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Mr. David K. Wiesner, Esq.
NHPUC Staff Attorney
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: SEC Docket No. 2014-04, Rulemaking

Dear Mr. Wiesner:

I find the presumption by EverSource and the Northern Pass Project (NPP) that they are somehow entitled to use State of New Hampshire Rights of Way (ROW's), right out of the box, for the purposes of burial of its transmission lines to simply be beyond the pale! The sheer gall of this firm to believe that because permission for burial of utility lines in those ROW's has occasionally been granted in the past, that NPP now, somehow, automatically has a green light to put its lines in those same ROW's. This just defies comprehension.

As recently as last Tuesday, September 8th, at the hearing put on by EverSource at Loon Mountain in Lincoln, NH, Bill Quinlan, who heads up the NPP operation here in New Hampshire, actually told me and others in the room that NPP doesn't even have to seek permission to use state owned ROW's for transmission line burial because the right to do so has already been well established over the years. Such a presumption is obviously absurd, but that is Quinlan's stated belief.

I recently drove that portion of the NPP route that is now proposed to be placed underground from Bethlehem down to Bridgewater. It is obvious to me that the NPP engineers have not made such a trip. In many places along the route, it would be physically impossible to bury HVDC power lines in the shoulders of these roadways. In places where steep outcroppings of ledge come to within a foot or two of the shoulder, and then, directly across the road, there are 45-

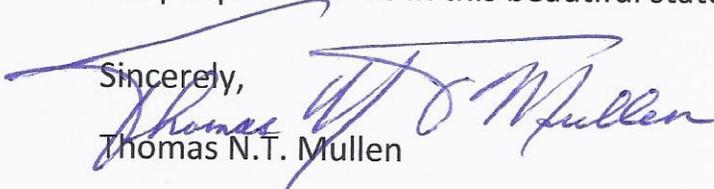
degree drop-offs protected only by a guard rail buried barely a foot from the sides of the roadway, it is clear that burial off to the sides of the road's travelled surface would not be feasible. If the plan is to bury it within the travelled surfaces, the process of excavation and laying the lines will snarl up traffic and disrupt people's lives for many months, if not years. Then, there are places like downtown Plymouth where installing the HVDC lines under streets would cause weeks of disruption that the town's citizens and businesses will never tolerate. When places like Plymouth fully grasp the level of chaos NPP's burial plans will cause, they will descend upon the NH PUC and the NH SEC like locusts.

NPP can't be serious about this proposal. It was created in a panic caused by the very late realization that bringing unsightly towers and wires down through the White Mountain National Forest was dead on arrival when it first arrived on Forest Supervisor, Tom Wagner's desk back in late 2010. Rather than face the red tape that surrounds the use of the shoulders of Interstate 93, and because NPP knew it had to act very quickly to set up the five regional meetings held over the last two weeks in order to move the New Hampshire Site Evaluation Committee (NH SEC) process forward, NPP knew it had to quickly to identify a route.

The routing the NPP came up with out of desperation and then presented to the public just recently as a gigantic concession, going underground for another 52 miles, is a nonsensical move typical of other recent desperate attempts to give legs to NPP. EverSource is trying very hard to beat two totally underground and/or under water projects in Vermont and one in Maine that are quite close to being fully permitted. If those projects get to market before NPP, the demand for NPP's power would be significantly diminished.

NPP, please step back and reconsider your routing plan. If you bring the lines underground or underwater along routes that will embrace the readily available HVDC Light technology, this project will be able to go ahead in time to get a place in the stack of projects that are steadily moving forward. This will require the EverSource planners and executives to lift their index fingers off the barrel forward at any cost button and to tune in their hearing to listen more carefully to the people who live in this beautiful state and want to keep it this way.

Sincerely,


Thomas N.T. Mullen