and unfavorably to the owner's desire over time and were not tied to any specific events.

With respect to Cape Wind, the project has received both good news (e.g. the U.S. Department of the Interior's Bureau of Ocean Energy Management, Regulation and Enforcement approved a construction and operations plan submitted for Cape Wind Associates' Cape Wind Energy Project offshore Massachusetts, Interior Secretary Ken Salazar announced April 19, 2011) and bad news (e.g. in late June 2011 the Alliance to Protect Nantucket Sound claimed a court victory against the offshore wind energy project in Massachusetts proposed by Cape Wind Associates). A Massachusetts Supreme Judicial Court justice allowed the alliance to reserve and report to the full court its appeal involving whether state regulators should be required to reopen the case involving the 15-year power purchase agreement between Cape Wind and National Grid USA to consider evidence of NSTAR's NSTAR Electric Co.'s lower priced renewable energy contracts.

With respect to Vermont Yankee, some examples of significant events possibly impacting the plant's future include the NRC's granting of a 20 year operating license extension and Entergy Corp.'s lawsuit against the state of Vermont in which the company is seeking to stop the Vermont Yankee nuclear power plant from being forced to shut down in March 2012 due to a lack of approval from the Vermont Legislature. Both of these events occurred after September 30, 2010.

In fact, as of today, the likelihood of Cape Wind being built and Vermont Yankee retiring are still undecided even though their respective owners have publically and repeatedly stated their preferred outcomes.