



# New England Ratepayers Association

May 25, 2016

Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301  
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Re: Docket No. 2015-06 Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire DBA Eversource Energy for a Certificate of Site and Facility

Dear Ms. Monroe:

The New England Ratepayers Association wishes to submit the following comments requesting that the SEC reconsider its decision to extend the Time Frame for a final decision on the Northern Pass Project.

The Northern Pass Project has been subject to public hearings, information sessions and legislative hearings for five years. The extent of the project, the type of construction and the route of the project has been known for most of that time period. Many of the intervenors who claim to need more time to prepare a response have already been publically testifying against the project for years. I have attended and testified at a number of the public sessions over the past several years and none of the arguments, for or against, have materially changed. It has been the same people saying the same things—whether it was before the legislature, the DOE or the SEC. The individuals, organizations and businesses who are intervening or providing comments now have been the ones commenting since the project was announced. It is highly unlikely that their arguments have changed or that that project opponents/intervenors need additional time to build a case against the project. It is far more likely their request(s) to extend the Time Frame is simply a tactic to continue to delay commencement of construction on Northern Pass.

More importantly, the codification of SB 245 rendered language in RSA 162-H:7 that clearly states: “Within 365 days of the acceptance of an application, the committee shall issue or deny a certificate for an energy facility”. That language was derived from the results of the two hundred and twenty-nine page “Raab Report”, which was the byproduct of five citizen workshops, seven focus groups and a “Coordinating Committee”—with the intent being to make recommendations to the legislature regarding the SEC. Many of the intervenors currently requesting an extended Time Frame agreed to the language in SB 245 which included the stated requirement to issue or deny a certificate within one year. Furthermore, the SEC has the authority under RSA 162-H:14 to suspend deliberations at any time during the proceeding

should it be determined to be in the public's best interest. Extending the process before it has even begun is premature and has unnecessarily set a precedent that will undoubtedly be used to delay future energy projects.

Extending the time frame also means that Northern Pass' participation in the regions capacity market will be delayed by at least one year. That delay could potentially cost New Hampshire's businesses and families in excess of \$100 million in capacity costs for each year of delay. The capacity market has climbed from \$1.2 billion a few years ago, to \$4 billion for the 2018-2019 market year before "falling" to \$3 billion for 2019-2020. New Hampshire ratepayers comprise roughly 10% of the regions load and thus incur 10% of the capacity costs. That equates to \$300 to \$400 million in each of the two most recent capacity auctions. Northern Pass's inclusion in the 2020-2021 capacity market would reduce capacity costs and provide real monetary benefits to New Hampshire ratepayers. Unfortunately, pushing back the Time Frame could cost New Hampshire's ratepayers and our economy \$100 million or more.

As an organization dedicated to protecting individual and business ratepayers from policies that result in higher electricity rates we strongly encourage the SEC to return to the Time Frame established in RSA 162-H:7.

Sincerely,

A handwritten signature in black ink, appearing to read 'MB', with a long horizontal flourish extending to the right.

Marc Brown  
President  
New England Ratepayers Association  
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603-369-4301