September 22, 2017

Via Electronic Mail

Ms. Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 Fruit Street, Suite 10
Concord, NH  03301


Dear Ms. Monroe:

Pursuant to the New Hampshire Site Evaluation Committee’s September 12, 2017, Procedural Order in Docket No. 2015-06, the New England Power Generators Association ("NEPGA") hereby files this list of each Non-Applicant witness NEPGA seeks to cross-examine in this proceeding.

NEPGA seeks to cross-examine Counsel for the Public witnesses Samuel Newell and Jurgen Weiss. In response to the Committee’s request for additional information with respect to NEPGA’s intent in cross-examining these witnesses, NEPGA submits the following:

1. NEPGA’s position is not adverse to the witnesses. Both NEPGA’s witness (William Fowler) and Counsel for the Public witnesses have challenged the conclusions drawn by the Applicant’s witnesses regarding the potential wholesale market benefits of the Project.

2. NEPGA intends to cross-examine Counsel for the Public’s witnesses on their testimony regarding the wholesale capacity and energy market benefits of the Project. In some respects, the conclusions drawn by NEPGA’s witness and Counsel for the Public’s witnesses differ – cross-examination of these witnesses will provide the Committee and NEPGA with a more full and true understanding of those differences. In addition, NEPGA counsel and Counsel for the Public cross-examined the Applicants’ wholesale market witness, Julia Frayer, on
June 8-9, 2017. The cross-examination of Ms. Frayer provided NEPGA with additional information supplementing her pre-filed testimony and conclusions, and which in many respects contradicts the pre-filed testimony filed by Counsel for the Public’s witnesses. NEGPA seeks the opportunity to cross-examine Counsel for the Public’s witnesses to provide NEPGA and the Committee with a better understanding of the differences among the several witnesses that have testified as to the potential wholesale market benefits of the Project.

Please contact me with any questions regarding this list of non-Applicant witnesses NEPGA seeks to cross-examine.

Very truly yours,

/s/ Bruce Anderson

Bruce Anderson

cc: Service List 2015-06 (electronic mail only)