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October 20, 2015

Martin Honigberg, Chairman NH Site Evaluation Committee NH Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301

Re: <u>SEA-3, Inc. ("SEC-3")</u> Request for Exemption SEC Docket No. 2015-01

Dear Chairman Honigberg:

Enclosed for filing in connection with the above-captioned matter, please find the original and two (2) copies of Portsmouth Intervenors' Notice of Joinder in Counsel for the Public's "Motion to Compel Production of Data Request Response, to Postpone Hearing, and for Order to Show Cause."

I certify that copies of the within filing have been sent to the parties identified on the Service List on this docket.

Very truly yours, Christopher Cole

cc: Service List

Site Evaluation Committee of the New Hampshire Public Utilities Commission

In the Matter of the Application of Sea-3, Inc.

(Request for Exemption)

SEC Docket No. 2015-01

PORTSMOUTH INTERVENORS' NOTICE OF JOINDER IN COUNSEL FOR THE PUBLIC'S "MOTION TO COMPEL PRODUCTION OF DATA REQUEST RESPONSE, TO POSTPONE HEARING, AND FOR ORDER TO SHOW CAUSE"

NOW COME the Portsmouth Intervenors,¹ by their counsel, Sheehan Phinney Bass & Green, Professional Association, and respectfully, for the reasons described in the Counsel for the Public's Motion to Compel Production of Data Request Response, To Postpone Hearing, and For Order to Show Cause ("Counsel for the Public's Motion"), join in the relief requested in Counsel for the Public's Motion. More specifically, Counsel for the Public has filed the Motion to Compel, To Postpone and For an Order to Show Cause on October 20, 2015. The Portsmouth Intervenors hereby formally join in the prayers for relief in Paragraph 11, subparts A, B and C of Counsel for the Public's Motion.

Respectfully submitted,

PORTSMOUTH INTERVENORS,

By Their Attorneys,

Sheehan Phinney Bass & Green, P.A.

¹ The Portsmouth Intervenors are Richard and Catherine Dipentima; Robert Gibbons and Patricia Ford; William and Kristina Campbell; John and Jane Sutherland; and Erica and Matthew Nania.

Dated: October 20, 2015

By:

Christopher Cole (Bar No. 8725) 1000 Elm Street P.O. Box 3701 Manchester, NH 03105-3701 (603) 627-8223 ccole@sheehan.com

Certification

I hereby certify that on this 20th day of October 2015, I caused a copy of the foregoing Notice of Joinder, to be sent via email to the persons on the Service List on this Docket.

Christopher Cole