

MCLANE MIDDLETON

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August 29, 2016

Via Electronic Mail & Hand Delivery

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: New Hampshire 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 (the "Applicants") for a Certificate of
Site and Facility
Objection to NGO Second Motion to Compel**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of the Applicants' Objection to NGO Intervenors' Second Motion To Compel Regarding Set 1 Data Requests.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:slb

cc: SEC Distribution List

Enclosure

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANTS' OBJECTION TO NGO INTERVENORS' SECOND MOTION TO
COMPEL REGARDING SET 1 DATA REQUESTS**

NOW COME Northern Pass Transmission LLC ("NPT") and Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") (collectively the "Applicants"), by and through their attorneys, McLane Middleton, Professional Association, and respectfully submit this Objection to the NGO Intervenor's Second Motion to Compel Regarding Set 1 Data Requests ("Second Motion"), in the above-captioned proceeding. The Applicants object to the Second Motion as described below.

On August 19, 2016, the NGO Intervenor filed the Second Motion, asserting that the Applicants failed to provide information responsive to certain portions of Data Request 1-23 as it relates to GIS geodatabases. They ask the Site Evaluation Committee ("SEC") to direct the Applicants to produce the information.

The Applicants object to the Second Motion because they believe that the information they have already provided is responsive to Data Request 1-23 as it relates to GIS geodatabases used in their Application. The Applicants have contacted the NGO Intervenor in an effort to resolve the issue.

WHEREFORE, the Applicants respectfully request that the Site Evaluation Committee:

- A. Deny the Motion; and
- B. Grant such further relief as is deemed just and appropriate.

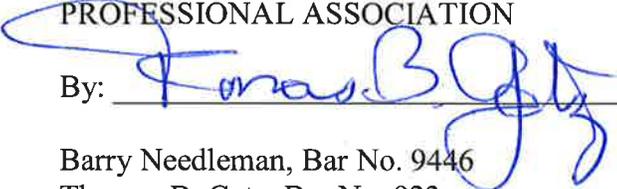
Respectfully submitted,

Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy

By Its Attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

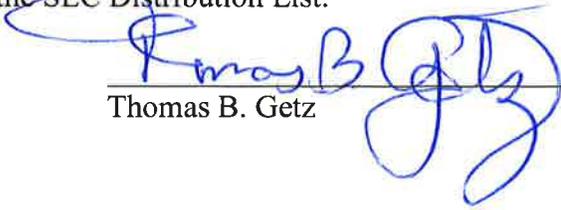
Dated: August 29, 2016

By: 

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Certificate of Service

I hereby certify that on the 29th of August, 2016, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.


Thomas B. Getz