



CITY OF PORTSMOUTH

LEGAL DEPARTMENT

Robert P. Sullivan, City Attorney – 603-610-7204 (Direct Dial)
Suzanne M. Woodland, Deputy City Attorney – 603-610-7240 (Direct Dial)
Kathleen M. Dwyer, Assistant City Attorney – 603-427-1338 (Phone/Fax)

October 27, 2015

EMAILED to pamela.monroe@sec.nh.gov

Martin P. Honigberg, Chairman
Alex Speidel, Acting Chairman
NH Site Evaluation Committee
NH Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301

**RE: SEC Docket Number 2015 – 01
Request of SEA-3, Inc. for Exemption from the Approval and Certificate
Provisions of RSA Chapter 162-H**

Dear Chairman Honigberg and Acting Chairman Speidel:

Enclosed for filing please find the original and two (2) copies of the City of Portsmouth's 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 in the above-referenced matter.

I certify that copies of the within filing have been provided to those named in the Service List.

Thank you for your assistance.

Sincerely


Jane Ferrini, Staff Attorney
City of Portsmouth

enclosure

cc: Pamela G. Monroe, Administrator - SEC (emailed and mailed)
Service List (emailed)
John P. Bohenko, City Manager
Robert P. Sullivan, City Attorney

h:\rps\litigation\sea3\sec\letters\ltr re-cop's notice of joinder

**Site Evaluation Committee
Of the New Hampshire Public Utilities Commission**

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

SEC DOCKET NO. 2015-01

(Request for Exemption)

**THE CITY OF PORTSMOUTH'S 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 COMES the City of Portsmouth, by its counsel, and respectfully joins in the relief requested in Counsel for the Public's Motion to Compel Production of Data Request Response, To Postpone Hearing, and For Order to Show Cause filed on October 20, 2015 ("Counsel for the Public's Motion") for the reasons described in Counsel for the Public's Motion. The City of Portsmouth formally joins in the prayers for relief in Paragraph 11, subparts A, B and C of Counsel for the Public's Motion.

Respectfully submitted,

THE CITY OF PORTSMOUTH,


By its Attorneys

By: 
Jane Ferrini, Staff Attorney
NHBA No. 6528
1 Junkins Avenue
Portsmouth, NH 03801
(603) 610- 7256
jferrini@cityofportsmouth.com

Date: October 27, 2015

Certification

I hereby certify that on this 27th 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.


Jane Ferrini