THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

SEC Docket No. 2015-05

Re: Joint Application of New England Power Company
d/b/a National Grid and Public Service Company of New Hampshire
d/b/a Eversource Energy for a Certificate of Site and Facility

ASSENTED-TO MOTION TO AMEND PROCEDURAL SCHEDULE TO EXTEND DISCOVERY DEADLINES

Counsel for the Public, by his attorneys, the Office of the Attorney General, hereby moves the Committee for entry of an order, pursuant to Site 202.14, amending the Procedural Schedule entered in this case to provide a brief extension of time to file and respond to discovery requests. In support hereof, Counsel for the Public states as follows:

1. On December 3, 2015, a prehearing conference was held in this docket, at which a procedural schedule was agreed to by the parties. On December 7, 2015, the Presiding Officer issued a Report of Prehearing Conference and Procedural Schedule.

2. Pursuant to the Procedural Schedule, the deadline for Counsel for the Public and intervenors to propound data requests upon the Applicants was set for January 15, 2016.

3. Pursuant to the Procedural Schedule, the deadline for Applicants' responses to data requests was set for February 5, 2016.

4. Due to unavoidable and unexpected conflicts, Counsel for the Public seeks a brief extension of the deadline to propound data requests on the Applicants to January 19, 2016, with a corresponding extension of the Applicants' response deadline to February 9, 2016.

5. Counsel for the Public has consulted with counsel for the Applicants and with Intervenor Huard, and all parties assent to the requested relief.

WHEREFORE, Counsel for the Public respectfully requests that the Presiding Officer enter an order adjusting the procedural schedule to extend the discovery deadlines as set forth above in this motion, and granting such other and further relief as may be just.

Respectfully submitted,

COUNSEL FOR THE PUBLIC

By his attorneys,

Joseph A. Foster
Attorney General

Dated: January 15, 2016

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Certificate of Service

I hereby certify that on this 15th day of January, 2016, I have caused a true copy of the foregoing motion to be served by electronic mail upon each of the parties on the Service List.

Christopher G. Aslin, Esquire