

July 21, 2016

VIA FEDERAL EXPRESS OVERNIGHT

Pamela G. Munroe, Administrator NH Site Evaluation Committee 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Re: Application of Public Service Company of New Hampshire D/B/A

Eversource Energy for a Certificate of Site and Facility

Docket No. 2015-04 (the "Seacoast Reliability Project Application")

Dear Ms. Munroe:

This firm represents Tom and Yael DeCapo in connection with their interests in the Seacoast Reliability Project Application. We respectfully submit the enclosed for filing in the above referenced matter. Consistent with the SEC rules, please find the original and one copy of the Motion to Intervene on behalf of the DeCapo Family.

Please feel free to contact me with any questions or concerns.

Very truly yours,

Irwin B. Schwartz

Enclosure

cc: SEC Distribution List (via e-mail)

THE STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE DOCKET NO. 2015-04

MOTION TO INTERVENE

Seacoast Reliability Project - Application of Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility for the Construction of a New 115 kV Transmission Line from Madbury Substation to Portsmouth Substation

NOW COMES movants Thomas A. DeCapo and Yael D. DeCapo (together, the "DeCapo Family"), who own 313 and 315 Durham Point Road, Durham, New Hampshire, and hold interests in another adjacent parcel (together, the "DeCapo Property"), by and through their attorneys, BLA Schwartz, PC, and submit this Motion to Intervene in the above-referenced matter, and in support thereof state as follows:

- 1. On or about April 12, 2016, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") filed an Application of Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility for the Construction of a New 115 kV Transmission Line from Madbury Substation to Portsmouth Substation (the "Seacoast Reliability Project") with the New Hampshire Site Evaluation Committee ("SEC").
 - 2. The Application was accepted on June 1, 2016.
- 3. The DeCapo Property consists of contiguous parcels having shore frontage on Little Bay, including oyster and clam beds, recreational frontage, conservation frontage, a dock, and tidal boating access, among other features.

- 4. Pursuant to RSA 541-A:32 and Site 202.11, the DeCapo Family moves to intervene in this matter as a portion of the Seacoast Reliability Project will pass through a purported easement on the DeCapo Property, will enter Little Bay adjacent to the DeCapo Property, and most importantly, the Seacoast Reliability Project will cross Little Bay adjacent to and in front of the DeCapo Property and will disturb and disrupt the Little Bay shore, sea floor and existing tidal flows and depths, likely destroying significant shoreline and oyster and clam beds, thereby having a direct impact on the DeCapo Family's shoreline, access to and enjoyment of Little Bay. Accordingly, the DeCapo Family has rights, duties, privileges, immunities or other substantial interests in this matter.
- 5. In addition, the DeCapo Family respectfully incorporates by reference the grounds set forth in the petition to intervene submitted by the Durham Point/Little Bay Abutters.
- 6. Further, the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing intervention.

WHEREFORE, the DeCapo Family respectfully requests that the Site Evaluation Committee:

A. Allow the DeCapo Family to intervene in the above-captioned matter; and

B. Grant such other relief as the Site Evaluation Committee deems just and necessary.

Dated: July 21, 2016

Respectfully submitted,

Irwin B. Schwartz BLA Schwartz, PC

One University Avenue, Suite 302B Westwood, Massachusetts 02090

Phone: 781-636-5000 Fax: 781-636-5090

Attorney for Intervenor DeCapos

CERTIFICATE OF SERVICE

I, Irwin B. Schwartz, hereby certify that an original and one copy of the foregoing Motion has this 21st day of July, 2016 been sent Federal Express to the New Hampshire Site Evaluation Committee and via electronic mail to the SEC Distribution List.

Irwin B. Schwartz