

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 15-459

NORTHERN PASS TRANSMISSION LLC

NPT LLC Petition to Commence Business as a Public Utility

Motion for Reconsideration

Petitioner Terry Cronin respectfully moves that the Commission reconsider its denial of his petition to intervene in the captioned docket for the reason that his rights as a residential ratepayer have been substantially impaired by the limitations imposed by this denial.

Statement of Position

1. Notwithstanding the petitioner's lack of familiarity with the PUC website and mistake in e-mailing to the December 11, 2015 service list in this docket, Mr. Getz's and Ms. Amidon's objection to Petitioner Cronin's petition for intervention for failing to cite "any right, duty, privilege or other substantial interest that's affected by this this proceeding" is a misreading of the petition. This petitioner cites a specific and substantial interest—the public interest—in this proceeding. The petitioner asked "But how can NPT LLC meet the ethical standard of fitness in fulfilling the public interest as a public utility constructing and operating '... one of the largest [transmission] infrastructure projects in state history,¹' with its parent company, Eversource Energy, under FERC investigation over its compliance with provisions of transmission law?"

Furthermore, this investigation wasn't ordered until weeks after the pre-hearing conference for this docket and petitions to intervene were closed.

The petitioner also makes clear that "Without the Office of Consumer Advocate as party to this settlement agreement, much less without the OCA having taken part in negotiating the deal, this proposed agreement will abrogate my rights, duties, privileges, immunities and other substantial interests in NPT, LLC's commencing business as a public utility." With the OCA excluded from this settlement NPT, LLC's and the staff of the commission's interests are assumed while the collective interests of all residential ratepayers, including this petitioner's, are denied. Moreover, at the prehearing conference the former Consumer Advocate, Susan Chamberlin, told the Commission that "The Consumer Advocate is looking forward to engaging in discovery and participating in the proceeding." But between the end of Ms. Chamberlin's term and the

¹ Eversource names suppliers for Northern Pass project, Union Leader (April 22, 2016) quoting Bill Quinlan, President of Eversource Operations in New Hampshire available at <http://www.unionleader.com/apps/pbcs.dll/article?avis=UL&date=20160422&category=NEWS05&lopenr=160429764&Ref=AR&template=printart>

appointment of the latest Consumer Advocate, Donald Kreis, there has been no OCA discovery or negotiations in this docket. Without OCA representation this petitioner's rights, duties, privileges, immunities and other substantial interests, as well as those of all residential ratepayers have been nullified in this case.

2. The Settlement agreement between NPT LLC and the staff of the Commission provides the basis to charge ratepayers for construction of the Northern Pass Transmission project. Mr. Getz and Ms. Amidon objected to the Cronin petition for intervention for where he lives —Mr. Getz: “Hopkinton is not one of the towns in which Northern Pass Transmission, LLC, seeks to commence business as a public utility.” But where petitioner Cronin lives has nothing to do with the impact of the project's costs on him as a ratepayer. Remember too that NPT LLC promised the project “at no cost to New Hampshire customers” and that it was presented to FERC as a “participant-funded, cost-based transmission project.”

3. Ms. Amidon also objected to the Cronin petition for intervention for its late filing because “he could have filed this two months ago, had he really wanted to avoid interfering with the orderly conduct of this proceeding.”

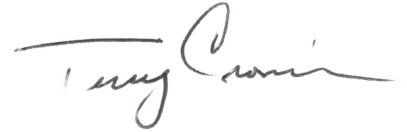
With all due respect, as an ordinary ratepayer petitioner Cronin does not have reason to surveil the PUC dockets regarding his individual interests because unlike everyone else on this docket's service list he is not paid for the work he does here.

This petitioner did not file two months ago over the OCA's not being a principle to this agreement for the same reason he did not file late in January and object to NPT's fitness as a public utility. He did not know about DE 15-459 then, but learned only recently and acted as soon as he could. His petition to intervene is not a conspiracy to interfere with the orderly conduct of this proceeding. Further, Mr. Franz gave testimony at the July 20, 2016 hearing in this docket that this settlement is conditioned on all other necessary permits and approvals before going into effect.

Moreover, when aware of an opportunity to act, as early as March 1, 2016 petitioner Cronin did raise the issue of transmission rates in email to Peter Roth, the Counsel for the Public, in SEC docket 2015-06 asking “shouldn't the SEC wait to consider this project until after FERC looks into the matter of transmission rates in New England given the nature of their investigation and its bearing on this project?” When after almost six weeks Mr. Roth didn't respond to this letter, Mr. Cronin wrote another to the Counsel for the Public on April 11, 2016. Both letters, one attachment to the second letter and Mr. Roth's response to the second letter are enclosed.

Wherefore, petitioner Cronin requests that the Commission vacate its denial of his petition and allow that he be permitted to proceed as a full intervenor in docket DE 15-459.

Respectfully submitted on August 3, 2016,


A handwritten signature in black ink, appearing to read "Terry Cronin". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

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Certificate of Service

This motion was filed and served in accordance with Puc 203.11

A handwritten signature in black ink, appearing to read "Terry Cronin". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Terry Cronin