The Society for the Protection of New Hampshire Forests (the "Forest Society"), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully requests that the SEC order Dixville Capital, LLC and Balsams Resort Holdings, LLC ("The Balsams") to produce to the Forest Society all documents and responses sought by it in its Data Requests on The Balsams dated November 30, 2016 (the "Data Requests"). The Forest Society states as follows in support of its request:

1. Among the benefits claimed by the Applicants that the Project would bring to New Hampshire are those associated with the Forward New Hampshire Fund. The Application states that "NPT will spend $10 million annually on funding initiatives under the Forward New Hampshire Plan ... through 2039." Application at 86. The Applicants cite this investment as evidence that the Project is in the public interest. Application at 92-93. Mr. Quinlan, in his prefiled testimony stated that:

NPT will establish the Forward New Hampshire Fund, a $200 million ($10 million a year for 20 years) fund targeted to support community betterment, clean energy innovation, tourism and economic development. The emphasis for the Fund will be on host communities and, in particular, host communities in the North Country. The Fund will operate through an advisory Board structure including municipal and community leaders, representatives of the business community, environmental organizations, North Country leaders and other key stakeholders.

2. On February 5, 2016, The Balsams petitioned to intervene (which was subsequently granted) and pointed out the value of The Balsams resort redevelopment and the broad public support it enjoyed. The Balsams argued that it had an interest in the availability of power and energy costs and the proximity of the NPT project to the Balsams Hotel and resort property. Petition to Intervene of Dixville Capital, LLC and Balsams Resort Holdings, LLC, dated Feb. 5, 2016. The Balsams did not mention any financial support for its plans from the Forward New Hampshire Fund or NPT in its petition.

3. On March 7, 2016 however, Mr. Otten, who identifies himself as "the lead developer" of The Balsams project, announced at the SEC's Public Hearing in Colebrook that NPT invested $2 million from the Forward New Hampshire Fund "without strings" in The Balsams redevelopment project. See Transcript of Public Hearing Conducted in Conjunction with the U.S. Department of Energy, Colebrook, NH, dated March 7, 2016 at 194, lines 21-23, attached as Exhibit 1. He also stated that "we're discussing a potential increased investment as the Pass progresses." Id. at 194-95, lines 23 & 1-2. Mr. Otten further argued, "The fund for the future is real. It's $200 million that's going to be spent in the North Country. That is a significant investment and commitment." Id. at 195-96, lines 23 & 1-3. An employee of The Balsams also spoke that night in favor of the Project and clearly linked the Forward New Hampshire Fund to the "rebirth of the resort." Id. at 199.

4. On March 14, 2016, at the SEC's Public Hearing in Holderness, Mr. Quinlan corroborated Mr. Otten's previous statements in answering a question from the Chair. The Chair asked "Is the Forward NH Fund currently active?" See Transcript of Public Hearing,

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1 In a footnote to the Order on Petitions to Intervene, dated March 18, 2016, the Chair noted the "advance grant of $2 million from the Forward New Hampshire Fund to the redevelopment of the Balsams Resort." Order on Petitions to Intervene, at 43, note 17.
Mr. Quinlan responded that while "technically" it was not, NPT had recently announced "an advance commitment from the Forward NH Fund." Id. at lines 16-22. He elaborated that the advance was made "in essence, by Eversource and its shareholders. And it was really an opportunity to help make the Balsams redevelopment project in the North Country a reality."

Id. at 49, lines 1-4. Further he argued that the advance from the Fund was:

exactly the type of initiative that the $200 million Forward NH Fund is intended to target. It's in the North Country, it's for the betterment of communities hosting the line. It would have a positive effect on tourism and economic development in the region. So it's the quintessential initiative for a fund like the Forward NH Fund and we took the opportunity to make the commitment.

(Id. at 49, lines 15-22.)

Mr. Quinlan also informed everyone that the Advisory Board for the Fund had not been established. Id. at 50. Other witnesses that night also stressed the importance of the Fund's contribution to The Balsams. See Holderness Hearing Transcript, at 96 (remarks of Rep. Herb Richardson, Coos Dist. 4):

I support the project's decision that Northern Pass was providing $2 million in early funding for the Balsams redevelopment. This is another perfect example of how beneficial this fund could be. This is great news for Coos County, and will help to bring the project to completion.

and see also id. at 97 (remarks of Alan McLain thanking the Fund for choosing The Balsams).

5. On March 16, 2016, at the Public Hearing in Deerfield, Mr. Quinlan again identified the $2 million award that the Forward New Hampshire Fund made to The Balsams as "the single best example" of what the Fund was intended to do. See Transcript of Public Hearing, Deerfield, New Hampshire, dated March 16, 2016, at 55, lines 3-22, attached as Exhibit 3. When queried further by the Chair, Mr. Quinlan said that the $2 million promised to The Balsams would be deducted from the $200 million Forward New Hampshire Fund. Id. at
6. In data requests, the Clarksville-Stewartstown Non-Abutter Intervenors sought further information about the Applicants' contribution and commitment for the Forward New Hampshire Fund to The Balsams. The Applicants objected on the grounds of confidentiality and relevance and the Intervenors moved to compel. See Order on Motions to Compel, dated Sept. 22, 2016, at 25-26. The presiding officer denied the Intervenors' motion to compel without analysis saying, "The requested information is simply not relevant or reasonably calculated to lead to the discovery of admissible evidence." Id. at 26.

7. The Balsams submitted the Pre-filed Direct Testimony of Leslie Otten on Behalf of Dixville Capital, LLC, and Balsams Resort Holdings, LLC, on November 15, 2016. Mr. Otten's testimony is openly supportive of the Project and voices non-expert opinions concerning the Project's effects on tourism, air quality, real estate values, energy supply and cost, job creation, and the development plans of the resort. Mr. Otten does not reference the Fund's $2 million gift to his redevelopment project despite his previous public comments in Colebrook.

8. In response to Mr. Otten's testimony, the Forest Society made data requests to The Balsams seeking information as follows:

   (a) Identify all payments made to Dixville Capital, Leslie Otten, or Balsams Resort Holdings by the Applicants or any person affiliated with them specifying the date, the amount, and the purpose for each of such payments. Provide copies of all documents relating to such payments;

   (b) Identify any financial arrangements that have been discussed or committed to between Dixville Capital, Balsams Resort Holdings and the Applicants; and
(c) To answer whether future funding by the Applicants to Dixville Capital and/or Balsams Resort Holdings was conditioned upon Dixville Capital's or Balsams Resort Holdings support for the Project.

9. In response to the Forest Society's data requests, The Balsams objected in each instance stating "not relevant" and "not likely to lead to the discovery of admissible evidence." Its objection relied primarily upon the September 22, 2016 order on this issue. The objection also claimed confidentiality and over breadth. In no instance, however, did the objection make more than cursory arguments about these objections and provided no factual support for them. The Balsams did not explain why the evidence being sought would be inadmissible in this proceeding.

10. On December 30, 2016, Counsel for the Public ("CFP") submitted testimony and a report in the case claiming economic benefit credit for the Forward New Hampshire Fund. See, e.g., Testimony of Thomas E. Kavet, dated Dec. 30, 2016, at 11 & 12 (showing positive effects of the Forward NH Plan on job creation and Gross State Product.) Mr. Kavet, however, noted some qualifications to the realization of the benefits. See Kavet Testimony at 5 (Fund should be managed and administered by independent economic development professionals following best practices); Kavet & Rockler Assocs., Economic Impact Analysis and Review of the Proposed Northern Pass Transmission Project, dated Dec. 30, 2016, at 52-55 (noting further concerns and uncertainties).

11. Whether particular evidence is "relevant" is a determination as to whether it is material to an issue in the case and has probative value of that issue. It is clear that the value and uses of the $200 million Forward New Hampshire Fund are material issues in this case. The Fund is held out as evidence of the Project being in the public interest in the Application and as economic benefit in the testimony of Mr. Quinlan. In Mr. Quinlan's
public remarks at the SEC's hearings in Colebrook, Deerfield and Holderness, he very enthusiastically touted the Fund and its award to The Balsams as among the primary benefits of the Project to the State. Mr. Quinlan also said that the Fund will be administered by an as yet unestablished Advisory Board and notably, that notwithstanding the lack of such a board, the Applicants awarded The Balsams $2 million from the Fund "without strings." Further Mr. Quinlan, Mr. Otten and others publically declared the value of this decision as being "quintessential" and "the single best example" of the purposes and uses of the Fund. Moreover, CFP's witnesses have identified the Fund as an apparently positive economic benefit to the State. With these facts the Fund and the award to The Balsams are unmistakably material issues in this case.

12. Mr. Otten, for The Balsams, submitted testimony supporting the Project and offering opinions on a number of things including economic effects such as job creation, tourism, and the redevelopment of the resort. Consequently, Mr. Otten's credibility and the bias of The Balsams in favor the Project are material issues. The door has been opened both by Mr. Quinlan and Mr. Otten and it is thus appropriate and necessary for the Forest Society to know more details about the uses of the Fund through its award to The Balsams, the terms and conditions attached to the award, including whether it is actually "without strings," and the nature and extent of any future awards committed. Similarly the details can shed light on the motivations, credibility and biases of Mr. Otten and The Balsams in offering their testimony. It appears obvious that the SEC and the public would want to know if, for example, the Applicants committed a significant figure from the Fund to The Balsams, which amount presumably would not be available for other purposes in the North Country or elsewhere.

13. Finally, where Kavet & Rockler have testified that the Fund's effects may be positive if managed and administered properly, it is material to know whether in "the single
best example" of the use of the Fund, the Applicants made the award wisely or otherwise. Similarly, the Applicants' bases and standards for making awards from the Fund should be scrutinized by the SEC in this process and as such are relevant issues for discovery. In addition, a large commitment of the Fund to The Balsams might affect Kavet & Rockler's modeling.

14. Undeniably, information about the "single best example" of the use of the Fund should be highly probative. Whether strings were attached to the award could be highly probative of bias and credibility of Mr. Otten and The Balsams. If the Fund is administered well in this instance might be probative of whether the Fund is some evidence that the Project is in the public interest.

15. The question of relevance is a low bar in the context of discovery, which bar is perhaps even lower in administrative proceedings. Pre-hearing "discovery is by its nature preliminary, remedial and discretionary, so [it is] given a favored, liberal and broad application in order to accomplish its purposes. Its use has been encouraged and its availability has been consistently expanded." G. MacDonald, 4 N.H. Practice - Wiebusch on N.H. Civil Prac. & Proc., at § 22.02 (3d ed. 2010). Under New Hampshire Superior Court Rules, the question of probability of leading to the discovery of admissible evidence is used only protectively to balance an argument that the material sought may be inadmissible; it is an exception to the exception, not the rule. See N.H. Super. Ct. R. 21(b) ("Scope of Discovery").² That standard is not found in the SEC's rules or in RSA 541-A.

² (b) Scope of Discovery. Unless otherwise limited by order of the court in accordance with these rules, parties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, custody, condition and location of any books, documents, electronically stored information, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. It is not grounds for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.
Under RSA 541-A:33, "[a]ny oral or documentary evidence may be received; but the presiding officer may exclude irrelevant, immaterial or unduly repetitious evidence." Cross examination is mandated to provide the parties "a full and true disclosure of the facts." RSA 541-A:33, IV.

Under these liberal standards and given the clarity that the Forward New Hampshire Fund's status is a material issue, the clarity that the administration of the Fund is a material issue, the clarity that Mr. Otten's and The Balsams' credibility and possible bias are material issues, the presiding officer should compel the answers and production sought by the Forest Society.

The Forest Society respectfully requests that a ruling on this Motion be made as soon as possible following an anticipated Objection from the Balsams. The Forest Society and the Balsams have agreed that the Forest Society will not question The Balsams' witnesses about these topics at the forthcoming Technical Sessions unless a ruling has been issued compelling the Balsams to provide the requested information. So, to maximize the orderly conduct of these proceedings, the parties request a ruling as far in advance as possible of the technical session during which the Balsams’ witnesses are scheduled to appear.

Pursuant to Site 202.12(k)(4), the Forest Society certifies that it has made a good-faith effort to resolve the dispute informally. The Forest Society and The Balsams have agreed that this Motion is timely filed if filed by today.

WHEREFORE, the Forest Society respectfully asks that the Committee compel Dixville Capital, LLC, and Balsams Resort Holdings, LLC, to produce the information requested and grant such other and further relief as may be reasonable and just.
Respectfully Submitted,

SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS

By its Attorneys,

BCM Environmental & Land Law, PLLC

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Date: January 6, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this day, January 6, 2017, a copy of the foregoing Motion was sent by electronic mail to persons named on the Service List of this docket.

Amy Manzelli, Esq.
STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE
Docket No. 2015-066

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

AGENDA FOR
PUBLIC HEARING CONDUCTED IN CONJUNCTION WITH THE U.S.
DEPARTMENT OF ENERGY

Colebrook Elementary School
27 Dumont Street
Colebrook, New Hampshire
March 7, 2016
5:00 - 10:30 p.m.
entire project underground, not just part of it.

Now, listening to the comments tonight, for the most part, it looks like Northern Pass, yes or no, is not the question. The issue is towers, and the issue is an issue because of Northern Pass's stubborn refusal to spend the money to completely bury the lines. Thank you.

SPEAKER: Good evening. Thank you for allowing me to speak tonight. My name is Les Otten. I own a renewable energy company and I've been doing business in New Hampshire since 2008, wood pellet industry. I've long supported replacing fossil fuels with renewable energy. In fact, that's what my company has been doing and we're a leader in the state. We deliver efficient wood pellet boilers and heating systems so residents and businesses can stop burning oil and propane. I'm also for jobs and growing the North Country economy. I spent the last two and a half years creating a plan for the Balsams Resort that you've heard about tonight that could lift the entire region, if successful. The fulfillment of that plan is my
first responsibility.

I also believe that climate change is real. It's our responsibility to mitigate the most potentially damaging activity that man has inflicted on our planet, but this is again also about jobs and the economy. In Dixville, in particular, was where manufacturing, power and tourism thrived for decades. Power has been a central component of the North Country's history. People resist change and they fear the unknown. Many times in my life, I have resisted change and feared it as well so I understand.

We have currently a Hydro-Quebec line that is taller than the proposed Northern Pass line which was built in 1986. That line runs directly through major tourism areas without negative impacts. And 33 wind towers were built on the mountain ridges above Dixville, and depending on your perspective and where you are at night, you can see blinking red lights on over 100 spaces on the hilltops over the State of New Hampshire. To some of us, those represent progress. They represent clean
energy, and we like to see them. So often
vision is in the eye of the beholder.

From a lifetime of developing resorts in
New Hampshire, California and Maine, I've never
seen tourism negatively affected by low cost
renewable energy and the systems derived and
built to create them. Views are important. The
North Country is also facing serious social and
economic issues. The highest unemployment
rating is in the North Country of New Hampshire.
It's caused our young workers to leave. Our
high school graduates can't find professions.
We've invested significant dollars in our
community only to watch these great assets leave
because there are no jobs. We have a drug
addiction epidemic in all of the northeast and
especially in the rural communities in New
Hampshire that many of us don't recognize, but
it's there.

Northern Pass while not loved, clearly, has
created a Forward New Hampshire fund that has
invested $2 million in the project at the
Balsams without strings. We're discussing a
potential increased investment with them as the Pass progresses. This will help us fulfill our commitment of restoring the Balsams Resort and revitalizing the North Country's economy. When we reopen with Phase 1, and at its completion, we will employ 1700 people. 600 people will be used over the next ten years in construction.

We will also save significantly in our annual energy cost. Those costs are something that a businessman really needs to pay attention to. The price that we're currently paying for power is the highest in the nature and in the continental United States. The possibility of keeping those costs in line and of stopping pollution of our land, our water, our air with hydrocarbons that are being put there from fossil fuels is an important part of our future and may well be the key to preserving our lakes, trees, our ground that we grow our food with.

Northern Pass is helping the North Country in a very significant way. Approving the project will bring more investment to our region. The fund for the future is real. It's
$200 million that's going to be spent in the North Country. That is a significant investment and commitment.

In closing, let me say that let there be no doubt that I favor the rebirth of the North Country, and I favor Northern Pass and the opportunities it will create. I hope these opportunities will endure for the next century. I thank you for your time.

MR. HONIGBERG: Every speaker up here this evening deserves your respect, and you will not make any more disparaging comments about any speaker here this evening. Thank you.

SPEAKER: Good evening. My name is Jeff Stevens, and I am a construction manager working on the Balsams renovation. I live in Dixville and have built large resort projects all over the world. Infrastructure is a necessary component of all development projects, and the Balsams project is no exception. In fact, there are many good aspects to the Balsams project and the Northern Pass including the fact that they will use clean renewable hydroelectric power and
will help Coos County to grow rather than shrink.

Exactly 30 years ago I helped to build the Pontook Hydroelectric Project in Dummer, and that has been a boon to Coos County and New Hampshire in terms of its economic, environmental and recreational opportunities with minimized visual impact from the infrastructure and transmission lines. I look forward to doing the same with the Balsams redevelopment. Thank you.

MR. HONIGBERG: Andy Pearson. I have been connected to the Balsams property for the majority of my life and have worked at the resort for upwards of 27 years. During this time, I've worked for different owners and several management companies, each of whom brought varying degrees of change, both to the resort's operation as well as the staff and guests. The biggest change and the one with the most impact still to this day was the decision in the fall of 2011 by our then owner, Tillotson Corporation, to close the resort.
Now I'd like to speak briefly about opportunities. Specifically, the opportunities that I've witnessed as countless students all from surrounding communities have experienced working at the resort during their high school and often college years. For decades our local youth have had the privilege of having a wide range of employment options allowing them to acquire skill sets, work alongside others from different parts of the world and recreate at the resort throughout the seasons. This unique opportunity was in their backyard, and for many had the enormous positive impact on their lives. On more than one occasion I received a copy of college papers written bring past employees of the resort on their experience and the importance of that experience during that time in their life.

We are now coming to the end of our fifth winter season at the Balsams and the Balsams remains closed. To my point, that represents five graduating classes or half a decade of kids who did not get to experience those types of
opportunities. This is a real concern of mine. I have a 13-year-old who wonders what her future will look like over the next 8 or 9 years. We're very close to realizing the tremendous opportunities that the rebirth of the resort will bring area wide, the opportunity to share in Forward New Hampshire fund to allow especially our local kids the chance to participate in and experience the many attributes and skills that will come with such employment options is a future that I've looked forward to.

There is a quote that used to hang in most offices at the resort, it came about from talking to employees about their feelings working at the Balsams, not management. It read, the Balsams is your highest priority. By serving its interests first and for the long-term, you and its guests, staff and community will all benefit the most.

SPEAKER: Monique Petrofsky. Thank for the opportunity to speak. I actually have a statement that my son wrote, and he represents
STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

March 14, 2016 - 5:03 p.m.
Plymouth State University
Welcome Center at the Ice Arena
129 NH Route 175A
Holderness, New Hampshire

IN RE: SEC 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.
(Public Hearing of the
Subcommittee members held pursuant
to RSA 162-H:10, I-c)

[Consisting of a presentation by the
Applicants, followed by a Question-and-Answer
Session with Subcommittee members, a
Question-and-Answer Session from the public,
and comments received from the public]

PRESENT FOR SUBCOMMITTEE:
Chairman Martin P. Honigberg
(Cremsr. Kathryn M. Bailey
Craig Wright, Designee
Christopher Way, Designee
William Oldenburg, Designee
Patricia Weathersby
Rachel Whitaker

SITE EVALUATION COMMITTEE:
Public Utilities Commission
(Presiding as Presiding Officer)
Public Utilities Commission
Dept. of Environmental Serv.
Dept. of Resources & Economic Development
Dept. of Transportation
Public Member
Alternate Public Member

COURT REPORTER: Steven E. Patnaude, LCR No. 052
know, if the aspiration was to be in the top five, you
know, we have to dramatically change the energy
infrastructure in this region.

But Northern Pass is a big step in the
right direction. You know, right now, we are the
highest in the country, and we're going higher. And,
not only are we high, we're very volatile. Which means
we're having very significant price swings in the wrong
direction during the winter months, which is a critical
period for many of our business and homeowners.

So, it's a step in the right direction,
but much more than Northern Pass will be necessary to
become truly competitive with the rest of the country.

CHAIRMAN HONIGBERG: "Is the ForwardNH
Fund currently active?"

MR. QUINLAN: Technically, it is not.
So, the ForwardNH Fund is a corporate commitment we
introduced last year, when we rolled out our new
project route. Technically, it doesn't become
effective until Northern Pass goes into service. The
funding source for the ForwardNH Fund is the Northern
Pass Project.

Now, I say "technically", because
recently we did announce an advance commitment from the
ForwardNH Fund. It was made, in essence, by Eversource and its shareholders. And, it was really an opportunity to help to make the Balsams redevelopment project in the North Country a reality. For those of you who followed that project, it is a transformational project for that portion of the state, which is, you know, somewhat depressed and could use, you know, economic development.

The Northern Pass Project, which essentially funds the ForwardNH Fund, was in a position to make a commitment to allow a critical phase of that Balsams redevelopment to go forward. So, it's an advance from the Fund. It's essentially being borne by our shareholders. The reason we selected that project is it's exactly the type of initiative that the $200 million ForwardNH Fund is intended to target. It's in the North Country, it's for the betterment of communities who are hosting the line. It would have a very positive effect on tourism and economic development in the region. So, it's the quintessential initiative for a fund like the ForwardNH Fund, and we took the opportunity to make the commitment.

So, it's not technically in effect, the Fund. But, in essence, we've made an initial
commitment.

CHAIRMAN HONIGBERG: "How will the Fund
be administered? If there's an advisory board, who
will be on it? And, how will those people be
appointed?"

MR. QUINLAN: So, ultimately, when we
move forward into construction of Northern Pass and we
actually place the Project in service, our anticipation
is we'll have an advisory board made up of key leaders
from across the State of New Hampshire. So, from the
business sector and the environmental community,
obviously, representation from the North Country. And,
especially, they will may make the determinations as
to which initiatives to fund. We're not at the point
where we are selecting advisory board members today.
If you think about it, this Project wouldn't go into
service until 2019. So, we've got quite a bit of time
before we actually stand the fund up fully. But, you
know, we're already getting inquiries from potential
advisory board members, as well as communities for
further investments. So, it's an opportunity to make a
real difference here in the State of New Hampshire.

CHAIRMAN HONIGBERG: "Are there specific
programs of New Hampshire Fish & Game that are
the vote of our people. Thank you.

CHAIRMAN HONIGBERG: Representative

Richardson, to be followed by Neil Irvine, and Martha
Richards.

REP. RICHARSON: Thank you, Mr.

Chairman. My name is Herb Richardson, H-e-r-b,
R-i-c-h-a-r-d-s-o-n. I'm the State Representative from
Coos District 4, the Towns of Lancaster, Dalton, and
the unincorporated place of Kilkenny. And, I am the
Vice Chairman of the Science, Technology and Energy
Committee, in Concord.

I am pleased to be here today in support
of the Northern Pass Project and ForwardNH Fund. I
believe that I speak for the silent majority of the
citizens of my district that want to grow our economy,
want opportunities for themselves and their families,
and want to see the North Country thrive again.

Unfortunately, those who speak up in
support of this project find themselves a target of
harassment and bullying from the opponent of this
project. This is something I have seen affect not only
myself, but others as well. This is something I have
learned firsthand, a few years ago, and again a couple
of years when I spoke against legislation on mandatory

{SEC 2015-06} [Joint Public Hearing/Holderness] {03-14-16}
burial that project opponents were pushing in the New Hampshire Legislature. I was threatened, as many others were, on this subject. Yes, but the New Hampshire House ITL'ed that bill. Yes, threatened personally, I was. But I can tell you, I'm still here today. And, I will not be silent.

I fought burial in Coos County down the state right-of-ways. No one could or would show me these right-of-ways. I learned that abandoned rails have been deeded back to the landowners. What's left? Route 3, creating a disaster for what -- that would only cripple the economy of the North Country, affecting transportation in a negative way for a couple of years.

I pass along the story only to encourage you to disregard the threats you will receive. Disregard the antics, the stunts, and the bullying that I have enjoyed. Do your job to do the best of your ability, look for the opportunities to make this a better project, and do your best to mitigate the impacts and make a decision based on facts.

I believe this project will bring major benefits and opportunities to Coos County. In addition to lower electric rates, which New Hampshire is one of
the highest in the country, this project will only -- will provide jobs and economic opportunity for residents and businesses of my district.

I support the project's decision to provide $200 million in funding for economic development and other initiatives. Imagine the possibilities. Imagine the projects, like broadband, that could bring -- that could be completed and the problems that could be solved with these funds.

I support the project's decision that Northern Pass was providing $2 million in early funding for the Balsams redevelopment. This is another perfect example of how beneficial this fund could be. This is great news for Coos County, and will help bring the project to completion. And, hopefully, in my lifetime, attend the ribbon-cutting.

I would also like to add that I do not dismiss the concerns of my constituents. These types of projects do have impacts. Over the past several years, I have tried to use my position to facilitate solutions to concerns raised. And, I encourage the SEC to do the same and continue to look for ways to mitigate -- mitigate the impact of this project.

Ultimately, I believe the SEC can and
than five years of lobbying by this Applicant, can see
through the fog and still knows that the Northern Pass
Project is not needed and should not be permitted as
processed. Thank you for letting me speak for New
Hampshire.

[Audience interruption.]

CHAIRMAN HONIGBERG: Alan McLain, to be
followed by Jim Mason, and Harley Mason.

MR. McLAIN: My name is Alan McLain --
my name is Alan McLain, spelled A-l-a-n, M-c-L-a-i-n.
First, I'd like to thank the Forward Fund for choosing
the Balsams. Hoping to get the hotel going and the ski
area, and the golf course. It's a big tremendous help
to Colebrook, New Hampshire, and they need it. I would
encourage the Forward Fund to pick, Mr. Chairman,
Berlin, New Hampshire as their second choice of a
community that certainly needs your help.

Now, I'll read my statement. And, thank
you for that. I'm a property owner in Berlin, New
Hampshire, and a business owner. On the property side,
I'd like to see my electric rates drop, and, on the tax
side, get some relief. Northern Pass will have a
positive impact on both of these problems. Lower
energy costs are also important, if we have any hope of
EXHIBIT 3
STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

March 16, 2016 - 5:09 p.m.
Deerfield Fair Pavilion
34 Stage Road
Deerfield, New Hampshire

IN RE: SEC 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.
(Public Hearing of the
Subcommittee members held pursuant
to RSA 162-H:10, I-c)

[Consisting of a presentation by the
Applicants, followed by a Question-and-Answer
Session with Subcommittee members, a
Question-and-Answer Session from the public,
and comments received from the public]

PRESENT FOR SUBCOMMITTEE:  SITE EVALUATION COMMITTEE:

Chairman Martin P. Honigberg  Public Utilities Commission
(Presiding as Presiding Officer)

Cmsr. Kathryn M. Bailey  Public Utilities Commission
Dir. Craig Wright, Designee  Dept. of Environmental Serv.
Christopher Way, Designee  Dept. of Resources &
William Oldenburg, Designee  Economic Development
Patricia Weathersby  Dept. of Transportation
Rachel Whitaker  Public Member

Alternate Public Member

COURT REPORTER:  Steven E. Patnaude, LCR No. 052
to show up in the market data.

MR. QUINLAN: Thank you.

CHAIRMAN HONIGBERG: "Will workers on the Northern Pass Project have an opportunity to continue working for Eversource after the Project is completed?"

MR. QUINLAN: So, one of the things that I talked about earlier was the "New Hampshire first" approach. As part of that, one of the things that we have launched, in collaboration with the IBEW, is an Apprentice Training Program, which really is designed to bring individuals who are interested in this trade, to this highly skilled trade, onto our projects, including Northern Pass. Give them an opportunity to receive, you know, state-of-the-art training. And, in some instances, we anticipate, you know, trying to recruit them as future Eversource employees. When we think about the electric worker of the future, projects like these are ideal opportunities to build out the craftsmen and to fully qualify a line worker.

So, the short answer is "yes". We do anticipate opportunities for many of the workers on this Project as part of that apprentice feeder program.

CHAIRMAN HONIGBERG: "What are some
examples of economic development projects that the $200 million ForwardNH Fund will support?"

MR. QUINLAN: So, the four focus areas were outlined on the slide. I won't repeat them. Probably, the single best example of that is our recent commitment we've made to the Balsams redevelopment up in Dixville Notch. You know, it's a project that is pretty far along in its development, from a permitting perspective, and is really working on final project planning and, ultimately, financing.

So, we have made an advance commitment to that important project in the North Country, because it's exactly the type of project that the ForwardNH Fund is intended to make a reality. It's in the North Country, it's a host community, it's economic development, it's tourism. It's kind of the perfect project for us to consider, and we've already made a $2 million commitment to it, in advance of our Project becoming a reality. We felt very strongly that that was the right thing to do. And, it's probably the single best example that I could provide you at this point.

CHAIRMAN HONIGBERG: Is that $2 million in addition to the 200 million or is that the first
deduction from the 200 million?

MR. QUINLAN: It's the latter. We would ultimately consider it part of the ForwardNH Fund commitment, as an advance commitment.

CHAIRMAN HONIGBERG: "Does Eversource support U.S. Representative Kennedy's bill", which is quoted here as "Fair Ratepayer Accountability, Transparency, and Efficiency Standards Act, to determine if Forward Capacity Market structure and policies are actually providing electric reliability at just and reasonable rates for consumers in New England?"

MR. QUINLAN: I'm not personally familiar with the bill. I am aware that, you know, capacity markets across this country, including in New England, are under review at a federal level, to look at whether they are really working. Are they incenting the investment they're intended to incent, to ensure that we have a reliable and diverse supply of power in the future? I think this bill is targeted on that very question, as well as, you know, are the rates being charged for capacity just and reasonable?

And, I'll give you an example of what's probably triggered this bill. You know, the capacity...