

**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**

**Deerfield Abutters Motion to Extend Deadline for Certain Items**

The Deerfield Abutters, Intervenor in this Action, are seeking an extension of the November 15, 2016 deadline for three items of their pre-filed testimony and state:

1. As set forth in the Procedural Order of 6/23/16 and the recently filed Order to Requests to Amend Procedural Order dated October 28, 2016, pre-filed testimony is due November 15, 2016.
2. Accordingly, the Deerfield Abutters will be able to file their individual testimony on or before this date, but are seeking an extension of forty five days to file the following three items of pre-filed testimony:
  - a. Pre-filed Testimony of a Historical Expert on behalf of Deerfield Abutters.
  - b. Case studies of certain real estate transactions pertinent to property values particularly, but not exclusively, as it relates to vacant as well as conserved land;
  - c. Report pertaining to Data Request DA1 - 5 PSNH/ Eversource Projects most like the proposed NPT project and its relation to property value impacts.
3. The Deerfield Abutters are seeking this extension because recent information from the on-going technical sessions will be used to complete the three items. These sessions have run longer than anticipated and thus these three items require additional time to complete. The DA's were engaged in each technical sessions throughout September and October.
  - a. The historical expert for Deerfield Abutters will need more time to prepare testimony. As you are well aware, the technical sessions with the Applicant's Historical expert have just recently concluded on October 27, 2016. And thus we are now in a position to describe more accurately the scope of work necessary to address the issues raised. We feel it is unreasonable for any testimony to be written with a compressed schedule to meet a deadline that was originally set with the expectation of 45 days following technical sessions for these reports to be filed. DA respectfully requests your consideration given our need for this subject matter (Historical) to be placed in the hands of a professional expert to prepare testimony to address our concerns.
  - b. Real Estate case studies mentioned above will incorporate recent discovery documents obtained from the Applicant. An additional reason for the extension request is that this work requires travel to various parts of the State for site visits which is necessary for reports to be completed and is time consuming. Pre filed testimony work has been ongoing and technical sessions with the Applicants Real Estate expert has provided additional information, however, participation in other technical sessions was also a priority for the DA's. Additional time will afford a complete and thorough report incorporating the information requested in the DA data requests.

c. Deerfield Abutters also received, in response to DA1- 5 Data Request, a list of 5 projects that were identified as most like the proposed NPT project ( where an 345Kv line is imposed on and existing ROW with new structures significantly higher than the existing structures). As stated in section b. above, in order to utilize this important information, travel time will be needed to visit these project locations (some out of state) before the real estate report can be completed.

It goes without saying that the Deerfield Abutters would prefer to file our pre-filed testimonies along with the above mentioned reports together (on December 30) as opposed to splitting our testimony in two filings. However, for the reasons stated herein, we request an extension of the 3 items above. Deerfield Abutters have relied heavily on the technical sessions to help us locate certain information in the original application, along with locating supplemental filings and vital information necessary to prepare our pre-filed testimonies. Now that technical sessions are nearing completion, we want to utilize the information to the fullest extent in the final preparations of our pre-filed testimony supporting reports.

4. The Deerfield Abutters have obtained the assent of:

Municipal Group 2

Municipal Group 3

New England Power Generators Association, Inc

Non Abutters Ashland to Deerfield

Abutters and Non Abutters Pittsburg, Clarksville, and Stewarstown

DWBA

Overhead Abutting Prop Owners Ashland to Allenstown

Pemigewasset River Local Advisory Commission

Grafton County Commissioners

Non Abutter Group Stark to Bethlehem

Society for the Protection of NH Forests

5. Applicant objects to this motion.

6. This limited extension will promote the interest of fairness and justice and will not impair the orderly and efficient conduct of the proceeding. It will allow the Committee to have the complete benefit of the views of the Deerfield Abutters, as contemplated by RSA 162-H:16.

WHEREFORE, the Deerfield Abutters are asking that the Hearing Officer order an extension of forty five days to submit the three items noted above and for any further relief.

Respectfully Submitted,  
Deerfield Abutters Group

By: 

11/1/16  
Date: October 31, 2016

Jeanne Menard, Deerfield Abutters Group

I certify that a copy of the foregoing Motion to Compel have been forwarded via e-mail to persons named on the Discovery List of this Docket.

By: Jeanne M Menard 11/1/16 Date: October 25, 2016  
Jeanne Menard, Deerfield Abutters Group