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

JOINDER OF THE ABUTTING PROPERTY OWNERS BETHLEHEM TO PLYMOUTH INTERVENOR GROUP IN THE COUNSEL FOR THE PUBLIC'S MOTION TO AMEND PROCEDURAL ORDER

The Abutting Property Owners Bethlehem To Plymouth Intervenor Group ("Intervenor Group") respectfully joins the Motion to Amend Procedural Order filed on October 4, 2016 by the Counsel for the Public ("Motion").

The intervenor Group states as follows in support:

- 1. The Intervenor Group cannot complete its pre-filed testimony in the absence of 90–100% completed construction documents from the Applicants.
- 2. As noted by the Grafton County Commissioners, the Group 1 Abutters, and other previous filings, the intervenor Group also lacks completed plans showing the exact underground route between Bethlehem and Plymouth, and the exact location and design of buried lines, connection vaults, pads, transfer stations, layout and staging areas, or any of the other items and facilities associated with the installation of the proposed power line.
- 3. The Intervenor Group also lacks the geotechnical core-drilling reports.
- 4. The Intervenor Group also lacks proof that the Applicant has a past history and proper knowledge to bury high tension cables of the type proposed, through the types of neighborhoods that will be impacted, or beneath or adjacent to small public highways such as those along the proposed route between Bethlehem and Plymouth.

WHEREFORE, The Intervenor Group respectfully requests the Site Evaluation Committee to note its Joinder and extend the deadline by which the Intervenor Group must file pre-filed testimony.

Respectfully Submitted

Walter A. Palmer

On behalf of the Abutting Property

Valla Ce. Palmer

Owners Bethlehem To

Plymouth Intervenor Group

Date: October 17, 2016

CERTIFICATE OF SERVICE

A hard copy of this Joinder has been mailed, and electro	onic copies have been sent to
persons named on the Service List of this docket.	1111 ~ 11
10/17/2016	Walter Co. Palmer

Walter A. Palmer Date