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March 27, 2016

Martin Honigberg, Chairman  
Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Dear Chairman Honigberg and Ms. Monroe: Re: Motion to Reconsider Grouping Portion of 3/18 /2016 Order

I thank the Site Evaluation Committee (SEC) for granting my petition to intervene in the Northern Pass Project proceedings. I am, however, hereby requesting, pursuant to Site 202.11(f), that the Committee reconsider that portion of its order grouping all Non-Abutting property owners from Clarksville through Bethlehem, which includes me (I reside in Lancaster) because the proposed grouping denies my specific rights to due process. I request that you divide this proposed group of non-abutters into two groups: 1) non-abutting property owners in Clarksville, Stewartstown and East Colebrook, and 2) non-abutting property owners in Stark, Lancaster, Whitefield, Dalton and Bethlehem, with each group designating a single spokesperson for purposes of filing pleadings (except those that relate solely to my property), conducting discovery, and examining witnesses. I further request that I be permitted to file pleadings that relate solely to my property (for example, a pleading relating to the Section 106 Historic Resources Assessment of my property). My property is located on Mount Prospect Road in Lancaster and shares a portion of the view shed with Weeks State Park on Mount Prospect.

As a property owner in Lancaster directly and materially affected by the proposed transmission lines, I believe I have the right to participate fully and meaningfully in the SEC's adjudicatory proceedings. The SEC's March 18, 2016 order, however, lumps me together with a large group of landowners (over 60 persons) stretching the entire northern third of the State from Clarksville to Bethlehem. The proposed grouping diminishes and impairs my right to participate meaningfully and effectively in the SEC proceedings for a number of reasons.

First, there is an insufficient degree of commonality of interests among the intervenors in this very large group, which will make it impossible for us to present a united front and speak with one voice. The Clarksville-to-East Colebrook segment of the proposed transmission line will be installed on all new right-of-way, some of which the Applicant proposes to bury and some of which it proposes to install above ground. The Stark-to-Bethlehem segment of the Project will be installed on existing rights-of-way and is all above ground. The view sheds and terrain of the 14 property owners in the Stark-to-Bethlehem segment differ significantly from those of the 47 or so intervenors in the northern segment, which makes unified collaboration among us unrealistic. The intervenors in the Lancaster-to-Bethlehem section are in reasonably close proximity to one another, and some share the same view sheds that the Project will unreasonably and adversely impact, making meaningful collaboration among the intervenors in the southern section more likely than if they are lumped together with the northern intervenors, who have different interests and will suffer different adverse impacts.

Second, the March 18, 2016 grouping order fails to recognize and accommodate the intervenors' inability to coordinate effectively such a large group and to communicate meaningfully among ourselves. When a court is attempting to schedule a hearing in which only four or five lawyers are involved, it is very difficult to find a mutually agreeable date and time that accommodates all of their schedules. It will be virtually impossible to schedule meetings or conference calls on a date when all 61 intervenors in this group are available to participate.

Doing so with even only 14 intervenors in a group will present considerable challenges, but I think it is certainly worth a try.

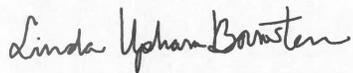
Finally, it simply is not feasible for a single person to be the sole spokesperson for and represent effectively the interests of each intervenor in this large group and to file pleadings and examine witnesses on behalf of them. No one person, especially a lay person who is unfamiliar with the substantive and procedural law relevant to the SEC proceedings, has the time and resources to do so. I suspect that most of the intervenors who are not represented by legal counsel have all they can do to find the time to prepare pleadings such as this one on their own behalf. An attorney working assiduously on behalf of such a large group of clients would find it a challenge. To expect and require a single person to act as the sole spokesperson for this large group and to file pleadings and examine witnesses effectively on behalf of each intervenor is unrealistic and not feasible. Although I think it will be difficult for a single person to act as the spokesperson for the 14 intervenors in Stark, Lancaster, Whitefield, Dalton and Bethlehem, it seems the best for which we can hope.

I also request that the SEC make a limited exception to the single spokesperson rule with respect to filing pleadings that relate solely to my property and allow me to file any such pleadings. For example, I would want to be able to file a pleading regarding the Section 106 Historic Resource Assessment of my property, since no other intervenor in this large group has any interest in this issue. To expect and require a single spokesperson to file a pleading on my behalf in which no other intervenor in this large group has any interest whatsoever is unworkable.

I respectfully submit that dividing the Non-Abutting Property Owners from Clarksville through Bethlehem into two groups, as I have proposed above, is a reasonable compromise and appropriately balances the intervenors' due process rights and other interests and the Applicant's interests in avoiding undue delays, minimizing the waste of time and resources, and promoting the orderly conduct of these SEC proceedings. I request that the SEC reconsider this grouping aspect of its March 18, 2016 order and divide us into said two groups, and that it allow me to file pleadings that relate solely to my property.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Linda Upham-Bornstein".

Linda Upham-Bornstein, Ph.D.