

April 1, 2016

By E-Mail & U.S. Mail

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
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**Re: Docket No. 2015-06 – Joint Application of Northern Pass Transmission, LLC and
Public Service Company of New Hampshire d/b/a Eversource Energy for a
Certificate of Site and Facility**

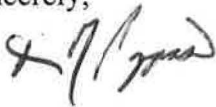
Dear Ms. Monroe:

Enclosed for filing in the above-captioned proceeding is Counsel for the Public's Partially Assented-to Motion to Suspend the Time Frame Established Under RSA 162-H:7.

Copies of this letter and its enclosure have been forwarded via e-mail or mail to all parties on the Distribution List.

Thank you.

Sincerely,



Thomas J. Pappas

TJP/scm - 2351724_1

Enclosure

cc: Distribution List

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

No. 20 15-06

Joint Application of Northern Pass Transmission, LLC and Public Service Company of New
Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

**COUNSEL FOR THE PUBLIC'S PARTIALLY ASSENTED-TO
MOTION TO SUSPEND THE TIME FRAME ESTABLISHED UNDER RSA 162-H:7**

Counsel for the Public, by his attorneys, the office of the Attorney General and Primmer Piper Eggleston & Cramer PC, respectfully requests that the Site Evaluation Committee suspend the time frame established under RSA 162-H:7, and adopt a schedule for this proceeding as proposed by Counsel for the Public in the pleading attached as Exhibit A. Counsel for the Public makes this request pursuant to RSA 162-H:14, because the unprecedented scale and scope of the project, the tremendous amount of public participation and the technical complexity of the issues make adherence to the statutory time frame unworkable, and ultimately would unfairly deprive the public and the Subcommittee a full and fair opportunity to determine whether the project will, on balance and in accord with the purposes of RSA 162-H, serve the public interest. In support thereof, Counsel for the Public states as follows:

A. BACKGROUND.

On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the “Applicants”), submitted a Joint Application for a Certificate of Site and Facility (the “Application”) to the New Hampshire Site Evaluation Committee (the “Committee” or “SEC”) to construct a 192-mile transmission line to run through New Hampshire from the Canadian border in Pittsburg to Deerfield (the “Project”).

The Application with its appendices contains more than 27,000 pages including numerous expert reports and studies.¹

On November 2, 2015, the Chairman of the Committee appointed a Subcommittee (the “Subcommittee”) to consider the Application. The Subcommittee accepted the Application on December 18, 2015. The Applicants provided additional information for the Application on February 26, 2016, pursuant to the revised SEC Rules effective December 16, 2015.

Pursuant to RSA 162-H:10 the Subcommittee held five public information sessions in five counties during January 2016, and held five public hearings in five counties during March 2016.

As of February 5, 2016, the Subcommittee received over 160 Petitions to Intervene in this proceeding, and to date members of the public have submitted over 300 written public comments. On March 18, 2016, the Chairman of the Committee issued a 53-page Order on the Petitions to Intervene, which included the grouping of intervenors. As a result, there are 24 separate parties in this proceeding, many of whom are groups of entities or individuals, including over 30 town governing bodies or sub-units. The Subcommittee has received additional Petitions to Intervene following the Applicants’ filing of additional information for the Application on February 26, 2016. The Subcommittee also has received numerous motions seeking review of the Order on Petitions to Intervene.

On April 12, 2016, the Subcommittee will hold a hearing on pending motions involving requests to review the Order on Petitions to Intervene, the Applicants’ request for partial waivers under SEC Rules, and the Applicants’ Motion for Protective Order and Confidential Treatment. The rulings on these motions may require the Applicants to further supplement the Application, and may alter the status of Intervenors.

¹ If a person read 74 pages of the Application per day it would take a full year to complete the task.

With the Application the Applicants filed testimony for 25 separate witnesses, addressing 26 general topics, and including thousands of pages of reports, maps and photos. The parties will conduct discovery pursuant to SEC Rules, and parties other than the Applicants will file testimony, including expert testimony, on many of the same subjects and probably a number of additional subjects. Pursuant to RSA 162-H:10, the Subcommittee will hold adjudicative proceedings under RSA 541-A. Following the adjudicative hearings, the Subcommittee must make certain findings, based upon the record in the proceeding, pursuant to RSA 162-H:16, in order to determine whether or not to issue a Certificate to the Applicants. It is anticipated that the adjudicative proceeding will have more than 50 witnesses, and that the record will also include voluminous additional public statements and documents for the Subcommittee to consider during its deliberations.

B. LEGAL STANDARD.

RSA 162-H:7 provides that “[w]ithin 365 days of the acceptance of an application, the Subcommittee shall issue or deny a certificate for an energy facility.” RSA 162-H:14 provides that “[i]f the site evaluation committee, at any time while an application for a certificate is before it, deems it to be in the public interest, it may temporarily suspend its deliberations and time frame established under RSA 162-H:7” (emphasis added). The SEC Rules also provide for suspending deliberations and the time frames at any time while an application is pending before the Committee, Site 301.12, and provide for the Committee to waive its rules. Site 302.05.

In RSA 162-H:1 (Declaration of Purpose), the legislature set forth the factors for the Subcommittee to consider in determining what constitutes the public interest. Specifically, the legislature provided that:

[t]he legislature recognizes that the selection of sites for energy facilities may have significant impacts on and benefits to the following: the welfare of the

population, private property, the location and growth of industry, the overall economic growth of the state, the environment of the state, historic sites, aesthetics, air and water quality, the use of natural resources, and public health and safety. Accordingly, the legislature finds that it is in the public interest to maintain a balance among those potential significant impacts and benefits in decisions about the siting, construction, and operation of energy facilities in New Hampshire; that undue delay in the construction of new energy facilities be avoided; that full and timely consideration of environmental consequences be provided; that all entities planning to construct facilities in the state be required to provide full and complete disclosure to the public of such plans; and that the state ensure that the construction and operation of energy facilities is treated as a significant aspect of land-use planning in which all environmental, economic, and technical issues are resolved in an integrated fashion.

Thus, although the legislature provided that the Committee shall issue or deny a certificate for an energy facility within one year of accepting the Application, the legislature also recognized that the selection of sites for energy facilities may have significant impacts and benefits, and provided in RSA 162-H:14 that the Committee may, “at any time while an application for a certificate is before it,” suspend the one-year time frame if the Committee deems it to be in the public interest (emphasis added).

C. ARGUMENT.

There is no dispute that the Subcommittee has the authority at this point in the proceeding to suspend the one-year time frame for consideration of the Application, and has the authority to establish a schedule longer than one year to consider the Application. Indeed, the Subcommittee has done so in prior proceedings. The question is whether this Application and the facts and circumstances of this proceeding demonstrate that it is in the public interest to suspend the one-year time frame now and establish a workable schedule for the orderly conduct of this proceeding. Counsel for the Public believes that they do.

1. It is in the Public Interest to Suspend the Time frame in this Proceeding.

The Subcommittee has recognized that “[t]his matter is without precedent in New Hampshire.” Order on Petitions to Intervene, p. 47. There has been significant public interest in this proceeding, including upwards of 1,000 attendees at the five public information sessions and five public hearings, and more than 350 pleadings, orders and other filings on the docket within a few months, and over 300 written public comments. The geographic scope (192 miles, 5 counties and 32 towns) and impact of the Project is enormous. The Project impacts several different regions of New Hampshire, often in different and unique ways that require different considerations, and it indisputably would have a lasting impact on New Hampshire’s citizens and its resources. RSA 162-H:1 sets forth the significant impacts and benefits the Subcommittee must weight when considering the public interest, including the welfare of the population, private property, the environment and natural resources, historic sites, aesthetics, air and water quality, and public health and safety. The number and complexity of the issues that must be considered and litigated to address the criteria will require significant time in order to insure a full and complete evidentiary record from which the Subcommittee can make an informed decision. Given the large number of parties and witnesses, many of whom will provide technical evidence, this matter will require significant time to conduct and complete discovery, as well as sufficient time to prepare for the adjudicative proceeding. Extending the time frame is necessary to ensure that all parties have a full and fair opportunity to pursue each of these complex issues and it is the only way to ensure the protection of due process rights.

It is in the public interest to suspend the one-year time frame now in order to provide for a more orderly conduct of this proceeding, rather than establish a one-year schedule with deadlines that cannot practically, or fairly, be met. Otherwise, the Subcommittee likely will be

faced with numerous motions for extensions of time, which could result in gaps in the schedule while the motions are decided, and which could result in the need to revisit prior activities. Moreover, providing sufficient time early in the proceeding to allow parties time to conduct necessary discovery will make the adjudicative hearings more efficient. It also will provide certainty to the parties and the Subcommittee. The parties cannot effectively retain experts, complete discovery, including the resolution or adjudication of any disputes over it, prepare for and conduct a lengthy and procedurally complex evidentiary hearing involving in excess of 25 parties, obtain transcripts, file post-hearing briefs, and allow sufficient time for the Subcommittee to deliberate on this Application within the next seven months. There is ample evidence and facts for the Subcommittee to find that it is in the public interest to suspend the one-year time frame and establish a realistic schedule.

It is important to bear in mind that among the key purposes of the proceeding is “that all entities planning to construct facilities in the state be required to provide full and complete disclosure to the public” of the Project’s attributes and impacts. RSA 162-H:1. Recent amendments to RSA 162-H acknowledge that the public’s ability to engage in meaningful participation in project approval was lacking and as a result additional opportunities for the public were built into the process. Nevertheless, a not insubstantial number of members of the public have already expressed genuine concern about whether the existing process is fair, transparent and being conducted on a level playing field. In light of these expressed concerns, the public interest demands that the process not be conducted in an artificially compressed and hurried way, and that instead, the adjudication of the largest project to come before the SEC in a generation be conducted in a thoughtful and careful way.

2. The SEC has Suspended the Time frame in Other Proceedings.

In the Antrim Wind case, the Subcommittee accepted the Counsel for the Public's argument to extend the schedule, wherein Counsel for the Public argued that:

[t]he public interest requires a full and fair opportunity for Counsel for the Public to present his witnesses and reports and to develop that evidence in a meaningful way. In addition, the public interest requires that other parties have a meaningful opportunity to examine that evidence and conduct discovery with respect thereto and with sufficient time to prepare responses and rebuttals and conduct their own independent research before the hearing on the merits.

See In re Application of Antrim Wind Energy, LLC, SEC no. 2012-01, *Procedural Order and Notice of Additional Prehearing Conference*, dated August 30, 2012 (adopting reasoning in the motions to extend schedule).

The Antrim Wind proceeding involved an applicant, Counsel for the Public, and 12 intervenors. The project was located within one town and one county. The anticipated cost of construction was \$55 million to \$65 million, for a 30 megawatt wind powered facility with 10 turbine structures located on 1,850 acres. The application was accepted on March 5, 2012, and the decision denying the application, as corrected and amended, was dated May 2, 2013, approximately 14 months later.

Here, the Project covers 192 miles and passes through 32 towns and 5 counties, with an estimated cost of \$1.6 billion and has the capacity to deliver 1090 MW of energy to the New England markets. The Project includes 1198 towers with heights from 48 feet to 160 feet, six transition stations covering 11.8 acres, a converter station covering 15.9 acres, and 60 miles of buried direct current cable. In essence, the Project is eight projects, including (1) from the Canadian border to Transition Station 3 in Clarksville (above ground); (2) from Transition Station 3 to Transition Station 4 in Stewartstown (underground along rural road); (3) from Transition Station 4 partially through a new ROW to Transition Station 5 in Bethlehem; (4) from

Transition Station 5 to Transition Station 6 in Bridgewater (underground along rural state routes and downtown villages); (5) from Transition Station 6 to the Converter Station in Franklin; (7) from the Converter Station to the Deerfield Substation, including upgrades to the Deerfield Substation; and (8) the upgrade to the Coos Loop. Included in this is the relocation of miles of existing overhead 115 kv lines along existing rights of way. Compared to the Antrim Wind project, this Project involves twice as many parties; involves construction of facilities over 192 miles versus 1,850 acres; will cost more than 25 times the projected costs for the proposed Antrim wind project; will deliver 36 times more energy; and involves 32 towns and five counties versus one town and one county.²

3. The Subcommittee Should Adopt Counsel for the Public's Proposed Schedule.

Counsel for the Public proposes an approximately 18-month schedule for this proceeding. See Exhibit A. This proposed schedule includes time for the parties to conduct discovery, including data requests and multiple days for technical sessions involving many expert witnesses.³ In order to save time and alleviate the burden on the Applicants, Counsel for the Public's proposed schedule provides for two periods of data requests, one involving non-expert requests and a second period involving expert data requests. The proposed schedule also provides time to file supplemental pre-filed testimony, pre-hearing motions and stipulated facts, and a final hearing conference. It also includes time for additional site visits immediately before the adjudicative hearings, and provides the Subcommittee with 35 business days in which to schedule adjudicative hearings. Finally, it provides for filing post-hearing briefs to assist the Subcommittee, and then time for the Subcommittee to conduct deliberations.

² See also In re Groton Wind, LLC, SEC No. 2010-01), In re Laidlaw Berlin BioPower, SEC No. 2009-02), and In re Granite Reliable, SEC No. 2008-04.

³ The proposed schedule does not account for time that may be necessary in the event of discovery disputes.

Counsel for the Public's proposed schedule is a minimally sufficient schedule that contains no breaks or lee-way. It would require all parties to cooperate and to pursue this matter continuously for the next 14 months. If this matter were pending in Superior Court, the court would likely order a 24-month schedule similar to the schedule proposed by the Society for the Protection of New Hampshire's Forests, given the size of the proceeding and the number of parties involved. Counsel for the Public's proposed schedule strikes a balance between the Applicants' desire for a prompt proceeding and the public interest in a full and fair opportunity to develop and present evidence so that the Subcommittee can make an informed decision.

4. Problems with Applicants' Proposed Schedule.

The Applicants propose a schedule that provides for a decision within one year from acceptance of the Application. There are a number of issues with the Applicants' proposed schedule which make it unworkable, including that it:

- Proposes that discovery begin before a scheduling order is entered, before Counsel for the Public can be authorized to retain experts, before all issues on intervenor groups are resolved, and before the parties know whether the Applicant will need to further supplement the Application if any of the requests for waivers are denied. These issues must be resolved before the parties can begin discovery.
- Requires Counsel for the Public to file motions to retain experts within 3 weeks of the prehearing conference.
- Provides only three days for technical sessions for the Applicants' five or six non-expert witnesses, which is unworkable given the number of parties.
- Provides only 10 days for technical sessions for the Applicants' approximately 20 expert witnesses.

- Provides only five days for technical sessions for expert witnesses submitted by Counsel for the Public and all of the intervenors, without knowing how many such witnesses there will be. Counsel for the Public anticipates that there likely will be up to 20 experts (not counting intervenors who may submit their own testimony on behalf of their organization – given the number of intervenors allowed, this number could be quite large). It also requires filing of pre-filed testimony and holding technical sessions before certain of Counsel for the Public’s witnesses will be able to finish their investigations and complete their reports.
- Provides 24 consecutive business days for the adjudicative hearings. This is unlikely to be a sufficient number of days and it appears unrealistic and unfair to expect the Sub-Committee to schedule trial for 24 consecutive business days.
- Provides no time for additional site visits by the Subcommittee and no time for transcript production or filing post-hearing briefs to assist the Subcommittee.
- Requires that all of the trial phase of the case be conducted between August 15 (deadline for agency decisions) and November 18 – three months, which period includes within it the two-week Antrim Wind proceeding, the introduction of supplemental testimony, technical sessions, prehearing conferences and 24 hearing dates.

These, and other problems, make the Applicants’ proposed schedule unworkable and are unlikely to create a full and fair assessment of the many issues to be decided in this unprecedented Project.

5. The Lack of Certain Information Requires Additional Time.

The lack of significant information will delay analyzing important aspects of the Application. The Applicants claim that the Project will reduce wholesale and retail electric rates, which they assert is a primary benefit of the Project, at times citing an anticipated Purchase Power Agreement (“PPA”) and the fact that the Applicants have bid this Project in the Tri-State Clean Energy RFP. Until a PPA is signed and produced, and until the Applicants learn later this year whether their bid in the Tri-State RFP is accepted and the bid materials become public, no party can fully evaluate these alleged benefits of the Project. Moreover, none of the intervenors can assess any of the alleged economic benefits of the Project until the Applicants’ economic testimony and supporting economic report are unsealed and disclosed to the intervenors and any expert witnesses they retain. Any schedule adopted by the Subcommittee must take these factors into account if the Application is to receive a full and comprehensive review.

In responding to the completeness of the Application, Counsel for the Public raised concerns that the Application lacked sufficient information in several areas, including detailed information on procedures for building both the above ground and the underground portions of the Project; how long roads will be closed during construction; whether the relocation of existing lines will impact customers; the number, size, location and environmental condition of laydown and staging areas that will be needed; the number, location and environmental condition of access roads; a description or depiction of significant Project structures such as transition stations or the converter station; and which components of the Project need to be built to assure stability and reliability. In these and other areas the Application only describes a concept for the Project but does not provided needed detailed information. The Chair noted at the hearing on acceptance of the Application that detailed information must be obtained during this process in order to

evaluate the Project and its impacts and that such would be “a heavy lift.” Transcript (“Tr.”), 12/7/15, at 29-30; see also Remarks of Ms. Weathersby, Tr. at 28 (expressing concern about need for more information but that “we can flesh out these other issues during the process”). While the Application was deemed complete, it also had omissions, generalities and “TBDs.” It is in the public interest to extend the time frame in order to provide sufficient time to discover and test this information. Moreover, the Subcommittee needs detailed information through evidence at the adjudicative hearings in order to make the numerous fact-based findings required by RSA 162-H:16. See Tr. at 28. It is in the public interest to provide the parties time to discover and present that evidence to allow the Subcommittee to satisfy its statutory obligation.

Due process requires that parties to an administrative adjudicative proceeding be provided a “meaningful” opportunity for a hearing that includes proper notice, an opportunity to present evidence and for cross-examination. Appeal of Kelleher, 124 N.H. 274, 278 (1983). This is especially true when the administrative agency is presented by the parties with issues of fact for resolution. Soc’y for Prot. of N.H. Forests v. Site Evaluation Comm., 115 N.H. 163, 168 (1975); see also Appeal of Portsmouth Trust Co., 120 N.H. 753, 758 (1980); 541-A:33, IV (“A party may conduct cross-examinations required for a full and true disclosure of the facts.”); RSA 541-A:33, VI (“Parties shall be notified either before or during the hearing or by reference in preliminary reports or otherwise of the material notices, ... and they shall be afforded an opportunity to contest the material so noticed.”); RSA 162-H:10 (setting forth duties of Subcommittee with respect to hearings and investigations of matters in the application). In the present case, there will be many parties providing numerous witnesses that present voluminous evidence, much of it conflicting. Due process, and RSA 541-A:33, require that sufficient time be

provided for all parties to have a meaningful opportunity to undertake the “heavy lift” and participate in this proceeding.

D. CONCLUSION.

For the reasons set forth above, Counsel for the Public respectfully requests that the Subcommittee adopt Counsel for the Public’s proposed schedule as set forth in Exhibit A.

The Following Parties Concur in this Motion:

- The Preservation Intervenors Group (National Trust for Historic Preservation, New Hampshire Preservation Alliance, Sugar Hill Historical Museum and North Country Scenic Byways Council)
- Charles and Donna Jordan
- Taras Kucman
- Mark W. Orzeck and Susan Orzeck

The Following Parties Object to this Motion:

- The Applicants
- The City of Franklin
- International Brotherhood of Electrical Workers

The Following Parties Take No Position on this Motion:

- The City of Berlin

The Following Parties Concur in this Motion, Subject to Their Request for a Date Certain to File Dispositive Motions:

- Kevin Spencer
- Mark Lagasse

Other parties have indicated that they concur with suspension of the time frame but that they support the schedule proposed by the Society for the Protection of New Hampshire Forests.

Respectfully submitted,

COUNSEL FOR THE PUBLIC,

By his attorneys,




Dated: April 1, 2016

By: Peter C.L. Roth, Senior Assistant Attorney General
Environmental Protection Bureau
33 Capitol Street
Concord, NH 03301-6397
(603) 271-3679

PRIMMER PIPER EGGLESTON & CRAMER PC,

Dated: April 1, 2016



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-and-

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO SUSPEND THE TIME FRAME ESTABLISHED UNDER RSA 162-H:7 has this day been forwarded via e-mail or mail to persons named on the Distribution List of this docket.

Dated: April 1, 2016



Thomas J. Pappas, Esq. (N.H. Bar No. 4111)

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE****No. 2015-06**

Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

**COUNSEL FOR THE PUBLIC'S
PROPOSED PROCEDURAL SCHEDULING ORDER**

Counsel for the Public, by his attorneys, the office of the Attorney General and Primmer Piper Eggleston & Cramer PC, hereby proposes the following procedural schedule for this proceeding.

April 15, 2016	<ul style="list-style-type: none">• Decision on Protective Order
May 1, 2016	<ul style="list-style-type: none">• Decision on Joint Applicants' requests for waivers
May 15, 2016	<ul style="list-style-type: none">• CFP and Intervenors shall propound first round of data requests on Joint Applicants
June 1, 2016	<ul style="list-style-type: none">• CFP intends to file motions to retain experts shortly after a schedule is ordered. The deadline for motions to employ experts is June 1, 2016. Any objection shall be filed within 10 days of a motion and any reply shall be filed within 5 days of any objection. The Committee shall rule on each motion as promptly as possible and within 20 days.
June 15, 2016	<ul style="list-style-type: none">• Joint Applicants shall respond to first round of data requests propounded by CFP and Intervenors
July 1, 2016	<ul style="list-style-type: none">• CFP and Intervenors shall propound second round of data requests on the Joint Applicants• State agencies shall report progress, draft permits and draft conditions 150 days after acceptance of the application
August 1, 2016	<ul style="list-style-type: none">• Joint Applicants shall respond to second round of data requests propounded by CFP and Intervenors

September 5 to September 30, 2016	<ul style="list-style-type: none"> • Technical sessions with Joint Applicants' witnesses. The parties to propose days for common subject matters
November 15, 2016	<ul style="list-style-type: none"> • CFP and Intervenors to file pre-filed testimony
November 30, 2016	<ul style="list-style-type: none"> • Joint Applicants shall propound data requests on CFP and the Intervenors
December 30, 2016	<ul style="list-style-type: none"> • CFP and the Intervenors shall respond to the data requests propounded by the Joint Applicants and CFP
January 16 to February 15, 2017	<ul style="list-style-type: none"> • Technical sessions with CFPs and the Intervenors' witnesses
March 15, 2017	<ul style="list-style-type: none"> • Supplemental pre-filed testimony due from all parties • State agencies shall issue final permits and conditions
March 20, 2017	<ul style="list-style-type: none"> • All parties shall file any pre-hearing motions and any statements of stipulated facts
March 29, 2017	<ul style="list-style-type: none"> • Final pre-hearing conference
April 3 to April 7, 2017	<ul style="list-style-type: none"> • Additional site visits
April 17 to June 2, 2017	<ul style="list-style-type: none"> • Final adjudicative hearings to begin on April 17, 2017
June 23, 2017	<ul style="list-style-type: none"> • Post-hearing briefs due
June 26, 2017 --	<ul style="list-style-type: none"> • Deliberations and decision

Respectfully submitted,

COUNSEL FOR THE PUBLIC,

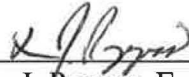
By his attorneys,



Dated: April 1, 2016 By:

Peter C.L. Roth, Senior Assistant Attorney General
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PRIMMER PIPER EGGLESTON & CRAMER PC,



Dated: April 1, 2016 By:

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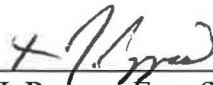
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing COUNSEL FOR THE PUBLIC'S PROPOSED PROCEDURAL SCHEDULING ORDER has this day been forwarded via e-mail or mail to persons named on the Distribution List of this docket.

Dated: April 1, 2016



Thomas J. Pappas, Esq. (N.H. Bar No. 4111)

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
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**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

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