

March 26, 2013

Mr. Brian Mills
National Electricity Division
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Northern Pass Transmission LLC
Docket No. PP-371

Dear Mr. Mills:

Northern Pass Transmission LLC (Northern Pass) has received a copy of the Department of Energy (DOE) letter of March 21, 2013, to Ms. Elizabeth Muzzey, Director of the New Hampshire Division of Historical Resources, establishing the Area of Potential Effects (APE) for below-grade archeological resources within the southern 140 miles of the proposed Northern Pass transmission line (the Project) at approximately 200 feet, or the width of the Public Service of New Hampshire right-of-way (PSNH ROW). Northern Pass is concerned, based on some preliminary estimates, that this designation of the APE could result in a requirement to excavate by hand during the Phase 1B review as many as 35,000 test areas along the route, including in many areas that will not be impacted by the Project. Requiring excavation in potentially many thousands of areas where the Project will have no on-the-ground impact would be unnecessarily burdensome and time-consuming. More importantly, it could have the unintended result that a process that is fundamentally designed to protect resources could cause far more disruption on the ground than the impacts of the Project warrant.

On the other hand, Northern Pass recognizes that it has not yet provided to DOE a final design for the Project, nor updated information regarding structure spacing and location – information that would show the specific areas in the PSNH ROW where the Project will have either direct or indirect impacts. Thus, Northern Pass believes it is premature to request reconsideration of the APE designation. However, once Northern Pass is able to provide to DOE additional information concerning the Project design and identifies specific areas where the Project will have an effect, we may contact you to request the opportunity to discuss with you whether an alternative APE for Phase 1B work may make more sense in light of the Project design and what we expect will be a mutual desire to minimize on-the-ground impacts of studies related to the Project.

Again, Northern Pass requests no action at this time. We simply wish to flag this subject of potential future concern.

Very truly yours,

A handwritten signature in black ink that reads "Mary Anne Sullivan". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Mary Anne Sullivan

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cc: Richard Boisvert
Deputy New Hampshire SHPO and State Archeologist