

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

Docket No. SEC 2015-06

Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility for the Construction of a New High Voltage Transmission Line in New Hampshire

APPEARANCE OF ALAN RAFF

Pursuant to New Hampshire Administrative Rule Site 202.04, please enter the appearance of Alan Raff as counsel for the International Brotherhood of Electrical Workers in the above-captioned matter.

The above-captioned matter involves an application by Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility. The undersigned, Alan Raff is an attorney admitted to practice in the State of New Hampshire.

Respectfully submitted,

By:

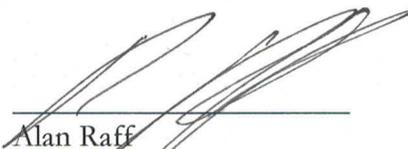


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CERTIFICATE OF SERVICE

I, Alan Raff, hereby certify that on February 2, 2016, I served a copy of the enclosed documents via first class mail/electronic mail to persons named on the Service List of this docket.

Dated: 2/2/2016



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**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

_____))
RE:)
Northern Pass Transmission, LLC and)
Public Service Company of New Hampshire)
d/b/a Eversource Energy:)
Joint Application for a Certificate of Site and)
Facility for Construction of a New High Voltage)
Electric Transmission Line in New Hampshire)
_____)

SEC DOCKET No. 2015-06

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS’ PETITION TO
INTERVENE**

NOW COMES the International Brotherhood of Electrical Workers (“IBEW”) and petitions the Site Evaluation Committee (“SEC”) to allow it to intervene in the above-captioned matter in accordance with RSA 541-A:32 and New Hampshire Administrative Rule Site 202.11, and says:

1. On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy filed the above-referenced joint application for a Certificate of Site and Facility with the SEC to construct and operate a 1,090 MW electric transmission line and related facilities from the Canadian border in Pittsburg, New Hampshire to Deerfield, New Hampshire.

2. The IBEW is a labor organization representing more than three thousand (3,000) employees in New Hampshire. Many of these employees also reside within the state.

3. The IBEW has substantial interest in the proposed application because of its expertise and experience in constructing energy infrastructure. Additionally, the proposed application will produce clean energy. The IBEW asserts that future employment of individuals it represents depends on the development of clean energy. Moreover, the development of energy

facilities that employ New Hampshire citizens will benefit local businesses, New Hampshire workers, and their families.

4. Furthermore, the IBEW has a substantial interest in these proceedings because its members will be called upon to undertake much of the work necessary to complete the proposed project. Because of the substantial interest that the IBEW has in the proposed facility, the IBEW does not believe that any other party to this proceeding can adequately represent its interests.

5. RSA 541-A:32 and Site 202.11 govern petitions to intervene. Pursuant to newly enacted administrative rules governing the SEC, “[p]ersons seeking to intervene in a proceeding shall file petitions with the committee” Site 202.11(a).

6. Site 202.11(b) further provides that the SEC, or its presiding officer, shall grant a petition to intervene if:

(1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the order of notice of the hearing or prehearing conference, not less than 3 days before the hearing or prehearing conference;

(2) The petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and

(3) The presiding officer or hearing officer, as applicable, determines that the interests of justice and the orderly and prompt conduct of the proceeding would not be impaired by allowing the intervention.

7. Here, the IBEW has met the requirements of Site 202.11(b).

8. First, the IBEW has submitted its petition in writing and in a timely manner, and has mailed copies as required by the rules. See Site 202.11(b)(1).

9. Second, the IBEW has set forth facts that are sufficient to demonstrate that its “rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding.” See Site 202.11(b)(2). As detailed above, the IBEW has a substantial interest in the

above-captioned proceeding because its members will be called upon to undertake much of the work necessary to complete the proposed project. Based on the facts detailed previously, the IBEW has sufficiently demonstrated its “rights, duties, privileges, immunities or other substantial interests” will be affected by the proceeding. See Site 202.11(b)(2).

10. Third, the intervention of the IBEW will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings. This petition has been filed by the deadline set forth by the SEC for Docket 2015-06. The IBEW respects the importance of carrying out an orderly and timely proceeding that will not unduly delay the SEC in reaching an outcome in the above-captioned matter. Further, the IBEW respectfully offers that the IBEW’s participation, if permitted by the SEC, would be in the interest of justice.

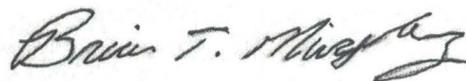
11. Given the above considerations, the IBEW has met the requirements of Site 202.11(b). As a result, the IBEW respectfully requests that the SEC grant its Petition to Intervene and permit the IBEW to participate with full standing in all phases and activities of the proceeding.

WHEREFORE, the IBEW respectfully requests that the SEC:

- A. Grant the IBEW’s Petition to Intervene; and
- B. Grant such other and further relief as may be just.

Respectfully submitted,
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS

By Its Representative,



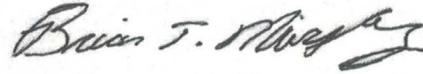
Dated: 2/2/2016

By: _____

Brian Murphy
Business Manager
International Brotherhood of Electrical Workers, Local 104

Certificate of Service

I hereby certify that on this day, an original and one copy of the foregoing petition was sent to the New Hampshire Site Evaluation Committee, and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.



Dated: 2/2/2016

By: _____
Brian Murphy