



*Knowledge Creating Value*

December 3, 2015

Martin P. Honigberg, Chairman  
New Hampshire Site Evaluation Committee  
21 Fruit Street, Suite 10  
Concord, NH 03301

Via e-mail: Pamela.Monroe@sec.nh.gov

RE: Application of Northern Pass Transmission LLC for a Certificate for Site and Facility for the Northern Pass Transmission Project before the Site Evaluation Committee; Docket 2015-06

Dear Mr. Chairman:

I am writing to express concern regarding the completeness of the Northern Pass Transmission Application to the Site Evaluation Committee and to ask some procedural questions concerning how the Committee will consider information about the application. I work with a number of clients who may be impacted by the project and am attempting to understand the application in order to advise them on how they might be affected

As you are likely aware, the narrative portion of the application addresses how the project will meet the public interest requirements of the law, and offers several items that the applicant argues offers value to the state and or ratepayers. However, many of these proposals are not included in the actual application or in the pre-filed testimony.

I would like to draw your attention to the Purchase Power Agreement (PPA) between Eversource New Hampshire and Hydro Quebec, using the Northern Pass Transmission Line: Without arguing the legality or the merits of the PPA, it is concerning that the application does not include a copy of the PPA. The applicant seems to suggest that something will be filed at a later date with the Public Utilities Commission, yet it is offered as an element of the SEC application within the public interest section of the filing. This is a matter of meaningful importance and it should be a part of the Committee's consideration, yet it does not exist within the record of the application. It is also curious that while other matters that would be filed with

the PUC as part of the application including river crossing, a lease application and more were filed with the PUC, this item was not.

It may well be that the Applicant intends to offer additional information about this element of the plan at some point in the regulatory process, however, given the importance of this items and the fact that they will have some bearing on the market, existing in-state generators and potentially ratepayers, more information needs to be included before the SEC can deem the application complete and begin the regulatory process. I don't think you can argue that the application is administratively complete if you indicate you are going to file an important and controversial part of the application later. This elements deserve the full benefit of the SEC process. Of concern here is, soon after the SEC acts to deem the application complete and ready for a public vetting through the public hearing process, critical information is not ready for public inspection or comment. With no meaningful information about these two important items the public and impacted parties will be disadvantaged and will not have the full benefit of the protections and rights offered in the SEC process. Parties, potential parties and the public should not have to wait until the expensive and resource intense adjudicatory process is underway to learn about and comment on this part of the application.

Given the fact that the applicant seems to want to move the process along, they should have completed this aspects of the application before they subjected it to a public process. Without the information the public process cannot be completed in a fair manner. This problem can be cured if the complete PPA information is filed with the SEC and PUC. At that point the PUC and other agencies that may be involved with these elements can review the updated application and report to the full SEC regarding this material. But of equal or more importance the public can be informed. Frankly the timelines in the law are there to protect the public as much as the applicant, and if the PPA materials are filed later, the public is denied the full benefits and protections of the siting law.

Without the details, the public process cannot protect the interest of those impacted, and so I would urge the Commission to deem the application incomplete unless and until the Northern Pass files the details of the PPA.

Thank you for your consideration of this matter.

Sincerely;

A handwritten signature in black ink, appearing to read 'J. Monahan', with a long horizontal flourish extending to the right.

James Monahan, Vice President  
The Dupont Group