



November 10, 2014

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

RE: SEC Rules Must Not Kill Jobs or End Run the Legislature

Dear Mr. Wiesner:

We write on behalf of the International Brotherhood of Electrical Workers (IBEW) with respect to the SEC rules process. The IBEW represents the hard working, highly skilled women and men in the electrical construction and maintenance industries. Our membership supports an orderly and objective review of proposed energy facilities. The SEC rules should provide a process to achieve that purpose. We have closely watched and participated in the SB 99 and SB245 legislation dealing with the siting of energy facilities. We have also been monitoring the SEC rules process and have reviewed the related materials on the SEC website.

We support the proposed rules (filed with the letter of September 22, 2014) which were submitted by a number of energy companies. We support their proposal because its adoption would provide for an orderly, objective, and comprehensive review of proposed energy facilities without dictating a pre-determined outcome.

We have also had the opportunity to review the proposed rules submitted via letter dated October 15, 2014 from a number of anti-development conservation groups. We vigorously oppose this proposal which seems designed to prevent the siting of energy facilities in New Hampshire. Unlike the unbiased set of proposed rules submitted by the energy companies, the conservation groups' proposal seems designed to produce a pre-determined outcome, namely, no more energy facilities will be sited in New Hampshire. We have no choice but to aggressively oppose this job destroying proposal.

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We would also point out that the anti-development conservation groups' proposed Site 301.12 governing the "public interest" standard uses the identical language (http://www.gencourt.state.nh.us/legislation/2014/SB0245_SA.html) which was removed by the Senate Finance Committee amendment adopted by the full Senate on March 27, 2014 (http://www.gencourt.state.nh.us/legislation/2014/SB0245_SA.html) before sending the bill to the House. The final version of SB245 as enacted by both bodies as Chapter 217, Laws of 2014 did not reinsert the language removed by Senate Finance. The SEC should not be the enabler of an attempt to end run the legislature.

We look forward to working with you on the proposed rules.

Sincerely,

Joseph Casey
Business Manager
IBEW Local 490

Brian Murphy
Business Manager
IBEW Local 104