

GRANITE STATE HYDROPOWER ASSOCIATION, INC.

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September 3, 2015

Dear Madam Chair and Honorable Members of the Assessing Standards Board's Subcommittee on HB 547 and HB 192:

On behalf of the Granite State Hydropower Association (GSHA), I am writing in response to questions that were posed to me on August 27, 2015 by members of the ASB Subcommittee on HB 547 and HB 192. GSHA has provided both written and oral testimony to the ASB Subcommittee indicating that during the 2015 legislative session it strongly opposed HB 192 "relative to the valuation of utility property" for a number of reasons, including GSHA's belief that HB 192 would interfere with the right to due process. Consistent with the Association's testimony, GSHA respectfully requests that this Subcommittee neither recommend nor support HB 192.

GSHA has attempted to answer the Subcommittee's questions to the best of its ability in the responses below. However, it is important to understand that, as a voluntary non-profit trade association for small-scale hydropower owners / operators, GSHA is not in a position to answer the questions in the same manner as a single company because GSHA does not systematically gather in-depth data from its members nor does it have the authority to speak for any given member. GSHA can only speak for the organization as a whole.

In response to the question about the willingness to allow the DRA's file on a particular small-scale hydro facility to be entered into the record in a court case, GSHA feels that it does not have the authority to speak for any given member that may find itself in litigation. It is important to note that GSHA members are private companies with a wide variation in size and ownership structure. Members are not investor-owned public utilities or member-owned cooperative utilities which may be more likely to have their corporate information publicly available. GSHA would expect that its members would want the necessary assurances in place to guarantee the protection of a member's confidential and financially sensitive information for both privacy and competitive reasons.

In response to the question about the informational requests that GSHA members receive from municipalities, it is GSHA's understanding based on anecdotal information that its members do receive different forms depending on the municipality and that the frequency with which such forms are issued has picked up in the last few years. It is also GSHA's understanding that its members work with their host municipalities to provide the information necessary to determine fair valuations, consistent with members' overall efforts to work collaboratively with

municipalities to reach agreement on fair valuations of their small-scale utility property. Members have found this to be far more effective and efficient than costly and time-consuming litigation, especially since few GSHA members have such resources.

In response to the question about whether GSHA members have experienced tax increases that significantly exceed what non-utility property owners in the municipality have experienced, GSHA does not have sufficient information to answer this question as it does not require its members to report such adverse experiences and has not received any anecdotal information on this topic.

I hope that this additional information is helpful. Please feel free to contact me if I can be of further assistance.

Sincerely,



Heidi Kroll

Registered Lobbyist for the Granite State Hydropower Association