## COMMENT CARD NH Site Evaluation Committee, Docket No. 2013-166MAR18'16 AM11:17 Public Hearing, RSA 162-H:10, I-c

## RE: Joint Application of Northern Pass Transmission LLC & Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

LOCATION (circle one): Meredith (March 1); Colebrook (March 7); Concord (March 10); Holderness (March 14); Deerfield (March 16)

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If you wish to provide written comments for the record, please provide your comments below:

I attended the Northern Pass Public Hearing at PSU Welcome Center last evening. Although I have not attended a lot of them, I have attended a couple of other hearings over the last 5 years and have followed the proposal in the news and on-line. The

explanations from Eversource and other proponents have improved over the 5 years.

However, there are still some significant questions as to why the Northern Pass Project

- needs to be built as currently proposed.

Although it was perhaps not as true a few years ago, the current price of electricity in NH and New England is higher than elsewhere, primarily due to the lack of natural gas for generating plants. Other alternative sources such as wind and solar have been built, but the transmission of such energy has been difficult. The Northern Pass Project may help address some of the cost issues and may also provide a way to transport electricity

- from other alternative sources in the north to customers in the south. As has always
- been true, the real demand for the electricity coming down the proposed Northern Pass

line will be in other states to the south and not as much in NH.

NH Site Evaluation Committee, 21 South Fruit Street, Suite 10, Concord, NH 03301 (603) 271-2435 Martin P. Honigberg, Chair • Thomas S. Burack, Vice-Chair • Pamela G. Monroe, Administrator www.nhsec.nh.gov Unfortunately, even allowing that the Northern Pass Project will be a benefit for New England, Eversource has not made a case for the current above-ground proposal. A fully-buried line would provide the same benefits as the proposed line, but without the detriments that have been listed time and again. Although the current proposal of burying part of the line going through the White Mountains is obviously an improvement from the original plan, it still does not address the valid concerns of the people of NH.

I believe that Eversource's opposition to completely burying the line along state or interstate highways is purely based on their interest in short-term profits as opposed to longer-term economic analysis. A well-built underground line with the latest technology would be an investment that would pay-off for generations, allowing shippers in the north to continue to transmit energy, even if Hydro-Quebec ceased to use the line. The ROR (rate of return) for the Northern Pass project from a first class underground line would eventually be greater than Eversouce can expect from their current proposal.

However, Eversource does not analyze the project by looking at the <u>project's</u> ROR, but they instead continue to focus on Eversource's short-term profits, as opposed to Northern Pass's anticipated profits. By keeping the lines above-ground partially across Eversource's right-of way corridors, Eversource will be able to charge Northern Pass,

and as a result the shippers on Northern Pass, fees for the use of their rights of way. If the line is buried along state or interstate roads, Eversource will not receive those right-

of-way fees. The actual cost of the line will be paid by the shippers of electricity over

time. Therefore, even if the total cost increases, those costs will be born by the

shippers, and Northern Pass will receive payment over time for a return on their

investment. From an economic analysis of just the Northern Pass Project, the complete

underground alternative appears to be just as good as the current proposal. In fact,

over time, the underground proposal may be even better economically. Eversource has not shown this to be the case since they are looking at the project from an Eversource point of view and do not want to give up their ability to collect right-of-way compensation for the use of their right-of-way corridors. Based upon this analysis, I believe that the

NH Site Evaluation Committee should reject the applications as currently filed by

Northern Pass and Eversource.

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