



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 Objection to the Applicant's Motion for Protective Order and City's Notice of Joinder in Portsmouth Intervenors' Objection to the Applicant's Motion for a Protective Order.

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

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**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 OBJECTION TO THE APPLICANT'S MOTION
FOR PROTECTIVE ORDER AND CITY'S NOTICE OF JOINDER IN
PORTSMOUTH INTERVENORS' OBJECTION TO THE APPLICANT'S
MOTION FOR A PROTECTIVE ORDER**

NOW COMES the City of Portsmouth, by its counsel, and respectfully objects to Applicant's Motion for a Protective Order and hereby formally joins in the Portsmouth Intervenor's Objection to the Applicant's Motion for a Protective Order ("Objection"), for the reasons set forth in the Objection and joins in the relief requested, specifically an Order from the Committee denying the Applicant's Motion for a Protective Order and requiring the Applicant to immediately produce the documents, information and materials sought by the Data Request.

Respectfully submitted,

THE CITY OF PORTSMOUTH,

By: 
Jane Ferrini, Staff Attorney
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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 Objection to Applicant's Motion for a Protective Order and Notice of Joinder, to be sent via email to the persons on the Service List on this Docket.


Jane Ferrini