

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

**SUPPLEMENT TO MOTION OF THE SOCIETY FOR THE PROTECTION
OF NEW HAMPSHIRE FORESTS TO COMPEL DOCUMENTS
PRODUCED INFORMALLY TO COUNSEL FOR THE PUBLIC**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, states as follows:

1. On October 6, 2016, the Forest Society filed a Motion to Compel Documents Produced Informally to Counsel for the Public (the “Motion”).
2. By way of update, on October 12, 2016, Counsel for the Public (“CFP”) provided the Forest Society with a list of documents the Applicants have provided to CFP in response to informal discovery (the “List”).
3. As the Committee has not yet decided the Motion, the List should be helpful to identify what documents are at issue, and therefore the Forest Society supplements the attached List to its Motion as Exhibit A.
4. In the event that the List is not completely exhaustive, the Forest Society respectfully requests that the Applicants be instructed to produce both the documents contained in the List and any other documents that CFP may have inadvertently omitted from the List but which are of the type described in the Motion.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC



Date: October 19, 2016

By: _____

Amy Manzelli, Esq. (17128)
Jason Reimers, Esq. (17309)
Elizabeth Boepple, Esq. (20218)
3 Maple Street
Concord, NH 03301
(603) 225-2585
manzelli@nhlandlaw.com
reimers@nhlandlaw.com
boepple@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, October 19, 2016, a copy of the foregoing Supplement was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli, Esq.

EXHIBIT A TO SUPPLEMENT TO MOTION OF THE SOCIETY
FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS
TO COMPEL DOCUMENTS PRODUCED
INFORMALLY TO COUNSEL FOR THE PUBLIC

CFP List of Documents Received from Applicants as a Result of Informal Requests

- Historic Assessment of Resources, Part 1, pp.30-32 (missing text from methodology)
- Historic Assessment of Resources, Native files for survey along underground section
 - UG North 10.8.15.kmz
 - UG Route 3 10.8.15.kmz
 - UG Route 18 10.8.15.kmz
 - UG Route 112 10.8.15.kmz
 - UG Route 116 10.8.15.kmz
- There is an Excel file [NPT Scenic Resource Spreadsheet.xlsx] of the identified scenic resources organized by town with values for various attributes. Every scenic resource seem to have an entry for its name, notes, publication that was the source of identification (indexed to Appencix C), ownership, distance and direction to corridor, cultural value, and possible visibility. Most resources do not have ratings for the other attributes.
- There is an Excel file [NPT RESOURCE EVAULATION CHARTS.xlsx] of the ratings for the simulations and the scenic resources they represent. This includes ratings by three individuals and the average ratings. Not every simulation is evaluated by all three raters.
- There is a folder [ALL PHOTOS] with folders for the SUBAREAs, Towns, and locations for which photos were taken. There is not a GIS file that locates them, but these photos are geotagged so the lat/long location is in the photo metadata.
- There is a folder [ALL PHOTOSIMULATIONS] that has a folder [Structures + ROW] containing KMZ files of the existing and proposed structures, and ROW limits.
- Updated 3D CAD files of the structures through the formal data request.
- Also in ALL PHOTOSIMULATIONS are with folders for the SUBAREAs, Towns, and locations where simulations were made. Each location has two folders of photos [1. Original Photos] and [2. Psim Photos]. Occasionally the original photo for the simulation is not present, but they seem to be in ALL PHOTOS.
- Each simulation location folder also contains a KMZ file showing how the base photo was registered with the KMZ file of the project. In almost all cases, this does not include a rendered 3D model of the structures.

- There is a Photoshop file that includes (1) a panorama at the simulation viewpoint, (2) rendered or drawn NPT project elements, (3) various Google Earth images, and (4) outlines of areas used for the “normal” simulations.
- There is a folder [GISData] that includes a folder [grids] with elevation and land cover data.
- There is a folder [GISData] that includes a folder [NPTStudyArea.gdb] with various data layers. In particular are all of the scenic resources they identified [TownResources] and [TownResources 10miles]. There are separate layers for:
 - [BywaysStudyArea]
 - [ConservationAreas]
 - [ExistingStructuresNorth]
 - [ExistingStructuresSouth]
 - [gnis]
 - [NHDWaterbody]
 - [PHotosimulationLocations]
 - [PrivatePropertyPhotoSims]
 - [ProposedProjectROWPolygon]
 - [ProposedRouteCenterline]
 - [ProposedStructures072315North]
 - [ProposedStructures072315South]
 - [RiverStudyArea]
 - [RoadStudyArea]
 - [StudyArea10mi]
 - [StudyArea1Mile]
 - [StudyAreaPoly]
 - [Subareas]
- There is a folder [GISData] that includes a folder [Viewshed.gdb] with the visibility maps for the existing and proposed conditions. There is a [ViewshedMask] indicating areas where the height of land cover is thought to be 5 feet above the ground (i.e., DSM-DTM).

- A memo titled “*Information Requests for the LEI Report for Northern Pass*” and dated June, 2016 that included the following information. LEI provided a spreading of the values behind the tables and figures in the memo.
 - a. An explanation of how LEI calculated the GHG emissions rate from Northern Pass Resources
 - b. The projected quantities of capacity by year and fuel type
 - c. An illustrative energy market supply curve
 - d. A table of historical imports on Phase II and Highgate that support LEI’s assumption of high load factors
- A memo title “*Information Requests for the LEI Report for Northern Pass – Part 2*” and dated July, 2016 that included the following information. LEI provided a spreading of the values behind the tables and figures in the memo.
 - e. An explanation and table of the social cost of CO2 LEI used in their analysis.
 - f. The annual average LMPs for both the Base Case and Project Cast for the system and New Hampshire load.
 - g. A list of sources for their fixed operating costs
 - h. The projected generation by year and fuel type
 - i. LEI assumptions concerning NY imports
 - j. LEI’s approach for validating the results of their backcast modeling
 - k. The projected hourly flows on each interface.
- Copy of all applications submitted to DOT.
- Documents submitted to ISO-NE.
- Reports, etc. related to locating near gas pipeline.