NEPGA
NEW ENGLAND POWER
GENERATORS ASSOCIATION, INC.

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May 6, 2016

Via Electronic Mail and Hand-Delivery

Ms. Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 Fruit Street, Suite 10
Concord, NH 03301

Re: 2015-06— Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

Dear Ms. Monroe:

In accordance with the Order and Notice issued on December 22, 2015 in the above-captioned docket, please find attached a Motion to Extend Time fin which to Propound or Discovery Requests on behalf of the New England Power Generators Association, Inc.

Please contact me if you have any questions in this regard. Thank you for your assistance.

Very truly yours,

Carol J. Holahan

cc: Service List 2015-06 (electronic mail only)

STATE OF NEW HAMPSHIRE

BEFORE THE

SITE EVALUATION COMMITTEE

Docket No. 2015-06

Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

Motion by New England Power Generator Association, Inc. to
Extend Time in which to Propound Data Requests

NOW COMES The New England Power Generator's Association (NEPGA) and respectfully requests the Chair of the Subcommittee extend NEPGA's May 20, 2016 deadline to propound data requests. In support of this motion, NEPGA states as follows:

1. The Order and Temporary Procedural Schedule dated April 22, 2016 ("Order") granted NEPGA limited intervention status in this proceeding. Specifically, NEPGA is permitted to pursue matters related to the effects of that this project will have on the wholesale electricity markets as well as a purchase power agreement that will purportedly be structured to benefit New Hampshire ratepayers.

2. The Order also established a deadline of May 20, 2016 by which NEPGA must propound data requests upon the Joint Applicants.

3. NEPGA is unable to develop its data requests by the May 20th deadline because of the following issues, all of which involve information not yet known or

known, but not publically available.

4. First the joint applicants have requested a waiver of certain regulatory requirements and confidential treatment of certain allegedly commercially-sensitive information. *See* Joint Applicants' Unassented-to Motion for Protective Order and Confidential Treatment and Appearance filed October 19, 2015; Joint Applicants' Request for Partial Waivers Under the Newly Adopted SEC Rules filed February 26, 2016; and Joint Applicants' letter enclosing Appendix 43, Cost - Benefit and Local Economic Impact Analysis and Direct testimony of J. Frayer filed March 28, 2016.

5. Second, given the extensive redaction in the Joint Applicants' filing documents, in particular, its economic analysis, NEPGA is severely handicapped in formulating meaningful data requests without the opportunity to review an unredacted version of the report. It is patently unfair to ask NEPGA to proceed with propounding discovery critical to the development of its case when the vast majority of the relevant information remains hidden behind a veil of secrecy. This is especially true where, as here, the SEC has limited intervenors' discovery requests to 50.

6. Third, as difficult as it may be for NEPGA to formulate meaningful data requests in light of the heavily redacted filings, it is impossible to develop such data requests regarding a purchase power agreement whose terms have yet to be announced. Since the precise terms of any such agreement will, undoubtedly, inform NEPGA's inquiry, it is unreasonable to expect NEPGA to proceed before

those terms have been disclosed.

7. Finally, in light of the Joint Applicants' admission that they have submitted a response to the Clean Energy Request for Proposals (RFP), NEPGA will certainly pursue a line of inquiry on this basis to explore the economic impacts this will have on the wholesale market. The results of the RFP will not, however, be announced until later this summer, with any resulting contracts filed for regulatory approval in the fall, both events occurring well after the currently-imposed May 20, 2016 discovery deadline. Accordingly, NEPGA cannot reasonably be expected to develop its data requests until the results of the Clean Energy RPF are announced and contracts filed for approval.

WHEREFORE, NEPGA respectfully requests that the Subcommittee:
Extend the deadline for NEPGA to propound data requests to a date after the latest to occur of all of the following events:

a. The Subcommittee or Chair grants in full the Joint Applicants' waiver request, or the Joint Applicants provide the information required as a result of the Subcommittee or Chair denying or only partially granting the request;
b. The Subcommittee or Chair grants in full the Joint Applicants' request for Protective Order and Confidential Treatment, or the Joint Applicants provide the information required as a result of the Subcommittee or Chair denying or only partially granting the request;
c. The Joint Applicants release the terms of its purchase power

agreement;

d. The results of the Clean Energy RFP are released and contracts are filed with the appropriate regulatory body for approval; and

e. Grant such further relief as it deems appropriate.

Dated: 5/6/16

Respectfully submitted,

New England Power Generators Association, Inc.

By its Attorney,

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Certificate of Service

I hereby certify that a copy of the foregoing Motion has on this 6th day of May 2016 been sent by email to the service list in 2015-06.

By: Carol J. Holahan