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Admitted in: NH

March 9, 2018

By Electronic Mail and First-Class Mail

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

Re: Northern Pass Transmission LLC and Public Service Company of
New Hampshire d/b/a Eversource Energy
Docket No. 2015-06

Dear Ms. Monroe:

I have enclosed Dixville Capital, LLC and Balsams Resort Holdings' Statement in Support of the Applicant's Motion for Rehearing and Request to Vacate Decision of February 1, 2018 and to Resume Incomplete Deliberations.

Thank you for your attention to this matter. Please contact me if you have any questions.

Very truly yours,



Mark E. Beliveau

MEB/kmd
Enclosure

cc: SEC, 2015-06 Master Service List, Revised 3.6.18 (by email)

**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

**DIXVILLE CAPITAL, LLC AND BALSAMS RESORT HOLDINGS' STATEMENT IN
SUPPORT OF THE APPLICANT'S MOTION FOR REHEARING AND REQUEST TO
VACATE DECISION OF FEBRUARY 1, 2018 AND TO RESUME INCOMPLETE
DELIBERATIONS**

Intervenors Dixville Capital, LLC (“Dixville Capital”) and Balsams Resort Holdings, LLC (“BRH”) (Dixville Capital and BRH are jointly referred to herein as the “Intervenors”) by and through their undersigned counsel submit this statement in support of Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy’s (collectively the “Applicants”) Motion for Rehearing and Request to Vacate Decisions of February 1, 2018 and to Resume Incomplete Deliberations (the “Motion”), stating as follows:

1. On February 1, 2018, the New Hampshire Site Evaluation Committee (“SEC”) denied the Applicants’ joint application for a certificate of site and facility, after 70 days of hearings and 2.5 days of deliberations.

2. The SEC reached its decision after deliberating on two of the four statutory criteria — whether “(a) [t]he applicant has adequate financial, technical, and managerial capability to assure construction and operation of the facility in continuing compliance with terms and conditions of the certificate” and whether (b) “[t]he site and facility will not unduly interfere with the orderly development of the region with due consideration having been given to the views of municipal and regional planning commissions and municipal governing bodies.” RSA 162-H:16, IV (a), (b). The SEC did not deliberate on the remaining two statutory criteria regarding impact

on “aesthetics, historic sites, air and water quality, the natural environment, and public health and safety,” as well as whether “[i]ssuance of a certificate will serve the public interest.” RSA 162-H:16, IV (c), (d).

3. Thus, the SEC did not consider suggestions by Counsel for the Public concerning conditions that might be imposed in connection with a certificate, or the manner in which the Applicant’s creation of the \$200 million Forward NH Fund might have been utilized to address and mitigate concerns regarding the Applicants’ Project.

4. Had the SEC considered the remaining two statutory criteria, it would not have overlooked the numerous benefits associated with the Applicants’ Project, including increased energy capacity, increased renewable energy production, reduction of CO² emissions, and job creation associated with the Project’s projected construction. Further, the Forward NH Plan, which BRH has benefited from to date, was slated to support the sectors of clean energy innovation, economic development, community investment, and tourism. If the Motion is not granted, these benefits may be lost, harming not only the Applicants, but also many residents and businesses within the State.

5. Specifically, the SEC’s decision will adversely impact the Balsams Resort redevelopment effort underway in Dixville, NH, in the following manner:

- a. NPT was slated to provide 1,090 MWs of clean, renewable power which would be of tremendous benefit to the Balsams as it will require a substantial and reliable source of power in order to maintain operations. This is of critical importance when much capacity is currently being retired, or is slated to be retired in the coming years, thus creating the potential, as was seen with the recent cold snap last December, for insufficient power being available.

- b. The Balsams Resort master plan involves a focus on all things sustainable, and having NPT transmitting clean hydro power into our region provided a great synergy to this plan, reducing our reliance on fossil fuel.
- c. NPT was estimated to reduce the cost of power to New Hampshire residents and businesses, and this would have had a positive impact on the Balsams Resort operations, where power consumption is expected to be one of the largest expenses.
- d. NPT was estimated to create in excess of 2,600 jobs during construction. These employment positions being available in Coos County, where they are much needed, would have had a tremendous impact on retaining and attracting a skilled work force in the area, which would have been significant to the Balsams, as when construction begins, 600 construction jobs will need to be filled. Further, once operational the Balsams is expected to employ approximately 400 individuals directly on-site. The multiple years of construction that both the NPT and the Balsams projects represents, means the higher likelihood that a strong work force will be in place once operations begin. Further, this increase in job creation would have benefitted the surrounding communities in tangible ways as a result of an increased need for housing, services, and other indirect activities.
- e. The Balsams was a recipient of funds from the Forward NH Fund, which were instrumental in advancing its development efforts, and demonstrated a true commitment by the Applicant to promote tourism and facilitate economic development in the North Country. The denial of NPT's application will result in losing the benefits of the proposed Forward NH

Fund, and the key commitments made by the Applicant relating to tourism, recreation, economic development and energy cost benefits to businesses and residents.

6. Therefore, the Intervenor support the Applicants' Motion and respectfully request that it be granted in full.

WHEREFORE, Intervenor Dixville Capital, LLC and Balsams Resort Holdings, LLC, respectfully request that the Presiding Officer:

- A. Grant the Applicants' Motion, dated February 28, 2018, in its entirety; and
- B. Grant such further and other relief as may be just and appropriate.

Respectfully Submitted,

Dixville Capital, LLC and

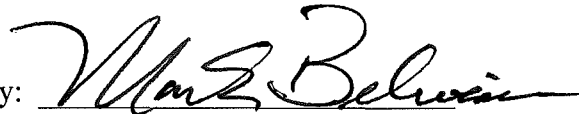
Balsams Resort Holdings, LLC

By their attorneys,

Pierce Atwood LLP

Dated: March 9, 2018

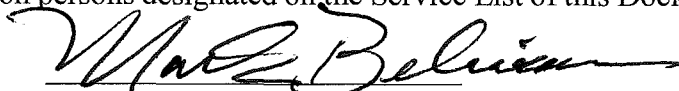
By:



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Certificate of Service

I hereby certify that on this 9th day of March 9, 2018, I caused a copy of the foregoing document to be served by electronic mail on persons designated on the Service List of this Docket.



Mark E. Beliveau