ATTORNEY GENERAL DEPARTMENT OF JUSTICE

33 CAPITOL STREET CONCORD, NEW HAMPSHIRE 03301-6397



ANN M. RICE DEPUTY ATTORNEY GENERAL

JOSEPH A. FOSTER ATTORNEY GENERAL

March 1, 2017

Pamela G. Monroe, Esq. Administrator State of New Hampshire Site Evaluation Committee 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301

Re: Application of Northern Pass Transmission for Certificate of Site and Facility, No. 2015-06 – Reply to Correspondence Received

Dear Pam,

I have recently reviewed the letters sent to you by the Chambers of Commerce of Manchester and Nashua and BAE Systems and Globe Manufacturing. In those two letters the writers claim that testimony that I have produced in the Northern Pass docket did not address the concerns raised by the authors with respect to the need for cheaper electricity in New Hampshire. The chambers said "In all the pre-filed testimony submitted by CFP to date, we have not seen any mention or acknowledgement of our concerns." BAE and Globe asserted that "we don't see any mention of the issues we raised in our meetings."

In response I simply say that I actually did consider the need of businesses for electricity price relief and concern over price stability/volatility.

Last fall I coordinated with the BIA and the Chambers to meet with them at three separate meetings in Concord, Portsmouth and Manchester to hear the concerns of their members. I also attended 10 public meetings last winter and spring and carefully listened to the concerns of the public including those representing many different business interests. I held 6 public workshops last summer where I met a number of business owners and I discussed their concerns with them. I met with business leaders and owners in Plymouth to hear their concerns. I generally see and read numerous comments from the public including those of many businesses and others who support the project. Letter to Pamela G. Monroe, Administrator March 1, 2017 Page 2

With the Committee's approval and the Applicants' consent, I hired Kavet Rockler & Associates ("KRA") last May. KRA's mission was to conduct a fair and objective study of the impacts and benefits of the project on the local and statewide economy. KRA attended some of the meetings with me and conducted their own research and made contacts with other business owners. I also retained the Brattle Group ("Brattle") to study the wholesale market benefits of the project, including electricity price and stability. Both KRA and Brattle wrote reports and I filed their testimony and reports on December 30, 2016.

Both Brattle and KRA studied scenarios which led to the conclusion that the project would generate some electricity price relief. KRA *specifically* mentioned the emphatic concerns voiced by the chambers and other business leaders in their report. KRA performed a detailed analysis of the beneficial effects on electricity costs in New Hampshire and assumed the highest of the scenarios from a benefits perspective. See KRA, *Economic Impact Analysis and Review of the Proposed Northern Pass Transmission Project*, Dec. 30, 2016, pp. 42-50, and 74-76. Their analysis included a study of electricity costs in New Hampshire relative to other states.

The writers also suggest that they do not believe that I represent or advance their interests. In that respect they are partially correct. As the Committee knows, my statutory role is to represent the interests of all of the public. As such, I cannot represent any specific party or their interests directly. At the meetings with the chambers and at various public meetings and hearings I have explained this role as best as I can. Nevertheless, to the extent that lower electricity prices are in the public interest and in balance with the environmental impacts of the project, it is within my role and mission in this case to investigate and address that.

Over the past year I made it a priority (among others) to hear and consider concerns of all business interests that may be affected by the project both beneficially and adversely. I am comfortable that KRA and Brattle have done fair and objective work investigating the economic benefits and costs of the project, including the effects on the costs of electricity to New Hampshire businesses and consumers.

Sincerely yours,

Rth a Rott

Peter C.L. Roth Counsel for the Public