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January 6, 2009

Ms. Karen Geraghty
Maine Public Utilities Commission
State House Station # 18
242 State Street
Augusta, Maine 04333-0018

RE: CENTRAL MAINE POWER COMPANY AND
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
Request for Certificate of Public Convenience and Necessity for the Maine Power
Reliability Program Consisting of the Construction of Approximately 350 Miles of
345 kV and 115 kV Transmission Lines ("MPRP")
Docket No. 2008-255

Dear Ms. Geraghty:

We write to respond on CMP's behalf to Yarmouth Intervenors' Motions for Clarification to Petitioners Answers to ODR-03-14 and ODR-03-15 ("Motion").

On Sunday, January 4, 2008, the Yarmouth Intervenors served their Motion, which seeks clarification of two of CMP's oral data responses. Prior to service of the seven page Motion, no representative for the Yarmouth Intervenors contacted CMP either in writing or by telephone to informally request the desired clarifications or otherwise meet and confer on this matter. In this respect, the Yarmouth Intervenors have failed to comply with the requirements of Chapter 110, Section 820 of the Commission's Rules of Practice and Procedure and Rule 26(g) of the Maine Rules of Civil Procedure, which bar discovery motions before the moving party "first confer(s) with the opposing party in a good faith effort to resolve by agreement the issues in dispute." For this reason, the Hearing Examiner should deny the Motion as premature and inappropriate under the circumstances.

Karen Geraghty, Administrative Director
January 6, 2009
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In any case, the Motion is entirely unnecessary. As it has done in this proceeding with similar clarification requests made by other parties, including most notably the OPA, CMP is happy to clarify its responses to the two ODRs in question to provide the additional information the Yarmouth Intervenors now seek and commits to serve its supplemental responses by the close of business on January 9, 2009. As such, the Hearing Examiner should also deny the Motion as moot.

Finally, we encourage the Yarmouth Intervenors and all other parties to confer with CMP's counsel with regard to any questions or concerns with CMP's discovery responses before formally raising the issue for Commission consideration. CMP has dedicated considerable time and resources to answer the large number of discovery requests served on the Company to date, and CMP is committed to working through any discovery issues in good faith in accordance with the Rules of Procedure. The limited time and resources of the Hearing Examiner and Commission should not be wasted on unnecessary discovery motion practice.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared S. des Rosiers". The signature is written in a cursive, somewhat stylized font.

Jared S. des Rosiers

JSD/p

cc: James Buckley, Esq.
Service List