

<b>ORIGINAL</b>	
N.H.P.U.C. Case No.	DE 11-184
Exhibit No.	#13
Witness	Panel
DO NOT REMOVE FROM FILE	

Public Service Company of New Hampshire, et al.  
DE 11-184



**NH PUC Non-Advocate Staff Responses  
to Data Requests of the Wood IPPs**

Date Received: October 21, 2011  
Request: Wood IPP – 1-6

Date of Response: October 28, 2011  
Witness: Steven E. Mullen

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**REQUEST:**

Referencing p. 17 lines 2-11 of Mr. Mullen’s testimony dated October 14, 2011 in Docket DE 11-184 and p. 29 line 7 to p. 30 line 10 of Mr. Mullen’s testimony dated January 15, 2010 in Docket DE 09-035, are the allocation method and ratios agreed to in settlement of Dockets DE 06-028 and DE 09-035 statutorily mandated? If so, please explain Staff’s understanding of that mandate.

**RESPONSE:**

Objection. The request seeks a legal conclusion. Notwithstanding the objection, Non-Advocate Staff responds as follows:

To Staff’s knowledge, there is no statutory mandate that prescribes the allocation method and ratios. However, RSA 374-F:1,II provides in part that “[c]ompetitive markets should...provide electricity buyers and sellers with appropriate price signals...” Further, RSA 374-F:3,III includes the following statement, “When customer choice is introduced, services and rates should be unbundled to provide customers clear price information on the cost components of generation, transmission, distribution and any other ancillary charges.” Further, RSA 374-F:3,V(c) includes the following statement, “The allocation of the costs of administering default service should be borne by the customers of default service in a manner approved by the commission.” I view my testimony in both referenced dockets to be consistent with those statutory provisions.