

Before the New Hampshire Site Evaluation Committee

Northern Pass Docket, No 2015-06

JOINT PUBLIC STATEMENT BY STATE LEGISLATORS

July 20, 2017

The undersigned New Hampshire state legislators and former members of the NH House and Senate appreciate the opportunity to explain why we continue to oppose the Northern Pass transmission project unless it is fully buried for its entire length.

Northern Pass Would be a Giant Scar on the Face of New Hampshire.

In order to issue a siting certificate, the Committee must find that Northern Pass (NP) “will not have an unreasonable adverse effect on aesthetics...[or] the natural environment” (RSA 162-H:16,IV(c)). As currently proposed, NP would bring 1090 MW of Canadian hydropower to the southern New England grid on 345-kV lines running 192 miles down the center of the state. Sixty of these miles would be buried within the White Mountain National Forest and upper Coos County, but the remaining 132 miles of lines would be hung from more than a thousand steel towers rising from 90 to 150 feet above the ground—as high as the State House dome, but without its aesthetic appeal. The towers would be among the tallest and ugliest man-made structures in New Hampshire. Some 40 of NP’s above-ground miles would run through a new swath of clear-cut forest and farmland north of the Notches—but even the towers and lines in existing Eversource transmission rights-of-way to the south would rise far above the surrounding forest canopy and town or city skylines, making all of these industrial structures visible to residents and tourists for miles.

At these heights, we believe Northern Pass would literally disfigure the face of our state. It would permanently scar some of our most iconic landscapes, destroying vistas that represent what is most special and unique about New

Hampshire to residents and visitors alike—our sense of place, and the image we seek to project to the rest of the country and the world. It is inconceivable to us that New Hampshire's "brand," once signified by the Old Man of the Mountains' craggy profile, could soon be represented by a string of industrial-grade steel towers more popularly associated with the northern New Jersey Turnpike. (We acknowledge that some New Hampshire residents do not object to the look of the proposed NP towers, but respectfully suggest that most of them do not live or regularly travel within sight of the proposed power line.)

Alleged Benefits of NP vs. Alternative Projects. In order for the Committee to find under RSA 162-H:16,IV(e) that "issuance of a certificate [to NP as currently proposed] would serve the public interest," the project's benefits should clearly outweigh its costs. NP is not needed to bring power to New Hampshire (we export power to the rest of New England), nor is it needed in order to keep the lights on elsewhere in New England (ISO-NE considers that NP is not needed for regional "reliability"). But even if NP's power were needed, it is completely unnecessary to do this damage to the landscape—to impose this unacceptable cost in return for alleged "benefits"—when at least two other announced projects would provide comparable benefits without the unacceptable costs associated with Northern Pass:

- (1) The New England Clean Power Link (NECPL) would be completely buried beneath Lake Champlain and Vermont highways for its entire length from the Canadian border to Ludlow, VT, and would provide a comparable amount of renewable power (1000 MW) from Quebec to southern New England.
- (2) National Grid and Citizens Energy have more recently announced the 1200-MW Granite State Power Link (GSPL), which would largely use existing towers in the existing HQ Phase II HVDC transmission corridor along virtually the entire 109-mile AC portion of the line from Monroe to Londonderry. (GSPL would thus be virtually indistinguishable from the existing HQ Phase II power line.)

Either of these alternative projects would bring a comparable amount of Canadian renewable energy to the southern New England grid without any negative impacts on New Hampshire's landscape.

Several of NP's alleged economic benefits to New Hampshire are questionable on their face, but when compared with GSPL or NECPL, at least two of the alleged NP "benefits" actually turn out to be negative.

First, any wholesale electric rate reduction benefits resulting from what Eversource has called NP's "market suppression effect" (i.e., the displacement of 1090 MW of higher-cost gas-fired electric energy with lower-cost Canadian hydropower) would also be achieved by either NECPL or GSPL. But because the construction costs for both NECPL and GSPL would be significantly lower (NP's projected cost is \$1.6 billion, NECPL's \$1.2 billion, and GSPL's \$1 billion), the "transmission cost adder" to wholesale energy rates charged for power imported on these three international transmission projects would be significantly less for either GSPL or NECPL than for NP. Thus, either NECPL or GSPL would be expected to provide more favorable wholesale energy rate reduction benefits than NP.

NP's market expert, Julia Frayer of London Economics International LLC, has estimated that New Hampshire ratepayers (a "blended" group of hypothetical residential, commercial and industrial retail consumers using an average of 300 kWh/month) would save an average of \$18 per year from NP's effect on New England electric rates. For its part, GSPL has estimated—in response to our request for an applicable comparison to Ms. Frayer's analysis—that a "blended" group of hypothetical New Hampshire residential, commercial and industrial retail consumers using an average of 300 kWh/month would save \$21 per year. While this "apples to apples" comparison arguably pits Macintoshes against Cortlands (because Ms. Frayer has used the REMI model for her calculations whereas GSPL analysts have used ESAI for their market model), it stands to reason that GSPL

would result in more savings to New England/New Hampshire ratepayers because GSPL is projected to cost less than 2/3's of NP's construction price-tag.

(We note here that although the SEC is able to review and evaluate in detail the energy and capacity cost savings claimed in Ms. Frayer's report and pre-filed testimony, the public and their undersigned representatives ironically may see only "redacted" versions, and have been barred from hearing her testimony on the critical assumptions underlying these claimed "public benefits." We respectfully ask that the Committee take the wraps off Ms. Frayer's report and testimony as of July 27, the deadline for submission of bids for the Massachusetts Clean Energy RFP, which is the only plausible basis for NP's claim that it needs to keep Ms. Frayer's analysis confidential.)

Second, although they would affect different New Hampshire towns (the routes differ, and NP would be 80 miles longer than the New Hampshire segment of GSPL), most of the same temporary construction payroll and local economic benefits that would be provided by NP would also be provided by GSPL. But GSPL's net effect on municipal property taxes would be more beneficial than NP's, because GSPL would cause no new off-setting negative viewshed impacts on property values.

While NP has touted its \$200 million "Forward NH" plan, which would involve grants to North Country entities as a further inducement for approval of the project, GSPL would feature energy efficiency grants to low-income New Hampshire and Vermont residents from National Grid's partner, Citizens Energy, and other financial benefits that GSPL claims would be comparable to NP's Forward NH plan.¹

¹ Nor is NP likely to provide any "exclusive benefit" to New Hampshire electric ratepayers. As recently as May 10, in their "Supplement to Objection to [NEPGA's] Motion to Strike Power Purchase Agreement," styled as a "legislative update," Eversource and NP held out the possibility that NP could provide an exclusive electric rate reduction benefit to New Hampshire ratepayers (as distinct from New England ratepayers generally) in the form of a 20-year 100-MW Power Purchase Agreement (PPA) between Eversource/PSNH and Hydro Quebec's American subsidiary, Hydro-Renewable Energy, Inc. The NHPUC had dismissed Eversource's petition for approval of the proposed PPA on March 27, on grounds that it would conflict with the Electric Restructuring Act's policy principles

Thus, GSPL would provide New Hampshire ratepayers and residents with all the alleged economic benefits of NP—claimed reductions in wholesale electric energy rates, lower Forward Capacity Market costs, at least temporary construction employment payrolls and local economic benefits, and increased utility property taxes (without the offsetting negative viewshed impacts)—all without the lasting damage to the landscape and New Hampshire’s brand that would be wrought by Northern Pass. For its part, NECPL would provide the same wholesale energy and capacity rate reductions to ratepayers without any construction impact in New Hampshire, though it would not provide New Hampshire communities with comparable construction payroll or property tax benefits.

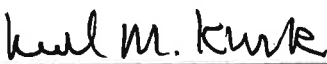
Downtown Disruption. Under RSA 162-H:16,IV(b), the Committee must also find that NP “will not unduly interfere with the orderly development of the region, with due consideration...to the views of municipal and regional planning commissions and municipal governing bodies. NP’s proposed construction schedule calls for burial of lines along Route 3 through downtown Plymouth. NP officials have testified that construction in Plymouth would mean a disruption for 3-4 months. (This could include Plymouth State University graduation, the summer tourist season, and arrival of new students in late August.) NP has also stated that construction would include a detour of the roundabout (the main access point from I-93 into downtown Plymouth and the University). Downtown would suffer the loss of parking spaces, single lane traffic through downtown, and disruption of 22 businesses on Main Street.

requiring a competitive generation market and “functional separation” of generation services from transmission and distribution services (RSA 374-F:3, III). Eversource then asked for reconsideration, citing what it suggested would be likely passage by the Legislature of Senate Bill 128, which would permit consideration of “other [non-market] measures” such as the PPA. But on May 9, the House Science, Technology & Energy Committee voted 20-1 to retain SB 128 rather than recommending its passage to the full House. Whatever the committee’s further work (if any) and final recommendation on SB 128, it will not come to the full House for consideration until January 2018.

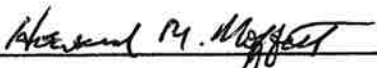
Meanwhile, legislation passed by the Legislature and signed by the Governor in 2016 (HB 626) would allow for a much more reasonable, less costly, and less disruptive alternative—burial of NP lines less than a mile away, along a parallel “energy infrastructure corridor” running beneath the I-93 right-of-way. The townspeople of Plymouth and the Selectboard have repeatedly called for this option. Franconia with its historic inns and small businesses has a similarly disruptive summer to look forward to. Where is the common sense in unnecessarily shutting down thoroughfares in North Country towns during the height of the summer tourist travel season?

In summary, well-designed alternative transmission projects are now able to provide virtually all of Northern Pass’s claimed benefits (most of which would go to southern New England) without the disruptions that NP would visit on New Hampshire communities, or the permanent scars on New Hampshire’s landscapes and brand. In determining under RSA 162-H:16,IV(e) whether “issuance of a certificate [to NP as currently proposed] would serve the public interest”, we ask the Committee to weigh NP’s questionable alleged benefits against its monumental permanent costs, and either dismiss its application or condition its approval on full burial of the proposed line.

Respectfully submitted,



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Signed by
Griffin Roberge

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(including 4 signatories on p. 6):

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