

**STATE OF NEW HAMPSHIRE**  
**SITE EVALUATION COMMITTEE**

**July 18, 2017 - 9:00 a.m.**  
49 Donovan Street  
Concord, New Hampshire

**DAY 21**  
**Morning Session ONLY**

*{Electronically filed with SEC 07-25-17}*

**IN RE:       SEC DOCKET NO. 2015-06**  
**NORTHERN PASS TRANSMISSION -**  
**EVERSOURCE; Joint Application of**  
**Northern Pass Transmission LLC and**  
**Public Service of New Hampshire d/b/a**  
**Eversource Energy for a**  
**Certificate of Site and Facility**  
**(Hearing on the Merits)**

**PRESENT FOR SUBCOMMITTEE/SITE EVALUATION COMMITTEE:**

<b>Chmn. Martin Honigberg</b> <i>(Presiding Officer)</i>	Public Utilities Comm.
<b>Cmsr. Kathryn M. Bailey</b>	Public Utilities Comm.
<b>Dir. Craig Wright, Designee</b>	Dept. of Environ.Serv.
<b>Christoper Way, Designee</b>	Dept. of Resources & Economic Development
<b>William Oldenburg, Designee</b>	Dept. of Transportation
<b>Patricia Weathersby</b>	Public Member
<b>Rachel Dandeneau</b>	Alternate Public Member

**ALSO PRESENT FOR THE SEC:**

Michael J. Iacopino, Esq. Counsel for SEC  
*(Brennan, Caron, Lenehan & Iacopino)*

Pamela G. Monroe, SEC Administrator

*(No Appearances Taken)*

**COURT REPORTER: Cynthia Foster, LCR No. 14**

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**P R O C E E D I N G S****(Hearing resumed at 9:00 a.m.)**

1  
2  
3 PRESIDING OFFICER HONIGBERG: Good morning,  
4 everyone. We're going to start up. This is Day  
5 21.

6 Ms. Monroe has asked me to remind people  
7 that if they want to be part of the site visit  
8 at the end of next week, they need to let her  
9 know by Thursday of this week, close of  
10 business, so arrangements can be made and the  
11 whole thing can be organized.

12 The witness this morning is Mr. Nichols,  
13 correct? Cross-examination is going to be in a  
14 little different order because some people are  
15 here and some people aren't. I think after the  
16 Business Organizations and the other ones that  
17 go before Counsel for the Public, instead of  
18 Counsel for the Public we're going to have Ms.  
19 Manzelli from Society of Protection of New  
20 Hampshire Forests is going to be the next up  
21 after that. So is there any other housekeeping  
22 we need to deal with before we get started? All  
23 right. Seeing none, Mr. Needleman.

24 MR. NEEDLEMAN: Thank you.

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**MITCH NICHOLS, DULY SWORN**

**DIRECT EXAMINATION**

**BY MR. NEEDLEMAN:**

Q Mr. Nichols, could you please state your full name and your business occupation?

A Mitch Nichols, President of Nichols Tourism Group.

Q Could you briefly state your role in this case?

A I was asked to evaluate the potential impacts to the tourism industry of the Northern Pass Project.

Q And I've given you two exhibits. Applicant's Exhibit 31 is your Prefiled Testimony, and Applicant's Exhibit 105 is your Supplemental Prefiled Testimony. Do you have both of those there?

A I do.

Q And do you have any corrections to either one of those documents?

A I have one correction.

Q Could you please explain that?

A On my Supplemental Testimony on page 4, the footnote number 8, it should read the Susquehanna to Roseland Transmission Line Final

1 Environmental Impact Statement. So it's the EIS  
2 from this Susquehanna to Roseland Transmission  
3 Line.

4 Q Other than that, any other corrections?

5 A No.

6 Q Having that one correction in mind then, do you  
7 adopt both pieces of testimony and swear to  
8 them?

9 A I do.

10 Q Thank you. Nothing further, Mr. Chairman.

11 PRESIDING OFFICER HONIGBERG: Anyone here  
12 from the City of Franklin, City of Berlin? How  
13 about Wagner Forest Management? I think Ms.  
14 Manzelli, you are up.

15 **CROSS-EXAMINATION**

16 **BY MS. MANZELLI:**

17 Q Good morning, Mr. Nichols.

18 A Good morning.

19 Q My name is Amy Manzelli. I'm the attorney for  
20 the Society for the Protection of New Hampshire  
21 Forests.

22 Attorney Needleman just went over two of  
23 the three key documents that we're going to be  
24 looking at this morning, and I just wanted to

1 mention the other one. Do you have a copy of  
2 your report which is a portion of Applicant's  
3 Exhibit 1 in this hearing?

4 A I do.

5 Q Okay. Thank you. And just to clarify, this is  
6 your September 2015 Northern Pass Transmission  
7 and New Hampshire Tourism Industry, correct?

8 A That's correct.

9 Q Now, just so we can set the stage here. It's  
10 your opinion, right, the opinion that you're  
11 rendering in this case, that Northern Pass, if  
12 approved, would not affect regional tourism  
13 demand and it will not have a measurable effect  
14 on New Hampshire's tourism industry.

15 That's your opinion in this case?

16 A That's correct.

17 Q Okay. I want to talk with you about traffic.  
18 Are you familiar at all with municipal zoning?

19 A In general.

20 Q Okay. And are you familiar with the municipal  
21 approval processes for developments in general?

22 A Yes, in general.

23 Q And how familiar, would you say? I mean, are  
24 you extremely familiar, are you involved in



1           these, are you somewhat familiar?

2       A     I would say somewhat familiar.

3       Q     Are you aware that it is common for developers  
4           to have a traffic consultant study the potential  
5           implications to traffic as a result of  
6           development and then to write that up in a  
7           report about traffic and submit that to the  
8           decision-making municipal entity?

9       A     I'm sure in certain instances that's a piece of  
10          a submission.

11      Q     And are you aware that such studies would  
12           typically evaluate current traffic conditions  
13           and then project what impact a particular  
14           development would have on things like wait times  
15           at traffic lights, stop signs, or other  
16           locations, safety considerations, such as  
17           visibility, volume and types of vehicles, and  
18           other considerations?

19      A     I'm sure they could include all of those.

20      Q     Are you aware that such a traffic study might be  
21           prepared for developments with a significantly  
22           smaller footprint than this Project; for  
23           example, something like a Dollar Store?

24      A     I would assume that would depend on the location

1 and a whole host of other factors in terms of  
2 that would be a relevant analysis that was  
3 undertaken.

4 Q Are you aware that the Applicants or their  
5 consultants have not prepared any such study for  
6 this Project?

7 A I am not aware of a traffic study.

8 Q In particular, are you aware that the  
9 Applicant's witness Lynn Farrington has  
10 discussed the need for a Transportation  
11 Management Plan but has not actually prepared or  
12 submitted one?

13 A I cannot speak to that. I've not been involved  
14 in those discussions.

15 Q And you yourself haven't prepared any traffic  
16 study in this case?

17 A I have not.

18 Q You're not qualified to prepare a traffic study,  
19 are you?

20 A That's not my area of expertise.

21 Q And given that the Applicant has not done a  
22 traffic study, am I safe to assume that you did  
23 not rely on anything from the Applicant  
24 regarding traffic in connection with rendering

1 your opinion?

2 A I certainly considered general visitor flows  
3 throughout the state and discussed issues as it  
4 related to traffic that could be influenced  
5 during construction periods in a general kind of  
6 context.

7 Q But that information was not anything from the  
8 Applicant that's been submitted in this case.

9 A I think the Applicant has submitted plans in  
10 terms of the construction process and some of  
11 the steps and initiatives they're undertaking to  
12 minimize the impacts to traffic and those areas.

13 Q In what areas?

14 A In areas of construction of the Project. I  
15 believe there is, that's a different area, but I  
16 believe that the team has undertaken steps to  
17 try and address and limit the impacts to traffic  
18 through the construction process.

19 Q Okay. Nicole, let's go back to the SEC  
20 transcripts regarding Lynn Farrington's  
21 testimony.

22 So I'll just identify this for you,  
23 Mr. Nichols. Your screen is working, I presume?

24 A It is.

1 Q So you can see down at the bottom there that  
2 this is the transcript from May 1st, 2017, in  
3 this matter. You see that?

4 A I do.

5 Q Now, do you see the information that I've  
6 highlighted there? Ms. Farrington is being  
7 questioned, and you can see the question is,  
8 "You haven't written that Traffic Management  
9 Plan, have you?" And then she responds that she  
10 has not.

11 I correctly read that testimony, right?

12 A I see that.

13 Q And I'm representing to you that Lynn Farrington  
14 is the Applicant's traffic expert so I would  
15 just ask that you accept that representation.

16 A Um-hum.

17 Q Now, between May 1st, 2017, and now, are you  
18 saying that you've received information from the  
19 Applicant about traffic?

20 A No, but I have talked with the construction  
21 group about the kinds of steps, the kinds of  
22 activities that they would anticipate  
23 undertaking during the construction process to  
24 limit the impact as it relates to the tourism

1 and visitor flows. So it's been in a more  
2 general kind of context.

3 Q Okay. And so you agree that any conversation  
4 that you had with the Applicant about traffic  
5 has been in a general context?

6 A That's correct.

7 Q And none of that information is contained  
8 anywhere in either of your Prefiled Testimonies  
9 or your report.

10 A Not specifically, no.

11 PRESIDING OFFICER HONIGBERG: Off the  
12 record.

13 (Discussion off the record)

14 Q Nicole, let's look at that other transcript,  
15 please.

16 And, again, I'll just call your attention  
17 to the sort of footer down at the bottom so you  
18 can see that this is from a different, looks  
19 like the same day, Day 6, morning session, May  
20 1st, 2017. Would you please take a moment to  
21 review the testimony on this page?

22 A Okay.

23 Q Okay. Thank you. Am I characterizing this  
24 testimony from the Applicant's traffic expert,

1           essentially, that they have not identified  
2           specific locations where they will be  
3           implementing or studying specific traffic  
4           ramifications as a result of this Project if it  
5           were to be approved?

6       A     I see that.

7       Q     Thank you.

8                        So just to confirm, nowhere in your report  
9                        or either of your Prefiled Testimonies did you  
10                      address the impact to traffic that the Northern  
11                      Pass would likely have if it were approved, did  
12                      you?

13      A     No, I did not.

14      Q     But you did note possible traffic delays in a  
15              general sense.

16      A     Correct.

17      Q     And in your report, you actually charted, quote,  
18              "possible traffic delays as the number 1  
19              critical or very important destination barrier,"  
20              right?

21      A     That was one of the barriers that were noted in  
22              our survey, correct.

23      Q     Isn't it the number one barrier noted?

24      A     Yes. Here. Yes.

1 Q Now, I want to talk about one specific area. Do  
2 you agree that the greater Lincoln and Woodstock  
3 areas are important tourism destinations in New  
4 Hampshire?

5 A Yes, I think that's a fair characterization.

6 Q Are you aware that the underground portion of  
7 the Project and we have -- I want to wait until  
8 we have the map here. There you go.

9 So just to orient you here. You can see  
10 the yellow highway going north to south is Route  
11 93. And then you can see some of the secondary  
12 highways over to the west. And so you'll see  
13 here these red-shaded triangles are different  
14 map segments of the proposed Project, and this  
15 is from the Northern Pass website.

16 So the underground portion comes down from  
17 Easton and Route 112, and then it heads easterly  
18 into North Woodstock, and then you can see it  
19 takes a turn to turn south on Route 3 in  
20 downtown Woodstock, and this is near Exit 32 off  
21 of I-93. Then the route continues south down  
22 Route 3. You can make that out on the map?

23 A I see that.

24 Q Can you see where Exit 32 is? I apologize.

1 It's not entirely clear, but it's a little green  
2 square kind of right in the center of the map.

3 A Okay.

4 Q Are you aware that at this exit off the Route  
5 93, Exit 32, to the east is the town of Lincoln,  
6 Loon Mountain, the Kancamagus Highway which is  
7 all a major entry point for summer tourists to  
8 reach the White Mountains; are you aware of  
9 that?

10 A Generally, yes.

11 Q And are you aware that the same exit to the west  
12 is downtown North Woodstock and that Route 112  
13 over the intersection of Route 3 is a major  
14 tourist access point to Mt. Moosilauke as well  
15 as the Appalachian Trail?

16 A In general, yes.

17 Q Are you aware that two of Woodstock's and this  
18 general region's biggest and busiest weekends  
19 for tourism are Columbus Day Weekend and the  
20 weekend of the Highland Games in mid-September?

21 A I have not studied the specific visitation  
22 volumes in that exact area.

23 Q Would it surprise you that Columbus Day Weekend  
24 is very busy weekend in this area?



1 A I'm sure it's an active period of time, sure.

2 Q Are you aware that for either of those weekends  
3 traffic can be so bad that it backs up for miles  
4 on both Route 3 and along Route 93?

5 A That wouldn't be surprising. I think in many  
6 visitor destinations in big events or festivals  
7 that's just part of the reality of large numbers  
8 of visitors in a somewhat concentrated area.

9 Q Do you have any knowledge about whether such  
10 traffic is common in New Hampshire?

11 A I'm sure on certain periods of time, certain  
12 events, certain festivals, certain periods,  
13 there can be congestion and activities at peak  
14 periods.

15 Q Is this based on general experience or do you  
16 have any specific knowledge about any location  
17 where there is traffic of this nature?

18 A It would be general experience. I haven't  
19 studied specific traffic flows at any specific  
20 location.

21 Q In New Hampshire.

22 A Correct.

23 Q Are you aware generally that the construction  
24 season is at its height in the summer and also

1 extends into the fall?

2 A I do. I understand that.

3 Q And according to your report, summer and fall  
4 are also when New Hampshire receives the most  
5 tourists, right?

6 A That's correct.

7 Q And you can see here, the brown is 41, the gray  
8 is 22, and each of those seasons alone, those  
9 are the two highest seasons, and together that's  
10 the majority of the tourists, right?

11 A That's correct.

12 Q And are you aware that construction of the  
13 Project over the anticipated construction period  
14 of 2-plus construction seasons would likely  
15 worsen the traffic in these areas during the  
16 summer and fall?

17 A I'm sure there will be some additional  
18 congestion as a result of the construction  
19 process.

20 Q But you didn't consider the impact of traffic  
21 potentially putting a downward pressure on  
22 tourism, did you?

23 A In general, I did.

24 Q But you testified earlier that it's not

1 reflected anywhere in your Testimonies or your  
2 Report.

3 A You asked about, I believe, a specific traffic  
4 analysis that I had undertaken. My experience  
5 has been that visitors come across the East  
6 Coast. There's construction activity that is  
7 occurring. In the last three years as I've  
8 undertaken this process I ran into multiple  
9 areas where construction was undertaken. I  
10 believe today's visitors understand that's part  
11 of the experience, and particularly in any areas  
12 on the East Coast, that summer and fall period  
13 is the period where much of that construction  
14 would be going on and that today's visitors  
15 understand that that's part of the visitor  
16 reality.

17 Q Nowhere in your Prefiled Testimony, and your  
18 Prefiled Testimony is both of them, and your  
19 Report did you analyze the impact of traffic  
20 putting a downward pressure on tourism, did you?

21 A Again, there was no specific analysis in my  
22 Testimony, and again as I just cited, I don't  
23 believe the construction or traffic delays would  
24 influence that fundamental decision to come to

1 New Hampshire.

2 Q And there's also no specific analysis in your  
3 report, correct?

4 A That's correct.

5 Q And you didn't have any analysis about how a  
6 tourist might or might not, you didn't say  
7 either way, decide to travel elsewhere to view  
8 fall foliage if the last two times they visited  
9 Woodstock they encountered excessive traffic  
10 delays, did you?

11 A I did not study that specific example, no.

12 Q So even though your own report shows possible  
13 traffic delays are the number one critical or  
14 most important destination barrier, and even  
15 though the greater Lincoln and Woodstock areas  
16 are important tourism destinations already  
17 experiencing adverse impacts because of traffic  
18 delays, you did not address at all what impact  
19 possible Northern Pass traffic delays would  
20 likely have on tourism in New Hampshire, right?

21 A I don't think that's accurate, no.

22 Q Where in your report did you address it?

23 A I think we spoke quite extensively that in our  
24 experience it's the collective mix of attributes

1 that a destination provides. So I don't believe  
2 it's appropriate to look at any one factor in a  
3 vacuum and say this is how a visitor makes a  
4 decision. Along with the points that you  
5 pointed out in terms of the barriers, we also  
6 identified a wide range of other factors that  
7 influence that visitor's decision, and in many  
8 instances we pointed out those factors were 3 to  
9 6 times as powerful as some of the barriers and  
10 that it's that collective mix of attributes that  
11 influences that visitor's decision.

12 So while the presence of a cell tower or  
13 traffic delays can be seen as a barrier, it's  
14 the much broader range of the mix of products  
15 and experiences, the ease of access, the value  
16 for money, those are the collective elements  
17 that I believe drives the visitor's decision to  
18 choose New Hampshire, and that's how we  
19 evaluated those mix of factors.

20 Q But Mr. Nichols, I'm not asking you about other  
21 factors such as the presence or absence of a  
22 cell tower or the presence or absence of utility  
23 infrastructure. I'm asking you where in your  
24 report, if my statement was inaccurate, where in

1 your report is your analysis of the impact  
2 possible Northern Pass traffic delays would  
3 likely have on tourism in New Hampshire?

4 A And, again, we did not do a specific traffic  
5 analysis, but my belief as you've just pointed  
6 out here is that while traffic is noted and  
7 traffic congestion is considered a barrier,  
8 again, I don't believe it's appropriate to look  
9 at that one factor in a vacuum. It has to be  
10 considered in context with the full range of  
11 factors that a visitor would consider in  
12 evaluating where to choose as a visitor  
13 destination.

14 Q And you didn't look at possible Northern Pass  
15 traffic delays and their impact they might have  
16 on tourism either in a vacuum or in a context.  
17 You didn't look at it at all, right?

18 A Again, we did not undertake a specific traffic  
19 analysis. I do believe we understand the  
20 general context of traffic delays in that whole  
21 visitor decision process but not specifically a  
22 specific traffic analysis we did not undertake.

23 Q Okay. Let's talk a little bit about your  
24 experience and background.

1           Am I correct to understand that what you do  
2           for a living, you advise tourism destinations on  
3           how to maximize tourists at their destination.  
4           So that could include getting the ideal type of  
5           tourist to come to the destination, getting the  
6           tourist to stay longer, spend more money, come  
7           more frequently. Am I correct characterizing  
8           that?

9           A     I think that's a fair characterization.

10          Q     And that's what you've done at the Nichols  
11          Tourism Group for 20 years, right?

12          A     That's correct.

13          Q     And we're going to look at some of the examples  
14          you have from your website.

15          A     Okay.

16          Q     So, for example, top left, Sonoma County hired  
17          your firm to make sure, and I'm using the words  
18          here from your website which I apologize, they  
19          are hard to read here. But you said something  
20          like to make sure its public resources were  
21          maximized, right?

22          A     Uh-huh.

23          Q     So what you did, you tracked activities, you  
24          benchmarked performances, you compared those to

1 other destinations and you used all that info to  
2 identify new initiatives to enhance cooperation  
3 among the diverse range of communities in Sonoma  
4 County, right?

5 A Correct.

6 Q And there's another example, sort of bottom  
7 left, and that's the Williamsburg Area  
8 Convention and Visitors Bureau. They hired you  
9 to assist the historic triangle to develop a  
10 long-range tourism strategic plan, right?

11 A Correct. Uh-huh.

12 Q Now, we'll talk more about Williamsburg later,  
13 but, in summary, you developed a plan that  
14 included addressing product enhancements,  
15 organization structure and tactical marketing  
16 initiatives, right?

17 A Correct.

18 Q And, again, you know, dumbing it down, I'm not  
19 someone who is trained to work in the tourism  
20 industry, but as I understand it, you're just  
21 trying to get as many people as possible to  
22 these destinations. That's the thrust of the  
23 work, right?

24 A No, I don't think that's accurate.



1 Q Okay. Tell me what the thrust of the work is.

2 A When we say maximizing the potential or the  
3 power of a visitor industry in an economic base,  
4 that can have a broad range of facets. It can  
5 be attracting a smaller number of higher  
6 spending, longer staying. It's not just a  
7 volume kind of issue.

8 Q Okay.

9 A In some instances. It's trying to attract  
10 segments that reinforce other economic  
11 development clusters a state is attempting to  
12 achieve. So volume of visitor is not the only  
13 factor that is considered.

14 Q So it goes back to some of these factors I  
15 mentioned earlier. So spending more money,  
16 staying longer, having the right type of tourist  
17 for the resources available, those sort of  
18 metrics, if you will?

19 A Those are a reasonable mix. Yes.

20 Q Okay. Now, looking at the same exhibit, next  
21 page, this lists the different types of services  
22 you provide to do this. Strategic planning,  
23 product development, destination advocacy and  
24 performance measurement, right?

1 A Correct.

2 Q Now, looking at your home page, all of those  
3 different services that you provide, they're all  
4 focused one way or another, as you say, on  
5 maximizing destination potential. Right?

6 A Um-hum.

7 Q You've got it there front and center on the home  
8 page.

9 Now, in fact, if we look at your report,  
10 you actually confirm that every single one of  
11 your more than 250 prior projects has been to,  
12 quote, "address a similar overall goal to  
13 understand how a tourism destination can  
14 maximize its potential in the increasingly  
15 competitive tourism industry." Right?

16 A That's correct.

17 Q Okay. And in this case, the Applicant, the  
18 Northern Pass Transmission, LLC, is your client,  
19 right?

20 A That's correct.

21 Q And Northern Pass is not a tourism destination,  
22 right?

23 A That's correct.

24 Q And your job was not to, quote, "maximize

1 destination potential" of the Northern Pass  
2 Project, was it?

3 A It was not.

4 Q So your analysis in this case is the first out  
5 of more than 250 projects where you are in the  
6 position of justifying a utility development  
7 project, correct?

8 A I'd say that's correct.

9 Q And prior to this case, in your 20 years of  
10 experience maximizing development potential, you  
11 have never analyzed the impact of a proposed  
12 electric transmission line upon tourism, let  
13 alone in a state where by your own numbers  
14 tourism generates \$15.2 billion and almost  
15 75,000 jobs, right?

16 A I don't think that's correct. No.

17 Q When have you previously analyzed the impact of  
18 a proposed electric transmission line upon  
19 tourism?

20 A Transmission lines were present in a wide range  
21 of the destinations I've worked with. In just  
22 about all of the cases, we would look at the  
23 full range of factors influencing demand,  
24 whether it's access or transportation. As I

1 say, many of these destinations had transmission  
2 lines, and by the presence of those lines in  
3 these destinations, they would have been  
4 considered as one of the possible factors, but  
5 as I've presented in my testimony, even though  
6 in many of these destinations they possess these  
7 assets, they never came up as a factor that  
8 influenced the strategic potential of the  
9 destination.

10 Q So let me just confirm two important  
11 distinctions. In these many cases that you're  
12 talking about, never was the utility your  
13 client, correct?

14 A That's correct.

15 Q Okay. And never were you tasked with assessing  
16 the impact to tourism of the siting of a  
17 brand-new utility infrastructure, correct?

18 A That's correct. That's correct.

19 Q Now, is it common for you to support your  
20 professional conclusions with your recollection  
21 like you did here in your Prefiled Testimony  
22 when you stated on page 4, quote, "I do not  
23 recall in my 20 years of work on tourism  
24 planning that any concern was raised about the

1 presence of transmission lines and their  
2 possible effect on visitor demand"?

3 A Yes. My background and experience I think  
4 oftentimes is one of the factors, one of the  
5 variables that I bring to any assignment and try  
6 and identify other examples that I've seen of  
7 similar situations in destinations all around  
8 the country.

9 Q Thank you for that, but I didn't ask about your  
10 experience or your background. I asked if you  
11 rely on your recollection.

12 A And I answered yes. I think that's something  
13 that frequently I look to my background, my  
14 experience, my recollection when addressing many  
15 instances in assignments in areas around the  
16 country.

17 Q You actually state this a few different ways in  
18 your materials. You state twice in your report  
19 that, quote, "never in 20 years of planning work  
20 has any concern been raised regarding the  
21 presence of power lines and their possible  
22 negative influence on visitor demand." Those  
23 are your words, right?

24 A That's correct.

1 Q And based on your report, would it be fair to  
2 say that during your dealings with clients over  
3 the last 20 years, the issue of power lines has  
4 never been raised to you?

5 A I believe so.

6 Q You're not aware whether any of your clients  
7 over the last 20 years have ever raised concerns  
8 about power lines, are you?

9 A I don't know all of the facets that might have  
10 been raised.

11 Q And you're not aware whether any of your clients  
12 over the last 20 years has opposed a power line  
13 project.

14 A I could not speak to that, no.

15 Q Would it be fair to say you just simply haven't  
16 had a conversation with your clients about power  
17 lines?

18 A In many of our assignments, there is broad  
19 public participation in terms of the issues and  
20 factors that are influencing destination  
21 performance, and in many of these destinations  
22 there are significant power and transmission  
23 lines present, and in none of these instances  
24 have the presence of transmission lines been

1 brought up as a significant concern that these  
2 participants have had.

3 Q Let me try and ask that a different way.

4 Would it be fair to say you simply haven't  
5 had a conversation with any of your clients  
6 about the siting of brand-new power lines?

7 A I think that's accurate.

8 Q Now, let's talk about some of these power lines  
9 in other areas. You make a lot in your  
10 materials about the existence of power lines,  
11 these are my words, not yours, essentially not  
12 being a big deal for tourism, right?

13 A I don't think I characterized it that way. I  
14 said that today's visitors understand  
15 infrastructure like transmission lines are a  
16 part of today's traveling reality, and they've  
17 largely accepted that as part of the travel  
18 experience.

19 Q As some examples of what you said in your  
20 materials on page 3 of your original Prefiled  
21 Testimony, you wrote, "the tourism industry is  
22 obviously important in New Hampshire." And I'm  
23 skipping over some of the language here. But  
24 you talk about industry performance fluctuating,

1 and you mention a variety of key influencing  
2 factors consistently noted by the Institute for  
3 New Hampshire Studies at Plymouth State  
4 University. And then you say, "Large  
5 infrastructure projects like transmission lines  
6 have never been noted in these explanations,"  
7 right?

8 A That's correct.

9 Q You also state that during some of the listening  
10 sessions that you conducted, quote,  
11 "transmission lines were not identified as a  
12 factor influencing past travel decisions."

13 A That's correct.

14 Q And in your Supplemental Prefiled Testimony, you  
15 state that you have worked in a wide range of  
16 beautiful tourism destinations where  
17 transmission lines, large and small, are located  
18 in plain view of these resources and along  
19 access roads to them. And then you give some  
20 examples, and we're going to look at these. One  
21 is Estes Park in Colorado. Another is the North  
22 Cascades Scenic Byway in Washington State. And  
23 you continue to say, "These destinations are and  
24 have remained very popular places to visit,"



1 right?

2 A That's correct.

3 Q And you used these purported absences of concern  
4 in your listening sessions and in the Plymouth  
5 State University data to reach your extremely  
6 broad conclusion that, quote, "The presence of  
7 transmission lines does not impact regional  
8 travel demand," right?

9 A Well, those were two of a wide range of  
10 approaches we used to come to that conclusion.

11 Q But you relied, in part, on those absences to  
12 support your conclusion.

13 A Those were, again, two of a wide range factors  
14 that we considered in reaching that conclusion.

15 Q Factors that you considered or factors that you  
16 relied on?

17 A I'm not sure the difference there, but both were  
18 taken into consideration and helped us reach our  
19 ultimate conclusion.

20 Q And let me clarify because the word "consider"  
21 can mean a bazillion different things.

22 What I mean when I say consider is you  
23 thought about it. You may have thought about it  
24 and dismissed it as being unimportant, and,

1           therefore, you didn't rely on it in reaching  
2           your conclusions or you may thought about it and  
3           you thought that there was some merit there and  
4           then you relied on it in making your  
5           conclusions.

6       A    I think in that case, those were two pieces that  
7           we relied on that as part of our collective  
8           conclusion.

9       Q    So I want to talk, I have a few questions about  
10          this. So let's look first at your general  
11          statements about a lack of expressed concern in  
12          the Plymouth State University data and in your  
13          listening sessions.

14                 So do I understand correctly that you claim  
15                 that because these two sources of information  
16                 did not reflect express concerns that this means  
17                 things like respondents involved want the  
18                 Northern Pass?

19       A    No.

20       Q    Does it mean that the respondents involved are  
21          perfectly representative of everyone in the  
22          municipalities along the proposed route in this  
23          Project?

24       A    My answer would be no.

1 Q Does it mean that there would not be an impact  
2 to your knowledge because the people involved  
3 didn't mention it?

4 A I think that not coming up and not being raised  
5 as an issue was certainly one factor that we  
6 used of drawing that ultimate conclusion about  
7 the lack of impacts.

8 Q We're going to talk more about this list in a  
9 bit, but for now, consider this list of  
10 activities and assume that they're important to  
11 tourists. Just assume for me for now. We'll  
12 get into it later. So scenic drives, visit a  
13 National or State Park, visit a beach/  
14 waterfront area, tour by automobile, bus, et  
15 cetera; participate in outdoor activities, visit  
16 a historic site, attend/visit a cultural  
17 site/event. Is clean air on this list?

18 A No.

19 Q You would agree though that clean air either  
20 enhances or is essential to many of the  
21 activities I just listed, right?

22 A In 20 years of my work I have never seen visitor  
23 profiles identify and try and rank clean air as  
24 a key factor or facet in that visitor's choice.

1 I can't speak to them.

2 Q Well, can you answer the question? Is clean air  
3 either an enhancement or an essential factor to  
4 visiting a historic site, touring by automobile,  
5 going to the beach, going to a State Park?

6 A You know, what is meant by clean? In general,  
7 clean air certainly would be a desirable  
8 element, I guess, from the vast majority of  
9 visitors.

10 Q You agree that New Hampshire generally has clean  
11 air?

12 A I think that's fair.

13 Q So that's what I'm talking about when I say  
14 clean air.

15 Now, would you agree that clean air being  
16 important can be implied from that list that I  
17 read you?

18 A You know, I don't know how a respondent from  
19 that, looking at that list, if they would imply  
20 clean air or not. I don't think I could make a  
21 statement in relation to that. I'd just be  
22 speculating.

23 Q But you agree that the cleaner the air, the more  
24 enjoyable these activities.

1 A The general position of visitors desiring clean  
2 air I think is a reasonable statement, but on a  
3 spectrum of clean air and how that would  
4 influence their visit, again, I can't speak  
5 specifically.

6 Q Do you agree that clean air could be important  
7 to respondents but not listed in the activities  
8 that they come to the State to enjoy?

9 A And, again, I've not seen in my 20 years where  
10 visitors are, that clean air is a key factor or  
11 variable. I think that that is part of the  
12 process, but I have not seen anywhere where that  
13 factor is attempted to be quantified in relation  
14 to the range of products and the costs and  
15 accessibility and those kinds of factors.

16 Q So would you agree that it's possible that the  
17 introduction into a valuable tourism landscape  
18 of new high voltage transmission lines could be  
19 implied to have an adverse impact on tourism  
20 even though respondents did not expressly say  
21 so?

22 A No. I wouldn't agree with that.

23 Q Now, talking about some of the statements that  
24 you've made about respondents, you even went on

1 to poo-poo those involved by saying that none of  
2 them, quote, "provided any specific foundation  
3 or empirical support for their concerns." Some  
4 respondents did state concerns, and that's what  
5 you said about their concerns, right?

6 A I think your characterization is inaccurate.

7 Q Okay. If we can see that, please?

8 So I have here a page from your original  
9 Prefiled Testimony, it's page 3, and I'd like to  
10 draw your attention to lines 25 to 26. I cannot  
11 actually see those standing here, but I hope you  
12 can. Can you see those lines?

13 A I can, yes.

14 Q Do you want to characterize in your own words  
15 what you've said here?

16 A Certainly. I think you characterized it as I  
17 poo-poo'd it. I did nothing of the sort. That  
18 was the fundamental purpose of going out and  
19 hearing different perspectives. I had read many  
20 different perspectives in the wide range of  
21 newspaper articles, attended public hearings and  
22 we undertook this public or this listening  
23 process to better understand and have the  
24 ability to sit more one-on-one and probe and

1 understand.

2 My point here where I was saying while we  
3 heard a broad range of concerns that no one  
4 provided any specific foundation or empirical  
5 support for those concerns. And that's a role  
6 that we play, again, going back to the broad  
7 work that we have done over the last 20 years,  
8 that's something we do in just about every  
9 assignment. We have broad input processes, and  
10 we take what we hear and then try and relate it  
11 back to research or other experience to see  
12 where there's merit and where there's not. So I  
13 absolutely would not characterize it as I  
14 poo-poo'd. I listened. I tried to understand  
15 the foundation or the support that they had for  
16 their beliefs.

17 Q So trying to use your words then, you concluded  
18 that the concerns lacked merit because they did  
19 not have any specific foundation or empirical  
20 support?

21 A Again, I wouldn't characterize it that they  
22 lacked merit. They were sincere beliefs that  
23 were held by some of the individuals. We wanted  
24 to hear and understand those beliefs and

1 understand what the foundation behind those  
2 beliefs and attitudes were.

3 Q Well, then, why did you note that they didn't  
4 provide any specific foundation or empirical  
5 support?

6 A I think that's just what I just said. That we  
7 asked them and we wanted to understand, and,  
8 again, I believe their beliefs were sincere.  
9 They truly held those beliefs, and we wanted to  
10 understand what foundation or what basis they  
11 built those beliefs around, and that was an  
12 important part of our process.

13 Q So do I understand you correctly to say that  
14 you're not poo-pooing, you're not discounting,  
15 you're not saying that they lacked merit in any  
16 way here. That these respondents' concerns  
17 about the impacts of this Project on tourism are  
18 completely valid?

19 A I wouldn't use the word valid. Again, I'd say  
20 they are sincere beliefs that are held by some  
21 representatives that we spoke with, and that,  
22 again, what we were particularly after was to  
23 understand what the basis or what the foundation  
24 behind those beliefs were.



1 Q Now, one of the things you mentioned in your  
2 response there is that you take respondents'  
3 input and you try to -- you didn't use this  
4 word. My word. Sort of cross-check it against  
5 the research that you've generated over the past  
6 20 years, right?

7 A Correct.

8 Q But isn't it your position in this case that  
9 there is no empirical data about the impact upon  
10 tourism from the new siting of a utility  
11 infrastructure project such as this?

12 A That's one of the conclusions we reached, yes.

13 Q So how were you to cross-check these folks'  
14 responses, their experience, against your  
15 research?

16 A In any of the number of ways that we approached  
17 this Project. In my actual experience and other  
18 destinations, the lack of secondary research  
19 that demonstrated any of those impacts, the  
20 results of some of the survey work that we did.  
21 So there was a broad range of facets that we  
22 tried to consider of the concerns that we heard  
23 in relation to what we're finding with actual  
24 past experience and background and research.

1 Q But how does any of your past background or  
2 experience apply if this is the first time that  
3 you ever evaluated the impact of a new  
4 infrastructure project on behalf of a utility?

5 A Because I think of it in a broader context. As  
6 I mentioned, many of the destinations we've  
7 worked with have large transmission projects.  
8 We've looked at the broad range of factors and  
9 concerns and issues that were present in those  
10 destinations, and whether it was brand-new or it  
11 had been in the past, these transmission lines  
12 had just not come up as a key critical concern  
13 or issue in any of the strategic planning work  
14 that we have been involved with.

15 Q Just to confirm again, none of that work  
16 involved the siting of a new high voltage  
17 transmission line?

18 A That's correct.

19 Q Now, if a family decides not to come back to New  
20 Hampshire because they were stuck in too much  
21 traffic at Exit 32, will you tell that family  
22 that there's no empirical data to support their  
23 gut instinct that their vacation time and money  
24 would be better spent elsewhere?

1 A No. I don't think I would have that  
2 conversation with that person.

3 Q Let's now look at the two examples you noted.  
4 Estes Park in Colorado and North Cascades Scenic  
5 Byway in Washington.

6 So this is Estes Park, right?

7 A That's correct.

8 Q If you want to flip, Nicole, and just show us  
9 the North Cascade Scenic Byway?

10 And these are images that you included in  
11 your Supplemental Prefiled Testimony, right?

12 A That's correct.

13 Q Now, you have some professional experience  
14 maximizing destination potential at both of  
15 these locations, right?

16 A That's correct.

17 Q But for both of these, again, we covered this a  
18 little bit already, you were not involved in  
19 whatever decision-making process happened  
20 regarding the original siting and installation  
21 of these lines.

22 A That's correct.

23 Q So for both of these, you are unaware of what  
24 topographical or elevation-based constraints

1           such as deep slopes, for example, confronted the  
2           siting of those power lines, right?

3       A     I did not.

4       Q     And you were not involved in the environmental  
5           assessment to identify and then to maximize  
6           avoiding and minimizing adverse impacts to  
7           water, to soil, to air, to wildlife, to plants,  
8           were you?

9       A     No.

10      Q     And you don't know what financial considerations  
11           were associated with the route that was  
12           ultimately chosen versus others that may have  
13           been possible, right?

14      A     I do not.

15      Q     And you also don't know whether either line was  
16           installed because of Reliability needs for the  
17           grid in those locations or solely to make  
18           profit, right?

19      A     I do not.

20      Q     And because we know, we've already established  
21           that the Northern Pass Project is the first time  
22           that you have ever rendered an opinion with  
23           respect to whether the siting of a proposed  
24           utility line would adversely impact tourism, we

1 know that you did not make such an analysis for  
2 the siting of either of these two lines, right?

3 A Not for the siting, but those are very large  
4 transmission lines that the vast majority of the  
5 four million visitors to Rocky Mountain National  
6 Park progress by. Those lines have been present  
7 and the utilization and attraction to an  
8 amazingly beautiful natural resource has  
9 continued to grow. They're now the third most  
10 positive or visited National Park, and there's a  
11 major power substation less than half a mile  
12 away from their main Visitor Center.

13 So, again, while I was not involved in the  
14 siting, I believe this is an important example  
15 of how visitors have come to accept that  
16 transmission lines are part of the fabric of  
17 travel today, and it's that broader range of  
18 products and experiences, value for money, those  
19 are the factors that drive the visitor's  
20 decision.

21 Q Can I safely assume that you are not aware of  
22 any study of the tourism impacts of introducing  
23 either one of these lines when they were first  
24 installed that showed no impact to tourism? I'm

1           assuming that if there was such a study,  
2           probably would have cited to it, right?

3       A     That's correct.

4       Q     So you know practically nothing about the  
5           various considerations that likely went into the  
6           choosing to site and install these lines where  
7           they exist today, right?

8       A     I was not involved in the siting process, no.

9       Q     And you have also provided no actual data about  
10          the impact of these lines to tourism, about the  
11          impact of the original siting of these lines to  
12          tourism in this area except your general  
13          statement that these are, quote, "very popular  
14          places to visit," right?

15      A     But, again, I believe it's a very important  
16          example of demonstrating the presence of large  
17          transmission lines in a major beautiful  
18          destination, a National Park, and with the  
19          presence of large scale transmission lines,  
20          visitation volumes continue to significantly  
21          escalate, and today's travelers understand  
22          that's part of the travel environment.

23      Q     My question was, am I correct that you have  
24          provided no actual data about the impacts to

1           tourism of the original siting and installation  
2           of these lines?

3           A     That's a correct statement.

4           Q     So you can't say, you haven't said, one way or  
5           another, whether these areas are as popular,  
6           more popular, or less popular because of the  
7           original siting and installation of these lines?

8           A     All I can say is it's an amazingly popular  
9           destination which continues to grow and expand,  
10          reach third highest volume of any National Park  
11          in the country, and all of that was achieved  
12          with the presence of these transmission lines.

13          Q     But you can't say whether because of the  
14          original installation of these power lines these  
15          areas would have been even more popular than  
16          they are now, less popular, or they would have  
17          maintained the same level of popularity?

18          A     I can't say that, no.

19          Q     I want to talk with you about aesthetic and  
20          historic considerations associated with this  
21          Project.

22                   Are you aware that this Subcommittee will  
23          consider whether or not the Project's adverse  
24          impacts to aesthetics are unreasonable?

1 A I understand that's part of the process.

2 Q And I assume then that you're also aware that  
3 this Subcommittee will consider whether or not  
4 the Project's adverse impacts to historic  
5 resources are unreasonable?

6 A I am aware of that.

7 Q Are you aware that there are extensive laws  
8 governing the details of what the Applicant must  
9 provide and how the Subcommittee must consider  
10 these issues?

11 A I'm generally aware but not in detail.

12 Q So, for example, are you aware that for this  
13 process the legal definition of scenic resource  
14 includes places to which the public has a legal  
15 right of access such as conservation areas,  
16 lakes, ponds, rivers, parks, scenic drives and  
17 rides and other tourism destinations,  
18 recreational trails and parks, historic sites  
19 and certain town and village centers?

20 A I've not studied that exact language, but that  
21 sounds reasonable.

22 Q Are you aware that for this process the legal  
23 definition of a historic site, it's a shorter  
24 one, is any building, structure, object,



1 district area or site that is significant in the  
2 history, architecture, archeology or culture of  
3 this state, its communities or the nation?

4 A Again, I have not studied that definition, but  
5 that does not sound unreasonable.

6 Q Are you aware that the Applicant and several  
7 other parties have submitted extensive volumes  
8 of expert reports rendering opinions about the  
9 historic and aesthetic impact that this project  
10 would cause if it were to be approved?

11 A I know the Applicant has submitted materials in  
12 relation to those.

13 Q But you, until I just mentioned it, you were  
14 unaware that others have?

15 A I guess I'm generally aware that others might  
16 have provided some material, but I've not  
17 studied or looked at any of those materials.

18 Q Yet nothing in your report or either of your  
19 Prefiled Testimony addresses the legal standards  
20 with respect to aesthetics or historic, correct?

21 A That's correct.

22 Q And they don't address the impact to tourism  
23 that the Project might cause as a result of  
24 impacts to aesthetic or historic resources.

1 A Again, my report focused on the potential  
2 regional impacts to the tourism industry and  
3 that's what I was, that's what my conclusion  
4 related to. I did not make any specific  
5 conclusions on any individual project or whether  
6 it's historic or otherwise.

7 Q I just want to clarify one word that you used  
8 because people use this word differently. Can  
9 you define what you mean when you said the  
10 region?

11 A I considered the regions as defined by the State  
12 Tourism Office, the 7 varying regions of the  
13 State and how they break the State down.

14 Q Thank you. So am I correct then to understand  
15 from your answer that you did not consider  
16 impacts to particular aesthetic resources and  
17 impacts to particular historic resources when  
18 you rendered your opinion regarding tourism?

19 A I considered it in a general kind of context but  
20 did not look at specific individual projects or  
21 businesses.

22 Q And you didn't rely on the volumes of expert  
23 analysis regarding aesthetics and historic  
24 resources?

1 A I didn't rely on that, no.

2 Q And you yourself, Mr. Nichols, you've studied  
3 New Hampshire's brand, albeit many years ago,  
4 and you've concluded that activities centered on  
5 New Hampshire's aesthetics are essential to New  
6 Hampshire's brand, right?

7 A Correct.

8 Q And so let's talk about the New Hampshire brand.  
9 You agree that tourism is a very competitive  
10 business, right?

11 A I do.

12 Q And you would agree that tourism is a voluntary  
13 activity which means that tourists have a choice  
14 among competing destinations. They don't have  
15 to come to New Hampshire, right?

16 A That's correct.

17 Q The State hired you, the State of New Hampshire  
18 hired you in the early 2000s to study the New  
19 Hampshire brand, right?

20 A That's correct.

21 Q And you found at that time that tourists -- go  
22 ahead, Nicole.

23 That tourists coming to New Hampshire rank  
24 amongst the highest of importance the following

1 activities. And this is that list that I asked  
2 you to just assume what I was saying earlier,  
3 but I got it from your report, and this is your  
4 2002 report. So I won't repeat the list here.  
5 It's highlighted. This is your list from your  
6 report in 2002, right?

7 A That is correct.

8 Q You also found that tourists coming to New  
9 Hampshire rank as the destination feature of  
10 greatest importance, greatest importance, the  
11 scenery/natural beauty, right?

12 A Correct.

13 Q And that was followed closely by some of the  
14 other highlighted items here. Quaint towns or  
15 villages, lakes and rivers, parks and forests,  
16 historic sites and access to mountains, correct?

17 A That's correct.

18 Q Now, moving through the report, you found that  
19 New Hampshire's greatest tourism strengths  
20 include access to mountains, parks and forests,  
21 quaint towns or villages, right?

22 A That's correct.

23 Q And those were followed closely by second to  
24 best strengths, scenery, natural beauty, fall

1 foliage, lakes and rivers, et cetera, correct?

2 A That's correct.

3 Q Now, in 2003, you found similar results, ranging  
4 New Hampshire as number one among New England  
5 states in fall foliage, scenery, natural beauty,  
6 access to mountains, lakes and rivers, quaint  
7 towns and villages, parks and forests and  
8 outdoor sports activities. And we'll take a  
9 moment here so you can have that report in front  
10 of you.

11 So did I correctly summarize your results  
12 and how you found New Hampshire ranked number  
13 one amongst New England states?

14 A That is correct.

15 Q And in this report, the 2003 report, you list  
16 two key opportunities for New Hampshire to  
17 differentiate itself from its competing states  
18 like Maine or Vermont. Quote, "New Hampshire  
19 can be successfully positioned in key markets as  
20 a premier New England family destination," and  
21 more important to this case, "New Hampshire can  
22 be positioned as offering superior access to  
23 outstanding scenery in year-round outdoor  
24 activities and recreation." Those are your

1 words, your conclusion, in 2003?

2 A That's correct.

3 Q Now, you would agree that tourism involves much  
4 more than marketing, right?

5 A Yes.

6 Q And you would agree that a place will likely not  
7 retain its special appeal by accident?

8 A Correct.

9 Q That it requires things like vision, management,  
10 control, a lot of the services that you provide  
11 to clients, right?

12 A Correct.

13 Q You need to protect and cultivate those unique  
14 attributes that make certain national and  
15 cultural landscapes special, right?

16 A I think that's a fair statement.

17 Q You would agree that the heritage, culture and  
18 natural beauty of a community or region attracts  
19 an important segment of the tourism market,  
20 right?

21 A That's correct.

22 Q And you would agree that the more a community  
23 does to enhance its unique set of assets,  
24 whether natural, architectural, cultural, the

1 greater the potential for it to attract more and  
2 maintain repeat tourists in this competitive  
3 market, right?

4 A I think as I've noted, there's many factors that  
5 go into that end result in terms of the  
6 attraction of visitors, but certainly that  
7 natural beauty and maintaining that is certainly  
8 a very important aspect.

9 Q And generally speaking, the more a tourism  
10 destination does to protect its assets, the  
11 better the tourism industry will be.

12 A I guess it depends on how you're defining  
13 protect, but, in general, the more a destination  
14 can build on its strengths, that's a strong  
15 factor.

16 Q In either of your 2002 and 2003 studies, in any  
17 of the images you chose to include in your  
18 report to represent New Hampshire, do any of  
19 them include high voltage transmission lines?

20 A I don't believe so.

21 Q In your analysis for the State of New Hampshire  
22 did you examine some of the promotional  
23 materials that the State of New Hampshire uses  
24 or used at that time to attract visitors to the

1 state?

2 A We would have, yes.

3 Q Can you think of any such New Hampshire tourism  
4 promotional materials that they showed pictures  
5 of high voltage transmission lines?

6 A I don't recall. I think that would be unlikely.

7 Q What about did any of them feature utility  
8 towers that exceeded the height of the forest  
9 canopy, something in the 90- to 160-foot-tall  
10 range?

11 A I don't believe so.

12 Q Would you agree that if a character of a  
13 destination is at odds with its description in  
14 advertising and promotional literature, the  
15 tourists may likely feel cheated?

16 A I think that setting expectations and delivering  
17 on expectations is something that any  
18 destination should strive for.

19 Q So is that a yes?

20 A I think I characterized it in an appropriate  
21 way. That setting expectations of a destination  
22 and that is a multi-faceted, many things go into  
23 the brand and what you're promising and  
24 delivering on that promise is an important



1 consideration.

2 Q So if the vision that's projected through a  
3 marketing campaign is better, different than and  
4 better than the reality, is that good or bad for  
5 tourism?

6 A That's bad. It should align.

7 Q And the creation of a false image can actually  
8 spoil a vacation and has the potential to reduce  
9 repeat visitation, right?

10 A Again, I wouldn't use the language you're using,  
11 "spoil a vacation," but I would generally agree  
12 that delivering on a brand promise is an  
13 important goal for any destination.

14 Q Would you agree that tourism involves different  
15 audiences and markets?

16 A It does.

17 Q For example, as you may know, this past weekend  
18 was a NASCAR race weekend at New Hampshire Motor  
19 Speedway in Loudon. So that's an example of one  
20 type of tourist, someone who comes to New  
21 Hampshire for the races, right?

22 A Right.

23 Q As another example, as you may know, some people  
24 come to New Hampshire for tax free shopping. So

1           that's another example of a particular type of  
2           tourist. With respect to teasing out the  
3           different types of New Hampshire tourists in  
4           your materials, your report simply puts them  
5           into five categories. And we have those here.  
6           Visiting friends and relatives, other; pleasure;  
7           outdoor recreation; entertainment/sightseeing,  
8           business, other. Neither this chart nor  
9           anywhere else in your materials do you explain  
10          which tourists come for the aesthetic value of  
11          New Hampshire's landscape, do you?

12        A    Not in this particular table. We certainly  
13          reviewed all of those materials from Plymouth  
14          State University that talked more about the  
15          activities and the experiences that the visitor,  
16          that chart was not included in our report, but  
17          we certainly reviewed the mix of visitors and  
18          the activities that they were attracted to.

19        Q    So am I correct then that none of your materials  
20          in this case that you have authored and  
21          submitted explain which tourists come for the  
22          aesthetic value of New Hampshire's landscape?

23        A    And, again, we reviewed all those materials,  
24          we're familiar with the mix of visitation.

1           There wasn't a table in our report that outlined  
2           those findings from Plymouth State University.

3           Q     So that's a no.

4           A     Again, we reviewed, we're aware and we  
5           considered that, but there is not a table in our  
6           report that presents those facts.

7           Q     Nor is there a table in your Prefiled Testimony,  
8           either one of them, correct?

9           A     That's correct.

10          Q     Nor is there any narrative analysis in any of  
11          your materials, correct?

12          A     No. I think basically a narrative spoke to this  
13          table that you're referencing here.

14          Q     Would not a more proper analysis differentiate  
15          what parts of the tourism market and which  
16          regions in the State would be most sensitive to  
17          aesthetic degradations to the landscape?

18          A     We considered the various regions of the state,  
19          the volumes of visitation, the seasonality of  
20          visitation. We looked at the overall  
21          characteristics of what travelers do. And so  
22          all of those factors were considered as we were  
23          evaluating the potential impacts.

24          Q     You agree that the overall importance and

1 markets for tourism vary in the different  
2 regions of the State, right?

3 A That's correct.

4 Q For example, you agree that tourism dollars  
5 spent in the North Country of New Hampshire  
6 might be relatively smaller compared to the  
7 overall State's tourism income?

8 A That's correct.

9 Q But would you also agree that tourism dollars  
10 can have disproportionate local economic impact,  
11 especially if an area of the State is more  
12 economically challenged?

13 A I think that's fair.

14 Q So a dollar spent up north might go farther than  
15 a dollar spent elsewhere?

16 A I don't know if it would go farther, but the  
17 role of the tourism industry in one area versus  
18 another could vary in terms of its general  
19 importance.

20 Q You would also agree that quality scenery is an  
21 important element of tourism experiences such as  
22 fishing, hiking and sightseeing, right?

23 A I think that's fair, yes.

24 Q You would also agree that the general impression

1 of the tourist is that New Hampshire is a  
2 beautiful state?

3 A I think that's absolutely fair.

4 Q I want to talk with you about Sarasota, Florida.

5 A Okay.

6 Q This is another location that you reference in  
7 your materials and you describe as having white  
8 sand beaches, right?

9 A Yes.

10 Q And you did work for the County of Sarasota in  
11 2003, right?

12 A That's correct.

13 Q None of the issues in Sarasota that you worked  
14 on involved the siting or installation of new  
15 power lines, correct?

16 A That's correct.

17 Q Now, isn't it true that the County of Sarasota  
18 was reportedly not happy with your work?

19 A I don't believe that's accurate.

20 Q Was there not this Herald Tribune article  
21 reporting on alleged unhappiness with your work?

22 A There was a Commissioner, we were retained by  
23 the County and worked with representatives of  
24 the County and the Sarasota Convention and

1 Visitor Bureau, and that was an assignment very  
2 similar to many that we've undertaken. It was a  
3 broad strategic plan for Sarasota County. In  
4 Sarasota County they have a Tourism Development  
5 Commission. We worked through a lengthy  
6 process, it was probably six to nine months of  
7 time we spent with them, and we had very good  
8 dealings with the County and the Convention and  
9 Visitor Bureau.

10 The one County Commissioner that you're  
11 referencing here, we were at odds. He also sat  
12 on the Fairgrounds Board and wanted us to  
13 recommend allocating a significant amount of bed  
14 tax dollars for refurbishment of fairgrounds.  
15 We did not agree with that position, did not  
16 make that recommendation, and in our final  
17 meeting he made his feelings clear.

18 And I think this is an example where we  
19 take our professional credibility very  
20 important, and we call it the way we see it, and  
21 in this instance, there was a particular Council  
22 Commissioner who was not pleased that we did not  
23 recommend allocating additional resources to the  
24 fairground.

1 I believe the County and the Convention and  
2 Visitor Bureau were very pleased with our work,  
3 and, in fact, we were asked when the strategic  
4 plan update come up four years later we were  
5 asked to bid on it. We came in second in that  
6 particular instance. But I do think this is an  
7 example of sometimes there can be individuals  
8 that desire certain recommendations that we  
9 don't agree with, and we will, as I say, call it  
10 the way we see it.

11 Q So are you claiming that this report, this news  
12 article is inaccurate when they use the plural  
13 "county officials" rather than just talking  
14 about one discontented individual?

15 A Yes. This particular Commissioner was the one  
16 that had the primary concern. There were a  
17 couple of others, but, again, the work that we  
18 undertook was for the County and the Convention  
19 and Visitor Bureau, and I believe those groups  
20 were very pleased with the work that we did.

21 Q According to this news article, some of the  
22 concerns were that your work lacked specifics  
23 and people felt dissatisfied and very troubled,  
24 correct?

1 A Again, that was the position particularly  
2 Commissioner Mills made. And, again, I don't  
3 think that's a fair characterization. And,  
4 again, I think somewhere in this article it  
5 noted our surprise because none of these  
6 concerns had been raised all the way through and  
7 this was at our very final presentation. It  
8 came out of left field, and that had not been  
9 the experience in the nine months that we worked  
10 with the destination.

11 Q Let's talk about another aspect of Sarasota.  
12 Before filing your materials in this case, is it  
13 fair to say that you did not contact the County  
14 of Sarasota to find out whether they have ever  
15 had concerns with power lines?

16 A That's correct.

17 Q So let's look at the Englewood Community  
18 Redevelopment Plan issued by Sarasota County.  
19 The cover there for you. Have you seen this  
20 document before that you recall?

21 A I have not.

22 Q Let's look at pages 88 and 89, and you'll see  
23 here when we get to those pages, the  
24 Redevelopment Plan specifically discusses the



1 need to move power lines located on a downtown  
2 street.

3 Would you please read the highlighted  
4 sentence in the Project Background section that  
5 begins with the utility lines also have a  
6 negative.

7 A The utility lines also have a negative aesthetic  
8 impact on the street and limit the size and  
9 location of street trees. Many feel that  
10 decorative street trees look out of place next  
11 to the power lines and cobra heads.

12 Q And would you please read the first highlighted  
13 bullet point?

14 A Improve the aesthetic quality of the downtown  
15 area.

16 Q So you would agree then that this Redevelopment  
17 Plan raises concerns about power lines.

18 A In an aesthetic context, yes.

19 Q Let's talk more now about the Williamsburg Area  
20 Convention and Visitors Bureau.

21 Attorney Pappas is reminding me to identify  
22 my exhibits. So that was SPNHF 206.

23 Now moving on to Williamsburg Area  
24 Convention and Visitors Bureau. We talked about

1           this earlier. This is one of the places that  
2           you have worked with. In what you describe, and  
3           you describe this area as a sensitive heritage  
4           destination. Right?

5       A     That's correct.

6       Q     It's the Historic Triangle of Virginia, and that  
7           includes Jamestown, Yorktown and Williamsburg,  
8           right?

9       A     That's correct.

10      Q     Now, we already saw you featured this work on  
11           your website. We looked at that page earlier.

12      A     Yes.

13      Q     Now, let's take a look at the Convention and  
14           Visitors Bureau report. This is SPNF 207. This  
15           was the result of your work in 2005. Over 12  
16           years ago, right?

17      A     Yes. Correct.

18      Q     Now, are you aware of a proposal pending in  
19           Virginia to construct power lines across the  
20           James River?

21      A     I am not.

22      Q     The James River is part of the Historic  
23           Triangle, right?

24      A     It is.

1 Q The Project was not being proposed in 2005 when  
2 you worked with the Williamsburg Area CVB,  
3 right?

4 A That's correct.

5 Q Now I'd like to show you SPNF 205 which is the  
6 Prefiled Testimony that Richard Schreiber  
7 submitted in opposition to the proposed power  
8 line project, and, if I may, here's's copy of  
9 that for you.

10 So I've just handed you a copy of SPNHF  
11 207, Mr. Schreiber's testimony. 205. Thank  
12 you. If I'm going to refer to them, I should do  
13 it correctly.

14 Do you know Mr. Schreiber?

15 A I'm not recalling offhand.

16 Q So I assume then you don't know of his  
17 involvement in the Historic Triangle area?

18 A I have not been involved with them for quite a  
19 number of years so I'm not sure of his position  
20 currently.

21 Q Do I correctly assume then that you have not  
22 worked with Richard Schreiber in the past?

23 A He might have been one of the representatives  
24 back 15 years ago, but I'm not recalling him.

1 Q Let me represent that he prepared this testimony  
2 in his capacity as the President and CEO of the  
3 Alliance. Are you aware that the Alliance is  
4 the entity that was created when the  
5 Williamsburg Area Chamber of Commerce merged  
6 with the Williamsburg Area Convention and  
7 Visitors Bureau?

8 A Okay.

9 Q Are you aware that the Alliance opposed the.  
10 Power line project because of tourism impacts?

11 A I am not aware of that.

12 Q Well, let's look at the testimony. I'd like you  
13 to turn to page 2.

14 A Um-hum.

15 Q And you can see here, this is just the general  
16 background description that Mr. Schreiber gives  
17 of himself.

18 A Okay.

19 Q And let's turn to page 3. You can see here he  
20 makes a general statement about what his  
21 testimony covers. Not unlike your Prefiled  
22 Testimony or anybody else's.

23 A Um-hum.

24 Q Now, let's turn to page 4. Now, you can see the

1 question here, "What effect, if any, would be  
2 anticipated from construction of proposed power  
3 lines across the James River."

4 Would you please read the response and  
5 continue on to page 5, please?

6 PRESIDING OFFICER HONIGBERG: Please read  
7 slowly so the stenographer can keep up with you.

8 A "It is impossible to estimate the direct impact.  
9 However, it seems reasonable to conclude that  
10 the work that has been accomplished over almost  
11 a century aimed at positioning the areas as both  
12 historically important and authentic in its  
13 presentation will be diminished by the  
14 introduction of major modern intrusions.  
15 Consider, for a moment, one of the important  
16 aspects of every trip, photos of the family  
17 experience, when a visitor to historic Jamestown  
18 looks south to see the river that carried  
19 English settlers here and wishes to capture an  
20 image of that scene, the result will have a new  
21 dominant feature, power line towers. As  
22 visitors encounter such intrusions, the result  
23 can only be diminution of the positioning of the  
24 triangle. Ultimately, this must lead to a

1 reduction in the number of people who come.  
2 That, in turn, will cause small businesses that  
3 support tourism to shrink and some to go out of  
4 business. Three quarters of our businesses have  
5 ten or fewer employees. They have little margin  
6 for negative change. Should the deterioration  
7 be significant, local government will see its  
8 revenues decline, a condition that must lead to  
9 either increase in taxes or reduction in  
10 services."

11 Q Thank you. And you can see the next question.  
12 "Are there any mitigation measures that the  
13 Alliance would support related to the  
14 construction of the proposed power lines."

15 Would you please read the response?

16 A "If they are to be constructed, they should be  
17 placed underground so that they are not visible  
18 to visitors, residents and business owners in  
19 the area. Unless placed underground, the  
20 impacts on historical sites and historic tourism  
21 cannot be mitigated."

22 Q When you were writing your report and your two  
23 sets of Prefiled Testimony in this case, you  
24 were not aware that the Alliance had raised

1 concerns about the James River transmission  
2 line, were you?

3 A I was not.

4 Q And you never contacted anybody from the  
5 Alliance to determine if they had any such  
6 concern or to discuss this concern, right?

7 A No. I did not.

8 Q Even though a discussion of power lines never  
9 was raised during your work, you never heard any  
10 concern about power lines when you worked in the  
11 Historic Triangle, it didn't mean that your  
12 tourism client has no concerns about power  
13 lines, does it?

14 A I think in this particular instance, that's  
15 accurate.

16 Q Did you contact any of your other clients to  
17 determine if they ever had any such concerns?

18 A Again, as I mentioned before, many of these  
19 clients have significant large transmission  
20 lines that are already present. Visitors would  
21 experience those on an ongoing kind of basis,  
22 and in wide raging discussions of critical  
23 issues facing the destinations, the transmission  
24 lines were never raised as a concern or an area

1 of concern.

2 Q Let me try one more time.

3 So did you contact any of your other  
4 clients in the context of writing your report  
5 and your Prefiled Testimonies here to determine  
6 if they have ever had any concerns about the  
7 siting of new high voltage transmission lines?

8 A I did not return and question our range of  
9 clients over the last 20 years. I did consider  
10 the actual work that we had done and the  
11 presence of power lines, transmission lines, in  
12 the context of the work that we did at the  
13 individual times that we would have undertaken  
14 the work for the various clients.

15 Q So as you sit here today, you are unaware  
16 whether any of your other tourism clients has  
17 ever raised similar concerns as were raised here  
18 with respect to the James River?

19 A Again, they weren't raised when we were doing  
20 the work. Has it ever been raised in any kind  
21 of context since we've done the work, I can't  
22 speak to that.

23 Q Okay. Thank you, Mr. Nichols. I have no  
24 further questions for you.





1 A You did.

2 Q So as I understand it, you looked at the  
3 Northern Pass's potential impact on tourism from  
4 a statewide basis, correct?

5 A And the potential regional impacts as well.

6 Q Okay. But you didn't look at the Northern  
7 Pass's potential impact on tourism for any  
8 specific region, did you?

9 A I considered the 7 different regions as outlined  
10 in the State Tourism Office and considered those  
11 impacts on a regional basis considering those 7  
12 regions.

13 Q But your analysis and conclusions are on a  
14 statewide basis, were they not?

15 A No, they were on a regional basis.

16 Q So did you make separate conclusions for each of  
17 the 7 regions?

18 A We investigated the mix of attractions, the  
19 volumes, the seasonality within each of the  
20 various regions and considered impacts on a  
21 regional basis.

22 Q But you didn't reach any conclusion on a  
23 regional basis, did you?

24 A Yes, we did.

1 Q Show me in your report where you did that.

2 A That's the fundamental conclusion that we  
3 reached that the Project would not have any  
4 impacts on regional tourism demand.

5 Q All right. So what you just referred to in your  
6 report is that last highlighted bullet point  
7 where you say, "In my opinion, the Northern Pass  
8 Project will not affect regional travel demand,  
9 and it will not have a measurable effect on New  
10 Hampshire's tourism industry." Is that what  
11 you're referring to?

12 A That's correct.

13 Q And when you say it will not affect regional  
14 travel demand, are you referring to regional  
15 travel demand within New England and the  
16 Mid-Atlantic states which is the primary source  
17 of New Hampshire's tourist visitors?

18 A No.

19 Q What were you referring to?

20 A Regions within New Hampshire, considering  
21 regions as defined by the State Tourism Office  
22 and their 7 regions within the state.

23 Q Okay. But other than this general statement,  
24 you didn't make any conclusions with respect to

1 each specific region, did you?

2 A Yes.

3 Q Did you note that in your report?

4 A Yes.

5 Q Where?

6 A Exactly this point here that it's not affecting  
7 regional travel demand.

8 Q Okay. Did you do any analysis to try to  
9 quantify any impact within a specific region?

10 A We considered and evaluated the mix of tourism  
11 products, the main products driving visitation  
12 in each of the regions, the volumes of  
13 visitation in each of the regions, the general  
14 character, and so considered each of the 7  
15 regions in terms of their attraction potential  
16 and made conclusions as it related to those  
17 regions.

18 Q When you did that, you were just looking  
19 historically at the regions, correct?

20 A Well, the historic experience of those regions  
21 was certainly a big part of the analysis.

22 Q But other than looking at historically each of  
23 these regions, you didn't further analyze the  
24 regions such as you did on a statewide basis,

1 correct? In other words, on a statewide basis,  
2 you did some analysis, and, for instance,  
3 comparing the Phase II line, and you did that on  
4 a county basis. You didn't do that on a  
5 regional basis, did you?

6 A Again, we did. We considered each of the 7  
7 regions. We considered the products, the  
8 experiences, the positioning of the new  
9 transmission lines and the effect that we  
10 anticipated within each of the 7 regions.

11 Q All right. We'll get to that later.

12 You did not look at the potential impact  
13 for specific tourist destinations; is that  
14 correct?

15 A No, not for specific businesses or individual  
16 communities.

17 Q Okay. So let me go back to your report and ask  
18 you some questions about your three main  
19 conclusions. And they start, you can see under  
20 1.2 of your report, do you see that?

21 A I do.

22 Q Okay. So your first main conclusion was, quote,  
23 "I do not recall in my 20 years of work in  
24 tourism planning work that any concern was

1 raised about the presence of transmission lines  
2 and their possible effect on visitor demand.  
3 From my analysis of this in New Hampshire, none  
4 of the five areas of my analysis suggests a  
5 different outcome, either generally or for the  
6 Northern Pass Project specifically."

7 Did I read that correctly?

8 A You did.

9 Q So based on your 20 years of experience, you  
10 began this assessment believing that the  
11 presence of transmission lines did not affect  
12 visitor demand, correct?

13 A Incorrect.

14 Q Incorrect. That wasn't your belief based on  
15 your experience?

16 A I didn't know. It had not come up, but that's  
17 why we undertook a wide range of other processes  
18 to try and determine if there was an effect.

19 Q Okay. Now, in your 20 years of experience, you  
20 focused on how the study of a specific tourist  
21 destination and its underlying economic factors  
22 how that would affect the performance of that  
23 destination, correct?

24 A Correct.

1 Q And you developed strategies to drive more  
2 visitors to your destination clients, correct?

3 A Again, I spoke to this earlier. In some  
4 instances, it's purely a volume issue, but in  
5 many instances it's the right segments, higher  
6 value segments. In other instances, it's  
7 segments that could help reinforce other  
8 economic clusters that a destination is  
9 attempting to attract so there could be a wide  
10 range of goals that a destination is trying to  
11 achieve.

12 Q One of the major goals is to drive more visitors  
13 to your destination clients, correct?

14 A Again, that can be one, and a number of our  
15 destinations is not driving more visitors, it's  
16 driving the right kind of visitors. So, again,  
17 it can vary.

18 Q Okay. Looking at your second main conclusion,  
19 you concluded that, quote, "Visitors come to New  
20 Hampshire because of the diversity of visitor  
21 experiences the state can provide, its ease of  
22 access and its general affordability. The  
23 presence or absence of transmission lines does  
24 not drive their fundamental decision to choose

1 New Hampshire. Even for those New Hampshire  
2 visitors who have a negative attitude towards  
3 transmission lines, other destination factors  
4 are of far greater importance in their  
5 fundamental travel decision. While it is  
6 imaginable that the presence of power lines may  
7 be a factor in travel decisions for a very small  
8 number of New Hampshire visitors, it is the  
9 overall scale of importance of the variables and  
10 the collective mix of destination attributes  
11 that influence visitors' choice of destination,  
12 and the positive attributes of a destination far  
13 outweigh any speculative adverse effects."

14 Did I read that correctly?

15 A You did.

16 Q So would you agree with me that negative  
17 attitude towards transmission lines is related  
18 to their view of the lines?

19 A I'm sorry. Can you repeat that?

20 Q Sure. Would you agree with me that any negative  
21 attitude towards transmission lines from  
22 visitors to New Hampshire would be related to  
23 their view of the line?

24 A Yes. I think that's a fair characterization.



1 Q Would you also agree with me that the view of  
2 transmission lines in New Hampshire scenery  
3 would be considered a negative attribute?

4 A For some. But I believe, as I've pointed out,  
5 in my experience I believe many of today's  
6 visitors recognize there are infrastructure  
7 elements that are part of the destination and  
8 that they do not play a negative factor. It's  
9 their presence, and they're present in many of  
10 the destinations that they travel to.

11 Q Would you agree with me that if the difference  
12 between having transmission lines and not having  
13 transmission lines, if it were a clean slate,  
14 the introduction of a transmission line would  
15 constitute a negative attribute?

16 A Again, I would not agree with that.

17 Q Would you agree that New Hampshire's beauty is  
18 one of its greatest attributes?

19 A I would.

20 Q And New Hampshire, both its State government and  
21 tourism industry, spend millions of dollars to  
22 promote New Hampshire's beauty?

23 A They do.

24 Q And do you believe that, in your opinion, are

1           you aware of any evidence that people would come  
2           to New Hampshire to view transmission lines?

3       A     Unlikely that that would be the driving factor  
4           that they'd want to view transmission lines.

5       Q     But you don't believe that the introduction of  
6           transmission lines would introduce a negative  
7           factor, a negative attribute?

8       A     For some small percentage that could pose a  
9           negative factor. I think for the overwhelming  
10          percentage of visitors they've come to accept  
11          and realize that's part of the environment, but  
12          there could be a small percentage that would  
13          view it as one negative factor.

14      Q     For those other folks you don't think they would  
15          consider it as one of many factors but one  
16          negative factor?

17      A     For some it could be a negative factor.

18      Q     But I'm interested. You say for a small amount  
19          would view it as a negative factor. So is it  
20          your opinion that the majority of people would  
21          not consider the introduction of a new  
22          transmission line to be a negative factor?

23      A     I think for many it's a general indifference  
24          that the much greater facet that they're looking

1 for in where they recreate, where they vacation  
2 is the products that the destination provides  
3 and accessibility and the price value of those  
4 are the things that drive that decision.

5 Q Okay. So you've indicated in your report and  
6 you've testified that in your opinion there's a  
7 mix of attributes people consider in deciding  
8 whether to visit a place as a tourist, correct?

9 A That's correct.

10 Q And the presence of transmission lines would be  
11 one factor among many?

12 A That's correct.

13 Q And in your opinion, for some people, the  
14 introduction of new transmission lines would be  
15 a negative factor but for the majority of people  
16 it would be a nonfactor?

17 A Correct.

18 Q And have you done any studies on that specific  
19 issue, people's view of a new transmission line?

20 A That's, a variety of the steps that we undertook  
21 in this analysis was the approaches and  
22 everything from looking at secondary research  
23 that's been done in other areas, other  
24 destinations that I've been involved with that

1           have large transmission line projects. So it's  
2           that range of background and research.

3       Q     But my question is a little more focused.

4       A     Okay.

5       Q     My question is not on the general things that  
6           you did. I'm wondering, you didn't go out and  
7           seek to measure people's views on the one factor  
8           of the introduction of new transmission line,  
9           did you?

10      A     We did attempt to measure how transmission lines  
11           relate to how prospective visitors could choose  
12           New Hampshire. What were the range of factors  
13           that would likely come into play and where does  
14           the presence of transmission lines relate to  
15           that broad array. So we did take that specific  
16           analysis of prospective visitors to New  
17           Hampshire.

18      Q     Did you do anything to specifically measure  
19           people's view of a new transmission line? That  
20           one factor. As opposed to the broad factors  
21           that you considered.

22      A     No.

23      Q     Okay. So you were retained in 2013, is that  
24           correct?

1 A That's correct.

2 Q And you were retained to develop a method to  
3 analyze what impact the Northern Pass Project  
4 would have on New Hampshire's tourism industry,  
5 correct?

6 A That's correct.

7 Q And you developed the method you used to do your  
8 analysis, correct?

9 A That's correct.

10 Q And that method is the five study elements that  
11 you include in your report, correct?

12 A Correct.

13 Q Now, you may have touched on this before, but  
14 this method, using these five study elements is  
15 the first time you've ever used that specific  
16 method, correct?

17 A No. No. I wouldn't agree with that.

18 Q You've used these five things as one method in  
19 which to study this issue?

20 A I think the methods we used in this Project were  
21 very similar to projects we've used over the  
22 last 20 years. In just about every assignment,  
23 we step into it where I'm using my experience,  
24 my background, my understanding and destinations

1 all around the country. Have I seen this  
2 activity or issue arise in other destinations?  
3 We very frequently undertake secondary research  
4 to see if there's other research that's been  
5 undertaken that can lend insights into a  
6 particular issue that we might be considering.  
7 We very frequently undertake input processes  
8 where we get insights from participants in the  
9 industry and hear different perspectives. We  
10 frequently undertake new primary survey research  
11 to help us understand issues. So I believe many  
12 of the approaches that we used on this  
13 particular Project were very similar to others  
14 that we've undertaken over the last 20 years.

15 Q So many of the things you did you've done before  
16 such as the listening tour, correct?

17 A Correct.

18 Q And you've used surveys in the past, correct?

19 A Correct.

20 Q You didn't find any studies that were applicable  
21 to this, correct?

22 A We, similar to the findings in the Draft  
23 Environmental Impact Statement, could not find  
24 any secondary research that demonstrated any

1 corollary between the introduction of  
2 transmission lines and a decline in visitation,  
3 and I believe that was an important finding  
4 that we --

5 Q My question was, you didn't find any, correct?

6 A That's correct.

7 Q Okay. You yourself didn't do that research; a  
8 grad student at Temple did it, correct?

9 A Incorrect.

10 Q You did it yourself?

11 A No. Well, I did some of it.

12 Q And a grad student did the rest of it?

13 A No.

14 Q Who did the rest of it?

15 A Dr. Daniel Fesenmaier, one the top tourism  
16 academics, one of the most published academics  
17 not just in the US but in the world. He is a  
18 professor who is in the top 3 to 5 most  
19 published tourism academics in the world.

20 Q And he didn't use a grad student to do the  
21 research?

22 A A grad student also assisted, but I did  
23 analysis, Dr. Fesenmaier did analysis, and some  
24 work was also undertaken by some of the graduate

1 students within his laboratory.

2 Q I'm not talking about the analysis. I'm talking  
3 about actually looking for the studies.

4 A And that's what I'm answering.

5 Q You haven't before used the method of  
6 comparing -- you compared the Phase II line in  
7 New Hampshire before and after, correct?

8 A Correct.

9 Q You hadn't used that method before, had you?

10 A We've used pre and post experiences in a variety  
11 of ways where you looked at --

12 Q Let me be a little bit more specific. I'll save  
13 you a little time. To analyze a transmission  
14 line, you haven't used that method before?

15 A That's correct.

16 Q And perhaps my questions weren't clear. I am  
17 interested in your analysis of a transmission  
18 line. You're not aware of anybody else who's  
19 used your five methods to analyze whether the  
20 introduction of a transmission line impacts  
21 tourism, are you?

22 A No.

23 Q Now, your analysis looked at potential impacts  
24 from a completed and operating transmission



1 line, correct?

2 A That's correct.

3 Q You did not analyze the impact on the New  
4 Hampshire tourism industry from construction of  
5 the transmission line, correct?

6 A Not specifically, but generally we had  
7 discussions in terms of the construction process  
8 of some of the steps that would be undertaken by  
9 the Applicant to try and minimize and mitigate  
10 the impacts, and generally considered some of  
11 the disruption that would likely occur during  
12 the construction process.

13 Q You didn't analyze the impact on the tourism  
14 industry from construction of the transmission  
15 line, did you? It's nowhere in your report, is  
16 it?

17 A And, again, I believe my answer would be the  
18 same. Not specifically but generally we  
19 considered that in the ways that I just noted.

20 Q Do you remember answering that question in your  
21 Technical Session?

22 A I don't.

23 Q Okay. Does anywhere in your report provide any  
24 analysis or discussion of the impact on the

1           tourism industry during the construction of the  
2           transmission line?

3       A     No.

4       Q     And nowhere in your Prefiled Testimony does it  
5           discuss that, does it?

6       A     It does not.

7       Q     And a moment ago you said that you were  
8           generally aware and discussed methods of  
9           construction, correct?

10      A     Correct.

11      Q     And how long is this construction project slated  
12           to be?

13      A     It varies on individual areas. I did not look  
14           at a location by location kind of period.

15      Q     Do you know when construction will occur along  
16           any specific part in the route?

17      A     I would have to look at the background  
18           documents. I don't know that off the top of my  
19           head.

20      Q     Do you know what construction crews will be  
21           doing during any particular tourist season?

22      A     Not specifically.

23      Q     Do you know the number of crews expected to work  
24           at any given time?

1 A Not specific numbers, no.

2 Q Do you know the number of construction vehicles  
3 that will be on the road during the construction  
4 period?

5 A I do not.

6 Q Do you know the types of construction vehicles  
7 that will be on the road?

8 A I do not.

9 Q Do you know whether, for instance, they'll be 50  
10 deliveries a week or 500 deliveries a week of  
11 concrete to different locations?

12 A No, I do not.

13 Q Do you know the number of laydown areas expected  
14 to be used?

15 A No. Not specifically.

16 Q Do you know the expected traffic in and out of  
17 those laydown areas?

18 A I do not.

19 Q You didn't do any analysis on the impact to  
20 tourism from traffic delays during construction,  
21 did you?

22 A I considered that in a general kind of context,  
23 and I think as raised earlier this morning, New  
24 Hampshire has significant traffic delays in many

1 instances, whether it's events or festivals or  
2 activities. That's part of the travel  
3 experience, not just in New Hampshire but all  
4 around the country, and we considered the role  
5 of traffic delays in our analysis.

6 Q Did you consider the role of traffic delays  
7 during the construction period?

8 A Again, in a general context but not  
9 specifically.

10 Q What do you mean by in a general context?

11 A Again, we discussed the steps that the Applicant  
12 would take to try and limit things like  
13 understanding the event and festival schedules  
14 and trying to work around periods where there  
15 would be larger than normal groups, steps to try  
16 and limit the duration in any individual areas  
17 and other activities and in our general  
18 experience. Again, we don't believe that the  
19 potential for a traffic delay is what would  
20 cause a visitor to come or not come to New  
21 Hampshire. They would still come. They might  
22 choose a different location to have lunch or to  
23 buy in retail, but they'd still come, and they'd  
24 still eat their lunch and still expend their

1 retail dollars.

2 Q So in order to do this analysis a consideration,  
3 wouldn't you need to know the amount of  
4 construction traffic vehicles during  
5 construction?

6 A Again, I said I considered it in a general -- we  
7 did not make specific conclusions as it related  
8 to construction impacts.

9 Q All right. So because you didn't make any  
10 specific conclusions, you didn't really  
11 determine whether or not traffic during  
12 construction would impact tourism in New  
13 Hampshire?

14 A Incorrect.

15 Q So how are you able to make those conclusions?  
16 How are you able to make that conclusion if you  
17 don't know what the vehicle traffic would be  
18 during construction?

19 A Because I'm using my experience over the last 20  
20 years. I understand the realities of  
21 construction delays. I traveled the state  
22 significantly over the last three years, and in  
23 many instances I came upon construction and  
24 traffic delays in New Hampshire, much as I have

1 in destinations all around the country, and the  
2 visitor understands that's part of today's  
3 world. I don't believe that the potential of  
4 having a traffic delay is the factor that would  
5 either cause a visitor to choose New Hampshire  
6 or not choose New Hampshire. I think it's these  
7 other factors that I've pointed out that drive  
8 that decision.

9 Q Do you know what the delay would be in the  
10 intersection in Franconia from construction at  
11 that intersection?

12 A I don't.

13 Q Do you know what the delay would be if you tried  
14 to travel from Franconia to Woodstock during  
15 construction?

16 A I don't.

17 Q Do you know what the delay would be if you tried  
18 to travel from Woodstock down to Plymouth during  
19 construction?

20 A I don't. But again, I would speak to today's  
21 visitors. There are examples upon examples,  
22 and, again, just earlier this morning, there  
23 were a couple of them that were noted during  
24 specific events and festivals where there are

1 miles of backup. Today's visitor understands  
2 that traffic congestion, traffic delays can be  
3 part of a visitor experience, and I believe  
4 making the general conclusion that we have, I  
5 don't need to know the exact duration. I  
6 understand how that weighs into a visitor's  
7 decision process.

8 Q Are you aware of any specific delay to go to any  
9 specific destination in New Hampshire caused by  
10 construction of the transmission line?

11 A Not caused by construction but just, again --

12 Q My question is, sir, are you aware of any amount  
13 of delay that would result from construction  
14 delay to go to any specific tourist destination  
15 in New Hampshire?

16 A I have not looked at specific duration at any  
17 single location.

18 Q Okay. So is it fair to say that your conclusion  
19 that construction and traffic delays from  
20 construction would not impact tourism is based  
21 on your belief that today tourists expect  
22 traffic delays, and, therefore, are accustomed  
23 to it without any specific analysis of specific  
24 amounts of delay at any specific location in New

1 Hampshire?

2 A No. We had input from industry participants on  
3 the factors influencing visitation and demand to  
4 the State. We had that sort of firsthand  
5 discussion and dialogue. We've looked at  
6 research that's undertaken by Plymouth State  
7 University. We've undertaken in our own visitor  
8 survey research where traffic delays fit in the  
9 broad range of factors. So there's a range of  
10 areas that we would have considered in coming to  
11 that conclusion.

12 Q In your listening tours, you discussed  
13 construction, delays from construction of the  
14 line?

15 A No. We asked what key factors influence demand  
16 and construction delays or delays because there  
17 was a traffic accident or delays because it's a  
18 popular event, those were not factors that came  
19 up by industry representatives that was a key  
20 factor influencing demand to New Hampshire and  
21 the visitor marketplace.

22 Q Did you discuss delays from lane closures or  
23 road closures?

24 A No. We talked about it in a general context of



1           what did the industry participants view as  
2           significant factors influencing a visitor's  
3           determination to come to New Hampshire, and  
4           those traffic congestion issues did not come up.

5       Q     Well, that's a discussion of what attracts  
6           people to New Hampshire. I'm asking about an  
7           issue that may be a negative, not attract people  
8           to New Hampshire. That's a little different,  
9           isn't it?

10      A     I think they're very similar.

11      Q     No, no, no. It's a little different looking at  
12           something that's going to be a deterrent as  
13           opposed to something that's going to be an  
14           attraction. Would you agree with me?

15      A     No. In our discussions we were talking about  
16           both positive, you know, the trends and exchange  
17           rates were a deterrent for some, if exchange  
18           rates went the wrong way. Those were the  
19           things, both positive and negative, that came up  
20           in our listening sessions and traffic delays and  
21           congestions were not one of the prominent  
22           factors that any of the industry participants  
23           noted.

24      Q     Did any of the industry participants indicate

1 any understanding of what traffic delays would  
2 be caused from construction?

3 A We did not speak about specific construction  
4 delays. I'm sure though that they are very  
5 aware of delays with a popular event or other  
6 factors that would have influenced traffic  
7 congestion, and, again, that did not come up in  
8 those discussions.

9 Q You when you did the listening tours weren't  
10 aware of any specific location where delay would  
11 occur from construction, nor the time, how long  
12 a delay would occur, correct?

13 A That's correct.

14 Q So you wouldn't expect any of the participants  
15 in these listening tours to know any specific  
16 place where traffic would be delayed from  
17 construction or how long it would be delayed,  
18 correct?

19 A Not from construction, but what we were asking  
20 was in a more general sense. Does traffic  
21 delays and certainly in certain periods up to  
22 the White Mountains there can be traffic  
23 congestion and issues that come up, and we were  
24 asking in a general context what are the key

1 factors that drive, either positively or  
2 negatively, the visitor's decision to come to  
3 New Hampshire, and that's the kind of discussion  
4 and dialogue we had with the industry  
5 participants.

6 Q What's on the screen in front of you is Counsel  
7 for the Public's Exhibit 359.

8 Now, these are summaries of your listening  
9 tour at the Town & Country Inn in Gorham. Do  
10 you see that?

11 A I do.

12 Q Now, I understand that during these listening  
13 tours you took some notes, correct?

14 A Correct.

15 Q But I understand you didn't save your notes.  
16 You tossed them away, correct?

17 A Well, we --

18 Q Did you toss your notes away?

19 A We did.

20 Q And I understand that you collected some notes  
21 from some other participates and created these  
22 bullet summaries?

23 A The bullet summaries incorporate the notes. We  
24 did not keep the handwritten notes. They were

1 aggregated into the summary that you have in  
2 front of me.

3 Q Now, looking at this page, the first question  
4 that you asked was, "What factors lead to  
5 tourism bumps/booms in the North Country." Do  
6 you see that?

7 A I do.

8 Q Is that your question that you asked them about  
9 what drives people and what deters people you  
10 mentioned a moment ago?

11 A That is a generalization, but we started the  
12 session asking industry participants from their  
13 perspective what were the key issues that have  
14 historically drove visitation in the State, both  
15 in good times and bad.

16 Q Take a look at this page and tell me if what you  
17 just asked about is noted on this page.

18 A I'm sorry. I'm not understanding your question.

19 Q Well, you just said you started the session by  
20 asking what are the key things that drive during  
21 good times and bad times. Is that the first  
22 question?

23 A I think in a general -- what factors lead to  
24 tourism bumps and booms in the North Country.

1           How is, historically how has the market  
2           performed and what are the factors that  
3           influence both bumps and booms.

4       Q     Is that the question that you asked about to  
5           determine whether or not traffic delays are an  
6           impact?

7       A     We asked that question as we started the session  
8           off to try and get an understanding from  
9           industry participants what they saw as the  
10          critical factors, the critical issues, that are  
11          influencing demand in their region and demand to  
12          New Hampshire.

13      Q     Okay.  If you look at that page, are there any  
14          other questions that you asked that relate to  
15          traffic delays?

16      A     Again --

17      Q     Sir, if you could answer my question yes, no,  
18          and then explain, it's fine.  But it works  
19          better if you start by answering my question.

20      A     Sure.

21      Q     Thank you.

22      A     I'm sorry.  Can you repeat the question?

23      Q     Sure.  If you look at that page, can you tell me  
24          if there are any other questions that you asked

1 that relate to traffic delays.

2 A We did not specifically ask about traffic  
3 delays.

4 Q Okay. Thank you. So I'm going to ask you now  
5 some questions about each of the five study  
6 elements in your report.

7 A Okay.

8 Q And what I put on the screen is page 8 of your  
9 report, and this relates to your first study  
10 element, and as I understand it your first study  
11 element was your own experience over the last 20  
12 years; is that correct?

13 A That and looking to others' experience in the  
14 regards of other research or secondary studies  
15 that had been done elsewhere.

16 Q Okay. And under the key factors you list, the  
17 first one is ease of destination access,  
18 correct?

19 A That's correct.

20 Q And you would agree with me that ease of access  
21 is very important to the New Hampshire tourism  
22 industry?

23 A It is.

24 Q Would you agree with me that most tourist

1 visitors to New Hampshire come from other New  
2 England states and the Mid-Atlantic states?

3 A That's correct.

4 Q Would you agree that most tourists drive to New  
5 Hampshire?

6 A That's correct.

7 Q And how easy they can access New Hampshire  
8 tourist destinations is very important in their  
9 decision as to whether to come to New Hampshire,  
10 would you agree with me?

11 A That's correct.

12 Q It also is important in their decision whether  
13 to return to the New Hampshire in the future,  
14 correct?

15 A That's correct.

16 Q So if access is impaired, that would have an  
17 impact on a tourist's decision to come to New  
18 Hampshire, would it not?

19 A I think that you'd have to define much more  
20 clearly what impaired access would mean before I  
21 could make a judgment on that.

22 Q Well, just let me ask you generally though. If  
23 access is the first item you put as a key  
24 consideration, if there is a significant enough

1           impairment in the mind of a visitor, that would  
2           certainly affect whether that visitor decides to  
3           come to New Hampshire or return to New  
4           Hampshire, correct?

5       A     Sure. But your destination access, it's how  
6           easy using interstates, et cetera, do I get to  
7           New Hampshire if I'm coming from Vermont or  
8           Delaware or one of the other states. What  
9           significant, I forget the exact word you used,  
10          how is that defined, I'm talking about this in  
11          terms of how easy is it for my wife and my two  
12          kids to get in the car and come to New Hampshire  
13          versus traveling to Florida or to Kansas or some  
14          other location.

15       Q     Would you agree with me that if somebody coming  
16           from Boston, if it took them, you know, two  
17           hours to get to the Lakes Region or the White  
18           Mountain region, depending on how fast they  
19           drive, if that two-hour trip were extended to  
20           three hours, that would have an impact on their  
21           decision whether to come or not?

22       A     Possibly. I think that would largely depend on  
23           the individual travel party and the full range  
24           of, you know, the factors, the products and



1 experiences that they were anticipating or  
2 expecting, and I think I just get back to a  
3 point I was raising earlier that there's many  
4 instances that were just brought up earlier this  
5 morning where people will stand in long lines to  
6 get to festivals or events or motor speedway  
7 activities because that's what they want to do,  
8 and they recognize there's going to be some  
9 inconveniences, but that's what they desire, and  
10 that's part of the experience.

11 Q And earlier you said that it's important to meet  
12 expectations of the visitor, correct?

13 A That's correct.

14 Q So if the visitor expects to travel two hours to  
15 a destination but it takes them three hours to  
16 get there, that isn't exactly meeting  
17 expectations, is it?

18 A In that particular example, if that is what the  
19 expectation versus reality, that wouldn't have  
20 met expectations.

21 Q And that would be a deterrent to that visitor  
22 visiting or returning, correct?

23 A And, again, I would agree, a deterrent, but what  
24 do we mean by deterrent. I think that's a very

1 important point in terms of how does that play  
2 into the broader set of decisions, but the  
3 example that you just raised, if there was an  
4 additional hour, it would be a factor.

5 Q You didn't seek to measure that in any way, did  
6 you?

7 A Not specifically, no.

8 Q Now, also in terms of your experience on page 9  
9 of your report, you state, quote, "Never in the  
10 prior 20 years of planning work has any concern  
11 been raise regarding the presence of power lines  
12 and their possible negative influence on visitor  
13 demand," close quote. Do you see that?

14 A I do.

15 Q Now, in your 20 years of planning, as I  
16 understand it, whether or not power lines were  
17 at one of your client's destinations was a fact.  
18 They either were there or they weren't there,  
19 correct?

20 A Correct.

21 Q And at no time in your 20 years when you were  
22 advising a client in either, that you were  
23 advising them in terms of a new power line or  
24 new transmission line coming into their area or

1 close to their destination, correct?

2 A That's correct.

3 Q And so when you were advising clients in the  
4 last 20 years, when you started your consulting  
5 with them, if transmission lines were present,  
6 that was a fact that already existed when you  
7 started your work, correct?

8 A That would be correct.

9 Q And so you didn't -- because the transmission  
10 line already existed, it wouldn't be a  
11 consideration for the client of oh, what do I do  
12 or how is this going to impact me going forward  
13 when you started your work because the line  
14 already existed, correct?

15 A I would say incorrect.

16 Q Incorrect. But you weren't advising them what  
17 to do because a new line is coming in. The line  
18 already was there, right?

19 A There can be any host of factors, both positive  
20 and negative, that in a long-range strategic  
21 plan, you're trying to take advantage of  
22 positive existing conditions and mitigating or  
23 moderating negative conditions, and so in many  
24 of these instances it's not an issue of it's a

1 new transmission line. It's that transmission  
2 lines were present and that they did not come up  
3 in all of the discussions that we would have had  
4 with thousands and thousands of industry  
5 participants over the last 20 years in terms of  
6 critical issues that we would want to address in  
7 our strategic planning process.

8 Q In none of your consulting did you come up with  
9 any ideas to mitigate that negative attribute,  
10 the existence of power lines?

11 A Again, even though power lines were present I  
12 can't recall an instance where it was raised as  
13 a strategic issue that we wanted to address in  
14 our long-range strategic planning.

15 Q An individual destination doesn't have the  
16 ability to address what to do with a  
17 transmission line that runs in front of their  
18 destination, do they?

19 A In general, no, but I have worked with  
20 destinations where we have thought about  
21 rerouting strategies, what's the arrival  
22 experience and do we want to try and bring more  
23 of our visitors in through a different entryway,  
24 provided them a different arrival experience.

1           So while in the most instances they wouldn't  
2           have the ability to change the transmission  
3           lines, certainly if there was enough concern is  
4           there ways where we would route our visitors in  
5           a different approach.

6       Q     And you would route them in an approach so they  
7           wouldn't see the transmission lines, correct?

8       A     If that arose. If that was that significant of  
9           an issue, that could have been a scenario that  
10          could have been considered, but, again, in the  
11          20 years, that never arose.

12      Q     Do you think that's because the lines existed  
13          and there was nothing the tourist destination  
14          could do about it?

15      A     No.

16      Q     Other than rerouting somebody to a different  
17          route, what else could they do about it?

18      A     Landscaping, other visual approaches. Frankly,  
19          I don't know the mitigation steps. All I can  
20          say is that while in many of these destinations  
21          they were present, that I believe the industry  
22          participants recognized the visitors  
23          acknowledged that was a part of today's fabric,  
24          those kinds of infrastructure elements, and,

1 again, it's this broader array of destination  
2 factors that were really driving and those were  
3 the factors that these industry participants  
4 were much more focused on and concerned about in  
5 long-range strategic planning initiative.

6 Q So visitors to these clients knew that the  
7 transmission lines existed because they're  
8 already there, correct?

9 A Yes. Many of these visitors had never come to  
10 the destination. They had no idea when the  
11 transmission lines were developed. They're  
12 there, and that's part of the experience that  
13 they would have in coming to the destination.

14 Q Let me ask you some questions about your study  
15 element number 2.

16 A Okay.

17 Q And that is Section 3 of your report.

18 Now, would I be correct in saying that this  
19 study element is a summary of the New Hampshire  
20 tourism industry based on your review of it?

21 A Yes, and it's one of the areas as we were  
22 talking earlier in terms of understanding the  
23 different regions, the different volumes, the  
24 character of visitation, understanding why and

1           where and how visitors choose New Hampshire,  
2           what they do when they get here, the  
3           seasonality, all of those background on that  
4           visitor market.

5       Q     Right, and the purpose of this study element is  
6           to understand New Hampshire tourism industry?

7       A     And to understand how the industry has  
8           fluctuated in the past and the factors that were  
9           pointed to in relation to what has influenced  
10          past periods of expansion or contraction.

11      Q     Okay. And you found that the industry is very  
12          important to New Hampshire?

13      A     It is.

14      Q     And it's a larger part of the economy in some  
15          regions than other regions?

16      A     It is.

17      Q     Certainly larger in the White Mountain Region  
18          and the Great North and Lakes Regions than it is  
19          in some of the other regions?

20      A     I would agree.

21      Q     Okay. And you found that the busiest time is in  
22          the summer?

23      A     That's correct.

24      Q     The next busiest time is in the fall?

1 A Correct.

2 Q And combined, those two times account for about  
3 63 percent of visitors to New Hampshire?

4 A That's correct.

5 Q Now, in this section of your report you  
6 primarily relied on research from Plymouth State  
7 University, is that right?

8 A That's correct.

9 Q You didn't speak to anybody at Plymouth State  
10 University, did you?

11 A We did not.

12 Q Now, on the screen now is a page from this  
13 section of your study element, and you say and  
14 it's highlighted, quote, "Again, there is no  
15 mention in the University's analysis that the  
16 presence or lack of presence of power lines or  
17 other major structure is having any impact to  
18 the state's travel industry."

19 Do you see that?

20 A I do.

21 Q Now, you didn't ask anybody at Plymouth State  
22 University whether or not they were ever asked  
23 to consider the presence or absence of  
24 transmission lines, correct?



1 A No. We looked at a number of years of their  
2 analysis and --

3 Q How many years did you look at?

4 A I think we went back to 2012. 2011 maybe.

5 Q Right, and in all the years from 2011 to 2012 to  
6 the present, are you aware of any large  
7 infrastructure projects that took place in New  
8 Hampshire?

9 A Certainly there were wind turbines, there were  
10 cell towers. There were a variety of those  
11 kinds of --

12 Q Did you look at any of them?

13 A Yes.

14 Q Which ones did you look at?

15 A There was a wind turbine at Mountain View Grand.

16 Q When was that put in?

17 A I don't know the exact year that that was put in  
18 place.

19 Q You say it's at Mountain View Grand?

20 A Correct.

21 Q How many turbines are there?

22 A I think there's only a single one at that  
23 location.

24 Q Right. Are you aware of any other large

1 infrastructure projects in the period you looked  
2 at the PSU information?

3 A Again, I did not quantify the number of cell  
4 towers or the number -- what we were looking at  
5 here is what the University, there were  
6 certainly periods as the Figure 3.2 shows, there  
7 were clearly periods of expansion and  
8 contraction in New Hampshire's visitor industry,  
9 and we were interested in what factors the  
10 University noted as sort of key variables that  
11 would have influenced those trends.

12 Q Understood. But you're not aware of any large  
13 infrastructure Project during that period, are  
14 you?

15 A Again --

16 Q Yes or no? Are you aware any large  
17 infrastructure Project during that period?

18 A I would answer yes. I'm sure that there were  
19 cell towers that were developed during that  
20 period of time. I don't know the exact numbers  
21 or the exact locations.

22 Q And how are you sure that cell towers were  
23 developed during that time?

24 A Because cell tower development over the last 5

1 to 7 years has been a constant evolution.

2 Q Have you looked at that in New Hampshire?

3 A I have not again looked specifically at which  
4 projects, and, again, it's not just brand-new  
5 infrastructure. It's if transmission lines or  
6 these large infrastructure Projects were  
7 responsible for a different opinion of visitors  
8 to the State over the years. And the thing that  
9 struck us was the consistency of the factors  
10 that were raised by Plymouth State University in  
11 driving and the consistency of those with the  
12 things that we found in our survey, the things  
13 that I found in my experience over the last 20  
14 years, and the experience we found in the input  
15 session and the consistency of what Plymouth  
16 State University was raising as the factors that  
17 were influencing either the ebbs and flows in  
18 visitor demand over those years.

19 Q Do you equate the installation of a single cell  
20 tower with the Northern Pass Project?

21 A Not the installation of a new tower, but  
22 certainly there were significant transmission  
23 lines in New Hampshire.

24 Q Are you aware of any built in the five-year

1 period that you looked at this report, this  
2 report covers?

3 A Not new. New construction. Correct.

4 Q Is it fair to say that you're not aware of any  
5 new large infrastructure project that was built  
6 during the five years that you looked at for the  
7 PSU information, correct?

8 A Again, I cannot speak to the specific number of  
9 whether it's a cell tower or wind turbine, but  
10 there were certainly large infrastructure that  
11 was present in New Hampshire in many of those  
12 years.

13 Q Not present. That was built in those years.  
14 But you can't identify any one sitting here  
15 today?

16 A Correct.

17 Q So on the screen now is page 13 from your  
18 report. And Table 3-1, you list New Hampshire  
19 traveler spending. Do you see that?

20 A I do.

21 Q And in Figure 3-5, you break up the spending by  
22 geographic share of spending. Do you see that?

23 A I do.

24 Q And it's broken up by the 7 travel regions that

1 are on the map on the left, correct?

2 A Correct.

3 Q And Merrimack Valley had the largest amount of  
4 traveler spending, correct?

5 A Correct.

6 Q Just under 30 percent?

7 A Correct.

8 Q And Merrimack Valley is the most populous region  
9 in the State, is that correct?

10 A That's correct.

11 Q It also has the largest concentration of  
12 businesses in the State, correct?

13 A I believe that's likely the case.

14 Q So looking at page 14, do you see Table 3.2?

15 A I do.

16 Q And it's got purpose of visit, correct?

17 A Uh-huh.

18 Q And the most frequently cited purpose is to  
19 visit friends and relatives, correct?

20 A That's correct.

21 Q And then at the bottom it says business other at  
22 11 percent, correct?

23 A Correct.

24 Q So it wouldn't surprise you that Merrimack

1 Valley being the largest concentration of people  
2 and the largest concentration of business would  
3 have the most traveler spending of the 7  
4 regions, correct?

5 A In general, um-hum.

6 Q And when you talk about traveler spending,  
7 you're not necessarily spending at a specific  
8 tourist destination, are you? You're including  
9 in that a number of things, including eating and  
10 drinking establishments, right?

11 A Yes. Food and beverage expenditures would be  
12 included.

13 Q So that would include, for instance, all the  
14 restaurants in Nashua and Manchester, correct?

15 A In the numbers you were speaking to before?

16 Q Yes.

17 A All the visitor-related expenditures. Yes.

18 Q Right. Now, most of the 192-mile Project,  
19 Northern Pass Project, does not go through  
20 Merrimack Valley, does it?

21 A That's correct.

22 Q So other than these tables that we just looked  
23 at on the prior page, Table 3-1 and Figure 3.5,  
24 that's the extent of your analysis on a regional

1 basis, correct?

2 A No.

3 Q Where else? Point to me where else.

4 A We spent extensive time traveling through all of  
5 these regions physically. We considered all of  
6 the background publication materials that  
7 outlined the various products and experiences  
8 within each of those areas. We looked at the  
9 positioning of the transmission lines in  
10 relation to many of the various attractions.  
11 Undertook all of that as part of our analysis  
12 and influenced our ultimate conclusion.

13 Q None of that shows up in your report, does it?

14 A There's not specific tables, but I think in the  
15 report we referenced the extensive traveling,  
16 the investigation of maps and aerial  
17 photography, the investigation of all the Travel  
18 Guides. I believe we made reference to that in  
19 our report.

20 Q But you didn't look at any, you said earlier you  
21 didn't look at any specific destination,  
22 correct?

23 A I went to a significant number of destinations,  
24 but we did not evaluate the impacts to any

1 individual but certainly went to a whole host of  
2 attractions throughout the state.

3 Q You didn't analyze factors such as the  
4 percentage of jobs in a specific region in the  
5 tourist industry, did you?

6 A We certainly looked at the scale of spending  
7 within the various regions.

8 Q But my question was you didn't look at  
9 percentage of jobs, did you?

10 A We looked at overall jobs, tourism-related jobs,  
11 and in my experience, the relation of where  
12 those dollars were spent have close association  
13 where the employment, where the visitors are  
14 spending so close correlation between those two.

15 Q Did you look at the percentage of jobs in each  
16 of the 7 regions?

17 A No. We looked at percentage of spending and  
18 visitation. We did not specifically equate the  
19 number of jobs.

20 Q And you didn't look at, for instance, percentage  
21 of a region's gross domestic product related to  
22 tourism, did you?

23 A Not specifically. In a general kind of context.  
24 Just as you spoke earlier the White Mountains,



1 the Great North Woods, obviously having a more  
2 significant dependence on the visitor  
3 marketplace.

4 Q Other than these one table and one figure, this  
5 is the only breakout of analysis or  
6 quantification or figures on a region by region  
7 basis, correct, in your report?

8 A Again, in the report, but there was an extensive  
9 amount of time that we spent with Plymouth State  
10 University data, looking at those regional  
11 variances, again, investigating, speaking to  
12 individuals, traveling to the different  
13 experiences and products in those different  
14 regions. So, again, I think it's important to  
15 recognize that all of those things which we  
16 noted in the report were undertaken. There  
17 weren't other specific tables in the report  
18 itself other than what you've pointed out here.

19 Q Any impact from the energy transmission line you  
20 would expect to fall within the three regions  
21 that the line travels through, correct?

22 A Primarily.

23 Q You wouldn't expect impact in an area that is  
24 remote from where the line is located, would

1           you?

2           A     Unlikely.

3           Q     So, for instance, you wouldn't expect any impact  
4           in Nashua or Manchester, would you?

5           A     Unlikely. Yes.

6           Q     And it's unlikely to have impact in Portsmouth  
7           or Keene, correct?

8           A     Likely.

9           Q     You're agreeing with me, correct?

10          A     You know, on some of the individual examples, I  
11          think I would need to see the exact geographic  
12          location, but outside of the primary regions  
13          where the line is placed, there would be less  
14          likelihood of impacts in areas that the line  
15          wasn't present in.

16          Q     Do you know which region Keene is located in?

17          A     Off the top of my head, I don't.

18          Q     Do you know what region Portsmouth is located  
19          in?

20          A     No. I'd have to look at the map.

21          Q     With respect to any quantitative analysis, I  
22          mean analysis regarding numbers, you don't have  
23          any numbers analysis on a region by region basis  
24          in your report other than these two tables,

1 correct?

2 A That's correct.

3 Q The impact of the potential impact of the  
4 transmission line, for instance, in the White  
5 Mountain area may be significant for that area  
6 but insignificant, for instance, to the  
7 Monadnock region, correct?

8 A In general.

9 Q So if the traveler spending in cities and towns  
10 where the Northern Pass line is not visible,  
11 it's less likely to have impact in those areas,  
12 correct?

13 A I wouldn't agree with that.

14 Q You think areas where the transmission line is  
15 not visible would have an impact?

16 A No.

17 Q No, you don't? You're going to have to clarify  
18 that no. I want to make sure we're on the same  
19 page.

20 Let me try it again.

21 A Okay.

22 Q Would you agree with me that the areas where the  
23 Northern Pass line would not be visible are  
24 unlikely to have an impact?

1 A No.

2 Q Why not?

3 A Because I don't believe the premise or lack of  
4 presence of transmission lines influences the  
5 fundamental decision of a visitor to choose New  
6 Hampshire. So whether that transmission line is  
7 above grade or underground, I do not believe is  
8 that the drives that fundamental decision by  
9 that traveler to come and experience New  
10 Hampshire.

11 Q I understand your position. But for purposes of  
12 my question assume if there were an impact,  
13 would you agree with me that that impact would  
14 be felt in those areas where the transmission  
15 line is visible as opposed to the areas where  
16 it's not visible?

17 A And, again, you're asking me to assume something  
18 that I don't believe is the case.

19 Q That's the beauty of asking an expert a  
20 question. Yes.

21 A Maybe try again? Can you ask me the question  
22 again?

23 Q Sure. I'll ask you one more time.

24 Would you agree with me that if the

1 Northern Pass transmission line had an impact on  
2 tourism, that impact would be felt in areas  
3 where the transmission line is visible and not  
4 in areas where the transmission line is not  
5 visible?

6 A If you're taking your position statement that,  
7 and if people were making their decisions based  
8 on the presence of transmission lines, being  
9 able to see the transmission line versus not  
10 seeing, there would be less of an impact if I  
11 took your premise to be the case.

12 Q So you'd agree with me, if you accepted my  
13 premise?

14 A Again, if what you're saying and that if the  
15 presence of transmission lines were what drove a  
16 visitor's decision, again, all of which I  
17 disagree with, that having those transmission  
18 lines visually present would likely have more of  
19 an impact than not seeing them.

20 Q So if we look at the percentages of traveler  
21 spending, and if the transmission line was  
22 visible in only 20 percent of the areas of  
23 traveler spending, the impact statewide would  
24 not be that significant because it would be

1 diluted, correct?

2 A Incorrect.

3 Q Why is that?

4 A Because, again, my fundamental belief is that  
5 whether the line is visible in this area or that  
6 area, that's not what is driving that visitor's  
7 decision.

8 Q I understand that. And let me explain one more  
9 time. For purposes of these questions, you  
10 should assume what I'm asking you. And I  
11 understand you've made it perfectly clear what  
12 your opinion is and it's set forth in your  
13 report. But for the purposes of these  
14 questions, you need to assume what I'm asking.

15 A Okay.

16 Q So I want you to assume that the presence of the  
17 transmission line impacts tourism spending. If  
18 you're going to look at tourism spending on a  
19 statewide basis, if the line were only visible  
20 in 10 or 20 percent of the areas where spending  
21 occurs, that would not have a significant impact  
22 if you were considering the whole state because  
23 it would be diluted, if you will. It would only  
24 be a small percentage, correct?

1 A Again, if you took your premise, that would be  
2 correct.

3 Q But for those areas where the 10 or 20 percent  
4 of the line is visible, it could have a  
5 significant impact because they're, if you will,  
6 bearing the brunt of the impact, correct?

7 A Again, if you took your premise and the areas  
8 where they were more visible, you're correct,  
9 would have more of an impact.

10 PRESIDING OFFICER HONIGBERG: Mr. Nichols,  
11 we understand, trust me, that you don't agree  
12 with Mr. Pappas's premises. If you could just  
13 accept for the purposes of these questions that  
14 the hypothetical situation he's presenting to  
15 you is true, you can give quicker answers and we  
16 can move along. Okay?

17 A Very good.

18 Q Thank you. Now, you'd agree with me that the  
19 tourist industry in New England is very  
20 competitive, correct?

21 A Correct.

22 Q And New Hampshire competes with Vermont and  
23 Maine and probably western Massachusetts?

24 A Correct.

1 Q Now, and you'd also agree with me that visitors  
2 to New Hampshire could easily divert to Maine,  
3 Vermont or western Massachusetts as opposed to  
4 coming to New Hampshire?

5 A Correct.

6 Q So I understand that you don't agree with my  
7 premise, but if the presence of transmission  
8 lines are visible in certain areas of New  
9 Hampshire, and that were a deterrent from  
10 visitors going to these areas, they could easily  
11 divert to Maine, Vermont or western  
12 Massachusetts, correct?

13 A They could.

14 Q Let me ask you some questions on the third study  
15 element in your report. So on the screen is the  
16 first page of your third study element, and I've  
17 highlighted your introduction. Do you see that?

18 A I do.

19 Q Okay. And since we all can read, I won't bother  
20 reading it to us, this relates to your listening  
21 tour, correct? That's the third element of your  
22 study?

23 A That's correct.

24 Q Now, you did not select the participants, did



1           you?

2           A     No.

3           Q     The participants were selected by Northern Pass  
4           Transmission with some assistance from the New  
5           Hampshire Travel Council, correct?

6           A     Correct.

7           Q     And you don't know how the participants were  
8           selected, do you?

9           A     Yes. I sat with both representatives of the  
10          Travel Council and the Hotel and Restaurant  
11          Association. We explained our goals here and  
12          that we were looking for senior representatives  
13          in various geographic areas of the state and in  
14          various thematic sectors of the visitor industry  
15          who could provide us insights in terms of  
16          thoughts, concerns, about the industry overall,  
17          and about the Northern Pass Project and that's  
18          how we've framed it, and they've helped us  
19          identify potential individuals that we might  
20          contact to see if they'd be willing to sit down  
21          and discuss their thoughts with us.

22          Q     So you laid this out and they went in and  
23          selected the folks for the listening tour,  
24          correct?

1 A Again, the Travel Council provided us a mix of  
2 individuals that they would suggest would be  
3 appropriate persons who could give us insight.

4 Q And that would be willing to participate?

5 A Correct.

6 Q You don't know what the participants were told  
7 before the meeting, do you?

8 A I do. I drafted a brief introduction letter of  
9 why we were asking them to join us and the  
10 purpose.

11 Q Okay. Now, you attended four meetings, correct?

12 A Correct.

13 Q And as I understand it, NPT's counsel at  
14 Hinckley Allen and NPT are the ones that  
15 organized these meetings, correct?

16 A This was before -- it was, Pat Murphy was,  
17 assisted us. There was before this when he was  
18 still at the utility. He hadn't moved over to  
19 the law firm at that point.

20 Q What's Pat's last name? Are you referring to  
21 Pat McDermott?

22 A Yes. Thank you.

23 Q That's fine. When he was doing this work, he  
24 was at the utility and then he went --

1 A Correct. I'm not remembering exactly when he  
2 transitioned, but the initial discussion was  
3 when he was at the utility.

4 Q That's fine. On the screen now is Counsel for  
5 the Public's Exhibit 356. Do you see that?

6 A I do.

7 Q And it's an email from Pat McDermott to you. Do  
8 you see that?

9 A I do.

10 Q Now on the screen is a listing of the four  
11 listening sessions, correct?

12 A Correct.

13 Q Now, each session was scheduled for an hour and  
14 a half?

15 A Correct.

16 Q And then if you turn to the next page, the next  
17 page are a list of RSVPs for the White Mountain  
18 session and the Gorham session, do you see that?

19 A I do.

20 Q So at the White Mountain session, did all four  
21 of these RSVPs participate?

22 A I believe so.

23 Q And you have two people from the ski industry,  
24 correct?

1 A Correct.

2 Q And you have one person from White Mountains  
3 Attractions, correct?

4 A Correct.

5 Q What is White Mountains Attractions?

6 A It's the association that represents the diverse  
7 array of businesses up in the area, and I  
8 believe they also have responsibility for  
9 running the Visitor Center there.

10 Q And then you have one person from Whale's Tale  
11 Water Park, correct?

12 A Correct.

13 Q Are you familiar with Whale's Tale Water Park?

14 A In general.

15 Q Did you go by it?

16 A I drove by it.

17 Q You didn't participate?

18 A Did not.

19 Q Do you know when Whale's Tale operates?

20 A Generally through the summer seasons, but I  
21 don't know the exact opening and closing dates.

22 Q I'll represent to you, and it's in an exhibit,  
23 basically June, July, August through September  
24 4.

1 A Um-hum.

2 Q Then at the Gorham meeting is four people  
3 listed, do you see that?

4 A I do.

5 Q Did all four attend?

6 A Chris Diego did not. We had another attendee,  
7 and I'm not recalling off the top of my head  
8 that representative, but Chris Diego I spoke  
9 with later by phone.

10 Q Somebody else from Mountain View Grand attended?

11 A No.

12 Q From some other --

13 A From some other, representing some other --

14 Q Hotel?

15 A -- other group. I forget who but there was  
16 another person who joined us there as well.

17 Q Do you know where the Coos County Historical  
18 Society is located?

19 A You know, he brought materials with him. I  
20 don't recall off the top of my head the specific  
21 location.

22 Q Do you know how far away it is from the proposed  
23 route of the line?

24 A I do not.

1 Q So you have somebody from Historical Society,  
2 you have somebody from lodging, and then you  
3 have somebody from Jericho Mountain Sports.  
4 What do they do?

5 A They provide, essentially an outfitter for lack  
6 of a better term, equipment, and facilities for  
7 outdoor recreation.

8 Q What kind of equipment?

9 A I think primarily snow machines, and I'm not  
10 sure of the full range that they provide.

11 Q They sell ATVs and snowmobiles, correct?

12 A I think that's their primary.

13 Q I think that's all they do. Do you know where  
14 their business is located?

15 A Not off the top my head, no. Certainly up in  
16 the region, but I don't know the exact location.

17 Q Okay. CFP 359 we saw earlier is a summary of  
18 discussion at these meetings, and if you look at  
19 the first bullet point, it indicates Jim  
20 introduces the Project and outlines the purpose  
21 of the meeting. Do you see that?

22 A I do.

23 Q Would that be Jim Wagner?

24 A Correct.

1 Q And then it says two of the three attendees  
2 stated that. Do you see that?

3 A Yes.

4 Q Does that refresh your recollection that only  
5 three people attended that meeting because  
6 Mr. Diego couldn't go?

7 A You know, I thought there was a fourth that  
8 joined us at some point, but it might have just  
9 been the three without Chris.

10 Q Okay. So looking back on Counsel for the  
11 Public's Exhibit 356, the third meeting was the  
12 Margate Resort. Do you see that?

13 A I do.

14 Q Now, the documents provided to us did not have a  
15 listing of who attended. Do you know how many  
16 people attended that meeting?

17 A I think we had three or four there as well.

18 Q Do you remember what industries they came from?

19 A It was lodging. I believe there was a snow  
20 machine, the woman who represents the  
21 association overall. And maybe, I believe there  
22 were two lodging oriented and then the  
23 snowmobile association, and I forget the fourth  
24 person.

1 Q Then the fourth meeting took place at the  
2 Hinckley Allen law firm in Concord; do you see  
3 that?

4 A I do.

5 Q Now, again, the documents didn't contain a  
6 listing of attendees. Do you recall how many  
7 people attended this fourth meeting?

8 A I think there was only two and Peter --

9 Q Peter Ramsey?

10 A Correct. And I believe one other, but I'm not  
11 recalling. There were only a couple at that  
12 session.

13 Q What industry did Mr. Ramsey represent?

14 A The theater and entertainment.

15 Q And how about the other person if there was  
16 another person?

17 A You know, I'd have to go back and -- I'm not  
18 recalling.

19 Q Now, at these meetings besides you also in  
20 attendance we saw was Mr. Wagner, correct?

21 A He was at the North County, Town & Country Inn.

22 Q And did Pat McDermott attend these meetings?

23 A He had a conflict. He might have attended the  
24 one at Hinckley Allen, but I don't believe Pat



1 was present at any of them.

2 Q And Melissa Skarupa from NPT was present?

3 A Correct.

4 Q And Sarah Hoodlet from Burns & McDonnell was  
5 present?

6 A Each one of them. One of them assisted me in  
7 the White Mountains and one assisted me at the  
8 Margate and at Hinckley Allen.

9 Q Were there other people present on behalf of the  
10 Project?

11 A No. Those would have been the people.

12 Q Okay. So at each of these meetings, there would  
13 be two or three, maybe at one meeting four  
14 industry participants, and four or five people  
15 from the Project, correct?

16 A Incorrect.

17 Q What's incorrect about that?

18 A There would be, I think two would be the maximum  
19 in the White Mountains, Margate and Hinckley  
20 Allen there would have only been one.

21 Q Well, I'm counting yourself.

22 A Okay. If you want to count me as part of the  
23 Project, then at Town & Country I think we would  
24 have had three. Myself, Jim and there was one

1 other person. At White Mountains it was myself  
2 and one of the women that you noted and the same  
3 thing at Margate and Hinckley Allen.

4 Q Well, Sarah Hoodlet from Burns & McDonnell  
5 attended both Gorham and the White Mountain one,  
6 correct?

7 A I'm forgetting the individual women, which ones  
8 they -- it was the first time I had met them.

9 Q Okay. All right. So what we've seen is at  
10 these listening sessions you heard from a couple  
11 of folks in the ski industry, one person from a  
12 water park, person from a Historical Society,  
13 person from the theater, and a person who sells  
14 snowmobiles, the association person and some  
15 lodging folks, correct?

16 A Correct.

17 Q But you didn't hear, from most of those  
18 industries you only had one representative,  
19 correct?

20 A Yes. The purpose, you know, we had obviously  
21 reviewed a broad range of articles and  
22 background that referenced different  
23 perspectives and different attitudes. We had  
24 attended public hearings and heard different

1 perspectives and the purpose of these listening  
2 sessions was to have a small informal group  
3 where we could probe and understand some of the  
4 issues and concerns in more detail so that was  
5 the purpose of these.

6 Q But these hearings and public sessions, when did  
7 they occur that you just mentioned a moment ago?

8 A That would have been after.

9 Q After. Right. So these listening sessions  
10 occurred in December of 2013, correct?

11 A Correct.

12 Q So you wouldn't have the opportunity to probe at  
13 these sessions things you heard at public  
14 hearings and public meetings, correct?

15 A No. This was, again, we had heard a broad array  
16 of feedback and thoughts in the many, many  
17 articles and different, you know, materials that  
18 we reviewed. And then we understood some of the  
19 main concerns and these listening sessions were  
20 to give us an opportunity to hear in greater  
21 detail, and we intentionally worked with the  
22 Travel Council to try and get senior level  
23 people who could provide, and whether it's the  
24 restaurant and lodging association, whether it's

1 the snowmobile association, whether it's White  
2 Mountains association, those people who could  
3 speak on behalf of a broad range of  
4 constituents.

5 Q You use the Travel Council because Eversource is  
6 one of the sponsors, correct?

7 A Incorrect.

8 Q It was helpful to have them as one of the  
9 sponsors?

10 A We went to the Travel Council because we thought  
11 they would be one of the best that could direct  
12 us in terms of some of the people that we might  
13 approach.

14 Q Who suggested the Travel Council?

15 A I don't recall, but it certainly would have  
16 been --

17 Q It wasn't you, I assume?

18 A I was going to continue my answer. It  
19 absolutely would have been one of the top, it  
20 would have been the hotel and motel and  
21 restaurant association or Travel Council. Each  
22 state has a different, but that would be the  
23 organization that I would like to look to to  
24 provide us insights on individuals that we could

1 speak with.

2 Q Now, after these listening sessions, you didn't  
3 follow up with any of the participants?

4 A Did not.

5 Q And other than speaking to the participants in  
6 these listening sessions, you didn't speak with  
7 any other business owners who might be affected  
8 by the Northern Pass Transmission line, correct?

9 A Not directly, but again, obviously, there was a  
10 wide range of things that we reviewed that gave  
11 a whole host of different perspectives.

12 Q So I'm going to now look at your report and your  
13 summary of the key points from these listening  
14 sessions.

15 A Okay.

16 Q And I've got it highlighted there where you  
17 said, "Opinions regarding the potential future  
18 impacts of the Northern Pass Project on tourism  
19 varied. While some concerns were expressed in  
20 regards to New Hampshire losing its image as a  
21 beautiful state and tourism attraction power, no  
22 one offered an empirical basis supporting those  
23 concerns. Some respondents also saw  
24 opportunities for the Project to partner with

1 various entities to help enhance tourism  
2 opportunities." Do you see that?

3 A I do.

4 Q So you would agree with me you heard a mix of  
5 perspectives at these meetings, correct?

6 A We did.

7 Q And there wasn't a consensus at these meetings,  
8 was there?

9 A There was not.

10 Q And you heard concerns at these meetings about  
11 the potential impact to tourism from the  
12 transmission line, correct?

13 A Correct.

14 Q Now, at these meetings you didn't discuss things  
15 such as the height of towers, did you?

16 A We did not.

17 Q And you didn't have with you any photo  
18 simulations of the Project, did you?

19 A We did not.

20 Q But in all four meetings, concerns were  
21 expressed about Northern Pass having a negative  
22 impact on tourism, right?

23 A That's correct.

24 Q Now, I think you said earlier, some participants

1 truly believed that the transmission line would  
2 negatively impact tourism, right?

3 A That's correct.

4 Q And they were concerned that New Hampshire would  
5 lose its image as a beautiful state?

6 A Correct.

7 Q Would I be correct in saying there was more  
8 concern about the Project in the northern part  
9 of the state than in the southern part of the  
10 state?

11 A The negative impacts of the Project more in the  
12 northern, correct.

13 Q And that's because tourism is a larger part of  
14 the economy up in the northern part, correct?

15 A Yes, and just the natural environments up there.

16 Q Now, you would expect the industry participants  
17 who you invited to these listening sessions to  
18 rely on their own experience, would you not?

19 A I would.

20 Q That's why you invited them, to get their  
21 perspective based on their experience, correct?

22 A That's correct.

23 Q In fact, one of the study elements of your  
24 report was your own experience in the tourism

1 industry, correct?

2 A That's correct.

3 Q You would not expect these industry participants  
4 to have done any empirical research, would you?

5 A It depends. I would have -- that was an  
6 important reason that we undertook this. We  
7 wanted to understand what the foundation was in  
8 terms of some of the characterizations, some of  
9 the opinions that we had heard time and time  
10 again, and we wanted to have that opportunity to  
11 better understand what was the foundation or the  
12 basis of some of these attitudes.

13 Q But you wouldn't expect any of the attendees to  
14 have come with empirical evidence or empirical  
15 studies, would you?

16 A We didn't know.

17 Q You didn't ask them to bring any in your letter  
18 that you sent out?

19 A No. We didn't.

20 Q And would you agree with me, by definition, a  
21 listening tour is intended to obtain  
22 perspectives and opinions of the participants?

23 A Yes, it is.

24 Q So I want to ask you some questions about the



1 fourth study element in your report.

2 A Okay.

3 (Discussion off the record)

4 Q Now, the fourth study element, you looked at two  
5 transmission line projects, correct?

6 A Correct.

7 Q One was the Phase II line in New Hampshire, is  
8 that right?

9 A That's correct.

10 Q On the other one was the Maine Reliability  
11 Program.

12 A That's correct.

13 Q And what you did is you compared the number of  
14 businesses and the number of employees during  
15 construction and then after completion of the  
16 Phase II line, correct?

17 A That's correct.

18 Q With respect to the Maine Reliability Program,  
19 when you did your report you didn't have any  
20 data on after completion because the program  
21 hadn't completed yet, correct?

22 A That's correct.

23 Q Now, let me ask you this. Here we go. Thank  
24 you.

1           If you look at what's on your screen now,  
2           this is Counsel for the Public's Exhibit 11.  
3           And if you look at what looks to me to be sort  
4           of a pink line to the left, you recognize that  
5           as Phase II?

6       A     I do.

7       Q     Little symbol on the right? Do you see that?

8       A     I do.

9       Q     And Phase II runs through Grafton County,  
10          Merrimack County, and then ends up in  
11          Hillsborough County, do you see that?

12      A     I do.

13      Q     That was approved in 1985 and completed in the  
14          1990s?

15      A     Correct.

16      Q     And I understand in your comparison in your  
17          report you compared the number of  
18          tourist-related businesses in those three  
19          counties where Phase II goes through and 6 of  
20          the 7 other New Hampshire counties, correct?

21      A     Correct.

22      Q     And you did the same thing for employment. And  
23          for terms of employment you compared those three  
24          counties with 6 of the other 7 counties in New

1 Hampshire, correct?

2 A That's correct.

3 Q In both your comparisons, you did not include  
4 Rockingham County, correct?

5 A That's correct. We added that in our  
6 Supplemental, but in the initial report, that  
7 did not include Rockingham.

8 Q So on the screen now is page 13 of your report.

9 A Uh-huh.

10 Q And if you look at Figure 3-5 geographic, share  
11 of spending, you'll see that the Seacoast is  
12 21.5 percent. Do you see that?

13 A I do.

14 Q Is it your understanding the Seacoast includes  
15 Rockingham County?

16 A Correct.

17 Q So by excluding 21.5 percent from your  
18 comparison, that skewed your numbers, did it  
19 not? In your report?

20 A That would make a difference. That's why we  
21 added that, and that's included in our  
22 Supplemental Testimony.

23 Q Now, you used data from the U.S. Bureau of Labor  
24 Statistics, correct?

1 A That's correct.

2 Q And you used the Standard Industrial  
3 Classification codes, otherwise known as SIC  
4 codes?

5 A That's correct.

6 Q And you used those to identify tourist-related  
7 businesses?

8 A Correct.

9 Q And what you did is you tracked six types of  
10 businesses by their SIC code?

11 A That's correct.

12 Q And as I understand it, you used a spreadsheet  
13 to do this analysis, correct?

14 A Correct.

15 Q You didn't use an economic model?

16 A Correct.

17 Q And was this the first time you performed this  
18 type of analysis comparing number of businesses  
19 and employees during construction of a  
20 transmission line with after the line is built?

21 A Yes. One of, the approach that we used here was  
22 there was an example of an existing transmission  
23 line in New Hampshire and the question was was  
24 there any evidence of impacts to the visitor

1 industry.

2 Q Okay. So this was the first time you used this  
3 analysis, correct?

4 A Correct.

5 Q And you developed this analysis yourself, this  
6 method?

7 A In association with Dr. Fesenmaier.

8 Q And you're not aware of anyone else who has ever  
9 used this analysis on a transmission line,  
10 correct?

11 A Correct.

12 Q And in your work, you do not regularly do this  
13 type of analysis, do you? Comparing employment  
14 and businesses for a transmission line during  
15 construction and after operation, correct?

16 A I've not done that specific, we certainly  
17 consider employment trends and what's happening  
18 but not in relation to a transmission line pre  
19 and post.

20 Q As part of your work, you don't use economic  
21 models; is that right?

22 A We work closely with a wide range of economists.

23 Q My question is do you use economic models?

24 A We use it in our work frequently, yes.

1 Q You yourself.

2 A Well, we're working in conjunction with entities  
3 where econometric models are used in terms of  
4 developing estimates of spending. I'm very  
5 familiar with them.

6 Q Somebody else uses the models, correct, as  
7 opposed to yourself?

8 A I'm not the one putting the inputs in. We're  
9 certainly using the outputs and the conclusions  
10 of them.

11 Q You're not familiar with the REMI economic  
12 model, are you?

13 A I am.

14 Q You are?

15 A Sure.

16 Q Have you used it yourself?

17 A Again, used the outputs and the findings of the  
18 REMI model.

19 Q Okay. Now, to calculate the changed numbers of  
20 businesses and employees, you used the average  
21 annual change, correct?

22 A Correct.

23 Q And that's a simple average each year?

24 A Correct.

1 Q Would you agree with me that in the economic  
2 modeling profession, the more common practice to  
3 compare growth rates is to use something known  
4 as the compound annual growth rates?

5 A That's another option.

6 Q Is that the more common practice?

7 A I think that it can vary. Oftentimes, we've  
8 seen trends looked at in a pure simple average,  
9 that kind of process.

10 Q Have you yourself employed the compound annual  
11 growth rates?

12 A In some instances. Growth is presented in those  
13 terms.

14 Q I didn't ask whether it was presented to you. I  
15 asked whether you used it.

16 A In some instances.

17 Q You yourself did the calculations?

18 A For this? Yes.

19 Q No. No. I understand you did the calculation  
20 for this. I want to know in the past have you  
21 yourself ever done calculations using the  
22 compound annual growth rates?

23 A Sure.

24 Q Now, the SIC codes you used were replaced in

1 1997, were they not?

2 A They were.

3 Q And they were replaced by the North American  
4 Industrial Classification System?

5 A That's correct.

6 Q And the North American Industrial Classification  
7 System is used by all federal statistic agencies  
8 to classify businesses, correct?

9 A In the more recent, yes. It's a more refined  
10 approach.

11 Q Well, the SIC codes haven't been used by these  
12 agencies for the last 20 years, isn't that  
13 right?

14 A Yes, but we were going back to try and analyze  
15 the Phase II line which was back in the mid '80s  
16 and that's why we used SIC code analysis to  
17 facilitate that analysis back in the mid '80s.

18 Q So on the screen now is page 19 from your  
19 report, and that identifies the 7 SIC codes that  
20 you used, correct?

21 A That's correct.

22 Q On the screen now is the SIC Division Structure  
23 for the various major groups of businesses. Do  
24 you see that?



1 A I do.

2 Q The first group you used is Major Group 70,  
3 hotels, rooming houses, camps and other lodging  
4 places, correct?

5 A I'm sorry. I'm looking at your --

6 Q If you see on the screen, Major Group 70?

7 A I do. Yes.

8 Q And you used that group as part of your SIC  
9 classification, correct?

10 A I did.

11 Q And then the next subgroup you used was Major  
12 Group 58, eating and drinking places, correct?

13 A That's correct.

14 Q And then you used Group 47, transportation  
15 services, correct?

16 A I think we refined that in this, it was the  
17 recreational vehicle parks and camps or, I'm  
18 sorry. Passenger transportation arrangement.  
19 Yes. Transportation services.

20 Q Here's the subgroups of that major group. You  
21 see that?

22 A I do.

23 Q And you used 4725 and 4729.

24 A Yes.

1 Q You didn't use travel agencies, correct?

2 A No.

3 Q And then you also, if you look under Division A,  
4 fishing and hunting and trapping, do you see  
5 that?

6 A I do.

7 Q You didn't use that group either, did you?

8 A No.

9 Q And under Major Group 79, you did not use the  
10 theater category, did you?

11 A I'm not seeing that on the -- but we did not use  
12 theaters.

13 Q Right. Although you had Mr. Ramsey at one of  
14 your listening group sessions, didn't you?

15 A We did.

16 Q And you didn't use the racing subcategory, did  
17 you?

18 A We did not.

19 Q You realize that Loudon Speedway is a major  
20 attraction in New Hampshire?

21 A I do.

22 Q And you didn't use the amusement park category,  
23 did you?

24 A No.

1 Q But you did include the representative from  
2 Whale's Tale Water Park as one part of your  
3 listening tour, didn't you?

4 A We did.

5 Q Now, the eating places and drinking places are a  
6 large category that you used, correct?

7 A Correct.

8 Q Now, most of the businesses in this category are  
9 not tourist related, are they?

10 A They're restaurants that would have a mix of  
11 both local and visitor-related, and their mix  
12 would depend on where they're positioned and the  
13 orientation of their restaurant.

14 Q Nationally, only about 17 percent of economic  
15 activity in this category relates to tourists,  
16 correct?

17 A I think it's approximately that percentage.

18 Q Now, if 83 percent of the eating and drinking  
19 places are not tourist related, and looking at  
20 the three counties you looked at which are  
21 Grafton, Merrimack and Hillsborough County, that  
22 would affect your numbers, would it not?

23 A Certainly. It's a mix of both resident and  
24 visitor. These are the SIC categories that

1 typically when the industry considers the SIC  
2 categories, it's the lodging, it's the food and  
3 beverage, it's recreational vehicles, it's the  
4 tour operators, transportation, these are the  
5 categories that are typically considered and  
6 looked at when you would be looking at trends  
7 within the visitor industry.

8 Q Your analysis used county-wide statistics for  
9 this part, correct?

10 A That's correct.

11 Q And the county-wide statistics don't only  
12 capture activity within the viewshed of the  
13 Northern Pass Transmission line, correct? It  
14 captures the whole county?

15 A That's correct.

16 Q So, for instance, in Grafton County, the  
17 Lebanon/Hanover area is not in the viewshed,  
18 correct?

19 A I would have to look at the map, but certainly  
20 there are areas of the county that are more  
21 proximate to the viewshed of the Phase II line  
22 than others.

23 Q And are you aware of whether or not Plymouth is  
24 in the viewshed of the Phase II line?

1 A I would -- not without looking at a map.

2 Q If Lebanon and Hanover area and the Plymouth  
3 area were not in the viewshed, those are the two  
4 largest concentrations of people and businesses  
5 in Grafton County, are they not?

6 A They're large communities.

7 Q They're the two largest in Grafton County,  
8 correct?

9 A Okay.

10 Q And if they're not within the viewshed, your  
11 county-wide analysis would include them as part  
12 of your analysis, but they're not within the  
13 viewshed so that would affect your numbers,  
14 correct?

15 A No. I think just like today, it's in a broader  
16 kind of context. People are traveling through a  
17 region or in their cars or going in and out.  
18 They might be staying in the community and  
19 traveling to another region, another attraction,  
20 and so the county-wide, looking at it on a  
21 county-wide kind of basis I think provides one  
22 additional opportunity for us to try and  
23 determine whether there were any significant  
24 impacts through the development of the Phase II

1 line.

2 Q Did you do any analysis to determine the number  
3 of people who might be staying in Plymouth or  
4 the Hanover/Lebanon area that are just traveling  
5 through?

6 A I did not.

7 Q Okay. Now, for Hillsborough County, Manchester  
8 and Nashua represent about half the county  
9 population, do they not?

10 A I do not know that number.

11 Q Do you know the percentage of food and beverage  
12 establishments that are in Manchester and Nashua  
13 that represent the percentage for the county?

14 A I do not.

15 Q The Phase II line doesn't go through Manchester  
16 and Nashua, does it?

17 A Then again, the people who are recreating or  
18 visiting or going to a wide range of parks and  
19 experiences, they would likely be traveling all  
20 around a particular region. They might be  
21 overnighting in one of the major urban areas but  
22 traveling all around and believe that, again,  
23 it's sort of a county-wide orientation there.

24 Q In the three counties that the Phase II line

1 goes through, Grafton, Merrimack, and  
2 Hillsborough, are you familiar with where the  
3 tourist-related industries are located in those  
4 three counties?

5 A In general.

6 Q Where?

7 A Again, I'd have to look at the map. We did  
8 analysis, we looked at all of the various travel  
9 publications, but I don't know off the top of my  
10 head specific inventories.

11 Q Would you agree with me that if the Phase II  
12 line were going to have an impact on the tourist  
13 industry that impact would be felt within the  
14 viewshed of the line?

15 A I believe it could be broader. The viewshed,  
16 the people interacting would likely be  
17 proximate, but, again, where they're traveling  
18 to, where they're overnighting, where they're  
19 having lunch and dinner could be far beyond the  
20 viewshed, but the most likely impacts would be  
21 if they came upon in some form or fashion the  
22 Project.

23 Q Okay. But you didn't analyze the tourist  
24 destination within the viewshed of the Phase II

1 line, did you?

2 A No.

3 Q You looked at a ten-year period, 1985 to 1995?

4 A '86 to '95.

5 Q Okay. Now, a lot of things happened in that  
6 ten-year period, correct?

7 A Correct.

8 Q And a lot of things that could affect your  
9 numbers that you did not account for, correct?

10 A Well, that's the fundamental reason why we  
11 benchmarked the counties in which the line was  
12 developed with the counties in which no  
13 development, and so some of those broader macro  
14 factors would have been impacting all of those  
15 areas. So what we were looking at is the  
16 performance within those counties, benchmarked  
17 to the counties that did not. So while there  
18 were other facets and factors that were  
19 occurring in the broader marketplace, many of  
20 those factors would have influenced many regions  
21 in the state, and that's why we approached it in  
22 that benchmarked fashion.

23 Q New Hampshire suffered an economic recession in  
24 the late '80s and early '90s, correct?



1 A That's correct.

2 Q And that was more severe in some counties than  
3 other counties, correct?

4 A I don't know the specific depth on a  
5 county-by-county level.

6 Q Are you aware of the depth within any of the  
7 individual counties of the recession?

8 A Not specifically.

9 Q Didn't you just mention a moment ago one of the  
10 reasons you used the county method is so you  
11 could account for things like that?

12 A Again, we used a benchmark approach that would  
13 consider those broad factors that certainly  
14 there might be certain areas that might impact  
15 one individual county, and it was that grouping  
16 of three counties to the grouping of the other  
17 counties and the benchmarking process that  
18 controlled in general for some of those broader  
19 factors that could be impacting the state.

20 Q The economic recession could have had a greater  
21 impact on business and employees than the Phase  
22 II line, correct?

23 A I'm sorry. Repeat that?

24 Q The economic recession could have had a greater

1 impact on the number of businesses and the  
2 number of employees during construction and  
3 after construction than the phase II line  
4 itself, correct?

5 A I guess possible.

6 Q You didn't control for the economic recession,  
7 did you?

8 A Again, by comparing counties in the state and  
9 benchmarking, we controlled for those because  
10 all areas of the state had a broad range of  
11 those factors influencing them, and the main  
12 variance here was the construction of the Phase  
13 II line.

14 Q Are you saying to me that the Phase II line had  
15 more of an impact than the economic recession?

16 A Again, I can't speak to that specific example.

17 Q And when you say benchmark, what do you mean by  
18 you use benchmark? Because I know in your  
19 report you talk about benchmarks. So what do  
20 you mean by benchmarks?

21 A We compared and contrasted the expansion in the  
22 number of tourism-related establishments in the  
23 counties in which the Phase II line was  
24 developed and benchmarked that to the trends in

1 areas of the state where no transmission lines  
2 were developed to see if there was a significant  
3 variance between tourism establishment expansion  
4 in the counties in which there was the Phase II  
5 line and so benchmarked those counties.

6 Q And you did this over a ten-year period?

7 A The five year, '96 to 2000.

8 Q And you didn't account for any other variable or  
9 factor other than the fact that the Phase II  
10 line was constructed, correct?

11 A Correct.

12 PRESIDING OFFICER HONIGBERG: We're going  
13 to break for lunch. We'll be back 20 minutes to  
14 2.

15 (Lunch recess taken at 12:35  
16 p.m. and concludes the **Day 21**  
17 **Morning Session**. The hearing  
18 continues under separate cover  
19 in the transcript noted as **Day**  
20 **21 Afternoon Session ONLY**.)

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**C E R T I F I C A T E**

1  
2 I, Cynthia Foster, Registered Professional  
3 Reporter and Licensed Court Reporter, duly authorized  
4 to practice Shorthand Court Reporting in the State of  
5 New Hampshire, hereby certify that the foregoing  
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16 interested in this action.

17 Dated at West Lebanon, New Hampshire, this 20th  
18 day of July, 2017.

19  
20 \_\_\_\_\_  
Cynthia Foster, LCR  
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