

STATE OF 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 for a Certificate of Site and Facility

**REPLY OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE
FORESTS TO APPLICANTS' RESPONSE AND
OBJECTION TO CERTAIN MOTIONS TO COMPEL AND
REQUEST FOR HEARING**

The Society for the Protection of New Hampshire Forests (the "Forest Society"), by and through its attorneys, BCM Environmental & Land Law, PLLC respectfully replies as follows the Applicants' Response and Objection to Certain Motions to Compel ("Objection"):

1. The Forest Society disagrees with most of the assertions the Applicants made in their Objection.
2. The Forest Society respectfully requests that, pursuant to Site 202.02(d)(6), the Chair identify the 8/15/16 Motion of The Society For The Protection of New Hampshire Forests To Compel Responses To Data Requests ("Motion") as a significant disputed issue for hearing and decision by the subcommittee.

WHEREFORE, the Forest Society respectfully requests that the SEC:

- A. Grant the Forest Society's Motion or schedule a hearing for the Subcommittee's consideration of the Forest Society's Motion; and
- B. Grant such other and further relief as is just and equitable.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,

BCM Environmental & Land Law, PLLC



Date: September 2, 2016

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this day, September 2, 2016, a copy of the foregoing Motion was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli, Esq.