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February 2, 2016

Via Electronic Mail and Hand Delivery

Ms. Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: SEC Docket No. 2015-04: Public Service Company of New Hampshire d/b/a
Eversource Energy For a Certificate of Site and Facility For a New 115 KV
Transmission Line From Madbury Substation to Portsmouth Substation**

Dear Ms. Monroe:

Enclosed for filing in the above-referenced Docket please find an original and fifteen copies of Applicant's Procedural Waiver Request Pursuant to Site 302.05.

Sincerely,


Barry Needleman

BN:slb

THE STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

SEC DOCKET NO. 2015-04

**APPLICATION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A
EVERSOURCE ENERGY FOR A CERTIFICATE OF SITE AND FACILITY FOR A
NEW 115 KV TRANSMISSION LINE FROM MADBURY SUBSTATION TO
PORTSMOUTH SUBSTATION**

APPLICANT'S PROCEDURAL WAIVER REQUEST PURSUANT TO SITE 302.05

NOW COMES Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") by and through their attorneys, McLane Middleton, Professional Association, and submits this request under Site 302.05 to waive certain requirements of the New Hampshire Site Evaluation Committee ("Committee" or "SEC") regarding applications for certificates of site and facility, and state the following:

1. PSNH will soon file an Application for a Certificate of Site and Facility to construct a new 115 kilovolt (kV) transmission line, approximately 13 miles in length, between existing substations in Madbury, New Hampshire and Portsmouth, New Hampshire (the "Application"). The proposed facility will be located in the Towns of Madbury, Durham, and Newington, and the City of Portsmouth. PSNH herein proposes an alternative method to satisfy the purpose of the Committee's procedural rules regarding the filing and formatting of SEC applications.

2. Pursuant to Site 302.05, PSNH seeks: (1) a waiver from Site 301.01(a) and Site 301.02(a) to allow PSNH to submit electronic copies of certain Application materials and (2) a waiver from Site 301.02(a) regarding the format of certain documents accompanying the Application.

3. Site 302.05(a) provides that the SEC shall waive a provision if it finds that a waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Committee. The public interest is satisfied if a rule is onerous or inapplicable under the circumstances, or if the purpose of the rule is met by an alternative method. Site 302.05(b).

Paper Copies of the Application

4. PSNH seeks a waiver from Site 301.01(a) and 301.02(a) regarding the filing and formatting requirements of the Application. Apart from the one original Application, PSNH respectfully requests permission to provide additional copies of the Application in electronic form unless specifically requested otherwise by a State Agency involved in the SEC proceedings or by a town where the proposed project would be located.

5. PSNH anticipates that the SEC Application in its entirety will total over 5,000 pages, many of which will be printed on oversized paper. PSNH expects and estimates that the number of printed pages, even printed as double-sided, will require approximately 5 five-inch, three-ring binders.

6. To conserve resources and to make it more convenient for the agencies and towns that receive a copy of the Application, PSNH respectfully requests that the Committee waive the requirement that PSNH generate complete paper copies of the Application for each recipient. PSNH will still provide 15 copies of the Application materials to the Committee and the required number of copies to each town where the proposed energy facility will be located—some materials, however, will be reproduced only in electronic format on a DVD.

7. As an alternative to meet the purpose of the Committee's rules, PSNH proposes to provide: (1) a complete original paper copy of the Application, pre-filed testimony, and all

related appendices and reports to the Committee; (2) 15 paper copies of the Application and pre-filed testimony; and (3) 15 electronic copies, in .pdf format, on a DVD, of all appendices, including permit applications and their attachments and attachments to expert reports that are exceedingly lengthy and that are subject-matter specific. PSNH will also provide paper copies of the Application and pre-filed testimony and electronic copies of all reports to each town, along with electronic copies of the entire Application. Should an individual agency involved in the SEC proceeding, or a town where the proposed energy facility will be sited, request a paper copy of an electronic report or attachment with the SEC, PSNH will comply with the request.

8. PSNH also asserts that requiring 15 complete paper copies of the Application would be an unnecessary waste of resources. By reducing the page count of the paper copies submitted to the SEC and towns, the printing of hundreds or thousands of pages will be avoided and the public interest will be served. PSNH will also satisfy the purpose of the rule by including electronic copies of all application materials and by providing paper copies when a request is made to PSNH, as described above. The waiver will not disrupt the orderly and efficient resolution of matters before the Committee.

Format of Materials Accompanying the Application

9. PSNH seeks a waiver from certain requirements of Site 301.02(a) regarding the format of certain documents that will accompany the Application and respectfully request that the Committee allow PSNH to print certain documents on 11 x 17 inch paper and be placed unfolded into 11 x 17 inch three-ring binders.

10. Site 301.02(a) requires that an application be printed on “standard 8 ½ x 11 inch sheets” and that “plans, maps, photosimulations, and other oversized documents shall be folded to that size or rolled and provided in protective tubes.” PSNH anticipates filing complete binders

that will contain Project maps, engineering drawings, plan and profile sheets, and a visual impact assessment that includes multiple maps and photosimulations, all of which will be printed on 11 x 17 inch paper. PSNH respectfully requests that the Committee waive the requirements of Site 301.02(a) and allow PSNH to submit large drawings, plans, and the visual impact assessment in an unfolded 11 x 17 inch format, and place them in 11 x 17 inch binders.

11. More specifically, PSNH seeks a waiver to provide the following documents in an unfolded 11 x 17 inch format to the Committee: (1) the Project Maps, (2) Engineering Drawings, and (3) the visual impact assessment report and related photosimulations.

12. PSNH submits that to alter the folding and/or rolling requirements for these documents will not disrupt the orderly and efficient resolution of matters before the Committee. In fact, PSNH suggests that, by submitting these documents in an unfolded 11 x 17 inch format, the reviewing agencies and members of the Committee and towns will be able to access these large oversized plans, drawings and simulations, more easily in one location without having to unfold and refold hundreds or thousands of pages of documents.

13. Strict compliance with Site 301.02(a) would require PSNH to choose between folding hundreds of pages to fit into an 8 ½ x 11 inch binder and rolling hundreds of pages to fit into protective tubes. Both requirements would make the Committee's task in reviewing the Application more burdensome than PSNH's submitted alternative. First, requiring oversized documents to be folded will double or triple the number of binders required and would likely frustrate Committee members by asking them to carry around additional binders and unfolding and refolding hundreds of pages to view their substance. In addition, it is harder to locate a folded document in a full binder; a reviewer may be subjected to a time consuming effort of unfolding many documents to locate only one. Second, requiring oversized documents to be

rolled and provided in protective tubes will prove even more burdensome because the Committee will be tasked with storing and organizing hundreds or thousands of tubes. Even if the tubes are properly and accurately labeled, the Committee's task in efficiently reviewing the Application will no doubt be frustrated. By submitting the plans in an unfolded 11 x 17 inch format, the purpose of the rule requiring necessary copies of the Application would be satisfied. The waiver will not disrupt the orderly and efficient resolution of matters before the Committee.

WHEREFORE, PSNH respectfully requests that this Committee:

A. Grant a waiver request pursuant to Site 302.05 to allow PSNH to submit copies of appendices and reports in electronic form, unless otherwise requested by a State agency in the SEC proceeding or by a town in which the proposed facility will be located;

B. Grant a waiver request pursuant to Site 302.05 to allow PSNH to submit the above-referenced documents in an unfolded 11 x 17 inch format placed in 11 x17 inch three-ring binders; and

C. Grant such further relief as it deems appropriate.

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Respectfully Submitted,

Public Service Company of New Hampshire d/b/a
Eversource Energy

By its attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION


Dated: February 2, 2016

By:  _____

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Certificate of Service

I hereby certify that on the 2nd day of February, 2016, an original and 15 copies of the foregoing Motion was hand-delivered to the New Hampshire Site Evaluation Committee.

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Barry Needleman