



**Public Service  
of New Hampshire**

780 N. Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire  
P. O. Box 330  
Manchester, NH 03105-0330  
(603) 634-2701

<b>ORIGINAL</b>	
N.H.P.U.C. Case No.	DE 11-216
Exhibit No.	112
Witness	White, Hall
<b>DO NOT REMOVE FROM FILE</b>	

Hallsr@psnh.com

A Northeast Utilities Company

**Stephen R. Hall**  
Rate & Regulatory Services Manager

July 25, 2012

*By Electronic Mail Only*

James T. Rodier, Esq.  
Attorney at Law  
1465 Woodbury Ave. No 303  
Portsmouth, NH 03801-5918

**Re: DE 11-216; Public Service Company of New Hampshire  
Alternative Default Energy Service**

Dear Attorney Rodier:

I enclose Public Service Company of New Hampshire's responses to the Second Set of Data Requests from Freedom Logistics, LLC in the above-captioned proceeding.

Very truly yours,

Stephen R. Hall  
Rate & Regulatory Services Manager

Enclosure

cc : Discovery Service List (by electronic mail only)

**Public Service Company of New Hampshire**  
**Docket No. 11-216**

**Data Request PNE-FEL-02**  
**Dated: 07/11/2012**  
**Q-PNE-FEL-001**  
**Page 1 of 1**

**Witness:** Stephen R. Hall  
**Request from:** Freedom Logistics, LLC

**Question:**  
How long will Rate ADE be in existence?

**Response:**  
PSNH does not know how long Rate ADE will be in existence.

**Public Service Company of New Hampshire**  
**Docket No. 11-216**

**Data Request PNE-FEL-02**  
**Dated: 07/11/2012**  
**Q-PNE-FEL-002**  
**Page 1 of 1**

**Witness: Stephen R. Hall**  
**Request from: Freedom Logistics, LLC**

**Question:**

Please describe in detail any marketing and outreach program that PSNH would undertake in conjunction with Rate ADE. Will PSNH undertake any targeting marketing to customers presently under contract with an electric supplier?

**Response:**

PSNH has not formulated any marketing or outreach programs, so this question cannot be answered.

**Public Service Company of New Hampshire**  
**Docket No. 11-216**

**Data Request PNE-FEL-02**  
**Dated: 07/11/2012**  
**Q-PNE-FEL-003**  
**Page 1 of 1**

**Witness:**           **Stephen R. Hall**  
**Request from:**   **Freedom Logistics, LLC**

**Question:**

Please provide an estimate for the costs expected by PSNH to be incurred for Rate ADE, including, without limitation, costs for administration, promotional materials, marketing, sales and customer service.

**Response:**

Please see the response to OCA-02, Q-OCA-002 and PNE-FEL-02, Q-PNE-FEL-002.

**Public Service Company of New Hampshire  
Docket No. 11-216**

**Data Request PNE-FEL-02  
Dated: 07/11/2012  
Q-PNE-FEL-004  
Page 1 of 1**

**Witness: Stephen R. Hall  
Request from: Freedom Logistics, LLC**

**Question:**

Why is PSNH proposing to not recover the operating costs of the Scrubber through Rate ADE, in addition to the non-operating costs?

**Response:**

Unlike non-operating costs, which are readily identifiable, operating costs associated with the Scrubber cannot be easily determined. Cost allocations would have to be made for plant costs such as labor and administrative and general expenses. Rather than base the adder on allocated cost, PSNH proposes that the adder only include non-operating costs.