



FINAL

NORTHERN PASS TRANSMISSION LINE PROJECT ENVIRONMENTAL IMPACT STATEMENT

VOLUME 3: APPENDIX L

U.S. DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY
AND ENERGY RELIABILITY
WASHINGTON, DC

AUGUST 2017



Department of Energy

Washington, DC 20585

August 2017

Dear Sir/Madam:

Enclosed is the final *Northern Pass Transmission Line Project Environmental Impact Statement* (DOE/EIS-0463) prepared by the Department of Energy (DOE) pursuant to the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations.

The United States Forest Service (USFS) – White Mountain National Forest, United States Environmental Protection Agency (EPA) – Region 1, United States Army Corps of Engineers (USACE) – New England District, and the New Hampshire Office of Energy and Planning (NHOEP) are cooperating agencies in the preparation of the EIS.

The proposed DOE action in the final EIS is to issue a Presidential permit to the Applicant, Northern Pass LLC, to construct, operate, maintain, and connect a new electric transmission line across the U.S./Canada border in northern New Hampshire (NH).

DOE has prepared this final EIS to evaluate the potential environmental impacts in the United States of the proposed action and the range of reasonable alternatives, including the No Action alternative. Under the No Action alternative, the Presidential permit would not be granted, and the proposed transmission line would not cross the U.S./Canada border.

In addition to its Presidential permit application to DOE, Northern Pass LLC applied to the USFS for a special use permit that would authorize Northern Pass LCC to construct, own, operate and maintain an electric transmission line to cross portions of the White Mountain National Forest under its jurisdiction. The final EIS will be used by the Forest Supervisor of the White Mountain National Forest to inform the Record of Decision in regard to this requested use.

DOE will use the EIS to ensure that it has the information it needs for informed decision-making.

The final EIS will also be posted on the project EIS website, http://www.northernpasseis.us/ and DOE's NEPA website at https://energy.gov/nepa/listings/environmental-impact-statements-eis.

Sincerely,

Bullet

Brian Mills

Transmission Permitting and Technical Assistance, Office of Electricity Delivery and Energy Reliability

U.S. Department of Energy

FINAL

NORTHERN PASS TRANSMISSION LINE PROJECT ENVIRONMENTAL IMPACT STATEMENT DOE/EIS-0463

Volume 3: Appendix L. Comment Response Document

U.S. DEPARTMENT OF ENERGY OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY



COOPERATING AGENCIES

United States Forest Service – White Mountain National Forest
United States Environmental Protection Agency– Region 1
United States Army Corps of Engineers – New England District
New Hampshire Office of Energy and Planning

August 2017

COVER SHEET

RESPONSIBLE FEDERAL AGENCY: U.S. Department of Energy (DOE), Office of Electricity Delivery and Energy Reliability

COOPERATING AGENCIES: United States Forest Service (USFS) – White Mountain National Forest (WMNF); United States Environmental Protection Agency (EPA) – Region 1; United States Army Corps of Engineers (USACE) – New England District; and New Hampshire Office of Energy and Planning (NHOEP)

TITLE: Northern Pass Transmission Line Project Environmental Impact Statement (DOE/EIS-0463)

LOCATION: Coös, Grafton, Belknap, Merrimack, and Rockingham counties in New Hampshire

CONTACTS: For additional information on this Environmental Impact Statement (EIS) contact:

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For general information on the DOE NEPA process, please write or call:

Mr. Brian Costner, Acting Director
Office of NEPA Policy and Compliance, GC-54
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585
askNEPA@hq.doe.gov

Telephone: (202) 586-4600 or leave a message at (800) 472-2756

ABSTRACT: Northern Pass Transmission, LLC (Northern Pass) has applied to the DOE for a Presidential permit to construct, operate, maintain, and connect a 192-mile (309-km) electric transmission line across the United States (U.S.)/Canada border in northern New Hampshire (NH). This final EIS addresses the potential environmental impacts of the Project (Proposed Action), the No Action Alternative, and ten additional action alternatives (Alternatives 2 through 6, with variations). The NH portion of the Project would be a single circuit ±320 kilovolt (kV) high voltage direct current (HVDC) transmission line running approximately 158 miles (254 km) from the U.S. border crossing with Canada in Pittsburg, NH, to a new direct current-to-alternating current (DC-to-AC) converter station to be constructed in Franklin, NH. From Franklin, NH, to the Project terminus at the Public Service of New Hampshire's existing Deerfield Substation located in Deerfield, NH, the Project would consist of 34 miles (55 km) of 345 kV AC electric transmission line. The total length of the Project would be approximately 192 miles (309 km).

PUBLIC COMMENTS: In preparing this final EIS, DOE considered comments received during the scoping period, which extended from February 11, 2011 to June 14, 2011, and was reopened from June 15, 2011 to November 5, 2013 (DOE accepted and considered all comments during the scoping period from February 11, 2011 to November 5, 2013), and the public comment period on the draft EIS (July 31, 2015 through April 4, 2016). Comments on the draft EIS were accepted during the 45-day period

following publication of EPA's Notice of Availability (NOA) in the *Federal Register* on July 31, 2015; the public comment period was extended until April 4, 2016 following publication of EPA's NOA of the supplement in the *Federal Register* on November 20, 2015. DOE held four public meetings on the draft EIS in Colebrook, NH on March 7, 2016; Waterville Valley, NH on March 9, 2016; Concord, NH on March 10, 2016; and Whitefield, NH on March 11, 2016. All comments were considered during preparation of this final EIS. Appendix L in Volume 3 of this EIS contains the comments received on the draft EIS and DOE's responses to these comments. This final EIS contains revisions and new information based in part on comments received on the draft EIS. Vertical bars in the margins marking changed text indicate the locations of these revisions and new information. Deletions are not indicated. Appendices J and K in Volume 2 and Appendix L in Volume 3 are entirely new parts of this EIS; therefore, they do not contain bars indicating changes from the draft EIS.

The EIS analyzes the potential environmental impacts of DOE issuing a Presidential permit for the proposed Northern Pass Project, which is DOE's proposed federal action. DOE will use the EIS to inform its decision on whether to issue a Presidential permit. Additionally, Northern Pass has applied to the USFS for a special use permit (SUP) authorizing Northern Pass to construct, operate, and maintain an electric power transmission line crossing portions of the WMNF. The WMNF Forest Supervisor will use the EIS to inform its decision regarding: 1) whether to issue a SUP under the Federal Land Policy and Management Act; 2) the selection of an alternative; 3) any need to amend the Forest Plan; and 4) what specific terms and conditions should apply if a SUP is issued.

Copies of the final EIS are available for public review at 30 local libraries and town halls, or a copy can be requested from Mr. Brian Mills. The EIS is also available on the Northern Pass EIS website (http://www.northernpasseis.us/). DOE will announce its decision on the Proposed Action in a Record of Decision (ROD) in the *Federal Register* no sooner than 30 days after the EPA publishes the NOA of the final EIS. The USFS will announce its draft decision on the Proposed Action in a draft ROD in the *Federal Register* shortly after the EPA publishes the NOA of the final EIS.

APPENDIX L COMMENT RESPONSE DOCUMENT

Attachment C. Response to All Comments on the Draft EIS

(Stewart Weeks) So part of this is to have the pleasure of introducing our singer again, but before I do that, I do want to hit these notes of common sense. I think if we look at this from a perspective of common sense, it's a lose, lose, lose, lose, lose for everybody but Northern Pass. I think the question is whether once again the corporations and the bottom line and the almighty buck is going to make havoc of the lives of your fellow citizens. It's my hope that you take that to heart, and I think I can say I've been working for 33 years with John Wingate Weeks on a Citizens Tale that's coming to a conclusion, and I have no doubt if he were here, he would say that it's no good, and make sure the process has integrity. So we have a wonderful singer. MR. KERVITSKY: Can you restate your name for the record, please? SPEAKER: Stewart Weeks from Lancaster, New Hampshire. We have a wonderful singer who will do a better job I do. SPEAKER: I want to make sure everyone has a chance to speak first. MR. KERVITSKY: Thank you for correcting the process. So we have concluded with all the first-time speakers. I was going to open it up to people who have already spoken once and would like to speak again.

0720-1
Thank you for your comment.

0721-1

0721-1

Thank you for your comment.

Mary Sloth from Hanover. And also we have property here in Lancaster. One thing I meant to say before that concerns me with the subject of towers is climate change, icing, and the fact that what may look like the least expensive way in the end could be become a much more expensive way if we get a lot more ice conditions in the next few years and decades.

Frederick Van Karls again. I spoke rather formally before in terms of writing a letter to an attorney, but what I'd like to say right now is that I feel this state is a national treasure. I think it's highly undervalued, and it is something that everyone in the state ought to be concerned about preserving as a national treasure, and I think the degradation of towers marching through this state and the effect it would have on tourism and how people would view their visits here is one of those things that you can't estimate. I think that you know if you watch TV a little bit, I don't watch it that much in terms of anything regular, but if you watch the ads for credit cards and they talk about how much this would cost and that. Then they reach some point where they say and this is priceless. Well, what we're talking about here is priceless. And I don't think it will ever be recovered in our lifetimes if we let this happen, and I hope that people will take that into consideration. I also think the impact on people who live in the areas directly who have property and who are going to lose equity and will lose a sense of their own identity in the areas they live and the fact that if they had any hope of selling their property, if they needed to as they get older or they wanted to move somewhere else how this will dramatically affect their ability literally to move about this country. I think that that's highly underestimated. And I wish to make that statement formally and in any way I can to impress people who are going to be making judgments about what happens to this state.

0722-1

⁰⁷²²⁻¹ Thank you for your comment.

Carol Coulombe from Clarksville, New Hampshire. I wasn't going to bring this up but just to give you an example of what Eversource is capable of. I wasn't going to bring this up because it's kind of

example of what Eversource is capable of. I wasn't going to bring this up because it's kind of embarrassing. My husband just passed away this week, and I feel that his health deteriorated so much after the five years of trying to fight with Eversource. Just to give you an example of what they're capable of. I'm not saving that everybody in that company is evil or bad, but there is a handful that have gotten in with the people that read the meters, and it's not all of them. It's maybe a handful. They've gone around claiming that houses were abandoned. They even said that our property was, the house wasn't there. Our residence exist. They lied to get my electricity shut off. They said that my neighbors place a couple miles down the road had burned down, but yet it's still there. But strangely enough, some other people came behind them and put in new meters on the buildings. And then all of a sudden our rates increased from like maybe \$100 a month to over \$400 a month so they've more than quadrupled our rates up there. Up north. I don't know if it's the whole state, but we're paying dearly for protesting against Eversource, and it goes on and on. The meter man was caught peeking in my windows and claiming that we had livestock animals in the house which wasn't true. It was a lie. The town knows better, but, you know, police had to get involved, and, you know, it goes on, the harassment. I've heard of cases down in Stratford where a woman's home was broken into and she was a doctor. She hired an attorney to investigate and we all know who did it, but, you know, it's another story to prove it. But I know for a fact it was the meter man that caused trouble for me, and he works for Eversource, and I can name him and if he goes on the property again, he's going to be video cameraed. We have our camcorders out there, and whenever he does something that's not legal, it's going to be documented and I believe we'll have a good lawsuit. And, you know, like I said, we've tried working with them in the past but it's gotten to a point where we just can't work with them. You can't trust them. They'll lie about you and they'll do anything they can to grab your land. They'll get your house condemned. This goes back to years ago. I know of cases down in Berlin where they got houses condemned and they would have the meters taken right off of the homes so that the people couldn't even fix their homes back up because they want that line to go through them or something else to go through them. So it's like all these companies that have to do with electricity, they work together. If they want your property, they're going to get it one way or another. Eminent domain or not. If they have to burn you down, they'll do it. If they have to run you off your property by lying about you and starting different kinds of problems, that's what they do, and I don't feel that our life is worth much because I feel like I got hitmen on my ass. You know, excuse the language, but, you know, if I disappear some day you'll know why. And Canada is known for that, Don't go to Quebec. They've made people disappear. They've burned people alive in their cars, and I've got proof of this, It's all documented. They even have their hitpeople. If they don't like you, don't go there. Now they're in our country. What's going to happen. You know? I'm just worried. I'm just really worried about the public. Public safety is at stake. This is a serious project and it involves a lot of money and they're going to make people disappear before it's over. So I just want you to be aware of what you're dealing with. I feel like you're dealing with the devil. Have a good day.

0723-1 Thank you for your comment.

John Colony. Sugar Hill. What Fred said priceless I wanted to stand up and cheer and hoot and holler. I've traveled around the country a fair amount, and I've lived up here for 40 years or something like that. This is the best place in the country to live and part of that is the sparseness of the population up north. Part of that is the rural nature of a lot of it. We have a small capital city. We have nice roads and nice people. Priceless is a good word for New Hampshire. Northern Pass will seriously harm that. May destroy good chunks of it. So I just want to say thank you for saying the word priceless.

0724-1

Thank you for your comment.

My name is Caleb Booth, and I live here in Lancaster. I grew up in Pittsburg, New Hampshire. I first want to say that somebody mentioned priceless. New Hampshire is priceless. When you look at what has generated revenue inside of the United States, it is real estate capital. The same stuff that have helped move the country forward has brought in a lot of revenue into our country and that's not going to change but if we start depreciating property value, then the property of the country is going to start to go down, and we need to keep New Hampshire as it was from the beginning. As a free country that was going to move forward and bring money through the landscape. I am a big supporter of nature and I love our area. It's really close. You just, you can't give up something that is priceless to you, and we need to remember that for the future and for the past. Because we know that when it really comes down to it, that that capital that is being generated is a lot, less important than the nature that we're going to give up and wilderness that we're going to destroy. Slowly but surely. And we need to understand that it's a big risk that we're taking, the further and further that we come to these corporations taking over. And I just wanted to say that we can't give up our nature. We're too close to it. When you affect our environment, you affect the humans around it. We're going to be affected by this electric grid, and I just, I'm thankful to speak. Thank you.

0725-1

⁰⁷²⁵⁻¹ Thank you for your comment.

0726-1

Thank you for your comment.

0726-1

My name is Gloria Potter. I'm from Jefferson. I've been here about 16 years. A flatlander really from Rhode Island, but I've been coming up here all my life. Hiking, fishing, camping. I think that the opportunity to reach out to the rest of the country, people that come here that don't have any clue what's going on up here right now, might be something that we need to do. I mean, there's other people that plan on coming up here for their vacations and they might not even know what is happening right now, and I think that it's more of a nation problem than just our own state. I really think this, I belong to the Appalachian Mountain Club. I've been hiking. I've done the huts, the whole thing, and, you know, there's people that come from all over the world over here to hike, and they may not even know what's going on. I think that we need to make a broader statement so we have more impact and more input from people around the country before we make any moves to put that grid in here. That's all I want to say. Thank you.

0727-1

Thank you for your comment.

0727-1

(Katie Rose) I would just like to make my comment relevant to the no build option, and if everyone doesn't mind me reiterating my comment, we are pleading with you. Everyone is pleading with you. Again and again and again. We're not looking for battle, and we didn't start this war, and we don't want this fight. So please just hear us. Hear us. To the powers that be, do you not see? Can you not hear, or are you just acting out of fear? The fate of our land is resting in your hands. The people have spoken. Please prove to us that the system's not broken. To the powers that be, in such a powerful company, how much more will you take from us? Do you not realize how much is at stake for us? How can you stay blind to the devastation left behind? Once you have taken of what we love, will it ever be enough. Or once you have taken, will you just rape us again and again? You never once asked our permission. You just continue to push your own mission. Well, this is all we have left, and there is no turning back once the damage is done. The loss for us is much greater than the gain might be for anyone. For the ones without a voice, nature has no choice in this. For all sacred land, I hear you and I understand. So I sing this for you, that the powers that be may see the truth. That they may be brave enough to stand up for all of us, and may they be wise to distinguish the truth from the lies. May they represent you and me, for we are the ones who give them the power to be.

0729-1 Thank you for your comment.

Refers to Comment placed on Mar 31, 2016

ID: 9149

Date Entered: Mar 31, 2016

Source: Website

Topics: Wildlife, Viewshed/Scenery, Recreation

Organization:

Comment: Please require that the burial of the entire northern pass proposed transmission lines.

0730-1 Thank you for your comment.

Refers to Comment placed on Apr 2, 2016

ID: 9161

Date Entered: Apr 2, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Recreation, Private

Property/Land Use, Quality of Life, Forest Service Lands

Name: Jane Henebury

Organization:

Email: jehenebury@comcast.net

Mailing Address: 613 Essex Street

City: Beverly

State: ME

Country: US

Comment: I am opposed to this project as it is proposed as it will impact open space use and wildlife displacement.

0731-1 Thank you for your comment.

Refers to Comment placed on Apr 2, 2016

ID: 9164

Date Entered: Apr 2, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Recreation, Private Property/Land Use, Historic/Cultural, Economic, Tourism, Quality of Life, Cumulative Effects, Forest Service Lands, Design Criteria / Mitigation Measures, Environmental Justice

Name: BRIAN PERLOW, AIA

Organization:

Title: CITIZEN/ARCHITECT

Email: BCPERLOW@GMAIL.COM

Mailing Address: 30 SPRINGFIELD ST

City: BELMONT

State: MA

Zip: 02478

Country: US

Comment: The Northern Pass project is not the right way forward for our state, our region, or our country when it comes to energy independence. It is unclear what the "real" impact/scope of the proposed project will be. The proposed lines being 100% buried in Vermont but not in New Hampshire creates an unbalanced approach and undue hardship on the Granite State. They are asking the public to be ok with a permanent negative effect on natural resources, habitat, view corridors, National Forest land, etc. What reward for such a sacrifice? This project should be canceled completely, and alternative resources & methodologies should be explored regarding DOMESTIC energy generation and independence.

0732-1 Thank you for your comment.

Refers to Comment placed on Apr 3, 2016

ID: 9172

Date Entered: Apr 3, 2016

Source: Website

Topics:

Organization:

Comment: I WORK AT AREA POWER PLANTS IN THE NORTHEAST. MANY OF THEM ARE OFTEN IDLED FOR EXTENDED DUE TO LACK OF ELECTRICITY DEMANDS. I ALSO SPEND VACATION TIME IN NEW HAMPSHIRE AND DO NOT WISH TO SEE MORE HIGH TOWER ELECTRICITY LINES OVER THE STATE IN SCENIC AREAS I VISIT. I DO NOT THINK THIS PROJECT SHOULD BE APPROVED AT ALL. IF IT HAS TO BE THE OWNERS SHOULD BE FORCED TO BURY THE LINES.

THANK YOU, CHARLES BAER

0733-1 Thank you for your comment.

0733-1

Refers to Comment placed on Apr 3, 2016

ID: 9175

Date Entered: Apr 3, 2016

Source: Website

Topics:

Organization: hiker

Comment: I am for energy and the northern pass plan in general. I have some specific suggestions * it *MUST* be fully buried, there is not reason for the ugly scars of above ground installation in a national forest

- I-93 is there. bury it right down the middle. no taking of private property, no visual impact.
- * the visual impact must be minimized, again especially in the national forest

My family and I are in the White Mountains, and the National Forest a couple times a month. We hike, snowshow, cross country ski and just enjoy this great National Resource. Please do not let a private company take this from us.

0734-1 Thank you for your comment.

Refers to Comment placed on Apr 3, 2016

ID: 9176

Date Entered: Apr 3, 2016

Source: Website

Topics: Viewshed/Scenery, Historic/Cultural, Quality of Life

Name: Jeffrey Steele

Organization:

Email: jeffsteele53@gmail.com

Mailing Address: 8 Harvey Rd

City: Deerfield

State: NH

Zip: 03037-1212

Country: US

Comment: I've been a resident in the town of Deerfield for 20 plus years. My wife and I moved here to enjoy the rural character, tranquil setting and ambiance that the town's setting offers. Although I'm not an abutter, the proposed transmission line that crosses NH Rte 107 is approximately 1 1/2 miles from my property. The current route will pass within feet of the town's major historical district and forever impact the view shed; I'm referring to the Town Hall area the SEC toured on 3/16/16.

At this point Eversource has not convinced me that I will benefit from this project in any way if it gets approved. I do not agree that burial of the entire route is a beneficial solution either. I feel there would be thousands of trees cut down along the route outside of the existing ROW and the potential downside to the environment of having that much power buried over time is unknown.

It seems Eversource is spending a lot of money to show how valuable the project is to the state of NH and beyond. They are treating New Hampshire as an electrical super highway to provide power to southern New England, Massachusetts and beyond, and by doing so lining the pockets of the Hydro-Quebec & Eversource management with Millions in profit at the expense of our great state.

0735-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9183

Date Entered: Apr 4, 2016

Source: Website

Topics: Health and Safety, Viewshed/Scenery

Texas; or Gunter, TX and Transmission Lines, Item #1907.

Name: Barbara Mahoney

Organization:

Email: barbaramahoney@hotmail.com

Mailing Address: 136 Bedford St.

City: Lexington

State: MA

Country: US

Comment: Transmission lines underground make sense. Attached are photos of my daughters street in No. Dallas,TX, Grayson County after towers and transmission lines were installed about 2 years ago. The 345kv (about 16lines) of transmission and towers surround her and her families home. Residence who received notices about the project were presented with many more appropriate areas for the lines and were shocked that their small, narrow street would be chosen. Most large land owners got "future use" status, wildlife areas strong opposition. Evidently, attorneys in the area could not compete. Shown photo facing tower from driveway exit. See on line: Oncor (owned by investors) Transmission Lines; ERCOT Electric Reliable council of

0736-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9184

Date Entered: Apr 4, 2016

Source: Website

Topics: Health and Safety, Viewshed/Scenery

Texas; or Gunter, TX and Transmission Lines, Item #1907.

Name: Barbara Mahoney

Organization:

Email: barbaramahoney@hotmail.com

Mailing Address: 136 Bedford St.

City: Lexington

State: MA

Country: US

Comment: Transmission lines underground make sense. Attached are photos of my daughters street in No. Dallas,TX, Grayson County after towers and transmission lines were installed about 2 years ago. The 345kv (about 16lines) of transmission and towers surround her and her families home. Residence who received notices about the project were presented with many more appropriate areas for the lines and were shocked that their small, narrow street would be chosen. Most large land owners got "future use" status, wildlife areas strong opposition. Evidently, attorneys in the area could not compete. Shown photo facing tower from driveway exit. See on line: Oncor (owned by investors) Transmission Lines; ERCOT Electric Reliable council of

0737-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9186

Date Entered: Apr 4, 2016

Source: Website

Topics: Health and Safety, Viewshed/Scenery

Organization:

Country: US

Comment: Gunter,TX Transmission lines across the street from house.

0738-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9189

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Viewshed/Scenery, Recreation, Economic, Tourism, Quality of Life

Name: James McCauley

Organization:

Email: mccauley33@comcast.net

Mailing Address: PO Box 223

City: Rye Beach

State: NH

Zip: 03871

Country: US

Comment: I am both an Abutter and a Customer as I am fortunate to own property in both the White Mountains and the NH Seacoast. I oppose this project as both.

This project, from the start, has been nothing more than a type of bureaucratic slight of hand. There is no pressing demand in MA or CT (where the majority of the power will go) for, even with the retirement of Pilgrim, both are awash in renewable energy sources (I also own property in MA). This demand is a distraction in the category of area 51, WMD's and the Yeti. Secondly the poject will contribute to "visual pollution" and while a new route has been poposed to bury half, then all of it should be buried. The proposal calls for towers 90-180 ft tall...this is taller than any building in Manchester. Can you imagine the impact to fall tourism with 3 dozen 9-15 story towers visible from the folliage corridors. Come see the beautiful folliage...underneath the watchtowers.

While the cost of energy production would be lowered, as we've learned from "deregulation", it's the cost of transmission that keeps rates high. During Q&A sessions I've asked directly the economic impact (specfically jobs) in COOS, Belknap and Grafton Counties...The answer 0. Possible benefit in So NH, but most likely in MA and CT.

The project should be rejected for it's adverse affect to NH..the negative impact to tourism cannot counter balance the "investments" being offered by Eversource, and as we've learned no new jobs in NH

However, if there pressure is so great as to reject the proposal outright, then the following conditions should be attached: bury the whole line; NO NH ratepayer will bear any cost of this transmission line;

0738-1 Continued

0738-1 cont'd

0738

For the record, Jason Balint. I've just got a couple statements, and I have a story to tell Bill. You guys stopped up to my camp today on Diamond Pond Road. I saw many of you out there. Appreciate you stopping by. Hopefully, it made a difference when you could see the view from that portion of the road that approaches Coleman State Park. A comment about the logging. Maybe the pictures were wrong that I saw that you guys were out there, but the swath of land that I saw cut that those towers were on wouldn't have enough wood to fill a pickup truck. So the pictures were wrong, or maybe I'm wrong. So now my story. My wife and I bought property which is located on Diamond Pond Road in Colebrook about one half a mile from where the proposed transmission line would be going aerial and about one mile from the entrance of Coleman State Park. We had dreams of building a camp in this area that as of now has some of the most beautiful views in the North Country. Someday we hoped to hand the keys over to our daughter Ayla so she could also have a chance to enjoy what we have come to love. But as of now, the tools have been put down and the building has stopped and our dreams and aspirations are being replaced with anger and disgust. The view from where the deck would be is exposed to about two miles of transmission towers and lines if the project were approved and it ripped through the valley near Heath Road and on the side of Sugar Hill. Who would have ever thought that six years since the original proposal that Northern Pass would still be insisting to install aerial transmission towers over 90 feet tall so close to a New Hampshire State Park and tourist attraction. My immediate neighbors along with everyone at Diamond Pond Road share the same level of disgust, frustration and anger. A couple statements: There were roughly 143 petitions for intervention recently submitted to the Site Committee. The Northern Pass was quick to submit their response and objections to many of these petitions. In the document entitled 2015-06 that was submitted to the SEC. Northern Pass states that any property owner not within 100 feet of the affected area do not qualify for any sort of intervention. The 100 foot rule would be shorter than the height of the proposed towers. My wife and I attended the first SEC meeting in Meredith last week. While we were there, a real estate expert who was apparently on the Northern Pass payroll stated that transmission lines such as those proposed by Northern Pass would have no adverse effects on property values. The reaction by two realtors in the room and many others would lead one to believe that this is a fictitious statement. My question would be, and it was asked earlier and not answered, Will Northern Pass be prepared to sign off on and except all monetary damages that will occur from the loss of our property values if the project were to go through as currently proposed. The Northern Pass speaks of job creation for New Hampshire which is false and misleading. This is nothing more than short-term highs and a stimulus package for the benefit of the Northern Pass and its associated unions which most likely have millions of dollars investigated in lobbying. Wouldn't total burial of the transmission line create more jobs. I question why we're all here in the first place. To intelligently and thoroughly evaluate a proposed route for the transmission line, there must be one. To my knowledge, the project is blocked in two locations north of where the project is proposed to go aerial in the area of Bear Rock Road and the Washburn Family Trust. Are we here to have a discussion about the maybe route? I leave you with these thoughts. In fact, beg you, the Site Evaluation Committee, come to our homes and properties and see the impacts that this project would have on our homes, towns and our state in general, from our point of view and not that of Northern Pass. We cannot allow our beautiful landscapes to be subject to the kind of project that has been proposed by an organization that has little to no regard for the State of New Hampshire or its residents and, in particular, those in the North Country. If the Northern Pass truly valued what we as residents and many state officials have voiced over and over for six years, they would have mentioned entirely burying this line. It's not that they can't. It's that they don't want to. This project is clearly more about

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Thank you for your comment.

0739-1 0739-1 cont'd

profit and less about power. Please consider what is ours and do not allow a for profit organization to capitalize on what we have worked so hard to preserve for generations to come. From what I can see, the only supporters of the Northern Pass are those who will profit from it.

Refers to Comment placed on Apr 4, 2016

ID: 9191

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety, Private Property/Land Use, Taxes, Economic, National Security, Quality of Life, Cumulative Effects, NEPA Process, Design Criteria /

Mitigation Measures

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Thomas M. Melone
President and
Chief Executive Officer

April 4, 2016

Office of Electricity Delivery and Energy Reliability (OE-20) U.S. Department of Energy 1000 Independence Ave. SW Washington, DC 20585

Attention of Brian Mills, Senior Planning Advisor

Re: Comments on the Draft EIS for the Northern Pass Project

The Draft EIS for the Northern Pass Project (the "Project") does not conform to NEPA because it does not properly and adequately analyze the "No-Action" alternative. Under NEPA regulations, agencies must consider all reasonable alternatives, *including those not specifically under their authority to implement*. See https://ceq.doe.gov/nepa/regs/40/1-10.HTM. See also NRDC v. Morton, 458 F.2d 827 (D.C. Cir 1972). The Draft EIS fails to do that.

More strikingly, the Draft EIS fails use basic market and economic principles in analyzing the No-Action. The Northern Pass might be able to be analyzed solely as an additive project as far as economic and climate change impacts if it existed in a vacuum, but it does not. Hydro-electric electricity from the Northern Pass would displace renewable energy projects (and the American jobs related to those projects) that would otherwise be built in the New England states and on the ISO-New England electricity grid. The results of New England's multi-state RFP establishes that beyond dispute. See, Exhibit A for the summary list. For the complete list of bids, see http://cleanenergyrfp.com/. That is another reason why the Draft EIS does not conform to NEPA.

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Thank you for your comment. The No Action Alternative is analyzed throughout the EIS. The No Action Alternative represents a continuation of the existing condition which is described in Chapter 3 of the EIS.

Thank you for your comment. DOE complied with the requirements of NEPA (42 United States Code [U.S.C.] Part

4321 et seg.), Council on Environmental Quality (CEQ)

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regulations for implementing NEPA (40 Code of Federal Regulations (CFR) Parts 1500 - 1508), and DOE implementing procedures for NEPA (10 CFR Part 1021). The No Action Alternative is analyzed throughout the EIS. The No Action Alternative represents a continuation of the existing condition which is described in Chapter 3 of the EIS. Chapter 3 describes in detail the existing condition for all resources throughout the study area. In particular, existing electricity system infrastructure is described in Section 3.1.2.5 of the EIS; this information has been updated for the final EIS. Section 1.4 of the EIS has also been updated to reflect current trends and conditions in the regional energy market. Economics impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. Additionally, the Socioeconomics Technical Report includes a discussion of modeling completed for this EIS. including a projection of future base case conditions in New Hampshire and the ISO-NE region through 2030. The modeling was updated for the final EIS to incorporate current market conditions and trends. The future base case condition was modeled based on the best available information from ISO-NE; this modeling represents the potential condition under the No Action Alternative and serves as a baseline against which to analyze the potential impacts of the Project. While the EIS analyzes possible impacts to the electricity system in the socioeconomics analysis, a detailed analysis of these impacts is

performed through DOE's reliability study completed in

cooperation with ISO-NE via a separate process.

Additionally, Northern Pass is not in the public interest because the project's proponent, Eversource, is trying to create the purported demand for the Northern Pass project by violating its obligations under the Public Utility Regulatory Policies Act to renewable energy developers in the New England states. Eversource touts the purported climate change benefits from the Project for one simple reason—shareholder profits. If Eversource were really concerned with climate change, it would be honoring its obligations under federal law to sign long-term agreements with US ISO-New England locally located renewable energy projects. The public interest cannot be served when a project's proponent, such as Eversource, ignores federal law, and it seeks an approval to further that purpose. But that is exactly what it seeks here. Nor can the public interest be served if a federal agency, such as the Department of Energy ("DOE"), or the President were to sanction such violation of federal law by approving a project that would not be needed if its proponent complied with federal law.

For the DOE to issue a Presidential Permit, the DOE must find that the project is "consistent with the public interest." The DOE's determination of whether a project is "consistent with the public interest" depends on:

- The potential environmental impacts of the project, as documented and evaluated during National Environmental Policy Act (NEPA) review;
- The impacts of the project on electric system reliability; and
- Any other factors DOE views as relevant to the public interest.

NEPA requires all federal agencies to consider the potential environmental impacts of their actions and to identify and evaluate reasonable alternatives to proposed actions and those alternatives' environmental impacts. Specifically, for "major Federal actions significantly affecting the quality of the human environment," the agency must prepare "a detailed statement" regarding "(i) the environmental impact of the proposed action, (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented, (iii) alternatives to the proposed action, (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

DOE has not adequately analyzed the No-Action alternative. The stated need of the Northern Pass, a high-voltage transmission line, is to bring Canadian hydro-power to the New England states. That mischaracterizes the need. The real need, if there is a need at all, would be to bring renewable energy to New England

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Thank you for your comment. The Public Utility Regulatory Policies Act does not apply to DOE's determination of public interest and is outside the scope of this EIS. The Project would not be approved unless it complies with all applicable laws. As described in Section 1.1.1 of the EIS, Executive Order (E.O.) 10485, as amended by E.O. 12038, authorizes the Secretary of Energy "Upon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection" of "facilities for the transmission of electric energy between the United States and a foreign country." Thus, in deciding whether to issue a Presidential permit, DOE must determine whether doing so would be "consistent with the public interest." In addition, the Departments of State and Defense must both make "favorable recommendations" on the issuance of the permit. In deciding whether the issuance of a Presidential permit would be consistent with the public interest. DOE assesses the environmental impacts of the proposed project and reasonable alternatives, the impact of the proposed action on electric reliability, and any other factors that DOE may also consider relevant to the public interest. DOE will announce its decision whether to issue a permit - as well as the factors DOE considered in making its decision - in the Record of Decision (ROD). DOE would issue a ROD no sooner than 30 days after the EPA publishes the Notice of Availability for this final EIS in the Federal Register. The EIS analyzes potential environmental impacts to the electricity system in the socioeconomics section (see Section 4.1.2 of the EIS). The reliability study, completed in cooperation with ISO-NE, provides a separate analysis of impacts of the proposed federal action on the electricity system.

states. But even if DOE's stated need were correct, a proper analysis of a No-Action alternative would need to account for the renewable energy generation resources in New England that would fill the need if the transmission line were not built.

The Draft EIS just brushes aside alternative generation resources that would fill the void on the basis of a suspicious rationale, that other generation resources aren't the subject of the permit application itself. Such a rationale is absurd and defeats the entire purpose of analyzing viable replacements when the No-Action alternative is selected. It is also a rationale that has been rejected by the courts.

This is what the Draft EIS says as the justification for its failure to analyze the No-Action alternative in any meaningful way:

Under this alternative, hydropower generated in Canada would not be transmitted into the U.S. Generation alternatives could include wind power, biomass, natural gas, and other generation sources in New Hampshire. DOE determined that this alternative does not meet the purpose and need for DOE's action. The purpose of, and need for, the DOE's action is to determine whether or not to grant the requested Presidential permit for the Project, which is a proposed transmission line crossing the international border carrying electricity generated by hydropower in Canada (i.e., the proposed Northern Pass project). Other sources of electricity generation are not the subject of the application for a Presidential permit, and, therefore, are outside of the scope of this draft EIS.

The Draft EIS is saying that because other generation resources would not require a Presidential Permit within DOE's jurisdiction, then the EIS does not have to analyze those alternatives. Such a conclusion is preposterous, and has been rejected by the courts.

Under NEPA regulations, agencies must consider all reasonable alternatives, <u>including those not specifically under their authority to implement</u>. See https://ceq.doe.gov/nepa/regs/40/1-10.HTM. See also NRDC v. Morton, 458 F.2d 827 (D.C. Cir 1972) (explaining that it is the essence and thrust of NEPA that impact statement serve to gather in one place discussion of relative environmental impact of alternatives, and although alternatives required for discussion are those reasonably available, they should not be limited to measures which particular agency or official can adopt; when proposed action is integral part of coordinated plan to deal with broad problem, range of alternatives which must be evaluated is

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Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038. "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction," operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, does not have siting authority for the Project. In this case, the New Hampshire Site Evaluation Committee has siting authority for the Project in the state of New Hampshire. Additionally, the USFS has siting authority for portions of the Project located in the White Mountain National Forest. (For further discussion, see Sections 1.1-1.3 of the final EIS.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section

1.4 of the final EIS has been updated to include new information

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on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

broadened). Thus the failure to consider other generation resources because they would not require a Presidential Permit within DOE's jurisdiction is clear error.

The results from the Multi-State clean energy RFP of the states of Connecticut, Massachusetts and Rhode Island clearly establish that the Northern Pass line is not needed. *See*, http://cleanenergyrfp.com/. Proposals for multiples of the renewable energy requirements of the New England States were received without the need for the Northern Pass. Those results prove beyond doubt that the Northern Pass is simply not needed. The attached list (Exhibit A) shows the proposals received, one of which was the Northern Pass.

The reality shown by those RFP results is that the Northern Pass would <u>displace</u> other domestic renewable energy projects. The New England States that are part of the ISO-New England electricity grid will only select a limited amount of renewable energy, and the Northern Pass would displace US-based generation. The Multi-State RFP bids proves that. If the Northern Pass were selected that means that renewable energy projects located in the United States would not be selected, resulting in, among other things, the loss of American jobs and revenue.

Thus the "Socioeconomic" impacts of the No-Action alternative are wrong. The No-Action alternative would result in different renewable energy projects filling its place. And because those alternative projects would be located entirely in the United States, they would far surpass the Northern Pass in economic benefits <u>to the United States</u>.

The Northern Pass will result in Canadian hydropower finding its way to the United States. <u>Canadian hydropower means more Canadian jobs and less American jobs.</u> The bulk of the economic benefits from such generation will be realized in Canada, not the United States. In sharp contrast, if the Northern Pass were not built, then as the Multi-State RFP results indisputably show, renewable energy projects <u>in the United States</u> would take its place.

Similarly, the analysis of the No-Action alternative in Section 4.10-Air Quality is incorrect. As the Multi-State RFP bids prove, the Northern Pass would be replaced with renewable energy projects located closer to the actual electrical load. Those projects would have the higher air quality benefits, and GHG benefits compared to the Northern Pass because they would be more efficient. The farther generation is from actual load, the more electrical losses incurred.

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Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. There is no evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting the general price of electricity within the market. Section 1.4 and Appendix D of the final EIS have been updated to include other reasonably foreseeable regional energy projects.

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Thank you for your comment. Section 4.1.10.2 of the EIS discusses greenhouse gas (GHG) emission impacts. Air quality and greenhouse gas analysis was conducted with GE Energy Modeling to consider future projected scenarios for electrical generation including fossil fuel and renewable sources. The GE Modeling relies upon data published by ISO-NE, including projected power plant retirements and new power generation. Please see Section 3.5 of the Air Quality and Greenhouse Gas Technical Report as well as the GE Engineering Energy Market Evaluation in the Northern Pass Transmission Project Report (Appendix 8 of the Socioeconomics Technical Report). Any future additional renewable energy produced in the region would continue to reduce criteria pollutants and GHG emissions needed to reach state and regional emission reduction goals.

The No-Action alternative must also take into account the fact that American jobs and tax revenues to the United States would be lost if Northern Pass were built. To be sure there would be construction jobs from the construction of the Northern Pass but all the generation facility jobs and economic benefits will be in Canada.

As the Multi-State RFP bids prove, the Northern Pass will displace American jobs related to construction and operation of renewable energy projects in the United States that would fill any void if the Northern Pass were not built. DOE has not analyzed those economic impacts and the loss of American jobs and tax revenues if the Northern Pass were built.

I. The Draft EIS Fails to Adequately Compare the Impacts of Approval versus the No-Action Alternative.

By relying on an incorrect assumption about the market impacts of the failure to approve the Northern Pass project, the Draft EIS violates NEPA's mandate to rigorously and objectively evaluate all reasonable alternatives to proposed actions, including the "no action" alternative. *See* 42 U.S.C. § 4332(C)(iii); 40 C.F.R. § 1502.14.

The U.S Supreme Court has held that agencies must "consider and disclose the actual environmental effects" of proposed projects in a way that "brings those effects to bear on [their] decisions." *Balt. Gas & Elec. Co. v. Natural Res. Def. Council, Inc.*, 462 U.S. 87, 97 (1983). Analysis of alternatives is the "heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires federal agencies to "[r]igorously explore and objectively evaluate all reasonable alternatives," including the "no action" alternative. *Id.* Agencies must "present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." *Id.* Agencies must also analyze the "[e]nergy requirements and conservation potential of various alternatives." 40 C.F.R. § 1502.16(e). Compliance with NEPA is required "to the fullest extent possible," 42 U.S.C. § 4332, a command which the U.S. Supreme Court has affirmed is "neither accidental nor hyperbolic." *Flint Ridge Dev. Co. v. Scenic Rivers Ass'n*, 426 U.S. 776, 787 (1976).

As detailed below, DOE's assumption that the failure to approve the Northern Pass would have no effect on ISO-New England demand for renewable

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Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. The analysis conducted did not find evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting total expenditures for electricity within the market. Potential impacts to employment are also discussed in Section 4.1.2 of the EIS. Section 1.4 and Appendix D of the final EIS have been updated to include the other reasonably foreseeable regional energy projects.

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Thank you for your comment. The No Action Alternative is analyzed throughout the EIS. The No Action Alternative represents a continuation of the existing condition which is described in Chapter 3 of the EIS. Chapter 3 describes in detail the existing condition for all resources throughout the study area. In particular, existing electricity system infrastructure is described in Section 3.1.2.5 of the EIS; this information has been updated for the final EIS. Section 1.4 of the EIS has also been updated to reflect current trends and conditions in the regional energy market. Additionally, the Socioeconomics Technical Report includes a discussion of modeling completed for this EIS, including a projection of future base case conditions in New Hampshire and the ISO-NE region through 2030. The modeling was updated for the final EIS to incorporate current market conditions and trends. The future base case condition was modeled based on the best available information from ISO-NE; this modeling represents the potential condition under the No Action Alternative and serves as a baseline against which to analyze the potential impacts of the Project. Under the No Action Alternative, it is assumed that existing energy sources, including alternative energy generation would continue to supply the ISO-NE region and that energy efficiency measures would continue. Existing issues with the electricity supply, including diversity, would persist. While the EIS analyzes possible impacts to the electricity system in the socioeconomics analysis, a detailed analysis of these impacts is performed through DOE's reliability study completed in cooperation with ISO-NE via a separate process. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of

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the final EIS has been updated with additional information about this alternative.

energy, or greenhouse gas emissions is flawed as a matter of economic theory, and disproven by the renewable energy market in ISO-NE as evidenced by, *inter alia*, the Multi-State RFP bids.

Remarkably Eversource, the proponent of Northern Pass, is also one of the participants in the ISO-NE clean energy RFP that is <u>seeking</u> bids for sources of renewable energy. The Multi-State ISO-New England RFP bids establish that building Northern Pass will have <u>no positive impact</u> on the actual renewable energy generation contracted for in ISO-New England because there are plenty of generation projects ready to take its place—none of which involve the multitude of adverse environmental impacts created by the Northern Pass that are described in the Draft EIS.

The Draft EIS simply fails to rigorously evaluate the No-Action Alternative or to provide a clear basis for choice among the options. The Draft EIS must be revised to do so.

II. DOE's Assumption That, Compared to No Action, Approving the Northern Pass Would Have Positive Impact on Total Greenhouse Gas Emissions Departs from Basic Economic Principles and Vastly Overstates the Northern Pass' Relative Climate Impacts.

The Draft EIS states:

S.8.4 ALTERNATIVE 1-NO ACTION ALTERNATIVE Under the No Action Alternative, there would be no impacts to any of the environmental resources analyzed. The local taxing jurisdictions would not realize any increases in tax revenues as a result of the Project and no direct or indirect economic impacts would occur within the region. No additional short-term or permanent jobs would be created. There would be no change in the wholesale price of electricity in New Hampshire or the ISO-NE region and no project related change in the level of CO2 emissions.

DOE's assumption that the No-Action will have no net effect on renewable energy generation, economic benefits or climate benefits contradicts fundamental economic principles. Significant changes in renewable energy supply will affect renewable energy's price and, therefore, consumption and emission levels. The Northern Pass will bring approximately 10 GWhs of electricity per year to ISO-New England. It is a serious error to assume that, under the No-Action Alternative, all 10 GWhs would not be completely replaced by renewable energy generation from

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Thank you for your comment. Socioeconomic impacts relative to the No Action alternative are addressed in the EIS, including impacts on electricity rates and both the existing and proposed mix of generation types. There is no evidence that the Project would reduce existing, or the construction of new, renewable power sources within New Hampshire. Potential impacts to air quality are analyzed throughout the EIS (see Section 4.1.10) and the Air Quality Technical Report.

other sources, with no effect on overall consumption or emissions. The Draft EIS fails to analyze how electricity from the Northern Pass directly competes with other renewable energy resources in electricity generation, such that <u>increasing the supply of Canadian hydro-electricity results in less American renewable energy generation</u> in ISO-New England. DOE also ignored how overall greenhouse gas emissions will vary among substitute sources of renewable energy generation. DOE should have—and easily could have—evaluated the No-Action Alternative's climate effects.

A. Basic Economic Principles Provide That Any Significant Change in Supply Will Change Price and Demand and, Therefore, Total Generation and Emissions.

The basic economic principles of supply and demand provide that significant changes in renewable energy supply will affect renewable energy's price and, therefore, consumption levels. Increasing the supply of any normal good (including renewable energy) puts downward pressure on that good's market price; this is a basic tenant of the law of supply and demand. N. Gregory Mankiw, *Principles of Economics* 74–78, 80–81 (5th ed. 2008). Lower renewable energy prices can result in lower electricity costs, which in turn encourages higher levels of electricity consumption, while higher renewable energy and electricity prices discourage consumption. *See id.* at 67–68.

Approving the Northern Pass would increase the supply of Canadian hydro-electricity, lowering demand for U.S.-based renewable energy generation.

Alternatively, in the No-Action Alternative, the demand for U.S.-based renewable energy generation would be higher, which U.S-based generation would reduce greenhouse gas emissions, as compared to the Northern Pass' climate impacts. Similarly, in the No-Action Alternative, the higher demand for U.S.-based renewable energy generation would result in increased economic benefits for the United States, as compared to the Northern Pass' economic benefits which are largely in Canada.

DOE may take notice

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Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. The analysis conducted did not find evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting total expenditures for electricity within the market.

¹ DOE may take notice of basic economic principles of supply and demand, as well as classic economic textbooks and peer reviewed articles. *See Citizens for Alternatives to Radioactive Dumping v. U.S. Dep't of Energy*, 485 F.3d 1091, 1096 (10th Cir. 2007) ("In dealing with scientific and technical evidence, extra-record evidence 'may illuminate whether an [environmental impact statement] has neglected to mention a serious environmental consequence, failed adequately to discuss some reasonable alternative, or otherwise swept stubborn problems or serious criticism . . . under the rug.") (alterations in original).

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Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. The analysis conducted did not find evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting total expenditures for electricity within the market.

Canadian hydro-electricity directly competes with other forms of renewable energy resources in the generation of electricity. Economists measure how coal, natural gas, and other fuels act as substitutes in the electricity market by analyzing "cross-price elasticity" (that is, how responsive producers are in swapping inputs when relative prices change). See Mankiw, supra at 99. For example, the U.S. Energy Information Administration ("EIA") found that for the U.S. market, a 10percent increase in the ratio of the price of coal to the price of natural gas leads to a 1.4-percent increase in the use of natural gas over coal. EIA, Fuel Competition in Power Generation and Elasticities of Substitution 1 (2012). In other words, in that example, the cross-price elasticity of demand for natural gas is 0.14 with respect to coal's price. Id. Other economists reach similar conclusions. James Ko & Carol Dahl, Interfuel Substitution in U.S. Electricity Generation, 33 APPLIED ECONOMICS 1833, 1835 (2001) (analyzing "average" cross-price elasticity). See also Nate Blair et al., Long-Term National Impacts of State-Level Policies (Nat'l Renewable Energy Lab. Conf. Paper 620-40105, June 2006) (discussing how "higher coal prices would dramatically increase" use of renewable wind energy). These estimates represent short-run elasticities; over time, substitution effects become more pronounced as power plants make technological changes that facilitate fuel-switching, and as longterm investments favor renewable energy. See Mankiw, supra at 105-106.

Changes in the relative amounts of coal, natural gas, renewable sources, and nuclear energy used to generate electricity—as well as changes in total energy demand—would, in turn, change total greenhouse gases emissions. In short, the Draft EIS' unexamined and unsupported assumption that the No-Action Alternative would have no effect on greenhouse gas emissions is contradicted by fundamental economics and market analyses. The environmental impact statement fails to meet NEPA's requirements, and should be revised.

B. Considering the Size and Nature of the Northern Pass It Is a Fallacy to Assume that Under the No-Action Alternative There Would be No Substitution With No Effect on Price, Consumption, or Emissions.

Moving beyond theory to the specific project at issue, given the size and characteristics of the Northern Pass and the ISO-New England market, it is clear error to not analyze the substitutions that would occur if the Northern Pass were not built. A list of candidates are included in Exhibit A. Moreover, the list in Exhibit A does not include the most beneficial renewable energy projects in ISO-New England—locally based projects under 20MWs, including small distributed projects and net-meter projects.

The Draft EIS' assumption that there would be no substitution simply bears no relationship to reality. The Northern Pass represents an enormous amount of renewable energy that affects hundreds of miles of forest and other resources. In fact, as the Multi-State Clean Energy RFP shows, it would provide double the renewable energy that those States are seeking for the next many years, thus virtually eliminating the demand for other forms of renewable energy.

If the Northern Pass is not approved, utilities in ISO-New England will acquire other renewable energy production to satisfy their respective renewable energy goals and standards, and therefore, lower greenhouse gas emissions. In the No-Action Alternative, any renewable energy substituting for the Northern Pass may provide a more positive impact on emissions and climate change. Yet, the Draft EIS does not analyze this environmental impact in its alternatives analysis.

In short, the Draft EIS' flawed economic assumptions renders its alternatives analysis ineffective and misleading, and the Draft EIS must be revised.

III. Other Federal Agencies—during Previous NEPA Reviews—Properly Analyze the Supply and Demand of Resources and Resulting Climate Effects.

For over 35 years, in NEPA reviews, the Department of the Interior has consistently understood that a decision not to take action related to energy production will affect that energy resource's supply and price and thus trigger other actions. Interior has further analyzed how such triggered actions generate different consequences for air pollution, climate change, and overall environmental quality. The U.S. Court of Appeals for the D.C. Circuit has praised Interior's analysis of these substitution effects. As far back as 1979, Interior has assessed the different environmental effects of energy substitutes under a No-Action Alternative—including different levels of carbon dioxide emissions.

Other agencies, such as the Surface Transportation Board, the Forest Service, the State Department, the Office of Surface Mining Reclamation and Enforcement (another Interior sub-agency), the Federal Energy Regulatory Commission, and the Nuclear Regulatory Commission, have also properly analyzed the effects of their energy management decisions in NEPA reviews, consistent with the advice of the U.S. Court of Appeals for the Eighth Circuit and the U.S. District Courts of Colorado and Minnesota. DOE's mistaken assumption that taking no action on the Northern Pass would have, compared to approving it, no net effects on

0740-11 Continued greenhouse gas emissions represents a substantial break with a 35-year history of proper analysis by DOE's sister agencies.

A. Other Federal Agencies Analyze the Connections between Supply, Price, Substitutes, Conservation, and Emissions.

Before the 1982 creation of a sub-agency within Interior responsible for offshore resources, the Office of the Secretary of the Interior developed the federal offshore oil and gas leasing program, and the Bureau of Land Management ("BLM") prepared environmental impact statements on leasing actions (then called simply "environmental statements"). In BLM's 1979 Final Environmental Statement on a proposed lease sale off the coast of Southern California, the agency analyzed the No-Action Alternative of withdrawing the sale:

[I]f the subject sale were cancelled, the following energy actions or sources might be used as substitutes: Energy Conservation; Conventional oil and gas supplies; Coal; Nuclear power; Oil shale; Hydroelectric power; Solar energy; Energy imports; Vigorous energy conservation is an alternative that warrants serious consideration. The Project Independence Report of the Federal Energy Administration claims that energy conservation alone can reduce energy demand growth by 0.7 to 1.2 percent depending on the world price of oil. . . . The environmental impacts of a vigorous energy conservation program will be primarily beneficial.

Final Environmental Statement, OCS Sale No. 48, Proposed 1979 Outer Continental Shelf Oil and Gas Lease Sale Offshore Southern California, 1508–09 (1979). See also BLM, Draft Environmental Statement, Proposed Five-Year OCS Oil and Gas Lease Sale Schedule 63 (1980) ("An alternative . . . to cease leasing . . . would result in the need to meet national energy needs through other sources, or to reduce energy consumption").

Thus, as early as 1979, DOE's sister agency recognized that canceling even a single oil and gas lease would cause the market to respond by substituting not just oil and gas from other sources, but alternative fuel types as well as increased energy conservation. BLM further recognized that the extent of energy conservation as a response depended on the price of the resource being replaced. BLM explained in 1979 to decisionmakers and the public, over the course of 25 pages of analysis, how each possible substitute for the foregone offshore leasing carried its own environmental effects: net beneficial to the extent increased energy conservation or renewable energy offset the lost offshore oil and gas; a more mixed or net negative

effect on environmental quality with switches to other types and sources of fossil fuels. BLM, *Final Envtl. Stmt. on Sale No. 48*, *supra* at 1508–1532. BLM even noted in this 1979 analysis that different energy substitutes generated different carbon dioxide emissions: "A number of gases are associated with geothermal systems and may pose health and pollution problems. These gases include . . . carbon dioxide However, adverse air quality impacts are generally less than those associated with fossil-fuel plants." *Id.* at 1525.

B. Interior Uses Sophisticated Tools to Assess the Environmental Consequences of Substitutes, and the D.C. Circuit Has Praised Its Modeling.

Interior develops Five-Year Programs to manage the leasing of offshore (or "Outer Continental Shelf" ("OCS")) oil and gas resources. Its current Program covers the years 2012–2017; development of that Program and the related Environmental Impact Statement first began in 2009. See BOEM, Outer Continental Shelf Oil and Gas Leasing Program: 2012–2017—Final Programmatic Environmental Impact Statement, 8-1 (2012). In the decision document for the current offshore Program, Interior's Bureau of Ocean Energy Management ("BOEM") explained:

In an environment of strong worldwide demand for oil and natural gas, a domestic supply cut equivalent to the production anticipated to result from a new Five Year Program would lead to a slight increase in world oil prices and a relatively larger increase in U.S. natural gas prices. All other things being equal, this would lead to a market response providing . . . a slight reduction in oil and natural gas consumed, a substantial increase in oil imports, and added supplies provided by onshore hydrocarbon resources.

BOEM uses its *Market Simulation Model (MarketSim)* to estimate the amount and percentage of substitutes the economy would adopt should a particular program area not be offered to lease. *MarketSim* is based on authoritative and publicly available estimates of price elasticities of supply and demand and substitution effects. . . .

[I]n the event the NAA [No-Action Alternative] were implemented.... 68 percent of the oil and natural gas production foregone from this program would be replaced by greater imports, 16 percent by increased onshore production, [10 percent by other energy sources]... and 6 percent by a reduction in consumption.

BOEM, Proposed Final Outer Continental Shelf Oil & Gas Leasing Program 2012–2017, 110 (2012)13; see also BOEM, 2012–2017 Final Programmatic Environmental Impact Statement, supra at 4-643 ("With less oil and gas available from the OCS under the No Action Alternative, consumers could obtain oil and gas from other sources, substitute to other types of energy, or consume less energy overall.").

BOEM explained in its Final Environmental Impact Statement that, compared to leasing offshore oil and gas, the energy substitutes anticipated under a No-Action Alternative will have different environmental consequences, including for climate change. For example, BOEM detailed how "Coal consumed in place of gas under the No Action Alternative will result in environmental costs The combustion of coal in power plants or industrial boilers produces higher emissions . . . than the combustion of natural gas and results in greater CO2 [carbon dioxide] emissions." *Id.* at 4-647. Similarly, BOEM's Economic Analysis Methodology calculates:

[T]he emissions for carbon dioxide and nitrous oxide [another greenhouse gas] are greater under the NSOs [No-Sale Options] than from the program. However, there is more methane from the program than the NSOs. Though these impacts are not monetized, they are not identical between having an OCS program and having the impacts of the NSOs.

BOEM, Economic Analysis Methodology for the Five Year OCS Oil and Gas Leasing Program for 2012–2017, 29–30 (2012) (emphasis added).

In a recent case challenging Interior's 2012-2017 offshore oil and gas leasing program, the D.C. Circuit favorably reviewed Interior's modeling of how "forgoing additional leasing on the OCS would cause an increase in the use of substitute fuels . . . and a reduction in overall domestic energy consumption from greater efforts to conserve in the face of higher prices." *Ctr. for Sustainable Economy v. Jewell*, 779 F.3d 588, 609 (D.C. Cir. 2015). Importantly, nothing in BOEM's modeling is unique to the offshore oil and gas context. According to BOEM, "MarketSim's economics-based model representation of U.S. energy markets . . . simulates end-use domestic consumption of oil, natural gas, coal and electricity in four sectors (residential, commercial, industrial and transportation); primary energy production; and the transformation of primary energy into electricity." BOEM, *The Revised Market Simulation Model (MarketSim): Model Description* 2 (2012).

Interior's sophisticated modeling of the environmental effects of energy substitutes under No-Action Alternatives is the culmination of 35 years of analysis. Interior has used the MarketSim model since at least its 2002-2007 Program for offshore leasing. See Minerals Mgmt. Serv. ("MMS"), Energy Alternatives and the Environment, 10 (2001)16 ("MMS employs the MktSim2000 model to evaluate the impact of decreased OCS production resulting from no action."). Since at least the 1990s, Interior's Environmental Impact Statements have calculated the percentage of offshore production expected to be substituted by various energy alternatives under a No-Action scenario. MMS Energy Alternatives and the Environment, 13 (1996)17 ("[F]or each unit of OCS gas not produced because of no action . . . conservation will account for about 0.14 units "); see also id. at 15 ("Significant environmental impacts associated with expanded importation of oil include: the generation of greenhouse gases "). And going back to the first Five-Year Program in 1980 (when BLM prepared the Environmental Statements), Interior has recognized that not all sources of the same fuel type present the same environmental effects—for example, offshore oil drilling presents lower spill risks than imported oil substituted under the no-action alternative. Interior, 5-Year OCS Leasing Program 13b (1980).

Similarly, in a 2001 report on its offshore oil leasing program, Interior declared in no uncertain terms that "Examining other energy sources is an important aspect of the No Action Alternative" under NEPA reviews. MMS, *Energy Alternatives and the Environment* 1 (2001).

So how could it be that the DOE does not understand market dynamics and the principles of substitution, particularly when it comes to energy decisions?

C. Other Agencies Analyze Supply and Demand in NEPA Reviews of Energy Management Decisions.

Two other federal agencies—the Surface Transportation Board and the Forest Service—began, upon remand from federal courts, conducting the proper analysis of supply and demand in NEPA reviews of their energy management decisions. The U.S. Court of Appeals for the Eighth Circuit sharply criticized the Surface Transportation Board for "illogical[ly]" concluding that approving new railroad lines to Powder River Basin coal mines would not affect the demand for and consumption of coal, and for ignoring "widely used" models capable of forecasting such effects. *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520,

549–550 (8th Cir. 2003). "On remand, the Board undertook just such a study using the Energy Information Administration's (EIA) National Energy Modeling System (NEMS)...'[which] not only forecasts coal supply and demand but also quantifies environmental impacts." *Mayo Found. v. Surface Transp. Bd.*, 472 F.3d 545, 555 (8th Cir. 2006). *See also* Surface Transp. Bd., *Draft Environmental Impact Statement for the Tongue River Railroad*, Appendix C.1-13 to 1-14 (2015) (analyzing how approving a new coal railroad would only increase annual U.S. coal production by 0.13 percent, which "would not be significant enough to noticeably lower delivered coal prices (which includes transportation), and thus, would not increase total demand for coal").

Similarly, the U.S. District Court of Colorado "[could] not make sense" of the Forest Service's assumption that approving road construction through national forests to reach Colorado coal mines would not increase coal production and consumption. *High Country Conservation Advocates v. Forest Service*, 52 F. Supp. 3d 1174, 1197 (D. Colo. 2014). On remand, the Forest Service's draft environmental impact statement details that while the no-action alternative "has no impact on climate change," under the leasing option "coal mining, transportation, and combustion would increase the atmospheric concentrations of GHGs [greenhouse gases]." Forest Service, *Rulemaking for Colorado Roadless Areas—Supplemental Draft Environmental Impact Statement* 48–49 (2015).

The State Department provides another example. In its environmental impact statements, the agency has estimated how, at different oil prices, approving international oil pipelines could affect production and greenhouse gas emissions. See State Dep't, Final Supplemental Environmental Impact Statement for the Keystone XL Project, ES-16 (2014)23 ("The 2013 Draft Supplemental EIS estimated how oil sands production would be affected by long-term constraints on pipeline capacity . . . if long-term . . . oil prices were less than \$100 per barrel. The Draft Supplemental EIS also estimated a change in GHG emissions associated with such changes in production."). This analysis was strongly encouraged by comments from the Environmental Protection Agency. See Comments from EPA, to State Dep't, on Draft EIS for the Keystone XL Project, at 3 (July 16, 2010) ("[I]t is reasonable to conclude that extraction will likely increase if the pipeline is constructed."). Even when the State Department concluded that a different pipeline approval would not affect energy substitutes, the agency first assessed the market and "conclude d that this amount of crude oil [3% of total U.S. processing] is not expected . . . to significantly impact end-use price or demand." Sierra Club v. Clinton, 746 F. Supp 2d 1025, 1046 (D. Minn. 2010). The State Department's practice of assessing

whether its actions would affect overall energy demand stands in stark contrast with this case, where DOE simply made an unsubstantiated assumption, without conducting any analysis.

Other agencies that, during NEPA reviews, have properly analyzed how their energy management decisions might affect energy supply and demand, and so affect emissions, include the Office of Surface Mining Reclamation and Enforcement (another Interior sub-agency), the Federal Energy Regulatory Commission, and the Nuclear Regulatory Commission. See Office of Surface Mining, Draft Stream Protection Rule Environmental Impact Statement, at 4-175 to 4-176 (2015) ("Modeling suggests that these Alternatives [to regulate surface coal mining to protect streams could decrease national coal production [T]his analysis anticipates that the net effect on climate resiliency is positive at the national level under each Action Alternative "); id. at 4-160 to 4-161 "Under some Alternatives, the mix of production type, i.e., surface or underground, may also change. As discussed . . . surface and underground mining activities have different emissions profiles."); Fed. Energy Reg. Comm'n, Lake Charles Liquefaction Project—Final Environmental Impact Statement, 3-3 (2015)26 ("If the No-Action Alternative is selected, it could result in the continued use of less clean-burning fossil fuels at levels that might otherwise have been reduced through replacement with LNG."); Nuclear Reg. Comm'n, Generic Environmental Impact Statement for License Renewal of Nuclear Plants §8.2 (1996)27 ("Denial of a renewed license . . . may lead to the selection of other electric generating sources to meet energy demands . . . [or] to conservation measures [T]he environmental impacts of such resulting alternatives would be included as the environmental impacts of the no-action alternative.").

In short, at least nine different agencies—including Interior's Office of the Secretary and at least three Interior sub-agencies (Office of Surface Mining, Bureau of Ocean Energy Management, and Minerals Management Service)—in NEPA analyses stretching back over 35 years, have analyzed how their energy management decisions affect energy supply and demand, and so affect emissions. The economic theory is undisputed, the economic models are easily accessible, and the practice is widespread through the government. DOE's unexplained assumption regarding the No-Action Alternative sharply breaks with 35 years of agency practice.

IV. Even If DOE's Approach to the No-Action Alternative Were Correct, Its Calculation of the Economic Benefits and Climate Impacts of the Northern Pass Would Be Overestimated and Inaccurate.

The Draft EIS assumes that taking no action on the Northern Pass would have, compared to approval, no net effects on carbon dioxide emissions, methane emissions, or climate change. These comments have explained why that assumption is entirely inconsistent with economic theory, real market conditions, and past agency practices. Consequently, the Draft EIS presents a deeply inaccurate and misleading comparison of the approval options and No-Action Alternative. However, even if DOE were to start from the proposition that the No-Action Alternative resulted in no impacts, the Draft EIS would be inaccurate and misleading in a different but equally problematic way.

The Draft EIS calculates the "economic benefits" and climate impacts of Northern Pass by assuming that no other renewable energy facilities would be built to take its place if it were not built. As explained above that is simply not true. Other sources of renewable energy generation would substitute for the Northern Pass, then the Draft EIS must subtract from its calculation of the Northern Pass' economic, energy supply and climate benefits, the lost benefits from all those would-be sources of renewable energy generation that would no longer be built.

Once that is done Northern Pass may have a net negative impact on economics or climate benefits compared to its substitutes. That is particularly so when it comes to economic benefits because all the economic benefits from the hydro-generation facility are realized in Canada, not the United States. And the United States would lose thousands of American jobs related to the US-based substitutes. The Draft EIS does not comply with NEPA because it fails to analyze those effects.

V. The Draft EIS Does Not Account for Other American Projects that Will Displace the Need for Hydropower.

The Draft EIS states that there are three reasons that justify the Project's existence—electricity diversity, low carbon electricity supply and non-intermittent power supply. The electricity diversity section focuses on New England's constraints on the supply of natural gas. The Northern Pass sponsor— Eversource—has a gas pipeline project that is expected to be in service in the fourth quarter of 2018 which will eliminate the gas pipeline constraints. See, http://accessnortheastenergy.com/. Thus the need for Canadian hydropower as a

0740-12

Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. The analysis conducted did not find evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting total expenditures for electricity within the market.

0740-13

0740-12

Thank you for your comment. As discussed in Section 1.4 of the EIS. Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity. The project objectives in Section 1.4 of the final EIS have been updated to include new information on market trends and energy use since the draft EIS was published in 2015. The economic consequences of the Project are analyzed in detail in Section 4.1.2 of the EIS. The analysis presented in the final EIS was updated to reflect current market conditions and inputs (see Section 4.1.2 of the EIS). Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that other transmission projects, power generation alternatives, and energy conservation are not reasonable alternatives. Section 2.4 has been updated to include additional information about these alternatives. The EIS analyzes in detail the potential environmental impacts of a No Action Alternative and eleven action alternatives. Under the No Action Alternative, it is assumed that existing energy sources, including distributed generation and alternative energy generation, would continue to supply the ISO-NE region and that energy efficiency measures would continue.

0740-13 cont'd 0740-13 Continued

means to potentially mitigate natural gas constraints is simply not needed. The natural gas constraints exist only in the winter and there is no way the Northern Pass will be built before the natural gas constraints are lifted through Eversource's Access Northeast project. Even under the most optimistic circumstances, where there is a Record of Decision in the fourth quarter of 2016 and no litigation thereafter, the Project would not be in-service until 2019, after the natural gas pipeline constraints go away.

A more likely scenario, however, involves litigation in the federal courts which would likely take a minimum of 3 years, bringing the earliest possible date for the Northern Pass' in service date to 2022. The natural gas constraints will be long gone by then.

The second stated justification for the Project is low carbon electricity supply. As shown above, there are many other renewable energy projects that are ready and willing to fill the void. The Northern Pass' project proponent—Eversource—simply does not want to have those other projects fill the void for an obvious reason: it results in lower profit and lower income for the company and its shareholders. Eversource's monetary self-interest is not a justification for issuance of the permit or failing to account for the other projects that would fill the Project's purported need.

The third stated justification for the Project is non-intermittent power supply. To be sure, hydro-electricity does not suffer from the same intermittency of wind and solar right now. But the ISO-New England grid is shifting to natural gas as the baseload supply until grid-scale storage for wind and solar becomes economically competitive. The natural gas baseload supply provides the most flexibility to integrate large amounts of wind and solar. Hydro-electricity does not provide that same quick ramp up and down, thus using hydro-electricity as baseload would harm integration of intermittent sources. Once the natural gas constraints are lifted, which they would be before the Northern Pass would be inservice, then baseload hydro is not needed, and its introduction would replace other renewables and restrict additional renewable integration into the grid.

Thus the three purported justifications for the Project are simply not there.

The Public Interest Will Not Be Served By Issuance of the Permit.

The Northern Pass is not in the public interest because as shown above, it would displace renewable energy projects (and the American jobs related to those projects) that would otherwise be built in the New England states and on the ISO-New England electricity grid. It is not in the US public interest to approve a project that will result in the loss of American jobs, and the economic benefits from those projects.

The Public Interest Will Not Be Served By Granting a Permit to a Proponent VII. that Ignores Its Obligation Under Federal Law to Buy Energy From US-Based Renewable Energy Project.

The position of Eversource in sponsoring the Northern Pass project instead of domestic renewable energy projects is yet another example of what Section 210 of the Public Utility Regulatory Policies Act ("PURPA"), 16 U.S.C. § 824a-3, intended to eliminate—the reluctance of utilities to purchase energy from independent power producers in the USA. More than thirty years later, this case shows that reluctance, as well as the utilities' desire to increase returns for their shareholders, is still alive and well.

Under PURPA, electric utilities, such as Eversource, must purchase any electricity produced by QFs. 18 C.F.R. § 292.303(a)(1). Allco and presumably other QFs have offered energy from their QF solar projects to Eversource over at the longterm rate required by 18 C.F.R. § 292.304(d)(2)(ii). Eversource has violated PURPA by rejecting such projects, forcing Allco to proceed with litigation. Northern Pass is not in the public interest because the project's proponent, Eversource, is trying to create the purported demand for the foreign Northern Pass project by violating its obligations under PURPA to domestic renewable energy developers in the New England states. The public interest cannot be served when a project's proponent, such as Eversource, ignores federal law, and it seeks an approval to further that purpose, such as what it seeks here. Nor can the public interest be served if a federal agency or the President of the United States were to sanction such conduct by approving a project that would not be needed if its proponent complied with federal law.

Respectfully Submitted.

Thomas Melone

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0740-14

Policies Act does not apply to DOE's determination of public interest and is outside the scope of this EIS. The Project would 0740-14 not be approved unless it complies with all applicable laws. As described in Section 1.1.1 of the EIS, Executive Order (E.O.) 10485, as amended by E.O. 12038, authorizes the Secretary of Energy "Upon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of

Thank you for your comment. The Public Utility Regulatory

Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection" of "facilities for the transmission of electric energy between the United States and a foreign country." Thus, in deciding whether to issue a Presidential permit, DOE must

determine whether doing so would be "consistent with the public interest." In addition, the Departments of State and Defense must both make "favorable recommendations" on the issuance of the

permit. In deciding whether the issuance of a Presidential permit would be consistent with the public interest. DOE assesses the environmental impacts of the proposed project and reasonable

alternatives, the impact of the proposed action on electric reliability, and any other factors that DOE may also consider

whether to issue a permit - as well as the factors DOE considered in making its decision - in the Record of Decision (ROD). DOE would issue a ROD no sooner than 30 days after

relevant to the public interest. DOE will announce its decision

the EPA publishes the Notice of Availability for this final EIS in the Federal Register. The EIS analyzes potential environmental impacts to the electricity system in the socioeconomics section (see Section 4.1.2 of the EIS). The reliability study, completed in

cooperation with ISO-NE, provides a separate analysis of

impacts of the proposed federal action on the electricity system.

EXHIBIT A

| Project Name | Developer Si | Size (MW) | Technology | Location |
|--|--|--------------------|-----------------|-------------------------------------|
| Candlewood Solar Project | Ameresco | 20 | Solar PV | New Milford, CT |
| Antrim Wind | Antrim Wind Energy LLC | 28.8 | Wind | Antrim, NH |
| Beacon Falls Energy Park | Beacon Falls Energy Park LLC | 63.3 | Fuel Cell | Beacon Falls, CT |
| Blueberry Hills | Blueberry Hills LLC | 249.9 | Wind | Deblois, ME |
| Canton Mountain Wind | Patriot Renewables | 22.8 | Wind | Canton, ME |
| Cassadaga | Cassadaga Wind LLC | 126 | Wind | Cherry Creek, NY |
| Alder Stream Wind/Moose Wind | NextEra | 216/245 | Wind | Eustis, ME |
| Clean Energy Connect | lberdrola/EDP Renewables/Brookfield Renewabl | 009 | Hydro/Wind | Multiple states |
| Conowingo Hydroelectric Project | Exelon | 572 | Hydro | Conowingo, MD |
| Simsbury Solar Farm | Deepwater Wind | 26.4 | Solar PV | Simsbury, CT |
| Fitchburg Solar 1 | EDP-ibvogt Solar LLC | 48 | Solar PV | Fitchburg, MA |
| Gardner Solar 1 | EDP-ibvogt Solar LLC | 22 | Solar PV | Gardner, MA |
| Hopkinton Solar 1 | EDP-ibvogt Solar LLC | 22 | Solar PV | Hopkinton, RI |
| Hopkinton Solar 2 | EDP-ibvogt Solar LLC | 22 | Solar PV | Hopkinton, RI |
| Hopkinton Solar 3 | EDP-ibvogt Solar LLC | 22 | Solar PV | Hopkinton, RI |
| Hopkinton Solar 4 | EDP-ibvogt Solar LLC | 22 | Solar PV | Hopkinton, RI |
| North Stonington Solar | EDP-ibvogt Solar LLC | 22 | Solar PV | Stoning, CT |
| West Greenwich Solar | EDP-ibvogt Solar LLC | 22 | Solar PV | West Greenwich, RI |
| Aroostook County Wind | EDP Renewables | 248 up to 650 Wind |) Wind | Aroostook County, Maine |
| GRE 501 MIRA LLC | Greenskies | 20 | Solar PV | Windsor, MA |
| Hope-Scituate Solar | RES Americas | 20 | Solar PV | Cranston, RI |
| Woods Hill Solar | RES Americas | 20 | Solar PV | Pomfret, CT |
| King Pine Wind | SunEdison | 009 | Wind | Aroostook/Penobscot Counties, ME |
| Maine Clean Power Connection (Moo NextEra, SunEdison | oo NextEra, SunEdison | 547 | Wind | Western Maine |
| Maine Renewable Energy Interconn | gy Interconne SunEdison (King Pine) , EDP (Number Nine Wind, | 1250 | Wind | Maine (various locations) |
| Alder Stream and Moose Wind, Winte NextEra | nt NextEra | 662 | Wind/Solar (15 | Wind/Solar (15t Franklin County, ME |
| Northern Pass Line | Eversource | 1090 | Transmission Li | Fransmission Lii Multiple states |
| Chinook Solar | Ranger Solar LLC | 20 | Solar PV | Fitzwilliam, NH |
| Enfield Solar | Ranger Solar LLC | 20 | Solar PV | Enfield/Somers, CT |
| Farmington Solar | Ranger Solar LLC | 20 | Solar PV | Farmington, ME |
| Quinegaug Solar | Ranger Solar LLC | 20 | Solar PV | Brooklyn/Canterbury, CT |
| Sanford Airport Solar | Ranger Solar LLC | 20 | Solar PV | Sanford, ME |
| Somerset Wind | SunEdison | 82.8 | Wind | Somerset County, ME |
| The Wind and Hydro Response | Invenergy/Hydro-Quebec/Vermont Green Line | 400 | Wind/Hydro | Various locations (NY/Quebec) |
| Weaver Wind | SunEdison | 72.6 | Wind | Eastbrook, ME |

SPEAKER: Thank you, especially for the correct pronunciation of my last name. My name is Greg Rahe, and I've worked for Eversource New Hampshire for 14 years. As an account executive I worked with Eversource's large commercial industrial customers in the greater Seacoast area. The Seacoast is growing at twice the rate of the rest of the state and is expected to represent approximately 25 percent of New Hampshire's electrical by 2020. The growth is due in part to business expansion. Several of the largest industrial customers on the Seacoast are multi-national concerns with corporate offices located in Europe and Asia. When deciding where to expand, Seacoast businesses are often competing against their counterparts in other US locations or abroad. The talent pool companies can draw from is abundant which strengthens the argument to expand here. However, many of these customers have stated that the high cost of utilities, especially electricity, is a prime concern. They tell that electric rates for their businesses in New Hampshire are nearly double the national average for manufacturing and almost 40 percent higher for the commercial segment. These are energy intensive businesses that consume a lot of electricity, and any opportunity for them to reduce their variable costs is very beneficial. To give you some perspective, a large business on the Seacoast consumes three million kilowatt hours a month. That's 6000 times more than the average home. To equate those figures to cost, that business would pay \$255,000 a month for energy, not including transmission and distribution charges. A five percent reduction in energy cost would save the business upwards of \$108,000 annually. Those are funds that they could use to hire additional staff, expand their product line and give back to the communities. I support Northern Pass because it's a renewable energy source which will reduce energy prices, help mitigate the price volatility we've witnessed over the last several winters and help business and industry thrive and expand in New Hampshire. Thank you.

0741-1 O741-1 Thank you for your comment.

0743-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9199

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety

Organization:

Country: US

Comment: I am concerned due to the fact of what the impact will be on the environment and wildlife. We will take away precious land from the wildlife and do they really know what will happen over time with the environment. Also, how ugly they will be against the landscape. One of the many reasons I live up here is the beautiful landscape of the mountains, etc. WE DO NOT NEED to add these ugly monsterous towers as they will most certainly be a eye sore. I cannot even stand to see the Wind Towers on Tenney Mountain Highway!

0745-1 Thank you for your comment.

0745-1

Refers to Comment placed on Apr 4, 2016

ID: 9206

Date Entered: Apr 4, 2016

Source: Website

Topics: Wildlife

Organization:

Comment: We are writing to express our grave concern about the continued efforts to bring above ground lines through the state of New Hampshire. The natural beauty of this state is a fragile asset to all living beings. Please do NOT bring this pass through our state. More harm than good will come of this construction. Thank you!

Sincerely,

Kathy and Rich Weymouth

0746-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9213

Date Entered: Apr 4, 2016

Source: Website

Topics: Alternatives

Name: Sean McNeill

Organization:

Email: smcneill99@gmail.com

Mailing Address: 26 Lois st

City: Plymouth

State: MA

Zip: 02360

Country: US

Comment: Northern Pass should be fully buried and DOE should examine all burial alternatives. Full burial is technically doable and is being used by other projects in the region. Northern Pass should do the same. The DEIS appropriately examines full burial in New Hampshire

Transmission line burial is technologically and economically viable for long distances with minimal social or environmental impacts. But it is critical to select the appropriate corridor for burial. Recently DOE has issued Presidential Permits for projects that cross from Canada into New York and VT using modern burial technology in transportation corridors. In a separate endeavor, Hydro-Quebec is participating in another proposed fully-buried transmission project at the NY-VT border. Likewise, Northern Pass should use current technology and bury all of the lines.

0747-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9215

Date Entered: Apr 4, 2016

Source: Website

Topics: Environmental Justice

Organization: NH resident

Comment: "We are like tenant farmers chopping down the fence around our house for fuel when we should be using Nature's inexhaustible sources of energy--sun, wind and tide. I'd put my money on the sun and solar energy. What a source of power! I hope we don't have to wait until oil and coal run out before we tackle that."

? Thomas A. Edison

"Non-violence leads to the highest ethics, which is the goal of all evolution. Until we stop harming all other living beings, we are still savages."

? Thomas A. Edison

I object to big hydro dams as a renewable or clean source of power due to the permanent environmental destruction, loss of wildlife and the destruction of the natural ecosystem as well as the overall global impacts it has to the earth and climate change. Transmission lines are outdated and need to be buried to protect the environment and beauty of NH. Stop this savage-like behavior.

0748-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9218

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Health and Safety, Viewshed/Scenery, Recreation, Private Property/Land Use, Historic/Cultural, Traffic, National Security, Tourism, Quality of Life, Air Quality, Cumulative Effects, Noise, Environmental Justice

Organization:

Comment: Thank you for all your work in considering the Northern Pass. I feel that the project is overall detrimental unless completely buried. As proposed, the Northern Pass will reduce the attractiveness of visiting New Hampshire and the desirability of living in the state. Though there would be some positives in jobs and tax revenue, I feel that the project would bring far more negatives.

0749-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9219

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Alternatives

Organization:

Comment: While I have been a strong supporter of Northern Pass since its inception, I do agree with the burial of ALL of the transmission lines along the ENTIRE length of the proposed project. I agree that we as a country need to be exploring and implementing all types of alternative energies to decrease, and one day eliminate, fossil fuel use. However, I also agree with the AMC and others that the development of solar power and its new, quickly advancing technologies can and will become a viable alternative for each and every household, both individual installations as well as group installations. I believe if this happens as quickly as many feel it will, then we will be left looking at metal towers across our landscapes that are no longer needed or useful. Burial of the transmission lines would leave us with a clean landscape and will be of no consequence to anyone if they are "shutdown" anytime in the future, which may very well be within this decade! Consider this my personal vote for BURYING 100% of the transmission lines.

0750-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9223

Date Entered: Apr 4, 2016

Source: Website

Topics:

Organization:

Comment: Tourism is a big part of northern new England revenue. Keep us beautiful. ...bury lines or pursue solar or other sources of power. Thankyou

0751-1 Thank you for your comment.

Refers to Comment placed on Apr 4, 2016

ID: 9225

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Recreation, Private Property/Land Use, Historic/Cultural, Economic, National Security,

Tourism, Quality of Life, Cumulative Effects

Organization:

Comment: I am opposed to Northern Pass project in any form because it's not needed in NH, and it would cause multiple negative impacts to each of the following and more: scenery, recreation, tourism and economy; health, safety and national security; vegetation, wildlife, water and wetlands; private property rights, use and values; historic and cultural heritage. The overall cumulative effects would destroy the quality of life of citizens both within our state and throughout our nation. Say "NO" to Northern Pass.

From: Robbie Hudson <robhudson@comcast.net>

Sent: Monday, April 04, 2016 8:31 PM
To: draftEIScomments@northernpasseis.us

Cc: robhudson@comcast.net

Subject: Northern ,Pass Draft EIS Comments

After reading the draft Northern Pass EIS I am writing to urge you <u>not</u> to issue the Presidential Permit and the SUP for the Northern Pass Project in New Hampshire. Please choose the No Action Alternative. I simply do not believe that this project addresses the needs of the New England electric system in a manner that outweighs the importance of the natural and human environment.

According to the EIS, "Applications for Presidential permits are evaluated based on the potential impacts that a proposed project could have on the environment, the operating reliability of the US electric power supply, and any other factors relevant to the public interest." This study is impressive and extensive in its evaluation of the environmental impacts, and there is no doubt about it; the overall environmental impact is <u>HUGE</u> - especially with above ground transportation routes.

Less convincing are the arguments for this project's ability to contribute to the <u>operating reliability of the US electric power supply</u> and the need for this project in NH. Such an extensive line of miles and miles of electric transmission would be both vulnerable to and indefensible from both terrorist attacks and increasingly violent weather. Shouldn't the DOE be exploring the development of more local sources? The calculations of reductions of CO2 emissions are only valid if the carbon emitting sources are replaced, but other power sources besides Hydro-Quebec (solar, wave energy, etc.) could also do that with much less damage to NH. I personally find it disconcerting that in the neighboring state of MA the expectation of power from Hydro-Quebec has caused the governor to no longer promote solar power. There are already proposals for importing hydro-electric power through buried and underwater transmission lines in NY, VT, and ME. Do we really need the devastation caused by a line through NH? NH doesn't need (and wouldn't even receive much of) the power from Northern Pass. With lines in three other states is the Northern Pass necessary for New England (or are we satisfying the interests of Hydro-Quebec and EverSource at the expense of NH)? The needs of the New England electric system will change over time along with changes in economics, population, and changes in energy technology. However if you allow this enormously damaging project to go through the scar on the NH landscape will be deep and forever.

This brings us to the third "potential impact" that the EIS examines when considering a Presidential permit; the impact on "any other factors relevant to the public interest." Now, there's the rub. The EIS clearly states that the impact on tourism, the second largest industry in NH, is "not quantifiable". Of course not! People come to the state for all kinds of reasons. What they find is beauty and peace. These are not quantifiable and neither would be their destruction by the Northern Pass.

In examining the impact of this project on "any other factors relevant to the public interest," the DOE must consider the impact on the spirit of the people. People live in NH because of the quality of life. We love the beauty of our state- the woods, the mountains, the wildlife, the lakes and streams. We love the land and we take care of it - whether it be our woods or someone else's. It is our soul. It is, again, not quantifiable.

All of the impressive calculations of this study, the mathematical manipulations and economic projections will change over time. Populations will change, technology will change, needs will change, climate will change etc. However, the need of humanity for pristine places where we can find peace in nature, where we can

1

0753-1 Thank you for your comment.

reconnect with our soul - that does not change. If anything it only intensifies as industry gobbles up more and more space. We <u>must</u> guard our beautiful lands. <u>You</u>, a division of the US government, must guard our lands. You must consider the spirit - the very soul - of this state and its people and what we have to offer the rest of the country just as we are (without the Northern Pass).

I do not know who is reading my letter or where you come from or whether you have ever visited this state. If you live in the city where so much is valued and derived from the commerce of man, then perhaps what we value in NH may be difficult for you to understand. But if you go to <u>your</u> favorite place, your favorite park, your favorite tree or flower, or even your favorite person - if you examine that which you value <u>not</u> with your quantifying mind but with your feeling heart - perhaps you can understand our love of NH. It is in our very soul. Please protect that. It is quite clear from the continued opposition since the Northern Pass was first proposed years ago that the people of NH do not want this. Please say no for us. Say <u>no</u> to corporate demands and projections. Say <u>no</u> to the Northern Pass.

Ellen Hudson of New Hampshire

0753-1 Continued 0753

0753-1 cont'd

abelly Gray 7 chiduan 5 tram Rd 1845burg 114 03592

To: Brian Mils
Office of Electricity + energy peliabelity
US Dept of Energy
1000 charpendnie au IV
Washington DC 20585

As a landowner in Pittsburg, and concerned citizen with I am writing to you to voice my concerns over the SEC and it's views over power projects. It seems that the SEC feels that it can act as a statewide planning and zoning board and that they have the authority to preempt local planning and zoning ordinances to the extent that it can grant power to energy companies to receive a permit that will ignore the rules and master plans of the towns affected by these projects.

This is NOT acceptable. The towns must have the power to protect themselves from energy companies (many of the companies are from foreign countries). Our towns must have the power to preserve their lands, property rights and the future of their children from these projects that are for profit and not needed. We should have local control and not be overruled by projects seeking private profits.

After OVER, 5 years of meetings and hearings in Concord and in many towns that are affected by the Northern Pass project, it seems that it is time for them to bury the entire length of the project or go home and NO BUILD! Northern Pass will destroy the beauty and the historic value of the north country that relies so much on tourism. People, contrary to Northern Pass propaganda, do not want to visit and stay in places that have ugly towers. The thirty-one towns that are directly affected by Northern Pass have come out in total opposition to the project.

It is time that you and the rest of the NH elected officials should be listening to the people who elected them to serve them not a foreign country who is in it for profit only.

For the people by the people.

(It is time for northern Pass to Pack UP & Go Home)

0755-1

Thank you for your comment. As noted in Section 1.7.3.1 of the EIS, the State of New Hampshire Site Evaluation Committee (SEC) is an eleven member committee representing state agencies and the public that review and act upon applications to construct energy facilities. This is a non-federal process in which DOE has no role. According to the New Hampshire Office of Energy and Planning study, "The New Hampshire Energy Facilities Siting Process," municipal and regional planning commissions and municipal governing bodies "have no decision-making power in the [energy facilities siting] process for projects within their boundaries" (NHOEP 2013a). A review of municipal and regional master plans was conducted as part of the EIS process and a summary is contained in the Administrative Record.

Holly Gray 7 chidian Stream Rd Pttsburg 47 H 03592

Brian Mills Office of Electricity delivery & Emergy Keliability US Dest of Emergy 1000 Undependence are SW Washington DC 20585

as a concerned citizen of 41th and honcowner in Pittsburg. el am very upset over this northern Pass Od rage.

Northern Pass is a foreign owned garagest for prevale profits. It is not a needed or wanted project. If an upgrade to the infew England Grid is in necessary (For Com, Rhode clelands Mass) why aren't other options or projects keing Considered ? Northern Pass is Northern only often our there.

Over 5 years ago, all 31 Hours duelty as perhed come and in total opposition. Why wasn't sonething done them to show thin ? We all know this project is all about Money. (Greed not Green) Money talks - the longer this is drawn will-people and Corresponde and Mothern Pass has do buy more people and politicans.

to this travely?

or above ground, dis not for the good of the people.

Just but no long term kenyto

client of whe do stop all this and tell

Monthern Pars to (Pack UP and Go Home)!

Please listen to the people. It's our land, state,
homes and yesture, were Marking about - no lining someone
lists yorker. Stop Northern Pars Moul!

Sincerely Hoely Heavy Alan Robert Baker Attorney at Law

481 Meriden Hill Rd. North Stratford NH 03590 Tel. 603-922-5571

Cell: 860-836-6094

Email: abobbaker@aol.com

STATEMENT OF ALAN ROBERT BAKER BEFORE THE U.S. DEPARTMENT OF ENERGY MEETING IN WHITEFIELD, NEW HAMPSHIRE ON MARCH 11, 2016 REGARDING THE NORTHERN PASS TRANSMISSION LINE PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT

Good evening. My name is Bob Baker and I am an almost retired lawyer living in Columbia, New Hampshire. I would like to take the opportunity to thank the Department of Energy for returning to the Great North Woods to hear the comments of our citizens in Northern New Hampshire regarding the Draft of the Environmental Impact Statement. In the next few minutes, I am only going to address the Alternatives studied.

From my perspective, the readily acceptable alternative is Alternative 1. No build. First, the power is not needed here in New Hampshire or elsewhere in New England. New Hampshire is a power exporter; and New England's own new power generation and power efficiency initiatives are paying huge dividends. We need to keep our attention focused on those job creating initiatives and industries right here at home. More foreign generated power will not help. It will kill jobs and take away our power generation self-sufficiency.

Second, reliance on more foreign power generated a thousand kilometers away is a threat to our security both from the occurrences of nature and men. We should never rely on a foreign controlled corporation to supply a significant portion of our power especially when it depends on hundreds of miles of exposed infrastructure that we cannot protect and maintain. Ice, wind, solar emissions, domestic terrorists, and kids with hunting rifles have all taken out Quebec power lines and towers in the past. Do we really think such events won't happen in the

0756

0756-1

0756-1

Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038. "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction," operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, does not have siting authority for the Project. In this case, the New Hampshire Site Evaluation Committee has siting authority for the Project in the state of New Hampshire. Additionally, the USFS has siting authority for portions of the Project located in the White Mountain National Forest. (For further discussion, see Sections 1.1-1.3 of the final EIS.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. Among these alternatives, DOE considered two alternate border crossings. One was an alternative that would utilize the existing National Grid Phase I/II route, including its border crossing in Vermont. Based on its review of the National Grid alternative DOE determined that this alternative is not reasonable. Section



0756

2.4.3 of the final EIS has been updated with additional information related to the National Grid alternative. Separately, in response to comments received on the draft EIS, DOE considered a second alternative border crossing in Vermont, specifically identified as a border crossing at Derby Line, VT that would utilize I-91. DOE determined that this alternative is not reasonable. Section 2.4.17 of the final EIS has been added to reflect consideration of this alternative and DOE's determination.

0756-1 cont'd

0756-1 Continued

near future? And I have not even mentioned the biggest threat of all: cybercrimes that will undoubtedly take out major portions of our grid. Do we really want to trust a foreign government to keep cyber criminals out of its computer controlled grids?

Third, even if more Canadian power imports might be nice to have in the Northeast, there are better alternative transmission corridors that have been proposed entirely underground and under water in Vermont, New York and Maine. This Northern Pass project as proposed is totally surplus destruction of our precious New England environment using century old technology to erect a visual blight in the form of transmission towers cables and insulators coursing across hundreds of miles of our priceless landscapes.

Other Alternatives such as the DOE's Alternatives 3, 4A, 4B, 4C, 6A and 6B would be more acceptable to far more citizens of New Hampshire if this project is to get any approvals. Those alternatives bury all or most of the transmission line in already disturbed highway corridors. DOE has determined that the burial technology is both practical and technically feasible. So if it has to come, please make it one of the North Country burial alternatives.

I do have a suggestion on how each of those alternatives could be improved. My suggestion, if adopted, would also save Northern Pass tens of millions of dollars because it would make the route to southern New Hampshire six miles shorter.

The project's entry point into the United States is in East Hereford, Quebec. It is immediately north of the Beecher Falls section of Canaan, Vermont. The present route for Alternatives 3, 4A, 4B, 4C, 6A and 6B has the transmission corridor running two miles east through Pittsburg high above the Connecticut River and just 200 yards north of the Vermont border. When it leaves Pittsburg, it is actually further north than when it entered from Canada. Then the alternative routes have to snake back through Clarksville along Route 3 to Stewartstown for 4 miles running west. My suggestion is to have that six miles eliminated altogether; and the Towns of Pittsburg and Clarksville can be spared any intrusion.

0756-1 cont'd

0756-1 Continued

In East Hereford, Quebec, have the route go south along existing roadway from East Hereford through Beecher Falls and then under the Connecticut River. From the Canadian Border, under the River and onto Route 3 in Stewartstown is exactly 0.3 miles. Seriously, 0.3 miles of digging will eliminate a six miles of digging.

Why hasn't that very sensible alternative been explored by Northern Pass and the DOE's environmental impact statement contractors? This alternative would save money, save environmental damage, save wildlife habitat, and save two North Country towns any intrusion whatsoever. It would eliminate 6 miles from the proposed Alternative routes. I therefore ask the DOE to please add this variation as an alternative to its final Environmental Impact Statement. I also ask the Northern Pass team this question: What are you thinking and why are you so afraid of Vermont? Vermont has no problem with your competitors' underground proposals. Thank you.

I am State Senator Andrew Hosmer and I represent from District 7 which is eight towns and two cities. One of those cities being the city of Franklin which is where the converter station is proposed to be built.

Franklin is a city that has struggled over the past few decades with the closure of mills and the depreciation of its tax base. It's also a place that's beautiful. Its citizens are proud and hard working, and I know that the ones that I speak with are hopeful that the future will hold economic opportunity for them as well as for future generations.

The Northern Pass project will be transformational for the City of Franklin. The project will provide a \$400 million investment in the city's tax base, approximately \$6 million a year in new tax revenues and more than 500 jobs during construction. Grateway to a future reso

The benefits to the city will be both short-term and long-term, and the resident of the city are eager to see this project move forward.

- I have followed this project for several years. No one will dispute that fact that Northern Pass got off to a bad start and was poorly designed However, the project has continued to reach out to communities, has listened to concerns and has made changes that address many of the concerns raised. Because of this the project deserves your support.
- I recognize that these types of project have impacts and many residents have legitimate concerns. The Site Evaluation Committee can play a positive role in helping address those concerns and encouraging Northern Pass and abutting landowners to continue to discuss opportunities to reduce the impact of the project.
- In conclusion, New Hampshire must pursue long-term energy strategies that balances the interests of its citizens, lowers the cost of energy and helps create a vibrant economy. This project allows citizens of Franklin to look into the future and know that the city they love has a future filled with opportunity. Thank you.

0757-1 Thank you for your comment. 0757

Dixville Motch / Horroy Swell becation

We identify ourselves as the Dixuille Motely Harvey Swell neighborhood 143 signaturies com see the Balsams Resort at Dixule Noteh do their South and the groposal Northern Pass groupet of towers along the hills to their north Oit least 10 of the 43 are abotters, some within the width of Heath Read and some was have conserments traversing the 120 wide dead zone under the proposed HVDK Line. Withon hours after me requested the Site Evaluation Committee to accept our Petition do Intervolve Languers from Horothern Ress potetronell the SEC to reject or deminish our regrest based on their Lawerly arguements Some of us spoke with governor Maggie Hassam in Errol a while back where we asked the following questions " Since money is power won birel wealth of Hydre Queba and Ever source is greater than the wealth of the state of How Hompshire to this project even, of they wanted to 0758-1 Thank you for your comment.

Governor Hassam ams wered that she had a great deal of confidence in the site Evaluation Committee and their recommendation. Now, I like Maggie Hassan because she always makes one feel like she cares but she is a politician so I have to balance what I feel against what I samk and what I think is that Morthern lass Lawyers are sharks in on ocean in which we are swimming and we look to the 5, to Evaluation Committee for protection By now every body Knows or should know that the north country is warking towards becoming Vacation & hospitality industry area. We welcome atoms like the Balsoms Resort Renewal project and recoil with onger and disgust at environmentally un Brendly projects 1.16e Northern Pass. Northern Pass doo expensive, " 5 million dollars a mile they say and going onwhite 'on line I also did the following I googlas the realestate value of

0758-1 Continued

land around Sunday River Resport comporable to land taround the Balsons which is the Horrey Swell/ Dixuile Hotch | Holden Hill neighbor hood If you do the same you will see that # 40 # 50000 facre is common. If you take a small percentage of land owned by Northern Pass along Holden Hill & Vaul HI which is where the Neath Rel traverses and instead a) don't bring the land with dowers your pay to bury the line under Houth Rel, the voilve of the land far exceeds the cost of burying the line. So the deal is this: Morthern Pass says yes we will traish your land but we will give you money to let us trash your land. What I amd my neighbors say is spend your money on burying the line, even your own land will be waster more than you spend on burying the line, let people live on land that otherwise would he dead zones; let the towns get their money from property hours, let families live where towers. would have been tet children attend

0758-1 Continued local schools. Formilies contribute to the culture of our communities and are the fiture of the north country not transmission lines. The energy of the Inture will not be coming from companies like Hydro Queba who submerged on entire culture + history of a people under an ocean of water in Northern Oveles and now have the fall to postray themselves as an environmentally Friendly compan The HUDC line should be busied the ontine longth of the project. Our out of respect for our state of New Hampshine soy that is the cost of doing business in Hew Hompshine Elizabeth Warren has written of Magsie Hassan" she stomds up for warking people, not the powerful special interests." So 1 overnor Hassam whom I do like, The SEC + DOF are here getting a town of our neighborhoos by a Horthurn Pass tour guide " This is the place and this is the time to stand with us.

0758-1 Continued I have been connected to The Balsams property for the majority of my life and have worked at the resort for 27 years. During this time I have worked for different owners and several management companies, each of whom brought varying degrees of change, both to the resort's operation as well as it's staff and guests. The biggest change and the one with the most impact, still to this day was the decision in the fall of 2011 by our then owner, Tillotson Corporation to close the resort.

Now I'd like to speak about opportunity. Specifically the opportunities that I've witnessed as countless students, from all the surrounding communities have experienced working at the resort during their high school and often college years. For decades our local youth had the privilege to have a wide range of employment options allowing them to acquire skill sets, work along side others from different parts of the world and recreate at the resort throughout the seasons. This unique opportunity was in their Backyard and for many had an enormous positive impact on their lives. On more than one occasion I have received a copy of a college paper written by a past employee of the resort on their experience and the importance of that experience during that time in their life.

0759

0759-1 Thank you for your comment.

We are now coming to the end of our 5th winter season and The Balsams remains closed. To my point, that represents 5 graduating classes or half a decade of local kids who did not get to experience those types of opportunities. This is a real concern of mine, as I have a 13 year-old daughter who wonders what her future will look like over the next 8-9 years.

We are very close to realizing the tremendous opportunities that the rebirth of The Balsams Resort will bring, area wide. The opportunity to share in the Forward NH funds to allow, especially our local youth, the chance to participate in and experience the many attributes and skills that will come with such employment options is a future that I would look forward to.

There is a quote that used to hang in most offices at the resort. It came about from talking to employees about their feelings working at The Balsams. It read,

"The Balsams is your highest priority - By serving its interests first and for the long term, you, and its guests, staff and community will all benefit the most."

0759-1 Continued

0760-1 I shood outside apat our historic fown hall tversource e le co youre am woin. BLOSON 6 rone we lose wetler the project is ne point this she must dome of the must dome out At some a converter power Thes and doubles planned minimal Mor her n 1 mpact 2/000 Bordet

0760-1

Thank you for your comment. Chapter 4 of the EIS describes potential impacts to wetlands and other water resources from the Project. Appendix H of the EIS describes Applicant-Proposed Impact Avoidance and Minimization Measures that would minimize or avoid wetland impacts. Site-specific decisions regarding placement of project components are beyond the scope of this analysis and would be considered in the process overseen by the New Hampshire Site Evaluation Committee.

0760-1 cont'd

There are practices avaliable that will minimize the comage but Muse will cost them money and cut indo their profits. They have not included any wetlands that are jost sutside their right of way even though common sence says they will be greatly impacted. IOS New England has stated This power is not needed. New Hausshire exports power but wears being asked to bear a burden that is excessively high borden for a private project that will benefit Eversource and the Providurce of chelse. Not Hew Hourshie residuds or Rote Payeus. Please do not destroy Neu Hamponie for this project

It claims the whole 192 miles of project will cause only 2.7 acres of permanent wetlands damage.

Do you believe these statements?

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0761

0761-1

0761-1

Thank you for your comment. Chapter 4 of the EIS describes potential impacts to wetlands and other water resources from the Project. Appendix H of the EIS describes Applicant-Proposed Impact Avoidance and Minimization Measures that would minimize or avoid wetland impacts. Site-specific decisions regarding placement of project components are beyond the scope of this analysis and would be considered in the process overseen by the New Hampshire Site Evaluation Committee.

Northern Pass hearing

History-When my Native ancestors were 'discovered', Turtle Island was called a paradise even though they had lived here a VERY long time.

Comparatively Short term destruction since.

Our Mother is very ill-temp rising. Panting with strong winds. Droughts in CA and floods in the southern Midwest. Radioactive waste from the Manhattan Project buried near St Louis is now spewing out of the flooded ground and poisoning farmland. (Where does your food come from?) Our Mother is trying to heal herself but we need to stop hurting her. Projects like the Tar Sands pipeline, fracking and injecting kemo-like poisons causing seizure-like earthquakes and Northern Pass and many others, are not helping her.

Like a nursing mother on crack, like when we use GMO's and poisonous insecticides; what we put into our Mother she gives back to us.

We keep getting mind bending propaganda telling us that we NEED fracking, pipelines and towers but we really don't. If as much time, money and effort was put into solar and wind power as is put into the propaganda we and our Mother and our children's future will be better off.

In history before the Europeans came if an important decision had to be made our Elders would gather and discuss the situation with the admonition 'Conduct your actions in respect for the next 7 generations'. Nowadays an overpaid board meets with the admonition 'How will this decision affect our stockholders (and our jobs and pay) 3 months from now?' Greed not love of our Mother determines everything now.

(Under 18, come forward with a globe). If you let this Northern Pass towers or buried happen you will be continuing the destruction of our Mother and killing our children by handing them a non-life sustaining Earth. The blood of their deaths will be on your hands. Don't kill our Mother!! Don't kill our future!!

0762

0762-1 Thank you for your comment.

Meni

I imagine the SEC is here tonight so that the record might show that this permitting agency has at least listened to the people of New Hampshire regarding the Northern Pass project. Has the SEC read the Master Plain's of the 31 towns/preserity under affack by No. Pass 2* Thas the SEC found anything in our Master Plans that justifies the No. Pass or do our Master Plans, created by New Hampshire citizens, contradict the economic Master Plans of Hydro-Quebec/ No. Pass/ Eversource?

N.H. RSA 674:1 states that the Master Plan will "guide the development of the municipality" and that it "shall contain a set of statements which articulate the desires of the citizens affected by the master plan, not only for their locality but for the region and the whole state....it shall contain a set of guiding principles and priorities...." The Master Plan is the resource document helping to determine whether proposals of change are consistent with the views of the townspeople. It serves as a guide for the community to use in shaping its future:

If the SEC is really trying to capture the beliefs of our citizens, read these Master Plans and then act on them for the people who created them — not for Northern Pass.

0763

0763-1

⁰⁷⁶³⁻¹ Thank you for your comment.

March 7, 2016 NH SEC Event, Colebrook NH Page 1 of 2

Cindy-Lou Amey 81 Tabor Road Pittsburg, NH 03592

Thank you for hearing the questions and comments coming to you and at you from both sides of this very divisive issue.

There is a particular concern troubling me.

While well-educated, I know that I am not an expert in the field of energy. In our state it is the office of the Site Evaluation Committee that will weigh in on the application submitted by Northern Pass, LLC. As yours is the body charged with approving or disapproving this application I wished to inform myself as to the process. Therefore, I spent considerable time on the NH Site Evaluation Committee website. There I discovered that you have guite an onerous responsibility. Under the section: Title XII, the term Public Safety and Welfare is in bold print. While reading through this material it became obvious that your committee must rely on the applicant and a host of experts to provide you with unbiased, detailed, technical information which you must sift through and analyze in order to come up with a fair and equitable response to their application. This is to be done all the while ensuring that you have kept faith with delivering on your obligation to ensure that the public is kept safe and their welfare secured. What failsafe mechanisms are in place to guard against your lack of expertise in ascertaining the truthfulness of the information presented to you? I mean no disrespect in asking that question. It is just that when entities as large as Eversource and Hydro-Quebec put together a business plan such as Northern Pass which promises shareholders an unusually robust return on their investment, how can you be certain that they haven't skewed the information provided to you in order to help you feel confident that a finding in favor of their application is a sound decision. Sound decisions can only be made from sound information. My concern is that you may not even be able to recognize whether or not you are being manipulated.

I respectfully submit that we depend upon you to sincerely fulfil the duties of the position you hold in this process. It is my hope that after all is said and done; you are able to find that this project, if it must be built in NH, is required to be buried

0764

0764-1

Thank you for your comment. DOE was solely responsible for, and did not delegate, the selection of a contractor to support the preparation of this EIS (see Section B.2.9 of the EIS). Disclosure statements are included in Appendix I of the EIS. Those statements indicate that neither the contractor selected by DOE nor any of the subcontractors have a financial or other interest in the outcome of the Project. In accordance with 40 CFR Part 1506.5(c), DOE has determined that the selected contractor and its subcontractors have no conflict of interest with respect to the preparation of this EIS.

March 7, 2016 NH SEC Event, Colebrook NH Page 2 of 2

along state right-of-ways with an equitable payment schedule to the State of NH which cannot be set aside.

0764

0764-1 cont'd

0764-1 Continued

My name is Carl Martland

DOE Visual Impact Analysis of draft EIS

- 1. I previously submitted detailed comment.
 - a. Lit review was at best of limited use and at worst misleading but even so, it did find some impact on property value
 - b. Avg visual analysis very misleading
 - c. Key observation point analysis is excellent, but results dispersed throughout Vol I, while photo simulations are in separate appendix

But today,

I am here as chair of North County Scenic Byways Council to summarize comments we have submitted concerning the adverse aesthetic impacts of NP on our byways which include all of the major state and non-interstate federal highways in Coos County.

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0765-1

0765-1

Thank you for your comment. The commenter's opinions are noted regarding the adequacy of visual impact analysis. The rationale for the viewer experience ratings is explained in Section 2.4.2.4 of the Visual Impact Assessment technical report.

The final EIS and Visual Impact Assessment Technical Report have been updated to fully incorporate an analysis of Alternative 7 - Proposed Action. The visibility analysis for Alternative 7 used the new design information, including structure locations and heights. Seven new Key Observation Point (KOP) simulations have been added and evaluated to ensure that a range of representative conditions is presented along the corridor for all alternatives. Transition stations are visible in KOP CL-1 (for Alternative 2) and BT-1 (for Alternative 7). All 73 simulations have also been updated in the final EIS to reflect all the alternatives. The two primary methods are intended to be independent and to provide different approaches. The GIS landscape assessment presents an overall view, while the Key Observation Point (KOP) simulations represent a "worst-case" view for a range of landscape conditions. As such, these two approaches are not intended to be "integrated". The final EIS and the Visual Impact Assessment Technical Report have the same organization. The KOP analysis is presented in Appendix E to the EIS and Appendices A and B of the Visual Impact Assessment Technical Report.

As an architect and renewable energy developer from way back before talk of polar ice caps melting or global climate change were even mentioned, as a former member of Congress who served on the Public Works and Infrastructure Committee and on the Science and Technology Committee, and as a member of the NH Clean Tech Council, I have always been interested in the intersection of design esthetics, power production, environmental protection and economic profitability. My work today continues to combine these four components in what I hope is a balanced and practical, yet beautiful way. Solutions is a server of the NH Clean Technology Committee, and as a member of the NH Clean Technology Committee, and as a member of the NH Clean Technology. I have always been interested in the intersection of design esthetics, power production, environmental protection and economic profitability. My work today continues to combine these four components in what I hope is a balanced and practical, yet beautiful

The Northern Pass is a challenging project to consider when these requirements are applied to it, yet I believe there is a way to balance all in harmony. This project will be a long enduring source of power for many years to come. For that reason, we should take the long view and make sure that it, over time, does nothing to diminish the esthetics of our beautiful state. That long time line also enables it to recoup its profits over time and to spread out the costs over time.

For these reasons I rise to contribute my voice to those who would like to see the line buried for the entire distance through the North Country. The economics have been proven feasible in our neighboring states of Vermont and Maine. Burying the line would leave our wilderness in a pristine condition without the imposition of horrendously ugly towers cutting across the landscape, and would minimize the environmental impact. Over time, perhaps a little longer than originally planned, revenue could be recouped and profits would not diminish to unacceptable levels.

At the same time, I believe that the developers should show a commitment to NH's ability to self generate renewable power in the North Country and provide a way to help it get to market in the southern tier of the state. I know there is talk of Northern Pass providing economic support for the upgrade of the COOS Loop, which would enable the green power produced in the North Country to make its way to the south. I encourage this commitment of support

0769

0769-1 Thank you for your comment.

to be realized, for the sake of our local economy and our commitment to our natural habitat. It is a small price to pay that will enable the great state of NH to self-generate power using its own resources. This will not only make us less reliant on energy from over our border, it will enable us to produce greater economic churn from every dollar spent on energy that is spent within our state borders, in some cases generating economic activity over six times its original value. The NH Clean Tech Council sheport, New Hampshires Clean Tech Market Report, dated February 2015 states on page 15 that "if NH could achieve the kind of relatively more efficient relationship between total energy expenditures and economic activity as Massachusetts (which is a leader in New England and the nation in cleantech), then NH citizens and businesses would have spent \$2 billion less on energy in 2012 for the same level of economic output. And where would that \$2 billion have gone? Mostly back into the state's economy in other areas, boosting producers of other goods and services and incentivizing job creation." Northern Pass can help make this happen through its support of that upgrade of the COOS Loop.

In conclusion, let me say that the beauty of our natural environment is central to our economic well being, as we share it with all who come to visit our beautiful state. We need to protect our environment and at the same time allow for utilization of our natural resources for the generation of power that creates more than light in the night, it creates employment for many more people than will be employed by Northern Pass long after it has been built. The balancing of these points will allow profits to be realized by all parties concerned, the economy will be strengthened, and the future of the state will remain bright. I encourage the burial of the Northern Pass line and the upgrade of the COOS Loop for these reasons.

Thank you.

0769-1 cont'd

0769

0769-1 Continued

SEC Docket No. 2015-06, Northern Pass Public Hearing – March 10, 2016 Concord, N.H.

Comments from Don Welch

Dear SEC, DOE and Other Officials:

Thank you for the opportunity to speak this evening. Out of respect for the many folks here who are also waiting to speak, I will keep my comments brief.

My name is Don Welch. I am a N.H. native, currently live in Bow, and am the President of Globe Manufacturing Company in Pittsfield, N.H. At Globe we build protective clothing for firefighters all across the United States – from small local volunteer departments to large city departments like Boston, Atlanta, Indianapolis, and Dallas. We employ approximately 300 terrific employees in Pittsfield and also have smaller plants in Maine and Oklahoma.

We are fortunate to have a great workforce and are able to provide good paying jobs with excellent benefits to our employees. We are by far the largest employer in the Pittsfield area – a region with a long and proud manufacturing heritage that has seen its manufacturing base crumble over the past few decades.

As a manufacturer that relies on electricity to power our equipment, one of my essential and most basic needs is for reliable, low cost power. Every single employee in our operation is connected in some way to the electric grid whether it be for the machines that cut the high tech fabrics we use, the specialized sewing machines to stitch the panels together, or the computer terminals that our customer service folks need to communicate with customers efficiently and quickly.

As we all know, our electric rates in New Hampshire are among the highest in the country. I could save nearly 50% on my electric bill if we relocated our Pittsfield operation to Oklahoma, where we already have a plant. Labor

0770

0770-1 Thank you for your comment.

rates, housing costs and medical insurance rates are also less in Oklahoma and neighboring states. As I talk with other manufacturers in the state, I hear many struggling with the same issues.

The bottom line is that we must find ways to lower electricity costs in order to keep and create manufacturing jobs here in New Hampshire. The Northern Pass project will bring reliable lower-cost energy to New Hampshire which will begin to address our region's economic competiveness.

Now I don't believe that Northern Pass alone is going to solve all of the region's needs. I support other energy development projects as well including wind, solar and more natural gas pipeline capacity, and I believe we must continue our energy conservation work. But, the Northern Pass project is a great opportunity that will provide reliable, inexpensive and clean electricity we must not let slip away.

As a New Hampshire native, I have always enjoyed outdoor activities in the White Mountains and North Country including hiking, skiing and snowmobiling. So I appreciate the concerns that some have about the visual aspects along the route. However, I think Eversource has been responsive in modifying the route and offering to bury 60 miles in the White Mountains. The proposed route is primarily along existing transmission corridors or underground in public roadways. Calls to bury more of the cable will drive up costs and the rates we all pay.

In closing, as a long term and relatively large employer in the state I want to voice my support for the project. Manufacturing companies in the region need lower-cost, reliable power. Approval of the Northern Pass project is an important step to help us achieve that goal.

Thank you.

0770

0770-1 cont'd

0770-1 Continued

NH Site Evaluation Committee/US Department of Energy

March 10, 2016 Public Hearing

Northern Pass Project

Good evening.

My name is Elizabeth LaRocca. I'm a NH native who has worked for PSNH, now Eversource, for 35 years. I work in Community Relations, but also held positions in Accounting and Regulatory Affairs.

In 1988, I traveled with other NE utility representatives and various state officials to Quebec's hydroelectric complex in James Bay. NE utilities had just negotiated 2 separate energy agreements with Hydro Quebec. Hopes were high that this power would be as economical as the power New Brunswick had been selling to the region since 1971.

The first HQ agreement, signed in 1983, involved 52 miles of new transmission line in VT, 7 miles in NH, and a converter station in Monroe, NH. The line went operational in 1986 & allowed New England to buy hydro power for 11 years.

The second HQ agreement, signed in 1985, extended the transmission line 133 miles through the center of NH into Massachusetts, expanding the line capacity from 690 MWs to 2,000. The purchase power agreement covered a 10 year period from 1990 to 2000. The line stands today in communities like Hopkinton, Dunbarton, and Bedford, which are considered very scenic and desirable places to live.

Given the undisputed success of these energy agreements, why the controversy today? What has changed?

Part of the answer lies with the deregulation of the power generation sector which began 20 years ago in New England & elsewhere in the US. Most of the power plants serving the region today are owned by merchant generators who participate in a competitive marketplace overseen by ISO-New England, but governed by the economic principles of supply & demand.

To those who doubt that Northern Pass will lower electricity prices for New Englanders, I point to the NE Power Generators Association's fierce opposition to the project. It seems that they object to their most expensive generators being displaced by lower cost hydro power, since this would lower the wholesale market clearing price paid to all market participants. Although this would also lower electric costs for consumers, the Generators appear to be steadfast in their opposition to lower profits, and united in their efforts to keep the New England energy marketplace one of the most lucrative in the US.

Thank you for your time & attention.

0771

0771-1 Thank you for your comment.

I am speaking tonight as a citizen of NH and more specifically of Concord. I do not want the Northern Pass at all but because our neighbors to the south need more electricity I am willing to support a compromise as long as it is not at the expense of destroying the beauty and tranquility of our beautiful state and its capital city. This is what will happen if the line goes above ground or thru the Right of Way. The destruction of so many trees and the humming of the lines will ruin the surrounding areas, especially in Concord which has the most new towers of any area. Seventy seven new towers are scheduled to be built in Concord destroying farmland, Turtle Pond and passing way too close to homes. For this reason it must be buried along roads and not in the Right of Way. When I heard Bill Quinlan's comment that he wasn't hearing much opposition from people in central and southern NH I contacted my neighbor, Sue Woodard, who had a stop NP sign in her yard and we started the following petition which states:

"We support burying the Northern Pass transmission lines thru the entire state but especially thru Concord where they will be in close proximity to many homes."

We have gathered one thousand, one hundred and two signatures on this petition. Please enter this in the record.

Thank you Ellen Schaffer 34 Irving Dr Concord, NH 03301 0772

0772-1 Thank you for your comment.

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MCKENNA'S PUREHASI

SY Branch Turnpike
Concord NH
We support burying the Northern Pass transmission lines thru the entire state but

especially thru Concord where they will be in close proximity to many homes.

| 11 | Name | Address | Signature |
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| 132 | 1. WALTER | n C.CALIAN TRICO | RACHI Waled Cale |
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| 10 JANET BROWN | | R., Concord NH Sport Drown |
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89 BRANCH TURNPUKE CONCURD, NH UNIT 59 20. Sheila M. GAGNON Unit 21. CONSTANCE BYAVASCHI 61 22. LEE BUNVASCAI 24. Chelsen Belga 25. Jason Belyea 70 26. EUGENG RUDOLPH 12 27. HWN - Bland SARWON ranne Tollock QT. Pollock 73 30. JOHN POLLOCK 77 31. DEBRA WALDEN Vana Wood 79 32. Nancy Wood 80 33. ADNAN 81 34. DIENA Andosca 82 35. Nyah Shepaard 8236. Dan Donnelle 26 37. LAURENT MAKTEL 38. Stephanie Beaudet havin M Boardet & LORIA KRZYNINEK 39.

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| 62. 114 Gail Lewis Vaie Lewis |
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| 20 Jane Momssey | 1834 Wellington Rd | Manchester 118 |
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| 57. Dan Lilly | 320 Harrest Ar. | Dee |
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| 79. 8. 6 | Barcelo 149 & Side Dr. Com | ord 03361-77803 |
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especially thru Concord where they will be in close proximity to many homes. Address Name Signature aura Bonk lahanto 113. Chuck Dore 71 SNOW POND Rd 114. SANDrA Wescott MISNOW PONDRD, CONCORD

We support burying the Northern Pass transmission lines thru the entire state but

| Name | Address | Signature | /= /·· |
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| 1. Covinne Wait | 435 Mtn. Rd. Con | and Amer | ne fly |
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| 1. Leheja Conrad | 78 Allison ST | - Cancard NH > | 36Cf |
| 2. PETER PROTE | y 20 GROTON | DR CONSTORD IN Su | 2-9- |
| 3. Lin Hal | 11 Dakin St | Concept T | siston |
| 4. Tina Cooper | - 38 Heights | : Rd Concert | Mass |
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| 1. | JOSEPHE. BURKE | 5 WILD FLOWER | DR. Con | cops Aufre | |
| 2. | GEORGE H. HUMPHR | EVITA 38 SHEPARD | HILLRD HO | SERNESS NA MATERIAL | lenghs |
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| | 94. Cathy. | | | |
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| Name | Address | Signature |
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| 95. David Afflick | 22 Hillcrest Le. | A) Wille |
| | 4 | les MA |
| 97. Gloria Libe | man 2 Fairriew | Dring State |
| 98. John Els | Cante burs. | Johan Endes |
| | | Corrord Charles Blosson |
| 100. Frances Rome | | |
| | | n Marchester NH |
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| 103 MARK TILGERE | ND White Pano R | 1 WINDSOR 14 |
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| 105 Elain Rounds | 146 Ports mouth St. | nA Eldine Roundy |
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| 113 Diana Lewi | na 10 Brown | HIL Rd BOW JA |
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| N | lame | Address | Signature |
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| 38. | Helen A Prescott | 149 Pombrako Rd, Co | and HAP Helena Presse |
| 39. | ROBERT PRESCOTT | 149 PEMBROKE RD, Com | al Rus Rokes D. Pro. |
| 40. | GEORGE FITTS | 2 Guay STreet, Conc | ord M |
| | | | Concord Storner a. Die |
| | | | oncord pt/ R |
| 43. | ROBERT CREVIER | 3 GUAY ST, CONC | ORD Rott Alin |
| 44. | Mary fuller | 8 6 u dy 5t (en | cood May (Isal) |
| 45. | Carine & Ban A | - Yen 10 GUAY | ST Con Card Consi art |
| 46. | Ken Allen JR | · 10 GUAY S | it Concord Via (A)// |
| 47. | PATRICIA AM | 116HT 14 BUAY | St CONCORD NATATION |
| 48. | Teri Manning | 16 Gray St | Concord, NAt Juna |
| | | 16 Guars St Com | |
| 50. | Detrie Olas | 20 Guay St. | Courtney Rainie |
| 51. | Manhous | 19 Denis Dr | Auda Sabert |
| 52. | Stat Dams | 17 DENIS DR. | Scott DAVID |
| | Jan Davio | | |
| | 1 / | , | Laura Lombaro |
| 55. | 5/2 (| 13 Cricher Lange | Edlanberdi |
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| 58. | The your !! | 5mas | TUNET LA | STEVE | EN J SPRAGU |
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| 66. | Dolla | 17 | Gary Stre | et qu | 500 |
| 67. | Dearie Thoms | 6 | Crecket | Ph., Cox | ncord |
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| 69. | Sum S. Sagre | 4 | Cricket o | In Can | read |
| 70. | Mary Lunderalle | 1 | Cricket o | In Con | rord |
| 71. | Charlotte Mordey RT | 3 | Cricket & | n Con | rord |
| 72. | | 22 | TeniRd | Conc | ord |
| 73. | SUSANNE DESROSIERS | | +1 11 | ,1 | |
| 74. | JOHN MCCARTHY Of SMYSTER | 24 | TEMI RO. | Concorp | NA |
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| 38. (| hi Dohnh | 37 South (| urtisville | Chris | Schnelder | |
| 39. | Jackie Foles | 3 25 | Portsin | nouthst | Jacky Ed | les |
| 40. | Douglas Zonush | y 249- | Portsm | outhst. | Douglas Po | nusk |
| 41. | Susan Leavit | U | Portsino | 100 | Susan ho | خين |
| 42. | Jim Weigh | e 244 | Portsn | with St. | Jan P. W | 2 |
| 43. | MARYANN SAN | sone 244 | Portsn | north st. | God / | |
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| 2. JUANITA | MARTIN 15 PARMEN | PER RD. Jaranita March |
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| 5. John Sti | ERMAN 508CENTERED | GSLEWAN 0375 2 |
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| 20. Gerald Moure | | ord W. H. Terabl Jones |
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| 22. Benut Len | nay Concord | Beros Leny |
| 23. David Scon | CONCURS | Malled |
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| 28. Shelley M | Mut 42 Pellor D | or Cincord Shellay My Mat |
| 29. DAVID W | EST 92 Robinson RE | Bow Sungle |
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| 31. L SOISK | 5 Brookwoo | do Solar |
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| 36. Dawn Sta | vros 18 Boyce Can | terbury Sawn Stars |
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| 1 | Name | Address | Signature |
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| 38. | Diana Egrunis | 93 mutten Rd We | beter NH |
| 39. | Greg Meey | 337 Stalov Rd Cart | entery NH |
| 40. | Lon' Lacusse | 403-219-0136 | 2 Concerd 1 |
| 41. | James Chappela | 37 Frant und lang | Penacook In Croff |
| 42. | John Stauwick | 2 Susque Lane Concori | |
| 43. | Amy Slattery | 30 Snow Pund 2d C | orosal Any EStath |
| 44. | JOLA FISKE | & Freich Rd Ybsfor | MA 0249-3/16 |
| 45. | BRUCE BAIRSTON | 9 THACKERAY RD | CONC 03301 Bandis |
| 46. | Harrie O'Don well | Get Hill | Kd Con word |
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| 38. Roberta Posc | 85 District 5 RDC | mored Repraca Moss | |
| 39 Brotest D | Angely 59 Cem | eting St. Budget Detrock | |
| 40. | Angle 59 Cen | t st | |
| 41. HVOH WAY | we 60 Come | Just Hyll Wille | |
| 42. Patrick O' | Somell 20700le | HierRe! Patine O'Damel | |
| 43. Kelly Cron | n 185 oak Hi | 11Rd Kamin | |
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| 45. PAtti Cror | 11n 185 Oak | till Rd Patricia Cronin | |
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YWK#1

We support burying the Northern Pass transmission lines thru the entire state but especially thru Concord where they will be in close proximity to many homes.

Name Signature Address 12 BROOKEN OWD DE. CONCORD Concord NH Gilbert Concord ionland

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| Name | Address | Signature |
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| 20. Bettyan | Beatty 8 BROOKWOOD | Drive Better Beater |
| 21. J. Selle | 9 Brookwood | Dr John Getter |
| 22. Gail Ge | Hens 9 Brookn | ood Dr Jace Selter |
| 23. Kevin I' | Landy 18 BROOKWOOD | OF KILL |
| 24. Steve Ma | wagner 97 Brookwoo | Dr SVA |
| 25. ASADK | ANGARLOW AIFOX | |
| 26. Marlyn (| | Kun Concord |
| al Nex 27. Karen M | Houling FOXR | un Concord, MHD330 |
| 28. Jim Gree | en 2 Fox R | nun Concord, MI 135101 |
| 29. Toro Grace | | a rilyal of I! |
| 30. Flexunder | Hicks 3 Brooks | wood Dr. Consold NH 03301 |
| 31. ERCJONY | BOOTH S HISH | ST Bosephen |
| 32. Amylihite | 181 Laudon Rd * | |
| 33. A. Sulta | Coguno 45 Jackson | 11 |
| 34. Alarold | 4 Mary Beldull | 033 |
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| 52. | ther Calley | 69 NE VILL | ne rost/litt | nor Calley |
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| 76, Sagura | Fortin 52 Concord St. | Laura fort |
| 17 X 85E | R-ANICHAD 55 | Fare F. Course |
| 78. Jeff | Kable 39 Thirdike | S Concord |
| 79. | # K Michelle Speace | 14 Brodlword Dr. M. |
| 80. Brett | Spew 14 Brodusod & | + Covered ANT 03303 |
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| Name | Address | Signature |
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| 1. Ed Meyer | 3 Town Pound Rd, A | lexandría Del J.M |
| 2. Jake Re | 12 Penved de, Care | |
| 3. Cenanne Sa | nders 56 Kimpall | Brod Rd Canterbury, Cerramica |
| 4. Christopher Chi | rgwin 44A Croteau Cour | Marchaste, NTH Colodolog- |
| 5. Felicea Chirgwi | | Mandester NH Jelian Chigin |
| 6. Wille Wilt | - 49 A croteau | Court Mandrester, NH mulliwith |
| 7. Lawren Much | er pobox 422 Be | IMM NH STEP |
| 8. Jordan Richardson | 24 Bogg Rd | Apt 31 Concod NAt Junt |
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| Name | Address | Signature |
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| 1. DEBRA FORTIER | 14 Hampshire B, Concord NH | Debra Fortier |
| 2. Nancy Siff | 2 king st. Concard, NH | 03701 Nasy Sije |
| 3. Lind B. Fr | 7 OckHill | Rd Juip. Fry |
| 4. JOAnne qu' | | Drive concord Avance Hgutt |
| 5. Sur Hardt | 11A Gladstone S | 3t Concord Su Handt |
| 6. Leigh Walls | 6 Winthrop | St. Concord Leigh Wall |
| 7. Roy Tettengil | 1 99 Appleton | St Concord Ray Tellengel |
| 8. 1-Ano Jky | 98 Applear | St Compro NH ly |
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| Int | Name | Address | Signature |
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| 1. | Kin Berton | 93 Pembroke Rc1 | Kin S. Benta |
| 2. | . Carla Cochran | 73 North State ST. | Carla anchean |
| 3. | Many Brayle | 225 Mountain Rd | MEG |
| 4. | Mullion Puber | - 53 Heather lane | Hulla Puche |
| 5. | Low Dewcomer | 838 lackwater | Loui Dewcom |
| 6. | Lon Goodsell | 20 Prospect NH | Low Loodsel |
| 7. | . midge modge | 47 Skyline | Sound |
| 8. | Joan Osin | 20 Fishewille Rel | Jo-Ann Dixn |
| 9. | KATHRYN BARGER | 3 Wildflower Di Renacion | Kathy & Borga |
| 1 | o. Anita Gerrio | 20 Cricicet Ln | Inte Janie |
| 1 | 1. Sandra Cote | 10 Putney Ave | Sandy Cot |
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| | Name | Address | Signature |
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| | 20. PALLA W. JEW | Ell-54MOUNTAIDED.C | ConcoRD- (alow, felle) |
| | 21. William R Jan | IRL 54 MOUNTAIN Rd | CONCORD Hilling Kees |
| | 22. On Seade | - 36 Buckinghan La | are Dan Jean |
| | 23. Kay Garrigan | 2 Beaver Meadow St. | , Concord NH Tay Gami |
| (| 24. Myran Warine | L 234 Western AVE. | HENNIGH MH 03242 |
| | 25. Egg Wha | leo Gostview Dr. | Manuaster NH 03100 |
| | 26. Suly Blay | 2516uHRd | Northwood AH0326 |
| | 27. Babbara Linde. | r 11 Kearsarge St. | Concord NH 03301 |
| | 28. JAMIE WELCH | 795 LAWRENCE RD | POWNAL, ME 04069 |
| | 29. Kelly Welch | 795 Lawrence Rd | Pownal Me 04069 |
| | 30. Devan Uctado | en 435 mountiand c | Concord NH C13301 DM |
| | 31. Cortrey Demets | grex drive concord | of NH 03303 Contray Bene |
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| 20. M. Colburn | | scland, VH 03217 | M. Colburn |
| 21. I WEST | 268 E.SIPE DR | 141.03301 | Harest |
| 22. DAN KIPPHY | 43 BAK HILL RD | aneuro 1 | & Sepphent |
| 23. June 1 | Zensten 90 ElmSt N | orthfield. | usa A. Szanto |
| 24. Manay | Hade P.O. Bux 200 (| Contuly NH | Mducy Hadee |
| 25. Janey | Jarchille 47 S. Villag | Rd Lordon | Manuality |
| 26. Lexy Re | 866 Plause | wa Hill Rd. Pen | Gody Regator |
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| 76. MISTY (| oriffin 163 Portsmon | oth St. Maffer |
| 77. Julie | Buteau 16 Roger | are Gulutarla |
| 78. Krista | Lewis 1384ford Rd | Justo Jus |
| 79. JWAG | oper Portsmenth | St Jaguer |
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| 82. Dellia | Mangthen " | " |
| 83. Juli | e Kirker 87 Coffe | etoson Rd Deorfeeld |
| 84. Olient | tarrilgin 283 Soi | ITH RD DEERGELD |
| 85. June | Richards 15 IRON | HORSE DRIVE E-209 Bedford |
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| 87. Nanin | A Reese ZGONORTH R | d Recafield NH Nanyla Ree. |
| 88. Suse | in Sokul 84Br | anch Turnpiko conco, |
| 89. Day (1) | C4 Bran | A Tumpites Concrol / WH |
| 90. Halley No | 21 Farmion | I Rd Concord 10H |
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| especially thru Concord where they will be in close proximity to many homes. |
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| Name Address Signature |
| 38. Agnes Jones 6/ Colby Rd Gres Jones |
| 39. Carolyn Puffer 6 Watson Rd-Dycham Causentlygge |
| 40. Gro Danson Edon NH |
| Min Chi Page 66 Catamount Re Pillstide |
| 42. Matt McGrigem 18 Gray Ave 18 Matter |
| 43. Mellisa K. Bruce 191 New Rye Ad- Esson WH Mollis K. Spuce |
| 44. Todd C. DuBois 58 NE VIllage Rd. Concord, NA 03701 |
| 45. Sandra P Jones 2182 Ocean Blue Ryo NH Concord NH03301 CO 2876 |
| 46. Judy Boucher-Leidner 155 Liberty St Jedg. Borden fees |
| 47. Caura C Sparkly Co Cherry St. Hour Spaley |
| 48. Claira P. Taylor 341 Primbooks St. Rambrolk, NH 03275 Clein Por |
| 49. Estha GAUSIA 8 R. M. ALVER d Co rand It Edle Co |
| 50. Judith McPhail a4 Prinrose Lane Penacook |
| 51. heanne Jacques 191 Swamp Rd Epsom, NH 03234 |
| 52. Michelle Revservacry 38 Spry St Epson, NH OSD34 |
| 53. Holly and 9 Enevald Dr Apt b Bornington, NH 03 |
| 54. Haze Jone Fal Jos Beautilled Ch : 305 tailit |
| 55. mas Just 523 N. PEM BROKE NA NA |
| 56. Mary Law Deak 271 Turkey Hill Rd Blomsbury 77.9 |
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We support burying the Northern Pass transmission lines thru the entire state but

| Name | Address Signature |
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| 38. Payr | ce Contine-White Pom Dork Patrice Letie That |
| 39. BRYK | IN GUTURE-WHITE " Buyan Gatur-Whit |
| 40. Carl | a Houck 10 Jay Dive, Concord N. + Carlom Houck |
| 41. Char | |
| 42. | , hote 31 Shaunitst Concord, NH La Mate |
| 43. R | Jumie 31 Stransment St " |
| 44. Jour | & Fallon 5 BLISS RD DEFINELD, NH |
| 45. We / | lai Salon 5 Bliss Rd Derifield, NH |
| 46. Debr | a Brown 131 Oakdale Ave Monelyster |
| 47. Lynn (| C. Healy 45 thompson St Concord, NH |
| 48/ABRY | |
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| 2. ALAN | D.DEAK | Frequent Visitor | agan Dogs |
| 3. Harm | , Weiser | Canter bury | Harry Weign |
| 4. BILL | O'BRIKN | STYLES DR. | W. A. O'Bri |
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| 6. Rober | + Cland | re Tilton | That day |
| 7. Kerth | Matoll | Comares | (Shy Natoll |
| 8. May | withhor | elle Concord | Marybeth Morrill |
| 9. Julie | Sturgis | Boraugh Rd | fuli de |
| 10. MAR | Y BOSICHE | TR CONCORD | Mary Boucher |
| 11. W | of Hour | now Penacook | /, / |
| 12. ROSS N | nakdn | Belmoht | 11000 |
| 13. Dan | un Or 1 | ON BONCORI) | Aur AFOX |
| 14. Ryw | Sahr | 5 Hayward Brock DR Concord | and l |
| 15. | athles A | Galleghy Concr | a Bell |
| 16. MER. | D. Wilson | Concord | May S. Wilson |
| 17. | - CENTERN | | |
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| 19. | 1990 | A. S | |

| Name | Address | Signature |
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| 1. Canyn Thomson | 19 Freedom Au | B. Dr. CONCORNH Carly Thoms |
| 2. Day Thon | son 15 Freedon Ac | chi) Dr Concard NH 22 |
| 3. Genret | | Dr Comunit NH 033VI |
| 4. Hacey letter | | d Delpula NH 0037 |
| 5. PETER ANNON | | |
| oftoniala | as 49 Sunso | CCOM GREATRON 63874 |
| 8. Short Thon | | ue Kerminele |
| 9. DM | 2 13 MARI | AARE CONTON NH DANAAPA |
| 10. Hillary V Ste | Rba 502 W. Ruse | ex Rd Hooksett NH Jellay Jok |
| 11. Kenneth A Sterba | 562 W. RIVER RO | d Hooksett NH Kunght. Starten |
| 12. Natalia Eu | p 1 Dunklee | & St. Conword, B3d. |
| 13. Jen Nevar | ung 10 Fox cri | 085 Concord 0330 Jac |
| 14. Scott Devan | my 10 Fexor | Vors Corra 03301 DZ |
| | FFin 163 (| |
| 16. TOM Wrigh | ht 14 Logging | HILL RD BOW MEMONING |
| 17. Daniel Bro | isserel 233 South | St Concret Bar Confe |
| 18. Peter S | ands 253 Ple | osam+ 03301 / 3 |
| 19. Craig Hi | 11 Hall = | St 0=301 Gitig Hill |
| | | |

| Name | Address | Signature |
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| 2 38. Steven I Sue Parlik | 21 Winthrap St | Super to the |
| 39. Enerson Brack | 76 school St | Engager Brig |
| 40. Joel Pasturak | 15 styles Dr. | dutati |
| 41. Dave Borner | 683 Rellins 16 | DAN. |
| 42. Haroft Latis | 4 Woodland Cir | From H. Jawed Just |
| 43. Marghal Clumic | 325 Pleasant St | derullunie |
| 44. Lourst Bis | 5 791 Cherry V | alley R Kethelsen NH |
| 45. Sharon Sil | Un 277 gast 5 | 1 de la como |
| 46. Richt Sugar T | Cirel Da Hayshie | Dr. Mall He |
| 47. Bill Crawford | 7 Groton Dr | - Canada H WingConvard |
| 48. Lisa Cole | 14 Layton by | Cartegray Live Cot |
| 49. Jim Fry | 7 DAR HILL | Rd Cowend ONA 1330, |
| | n 169 Portsmouth | |
| 51. Lucy Gold thu | out 222 Cutamou | nt Rd Pithsfuld MH ducien skitching |
| 52. Karl Share B | ox 385 Coursel NH | -03302 YUL |
| 53. Maggie Ander | sen 259 E, S.Z. | e Dr Concord, M. Gradusa |
| 54. Tiyle norg | 153 Tina Or | We Pembroke, NH |
| 55. Amy Maclean | 120 Fisherville | ed Concord, NH Cy Mark |
| 56. Lucinda Paige | | 10000 |
| Total = 20 | | 59 |

| N | lame | Address | Signature |
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| 57. | Bill Pows 11 | Marign Dr | Conserved 13 land |
| 58. | PAUL LIZZARD | LOUDON RD | Par Almo |
| 59. | Laura Anderson | Susan Lane | Julia Chilom |
| 60. | Llerchish Exigen | Cypra Or | Y DUNDY DIA |
| 61. | BKIL | - caringle | The Delle |
| 62. | " Tank | arker Da | Skille Man |
| 63. | Say and | B STreet | GARY HNDRE |
| 64. | JoHn Woods | Belmont | John Woods |
| 65. | Dianne Harligh | EAST CONGRD | Dear M. Harhy |
| 66. | Des Brown | n Manchesta N | 4 Vos Sur |
| 67. | Julie Eader | Canter bory, IVH | Min Eade |
| 68. | Deriche Davis | Euson NH | Deik als |
| 69. | Coutlin Davis | Epson NH | Parfle |
| 70. | MATT Keyser | T. 1100 N.H | Meite |
| 71. | Carol Housen | 46 Snow Ford, Cones | rdNH Carefferson |
| 72. | Aimee Zorges | Lorden, NH | 43 |
| 73. | BETS I BLAYC | - CONCORD NH | RtoyPol |
| 74. | Hilary Thomson | concord NH | HelgyThomoch |
| 75. | Spi Borl | Concord My | Kim Pooles |

RC

| Name |
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| 1. Faith Y |
| 2. CHRIS |
| 3. Ocami a |
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| 21. David Shap | all 16-2 Cal | ernet Dr. David Shappel |
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| 27. ROBERT PURIEN | 7-1 CARRAGET J. | |
| 28. Philip Stohel | 73 South | St- |
| 29 Carole Jokey | | level Heights Concord My |
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| 31. Patrice Meier | 5 Cabernet De, #1, | CONCORD. NH VA |
| 32. HAURICE MUND WILLE | | 4, COKGED, NH. M. M. Mendishe |
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| 37. MUIARE BEOCH | | KN.H. 0330) WWW & MW. |
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| 40. MARICEL | VASQUEZ 2-7 CADERNET OR, CONCOR | 1003 Juny |
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| 45. NIEA G | ANDHI-SCHWATLE 93 Math Rd, | Harcock, Tulegardi School |
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| 1. Judy Frenette | 223 Rabbit Rd. Sali | sbury Judy Funt |
| 2. Kathy Lee | 27. TSabala Dr. L | andondery Lach Le |
| 3. CYNTHA PROULX | 16 FAIRFIELD DR. CONCARD, N | 4 (godhu Frank) |
| 4. Melanie Annk | em 6 Dartmouth St. Conco | Ed, NY Melaniliterse |
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| 11. Angela K | My 17 Clarke Strong | cord NH Auch Mills |
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| I. JEAN WILLOX | CONCORD NIT | ean (Willion |
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| 38. | PAUL R | CAMACTOCOLORD NHOS | 301 Paul R Cowarles |
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| 40. | L. D'Ami | :co Northfield, MY | In ED C |
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| 43. | Victoria Hut | churson Concord NH Vic | ctoria Hutchinson |
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| 52. | Mary K | Blaisdelf 38 Mountain | Rd Concord, NH. |
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