

Orr&Reno

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September 24, 2020

HAND DELIVERED AND VIA EMAIL

Debra A. Howland, Executive Director & Secretary
New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301-2429

***Re: DE 18-171 - New Hampshire Transmission, LLC, Petition for Approval of Financing
Related to Seabrook Substation***

Dear Ms. Howland:

In 2018 New Hampshire Transmission, LLC ("NHT") sought and obtained the approval of the New Hampshire Public Utilities Commission ("Commission") for financing related to the Seabrook Transmission Substation in the above-captioned docket. In Order No. 26,204 ("the Order"), the Commission authorized NHT to enter into a loan agreement with NextEra Capital and to issue long-term, secured debt instruments in an aggregate principal amount not to exceed \$59 million during the two-year period beginning on January 1, 2019 ("the Authorization Period").

Through this letter NHT is advising the Commission that it will be seeking approval from the Federal Energy Regulatory Commission ("FERC") pursuant to section 204 of the Federal Power Act and Part 34 of the regulations of FERC for reauthorization of the long-term, secured debt securities in principal amount not to exceed \$59 million for the two year period beginning December 22, 2020. Other than the change in the Authorization Period, the rest of the terms of the financing have not changed from the authorization obtained from the Commission and FERC in 2018, which are described in the Petition which NHT filed with this Commission in 2018 and which the Commission described in the Order. Under FERC regulations NHT must submit an application every two years whether there is a new financing or continuing draws on an existing one.

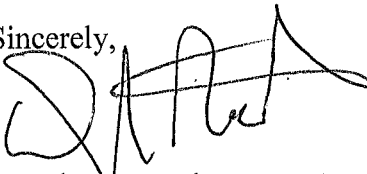
To the extent necessary, NHT is seeking the Commission's approval to extend the two year Authorization Period that was noted in the Order by another two years, until January 1, 2022. Because the rest of the terms of the financing other than the Authorization Period will not change, NHT is unsure whether it is necessary to file a formal petition with the Commission, or whether this letter is sufficient.

As the Commission noted in the Order, the rigor of an *Easton* (Appeal of Easton, 125 N.H. 205 (1984)) inquiry varies depending on the circumstances of the request. Because NHT has no retail ratepayers in New Hampshire, because this is not a new financing, and because all of the terms of the financing approved in 2018, except for the Authorization Period, remain the same, NHT submits that this inquiry is necessarily even more limited than a typical NHT financing approval review which this Commission has conducted in the past. See Order No. 24,935 in DE 08-164, 94 NH PUC 37 (2009); Order No. 25,138 in DE 10-062, 95 NH PUC 429 (2010); Order No. 25,556 issued on July 30, 2013 in DE 13-138; and Order No. 25,955 in DE 16-813, issued on October 21, 2016.

Please let me know if you have any questions and whether the Commission requires anything further from NHT.

Thank you for your attention to this matter.

Sincerely,



Douglas L. Patch

DLP/eac

cc: Office of Consumer Advocate by email

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