

**CENTRAL MAINE POWER COMPANY
OBJECTION TO CES DATA REQUEST NO. 4
DOCKET No. 2008-255**

March 13, 2009

CES-04-15

- Q.** In regard to CMP's Non-Transmission Alternatives Report (NTAR) included in the MPRP, please identify all permits required to site and permit all non-solar generating units contemplated as part of the NTAR project under Federal, State and local laws. Provide an estimate of the time required to obtain all such permits and provide the basis for this estimate. Please state in detail all efforts, and provide all documents related to such efforts, to obtain all such permits to date.
- A.** CMP objects to this request on the grounds that it is unduly burdensome and untimely. The Petition to Intervene by Competitive Energy Services (CES) was granted at the initial case conference in this matter on July 29, 2008. *See* Procedural Order dated August 28, 2008. In the August 28, 2008 Procedural Order, CES, like the other intervenors, was provided the opportunity to file data requests on CMP's Petition on or before September 17, 2008. *Id.* Additional opportunities for discovery on CMP's Petition were provided to CES at a number of technical conferences in 2008, including those held October 8, 9, 10, 14, 15 and 16 and November 10, 12, 17, 19, 20 and 21. CES provides no explanation for the delay in filing this discovery request. Notwithstanding and without waiving this objection, CMP will provide a response to this request.

Objection Prepared and Submitted By:
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Attorney for Central Maine Power Company