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October 29, 2014

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

Dear Mr. Wiesner,

I am writing in response to the Site Evaluation Committee's (SEC's) request for public comments regarding the administrative rulemaking called for by N.H. RSA 162-H:10, VII.

As you may know, the Business & Industry Association (BIA) is the state's leading business advocacy group. The BIA represents more than 400 members in a variety of industries, including advanced manufacturing, high technology, professional services, financial services, health care, hospitality, tourism, public utilities, higher education and insurance. Our member firms employ 86,000 people throughout the state and contribute \$4.5 billion annually to the state's economy.

While the BIA has been heavily engaged in legislation related to the siting of energy infrastructure projects in New Hampshire, the association does not support or oppose any specific development projects. The BIA's primary concern is the cost of electricity and economic environment of New Hampshire. Given the state's requirements for additional renewable generation set forth under N.H. RSA 362-F, and the regional needs for additional generation, transmission and pipeline capacity, we believe it is important to have a clear, consistently applied and balanced siting structure in New Hampshire. To that end, the BIA has closely followed the work of the SB 99 stakeholder process and submissions of other groups in response to the request for advanced public comment.

After careful review of the submissions, the BIA strongly supports adoption of the proposal submitted on September 22, 2014 by "various energy groups." This proposal is a thorough and even-handed approach, which will clarify the current submission and approval process. The proposal acknowledges the judicial nature of SEC proceedings and will give the SEC well-informed guidance on application submissions, process and criteria to be applied when determining project approval.

It is important to recognize that this proposal implements the law, as passed by the Legislature and signed by the governor. The rulemaking proceeding is not an opportunity to change existing statutes or legislative policies. While this proposal may not satisfy all opponents of particular projects who seek to erect barriers to energy development, it will create a balanced process that allows for the development of infrastructure, while providing for public participation and consideration of local views.

After review of the annotated submission dated October 3, 2014, we believe this proposal represents a balanced approach based upon best practices, past SEC decisions and consistent siting criteria employed in other states. As stated earlier, the BIA was heavily engaged in legislative proposal related to siting, including the development of SB 245. We believe this proposal fully embraces the requirements set forth by that legislation by establishing clear, comprehensive and fair criteria for developers, the public and the SEC.

The BIA urges the SEC to adopt this approach in formulating its Initial Proposal for Rulemaking. Thank you for the opportunity to voice our support for this proposal. Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jim Roche". The signature is written in dark ink and is positioned above the printed name.

Jim Roche
President