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May 4, 2017

Via Electronic Mail & Hand Delivery

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

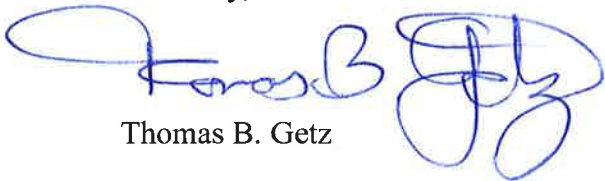
**Re: Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the “Applicants”) for a Certificate of
Site and Facility
Objection to NEPGA Motion to Strike Pre-Filed Testimony of Julia Frayer and LEI**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of the Applicants' Objection to New England Power Generators Association's Motion to Strike Portions of the Pre-Filed Testimony of Julia Frayer and Portions of the London Economics International LLC Report.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:slb

cc: SEC Distribution List

Enclosure

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANTS' OBJECTION TO NEW ENGLAND POWER GENERATORS
ASSOCIATION'S MOTION TO STRIKE PORTIONS OF THE PRE-FILED
TESTIMONY OF JULIA FRAYER AND PORTIONS OF THE LONDON ECONOMICS
INTERNATIONAL LLC REPORT**

NOW COME Northern Pass Transmission LLC (“NPT”) and Public Service Company of New Hampshire d/b/a Eversource Energy (the “Applicants”), by and through their attorneys, McLane Middleton, Professional Association, and respectfully object to the Motion to Strike Portions of the Pre-Filed Testimony of Julia Frayer and Portions of the London Economics International LLC Report (“Motion”) filed by New England Power Generators Association’s (“NEPGA”) dated April 24, 2017.

1. The Applicants filed an Application for a Certificate of Site and Facility with the Site Evaluation Committee (“SEC”) on October 19, 2015, for a 192-mile electric transmission line with associated facilities (“Northern Pass” or “Project”). Included with the Application was the Pre-filed Direct Testimony of Julia Frayer and a report titled *Cost-Benefit and Local Impact Analysis of the Proposed Northern Pass Transmission Project* (“Original Report”).

2. On February 15, 2017, the Applicants filed Ms. Frayer’s updated testimony and a report titled *Update of the Electricity Market Impacts Associated with the Proposed Northern Pass Transmission Project* (“Updated Report”). The updated testimony and report reflected a comprehensive re-calculation of the original market analysis, including the incorporation of the most recent FERC-approved demand curves and more recent natural gas price trends.

3. NEPGA now asks the SEC to strike portions of Ms. Frayer's Original Report. It says that "it is unclear whether the Applicants intended that the updated testimony and economic analysis contained in the report replace the prior testimony and portions of the report addressing the capacity savings." NEPGA also says that the information in the Original Report "could mislead those reading the testimony, including the public, the parties, intervenors and SEC members."

4. Presumably, NEPGA is trying to make some point with its Motion but the exercise it is asking the SEC and the parties to undertake is pointless. In the first place, the Updated Report, is, as stated, an update, i.e., not a replacement or substitute, and, in the second, there is little risk that the SEC will be misled or confused because the relationship between the updated information and the original information is clearly drawn, and the two reports complement one another inasmuch as the Original Report contains the underlying methodology and other information not repeated in the Updated Report.

5. The Applicants believe it is unnecessary, and potentially counter-productive, to strike any of Ms. Frayer's Original Report and that the record will be clearer if the full version of the Original Report is left intact. They also believe that the administrative effort for the SEC, the Applicants and the parties is not justified by the remote possibility that the SEC may determine capacity benefits for the Project based on the October 19, 2015 testimony and report. Inasmuch as NEPGA has shown no good reason for striking portions of Ms. Frayer's Original Report, its Motion should be denied.

WHEREFORE, the Applicants respectfully request that the Presiding Officer:

(A) Deny NEPGA's Motion to Strike; and


(B) Grant such further relief as it deems appropriate.

Respectfully submitted,

Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy

By Its Attorneys,
McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: May 4, 2017

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Certificate of Service

I hereby certify that on the 4th day of May, 2017, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.


Thomas B. Getz