



April 29, 2014

*Via Email*

SEC Aesthetics Criteria Working Group  
David Publicover, Appalachian Mountain Club  
Peter Silbermann, Wild Meadows Legal Fund  
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*dpublicover@outdoors.org*

**Re: Aesthetics Criteria - SB99 SEC Pre-rulemaking Process**

Dear Messrs Publicover and Silbermann:

New England Power d/b/a National Grid (“National Grid”), offers the following comments regarding the Draft Siting Criteria for Aesthetics, dated April 24, 2014 (“April 2014 Draft Aesthetics Criteria”), that were circulated by the Aesthetics Criteria Working Group in connection with the Site Evaluation Committee (“SEC”) pre-rulemaking process initiated pursuant to Senate Bill 99 of 2013. On behalf of National Grid, I participated in the Focus Group that was held on November 7, 2013, and the Aesthetics Working Group teleconference held yesterday, April 28, 2014.

By way of background, NEP owns and operates approximately 8,600 miles of electric transmission lines and associated facilities throughout the Northeast in New Hampshire, Massachusetts, New York, Vermont and Rhode Island. As such, National Grid has extensive experience with the siting of energy facilities in those states. National Grid currently has an application pending with the SEC for a new 0.2-mile 230-kV tap line project in Littleton, New Hampshire.

In preparing these comments, I have reviewed the following documents: (1) the joint letter of several environmental organizations dated March 25, 2014, which proposed a framework for SEC rules regarding aesthetics criteria; (2) the April 2014 Draft Aesthetics Criteria, which largely adopts the environmental organizations’ framework; and (3) the comments of Attorney Barry Needleman, dated April 30, 2014. I understand that this pre-rulemaking process is a continuing effort in which additional stakeholders may still provide important comments. Thus, on behalf of National Grid, I offer the following preliminary comments for consideration.

As a general matter, National Grid supports the comments submitted by Attorney Needleman and will not repeat them here. In particular, National Grid concurs that the April 2014 Draft Aesthetics Criteria are overbroad, potentially overly burdensome for certain projects and also appear to be inappropriately aimed at controlling the outcome of the SEC’s review

rather than ensuring that the SEC takes a hard look at the issue. In this regard, it is especially troublesome that the proposed "Siting Criteria" would, under certain circumstances, eliminate the SEC's authority to exercise its discretion in assessing visual impacts and weighing those against other critical factors that it must take into consideration, especially the reliability need for the project. Any new rules should ensure that SEC retains the discretion and flexibility to deal with different types of infrastructure projects differently.

An example highlights the potential shortcomings of the approach taken in the April 2014 Draft Aesthetics Criteria. As noted above, National Grid currently has an application pending before the SEC for approval to construct a new 0.2-mile 230-kV tap line project in Littleton, New Hampshire in order to meet the reliability needs identified by ISO-NE. This project will be constructed immediately adjacent to an existing right-of-way that is already occupied by other transmission lines and in an area where the only potential views of the new lines would be by a motorist passing at high speed on Interstate 93. The level of analysis that would be required under the April 2014 Draft Aesthetics Criteria would be a largely unnecessary exercise given the limited visual impacts of such a small project that would only serve to increase the cost of the project and, by extension, the rates paid by electricity customers.

In this project, as in all of its linear transmission projects, National Grid communicates directly with abutters, elicits their input and works to implement reasonable mitigation of visual and other impacts. Requiring that type of communication and cooperation with impacted abutters is reasonable and acceptable. By contrast, the approach embodied in the April 2014 Draft Aesthetics Criteria is unwise if it would require the SEC to reject a much-needed reliability project solely on the ground that it had significant visual impacts that could not be mitigated.

Thank you for the opportunity to comment. Please do not hesitate to contact me if National Grid can provide additional information or if you have any questions.

Respectfully,



Mark R. Rielly