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October 14, 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 and Coos County Business and Employers Group's Objection to Motions to Amend the Procedural Order, on behalf of the Business and Organizations with Economic Interests Intervenor Group; and
2. Corresponding Certificate of Service.

On Behalf of the Business and
Organizations with Economic
Interests Intervenor Group,



Alan Raff

Enclosures

Cc: Distribution List for Docket No. 2015-06

**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

IBEW AND CCBEG'S OBJECTION TO COUNSEL FOR THE PUBLIC'S
MOTION TO AMEND THE PROCEDURAL ORDER

NOW COME Intervenors, the International Brotherhood of Electrical Workers ("IBEW") and the Coos County Business and Employers Group ("CCBEG"), by and through their attorneys Alan Raff, Esquire, and Bianco Professional Association, and respectfully submit this Objection to the Counsel for the Public's Motion to Amend the Procedural Order filed on October 4, 2016, in the above captioned proceeding, and joined by the Society for the Protection of New Hampshire Forests (the "Forest Society"), Abutters Group 1,¹ and the Grafton County Commissioners. Because these parties have failed to demonstrate they are entitled to the extension of certain deadlines, the Motion to Amend the Procedural Order should be denied. In support thereof, IBEW and CCBEG state as follows:

Standard of Review

1. Pursuant to Site 202.19(a), "[t]he party asserting a proposition shall bear the burden of proving the proposition by a preponderance of the evidence." Thus, the parties requesting the extensions bear the burden of proving that they are entitled to the relief they seek in their motions.

¹ The abutters of Pittsburg, Clarksville, and Stewartstown.

Legal Analysis

2. Having reviewed the Applicants' objection, the IBEW and the CCBEG concur with the reasoning set forth therein. As a result, they support the Applicants' position on this issue and incorporate the same reasoning within this objection.

3. Additionally, the IBEW and the CCBEG object to the scope of the extension requested by the parties. Within its request, Counsel for the Public seeks the extension of specific deadlines. (See CFP's Mot. Ex. B.) It further states that an extension of time to file pre-filed testimony for certain witnesses will not "materially impact the pre-trial schedule." However, in the prayer for relief, Counsel for the Public broadly requests that the SEC "[e]xtend other portions of the Procedural Schedule by an equal number of days." (CFP's Mot., at 12 (emphasis added)). The IBEW and the CCBEG are concerned with the breadth of Counsel for the Public's request for relief. The reference to "other portions" of the procedural order is vague. It should not be construed to allow for an extension of time for other parts of the procedural schedule not explicitly referenced in Counsel for the Public's motion.

4. For example, neither Counsel for the Public nor any other party has demonstrated that it is necessary to delay the adjudicatory hearing itself, the deadline for post-hearing briefs or deliberations, and the SEC's final decision. Given the vagueness of Counsel for the Public's request for relief, the IBEW and the CCBEG object to it and requests that the SEC circumscribe its analysis to only those dates specifically referenced within Counsel for the Public's motion.

5. For this additional reason, the IBEW and the CCBEG objects to the parties' Motions to Amend the Procedural Order.

Conclusion

6. Based on the foregoing, the IBEW and the CCBEG request that the SEC deny Counsel for the Public's Motion to Amend the Procedural Order.

WHEREFORE, the IBEW and the CCBEG respectfully request that the SEC:

- A. Deny the Counsel for the Public's Motion to Amend the Procedural Order; and
- B. Grant such other and further relief as may be just.

Respectfully submitted,
On Behalf of the Business and Organizations
with Economic Interests Intervenor Group,

By Its Spokesperson,

Dated: 10/14/2016

By: _____

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Certificate of Service

I hereby certify that on this day 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: 10/19/2016

By: _____

Alan Raff