

STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

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

ABUTTING PROPERTY OWNERS: BETHLEHEM TO PLYMOUTH INTERVENOR GROUP
OBJECTION TO, AND MOTION TO DENY, APPLICANT'S MOTION FOR PROTECTIVE
ORDER AND CONFIDENTIAL TREATMENT

AND

MOTION TO ALLOW INTERVENORS FULL ACCESS TO ALL CONTENTS OF
APPLICANT'S "COST-BENEFIT AND LOCAL ECONOMIC IMPACT ANALYSIS OF THE
PROPOSED NORTHERN PASS TRANSMISSION PROJECT"

The Abutting Property Owners: Bethlehem To Plymouth Intervenor Group (the "Intervenor Group") objects to the Applicant's Motion for Protected Order and Confidential Treatment, as it pertains to the section of Applicant's application under the subject docket entitled: "Cost-Benefit and Local Economic Impact Analysis of the Proposed Northern Pass Transmission Project" (hereinafter referred to as Applicant's Economic Analysis). The Intervenor Group respectfully requests the Subcommittee deny the portions of Applicant's Motion for Protected Order and Confidential Treatment that pertain to Applicant's Economic Analysis. The Intervenor Group further respectfully requests that the Subcommittee require Applicant to make a complete, unredacted version of Applicant's Economic Analysis available to intervenors to this docket, as a condition of proceeding with the docket. Our bases for these requests are as follows:

1. On March 28, 2016 Applicant filed with the Subcommittee a proposed redacted version of Applicant's Economic Analysis. After review of this proposed redacted version, the Intervenor Group finds that the data provided by the Applicant in this redacted version is insufficient to allow a full assessment of Applicant's Economic Analysis.
2. Applicant has repeatedly asserted that Northern Pass would provide substantial economic benefits to NH. Applicant has presented detailed numerical values for these purported economic benefits, and cites these purported economic benefits as a justification for its proposed project. Applicant asserts that the purported economic benefits of its project would help to offset the extensive and long-term negative environmental and socioeconomic impacts associated with the project. Applicant's Economic Analysis therefore constitutes a critical component of Applicant's application. Yet Applicant has so far been unwilling to provide the full basis of its Economic Analysis for review by intervenors to this docket.
3. Many intervenors have serious questions about the claimed economic benefits of Northern Pass. These questions can only be answered by allowing intervenors the opportunity to examine the complete basis for these claims, and to determine whether the economic analysis has a solid basis in fact. The public interest can only be served by affording intervenors this opportunity.

If deemed necessary by the Subcommittee, members of the Intervenor Group would be amenable to entering into an appropriate Protective Agreement before viewing information that Applicant seeks to hold confidential. However, the terms of any such Protective Agreement must allow the intervenors to cite all information from the Applicant's Economic Analysis in testimony before the Subcommittee, in closed-door sessions if necessary.

Members of the Abutting Property Owners: Bethlehem To Plymouth Intervenor Group concur unanimously with the objection and motions stated above. This Intervenor Group includes the following intervenors in the Northern Pass docket:

Nigel Manley
Judy Ratzel
Russel and Lydia Cumbee
Walter Palmer
Kathryn Ting
G. Peter and Mary S. Grote
Paul and Dana O'Hara
Virginia Jeffryes
Carol Dwyer
Gregory and Lucille Wolf

Susan Schibanoff
Frank Pinter
Ken and Linda Ford
Campbell McLaren, M.D.
Eric and Barbara Meyer
Robert W. Thibault
Dennis Ford
Carl Lakes and Barbara Lakes
Bruce D. Ahern

WHEREFORE, the Abutting Property Owners: Bethlehem To Plymouth Intervenor Group respectfully requests that the Subcommittee:

1. Deny those portions of Applicant's Motion for Protective Order and Confidential Treatment that pertain to Applicant's "Cost-Benefit and Local Economic Impact Analysis of the Proposed Northern Pass Transmission Project";
2. Require Applicant to make a complete, unredacted version of Applicant's "Cost-Benefit and Local Economic Impact Analysis of the Proposed Northern Pass Transmission Project" available to intervenors to this docket; and
3. Grant such further relief as it deems appropriate.

Respectfully Submitted,
Abutting Property Owners: Bethlehem To
Plymouth Intervenor Group

By its designated spokesperson



Walter A. Palmer
1900 Easton Road
Apartment 5
Franconia, NH 03580
(603) 348-0558

Date: April 7, 2016