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June 10, 2016

VIA IN-HAND DELIVERY & E-MAIL

Pamela Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301
pamela.monroe@sec.nh.gov

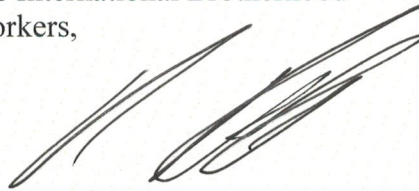
RE: NH Site Evaluation Committee Docket No. 2015-06: Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility

Dear Ms. Monroe,

Enclosed for filing with the New Hampshire Site Evaluation Committee in the above captioned matter, please find the:

1. International Brotherhood of Electrical Workers' RSA 162-H:4, V Motion; and
2. Corresponding Certificate of Service.

On Behalf of the International Brotherhood
of Electrical Workers,



Alan Raff

Enclosures

Cc: Distribution List for Docket No. 2015-06

**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'
RSA 162-H:4, V MOTION

NOW COMES the International Brotherhood of Electrical Workers ("IBEW"), as an intervenor in the above-captioned matter, and submits this motion under RSA 162-H:4, V.

Specifically, the IBEW requests that Chairman Honigberg, as Presiding Officer, review and revisit the Site Evaluation Committee ("SEC") ruling that the SEC shall issue a final order on the present application by September of 2017. In support thereof, the IBEW says:

1. On May 19, 2016, the Subcommittee assigned to the present docket deliberated on pending motions to suspend the time frames in RSA 162-H:7 and determined that it would issue a final order on the application by September of 2017. The IBEW respectfully requests that the Chairman Honigberg, as Presiding Officer, revisit the Subcommittee's prior determination regarding what is, in practical terms, a nine-month delay in the evaluation of the application in this matter.

2. The IBEW and its constituents have specific interests that will be negatively impacted in the event the SEC delays issuing an order on the application until September of 2017. As discussed in its petition to intervene, the IBEW represents roughly 3000 electrical workers in New Hampshire. The proposed project is estimated to create a minimum of 2,600

new jobs and will create new career opportunities for hundreds of young workers through apprenticeship training programs. Delaying this project by nine months will put these job creation and apprenticeship training opportunities at risk, thereby depriving thousands of electrical workers of much needed employment opportunities. The deprivation of such work has wide-reaching effects within the State of New Hampshire. The negative impact that a nine-month delay would have on the IBEW's interests would be profound. Thus, it is imperative that this application be evaluated in a timely and efficient manner.

3. The IBEW recognizes the need for the Subcommittee, as well as the pertinent parties in this matter, to have a sufficient amount of time to assess the impacts of this project. However, the negative impact that a nine-month delay would have on certain groups—and particularly, the negative impact that this delay will have on the IBEW—should have also been taken into consideration by the Subcommittee when it entered into deliberations on the pending motions to suspend the time frames contained in RSA 162-H:7, which were filed by Counsel for the Public and the Forest Society.¹ The IBEW respectfully submits that the SEC should have taken into consideration the negative ramifications that will arise from delaying the evaluation of the application when it considered whether a nine-month delay would be in the public interest.

4. The IBEW has reviewed the Applicants' pending filing entitled "Motion to Adopt Procedural Schedule," dated May 31, 2016, including the arguments and relief requested therein. The IBEW concurs with the Applicants' position and the proposed procedural schedule attached to their motion because it balances the rights of the parties in this proceeding with the need to address the pending application in a timely manner, thereby minimizing the negative impacts that would result from a substantial delay. For those reasons, in addition to the specific concerns

¹ On April 7, 2016, the IBEW submitted an objection to both of these motions highlighting the negative impact that substantial delay would have on the IBEW.

raised by the IBEW within this filing, the IBEW requests that Chairman Honigberg, as Presiding Officer, revisit the Subcommittee's prior determination and adopt the Applicants' proposed schedule attached to Applicants' motion.

WHEREFORE, the IBEW respectfully requests that the Chairman Honigberg, as Presiding Officer:

- A. Adopt the Applicants' procedural schedule contained in their May 31, 2016 motion; and
- B. Grant such other relief as may be just.

Respectfully submitted,
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS

By Its Attorney,

Dated: 6/10/2016

By: _____

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Certificate of Service

I hereby certify that on this day the foregoing was sent to the New Hampshire Site Evaluation Committee and to persons named on the SEC distribution list by electronic mail.

Dated: 6/10/2016

By: _____

Alan Raff