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December 21, 2017

**VIA IN-HAND DELIVERY & E-MAIL**

Pamela Monroe, Administrator  
NH Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301  
pamela.monroe@sec.nh.gov

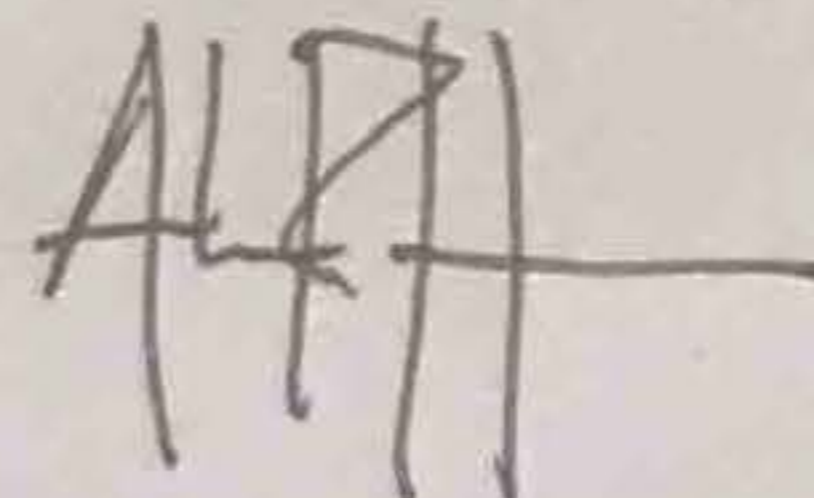
**RE: NH Site Evaluation Committee Docket No. 2015-06: Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility**

Dear Ms. Monroe,

Enclosed please find the:

1. International Brotherhood of Electrical Workers, Cate Street Capital, Inc., Coos County Business and Employers Group, and Dixville Capital, LLC and Balsams Resort Holdings, LLC's Objection to Counsel for the Public's Motion to Strike London Economics International's Memorandum; and
2. Corresponding Certificate of Service.

On Behalf of the Business & Organizations with Economic  
Interests Intervenor Group,



Alan Raff



THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

RE: )  
Northern Pass Transmission, LLC and )  
Public Service Company of New Hampshire )  
d/b/a Eversource Energy: )  
Joint Application for a Certificate of Site and )  
Facility for Construction of a New High Voltage )  
Electric Transmission Line in New Hampshire )

SEC DOCKET No. 2015-06

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, CATE STREET  
CAPITAL, INC., COOS COUNTY BUSINESS AND EMPLOYERS GROUP  
& DIXVILLE CAPITAL, LLC AND BALSAMS RESORT HOLDINGS, LLC'S  
OBJECTION TO COUNSEL FOR THE PUBLIC'S MOTION TO STRIKE LONDON  
ECONOMICS INTERNATIONAL'S MEMORANDUM

The International Brotherhood of Electrical Workers ("IBEW") objects to Counsel for the Public's motion to strike London Economics International's Memorandum ("LEI Memorandum"), and says:

1. The background surrounding this issue is set forth in both Counsel for the Public's motion, dated December 15, 2017, and the Applicants' objection, dated December 19, 2017.
2. Counsel for the Public's motion to strike should be denied. As the pertinent portions of the transcript from October 27, 2017 demonstrate, there was a discussion regarding Counsel for the Public conferring with the Applicants about reconciling the Brattle Group and LEI analyses. Based on the representations made in Counsel for the Public's motion and the Applicants' subsequent objection, it appears that Counsel for the Public did not confer with the Applicants regarding this issue. Because it is reasonable to conclude that the request was not directed solely at Counsel for the Public's witnesses and given



Counsel for the Public's failure to confer with the Applicants on this issue, the LEI memorandum is properly before the Subcommittee and should be considered.

3. Additionally, Counsel for the Public's motion to strike, is inconsistent with the overall purpose of this proceeding. The purpose of this proceeding is to evaluate the impacts of and benefits from a proposed energy facility in New Hampshire. See RSA 162-H:1. The overall purpose of the proceeding is to allow for a full and fair evaluation of the application. Despite the directive contained in the October 27, 2017 discussion on record to do so, Counsel for the Public chose to provide only its own reconciliation of the analyses. The LEI memorandum is necessary to allow for a full and fair evaluation of the application before the Subcommittee and would assist the Subcommittee in this process.
4. As a final matter, Counsel for the Public's motion is contrary to Counsel for the Public's statutory role in this proceeding. As set forth by statute, Counsel for the Public is directed to "represent the public in seeking to protect the environment and in seeking to assure an adequate supply of energy." RSA 162-H:9 (emphasis added). In representing the public in this proceeding, Counsel for the Public's role is to balance the interests of the public in an objective fashion, not as an adversary advocating for one side. Counsel for the Public's motion, as well as other motions filed and positions taken by Counsel for the Public, suggests that it is acting in an adversarial capacity for only one side. Rather than seeking to exclude the LEI memorandum, Counsel for the Public should be supporting its inclusion to allow for the full and fair evaluation of this application.
5. Based on the foregoing, Counsel for the Public's motion to strike should be denied.

Respectfully submitted,



BUSINESS & ORGANIZATIONS WITH ECONOMIC  
INTERESTS INTERVENOR GROUP

By Its Spokesperson,

Dated: 12/21/2017

By: AR

Alan Raff

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**Certificate of Service**

I hereby certify that on this day the foregoing was sent to the New Hampshire Site Evaluation Committee and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.

Dated: 12/21/2017

By: AR

Alan Raff