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VIA EMAIL AND US MAIL

April 3, 2017

Ms. Pamela G. Monroe, Administrator New Hampshire Site Evaluations Committee 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Re: NH Evaluation Committee Docket No. 2015-06

Dear Ms. Monroe:

Please find enclosed for filing in Docket No. 2015-06 the Grafton County Commissioner's Objection to Applicant's Motion to Strike Certain Track I Testimony. Copies have been forwarded via email to all parties on the Service List.

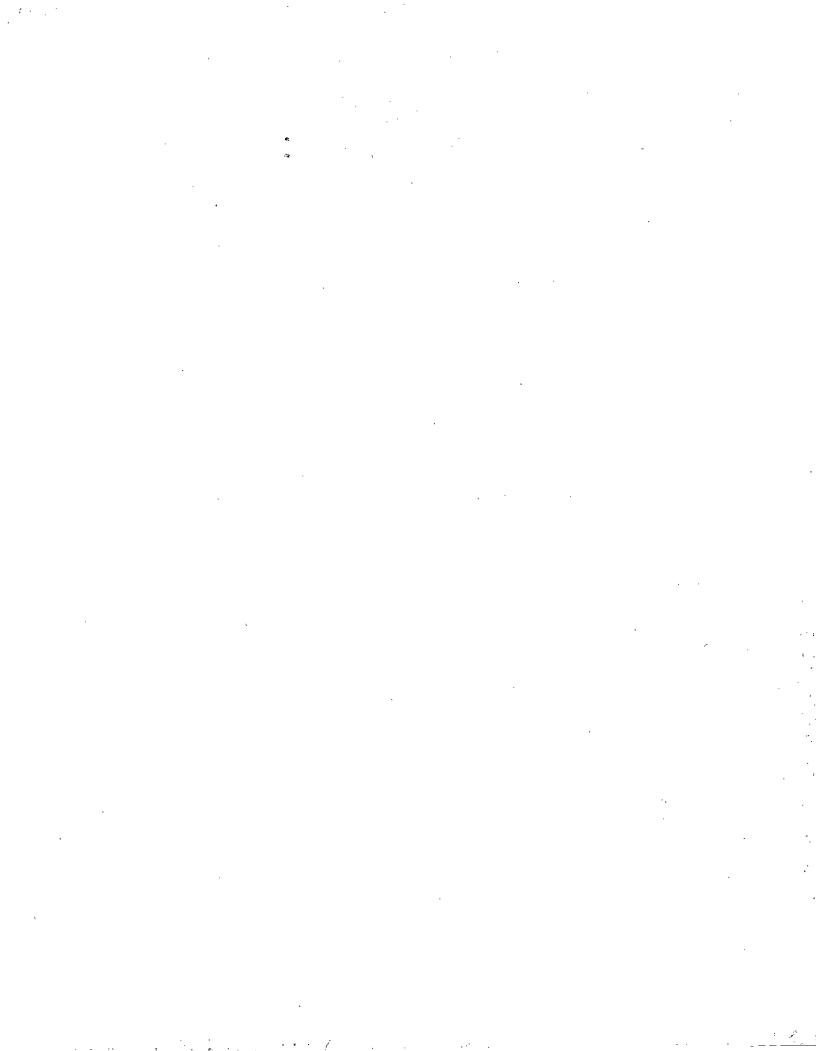
If you have any questions, please do not hesitate to contact me.

Sincerely,

In Ik May /for_ Lara Saffo

LJS/tlkm Enclosure ASSISTANT COUNTY ATTORNEYS

John A. Bell Mariana C. Pastore Tara J. Heater Viktoriya A. Kovalenko Nicholas A. Chong Yen



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

THE GRAFTON COUNTY COMMISSIONER'S OBJECTION TO APPLICANT'S MOTION TO STRIKE CERTAIN TRACK I TESTIMONY

The Grafton County Commissioners submit this objection to the Applicant's Motion to Strike Certain Track 1 Testimony and in support states as follows:

- The Grafton County Commissioners agree and understand that testimony must include evidence that is relevant and material to the Committee in making its determinations under RSA 162-H:16, IV.
- 2. The information in the pre-filed testimony and the supplement are material and relevant.
- 3. The fact that some of the information is also contained in other motions does not make it more or less relevant. The same information can be relevant in two different manners, and is in this case.
- 4. This information could not have been provided earlier. The Grafton County Commissioners (and all intervenors) were provided with plans too close in time to the prefiled testimony deadlines to be able to incorporate any plan deficiencies into their testimony. This has been repeatedly noted. Indeed, in their Data Requests to the Applicant <u>last summer</u>, the Commissioners asked for this information. In response, the Applicants promised to provide this information in

before the deadline for the pretrial testimony, and was to close in time to incorporate it into the prefiled testimony. The Commissioners have since exerted great effort to review the information, and other information, in a good faith attempt to work with the plans. After reviewing the plans, data requests, technical session information and other information, it has become apparent that the plans are deficient, and information provided incomplete. Accordingly, that is an appropriate supplement of the prefiled testimony at this time.

- 5. At the time of the prefiled testimony there was also no way to know that we would not have reviews completed by the agencies directed to provide review by law.
- 6. The work force study is something directly referenced in the original testimony.
 The Commissioners were asked by the Applicant to provide this study during technical session questioning, the commissioners did so, and added it to the prefiled testimony.
- 7. The Grafton County Commissioners object to the exclusion of other prefiled testimony and join in the intervenor's objections to this same motion. The rules of evidence do not apply to this proceeding, and it is vital that the Site Evaluation Committee have all needed information. Parties have worked hard not to duplicate the presentation of information, and thus it is in Grafton County's interest to have a complete record of the impacts in Grafton County.

WHEREFORE, it is respectfully requested that the Chair of the Site Evaluation Committee:

- A. DENY the Motion to Strike; and
- B. Grant such other and further relief as may be just.

Dated April 3, 2017

Lara J. Saffo, Esquire
Grafton County Attorney, on behalf of
Grafton County Commissioners
3785 Dartmouth College Highway
North Haverhill, NH 03774
(603) 787-6968

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion has this day been forwarded via email or mail to the persons named in the distribution list of this docket.

Dated: 4/3/17-

Lara Saffo, Esquire

On behalf of Grafton County Commissioners