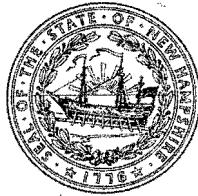


**ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET  
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER  
ATTORNEY GENERAL



ANN M. RICE  
DEPUTY ATTORNEY GENERAL

October 20, 2016

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

Re: SEC Docket No. 2015-04  
Application of Public Service Company of New Hampshire d/b/a Eversource Energy  
("Eversource") for a Certificate of Site and Facility for the Construction of a New 115 kV  
Transmission Line from Madbury Substation to Portsmouth Substation

Dear Ms. Monroe:

Enclosed for filing in reference to the above-captioned matter is an original and one copy  
of the following:

- Assented-To Motion of Counsel for the Public for Leave to Retain Heritage Landscapes LLC and for an Order Directing Eversource Energy to Bear the Costs Thereof and
- Assented-To Motion of Counsel for the Public for Leave to Retain Michael Lawrence Associates, PLC and for an Order Directing Eversource Energy to Bear the Costs Thereof.

Thank you for your attention to this matter. Please feel free to call with any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. G. Aslin".

Christopher G. Aslin  
Assistant Attorney General  
Environmental Protection Bureau  
(603) 271-3679

/cmc  
Enclosure  
cc: Distribution List

**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**No. 2015-04**

Application of Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") for a Certificate of Site and Facility for the Construction of a New 115 kV Transmission Line from Madbury Substation to Portsmouth Substation

**ASSENTED-TO MOTION OF COUNSEL FOR THE PUBLIC FOR LEAVE TO  
RETAIN MICHAEL LAWRENCE ASSOCIATES, PLC AND FOR AN ORDER  
DIRECTING EVERSOURCE ENERGY TO BEAR THE COSTS THEREOF**

NOW COMES Counsel for the Public, by his attorneys, the office of the Attorney General, and pursuant to RSA 162-H:10, V, hereby respectfully moves for leave to retain an expert consultant and for an order directing Public Service Company of New Hampshire d/b/a Eversource Energy (the "Applicant") to bear the costs and fees of the consultant and reimburse Counsel for the Public or pay the fees and costs directly to Michael Lawrence Associates PLC ("Lawrence" or the "Consultant"), in an amount up to \$40,000. In support hereof, Counsel for the Public respectfully represents as follows:

1. On April 12, 2016, Applicant submitted an Application for a Certificate of Site and Facility (the "Application") to the New Hampshire Site Evaluation Committee (the "Committee" or "SEC") to construct a 12.9 mile transmission line in the towns of Madbury, Durham, Newington and Portsmouth.
2. On April 21, 2016, the Attorney General appointed the undersigned to serve as Counsel for the Public in this case pursuant to RSA 162-H:9.
3. On April 29, 2016, the Chairman of the Committee appointed a Subcommittee (the "Subcommittee") to consider the Application. The Subcommittee accepted the Application on June 13, 2016.

4. Pursuant to RSA 162-H:9, I, Counsel for the Public “shall represent the public in seeking to protect the quality of the environment and in seeking to assure an adequate supply of energy.” Counsel for the Public’s broad role includes conducting studies and investigations necessary and appropriate to carry out the purposes of the statute. See Order on Pending Motions, *In re Request of SEA-3, Inc. for Exemption*, dated August 10, 2015, at 9. Those issues “go beyond protection of the environment and assuring an adequate supply of energy” and include any matters identified in RSA 162-H:1. *Id.*

5. Pursuant to RSA 162-H:10, V, Counsel for the Public may employ such consultants as are necessary to further his or her duties under RSA ch. 162-H, and the costs of such consultants “shall be borne by the applicant in such amount as may be approved by the committee.”

6. Counsel for the Public wishes to retain Lawrence to provide expert analysis and opinion concerning the Project’s impacts to aesthetics and scenic resources. The details of services that will be provided are set forth in the attached Exhibit A. The rates the Consultant will charge are also set forth in Exhibit A. The resume of Michael Lawrence is attached as Exhibit B. The total cost of the work is estimated not to exceed \$40,000.

7. Upon careful consideration of the Application, Counsel for the Public has deemed that the retention of the Consultant’s services to analyze the Project’s impacts to aesthetics is necessary to carry out the purpose of the siting statute and to evaluate if the Project will assure an adequate supply of energy without unreasonably and adversely affecting the quality of the environment, including aesthetics and scenic resources.

8. The Applicant proposes to construct a new transmission line in an existing utility right-of-way (“ROW”), replacing primarily 30-40 foot wooden distribution poles with

60-105 foot metal towers along much of the 12.9 mile project route. In some areas tree clearing will be conducted within the existing ROW. These changes will result in increased visibility of the Project and will have some effect on aesthetics and scenic resources.

9. The Applicant has submitted expert testimony from David Raphael, which includes a visual assessment by LandWorks (the "LandWorks Report"). The Landworks Report concludes that construction of the Project would not result in unreasonable adverse effects on aesthetics. Pursuant to RSA 162-H, it is Counsel for the Public's responsibility to test the underlying methodology and conclusions of the Application in order to inform the Subcommittee whether the Project would create an unreasonable adverse effect on aesthetics. Counsel for the Public requests leave to retain Lawrence to assist in this assessment of the LandWorks Report and to provide expert opinion regarding the effect of the Project on aesthetics and scenic resources.

10. Pursuant to RSA 162-H:10, V, Counsel for the Public requests that the Subcommittee order and direct the Applicant to pay the consultant's fees and costs, up to a total amount of \$40,000, as presented on invoices from the consultant on a monthly basis, with payments made within 30 days of receipt of an invoice by Applicant.

11. Counsel for the Public has endeavored to fairly and accurately estimate the total budget for the proposed services, but must nevertheless reserve the right to request additional sums should the need arise.

12. The Applicant assents to the relief sought in this motion.

13. The following parties concur in this motion: The Town of Newington, the Town of Durham and UNH, the Conservation Law Foundation, Helen Frink, the Durham Point/Little Bay Abutters; and the DeCapos.

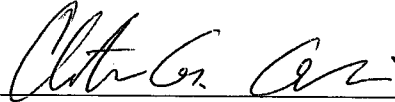
14. At the time of filing, Counsel for the Public had not heard from The Nature Conservancy, Fat Dog Shellfish Co., LLC, or Ms. McCosker with regard to a request for concurrence.

WHEREFORE, Counsel for the Public respectfully requests that the Subcommittee enter an order authorizing the retention of Michael Lawrence Associates PLC as a consultant pursuant to RSA 162-H:10, V, and directing the Applicant to bear the costs, as incurred monthly, up to a total of \$40,000, and to grant such additional relief as may be just.

Respectfully submitted,

COUNCIL FOR THE PUBLIC

By his attorneys



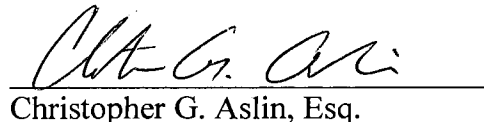
Dated: October 20, 2016

Christopher G. Aslin (N.H. Bar# 18285)  
Assistant Attorney General  
Environmental Protection Bureau  
33 Capitol Street  
Concord, New Hampshire 03301-6397  
Tel. (603) 271-3679  
[Christopher.Aslin@doj.nh.gov](mailto:Christopher.Aslin@doj.nh.gov)

**Certificate of Service**

I, Christopher G. Aslin, certify that on this day a true copy of the foregoing has been forwarded to the persons named on the Distribution List in this docket.

Dated: October 20, 2016



Christopher G. Aslin, Esq.



Michael Lawrence Associates PLC

Landscape Architects / Site Planning Consultants

September 27, 2016

Christopher G. Aslin  
Assistant Attorney General  
Environmental Protection Bureau  
33 Capitol Street  
Concord NH 03301

Via e-mail—[christopher.aslin@doj.nh.gov](mailto:christopher.aslin@doj.nh.gov)

Re ; Proposal for landscape architectural services - Review Landworks of Middlebury, Vermont's Visual Assessment Report prepared for Eversource Energy's 12.9 mile-long Seacoast Reliability Project proposed in Madbury, Durham, Newington and Portsmouth, NH and provide concluding report

Dear Christopher,

Thank you for inviting me to submit this proposal to analyze and critique the Seacoast Reliability Project Visual Assessment Report prepared by Landworks of Middlebury, Vermont. I understand that you want me to provide a written summary of my analysis and if I determine that the Landworks Report (LReport) has overlooked any important issues, provide a supplemental visual assessment .

This proposal includes providing written testimony, participation in the discovery process and my appearance as a witness at the hearings.

I envision the work to put together my report occurring in two phases—with information gathered in phase one determining the effort to complete phase two.

Phase One Report Analysis—Carefully analyze the facts presented in the LReport as well as maps, graphic representations and source materials.

Phase One New Graphics A—Develop independent maps to help understand the overall scale and scope of the project.

Phase One Site Visits—Visit the proposed project corridor and its environs with LReport and project plans in hand to gain a deeper awareness of project placement, scale and scope. Record observations with notes and photographs.

Phase One New Graphics B—Determine and represent graphically the essence of the project's visual issues and impacts based on information gleaned during site visits.

Phase One Conclusion—Determine whether or not the LReport represents the project accurately and its conclusion on page 4, *“that the Project will not have an unreasonable adverse effect on the aesthetics and scenic resources in the Project area.”*

Phase Two (option A)— **Agree w/LReport** —A fairly simple written report detailing and presenting the work outlined in phase one.

Phase Two (option B)— **Disagree w/LReport**—A written visual assessment examining areas of disagreement illustrated with maps, photos and photosimulations to support the logic of arriving at a different conclusion.

I propose a \$104.50 hourly rate fee submitted monthly with an upset limit of forty-thousand dollars (\$40,000). This represents estimated time to complete Phase Two option B.

I look forward to working with you on this important project.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Michael Lawrence".

Michael Lawrence



## Michael Lawrence Associates PLC

Landscape Architects / Site Planning Consultants

### Michael Charles Lawrence ASLA

Highly motivated design professional practicing the discipline of landscape architecture for over 40 years.

Applies primary character traits—  
patient attitude—optimistic outlook—visions of beauty—careful craftsmanship  
to transform site challenges—issues—problems  
into  
graceful landscapes.

#### **LANDSCAPE ARCHITECTURAL DESIGN SKILLS**

- Experienced as both primary landscape design consultant and consultant representative on site projects with budgets ranging from several thousand to over one million dollars.
- Design leader and team member for wide variety of award winning projects including; private residences, multi-family housing, public parks and gardens, urban landscapes, school campuses and both medical and commercial facilities. Works well with people.
- Adept at discovering site opportunities.
- Clear organization, presentation and communication of design ideas.

#### **ORGANIZATIONAL AND PROJECT MANAGEMENT SKILLS**

- First Chairperson Vermont Chapter of the American Society of Landscape Architects
- Skilled Presenter to Local Development and State Environmental Boards
- Co-organizer for Kairos at New York's Clinton Correctional Facility (max. security) - a nationally based volunteer program to bring peace to our prisons and communities.
- Co-organizer of Camp Agape Vermont - free camp for children who have experienced a parent's imprisonment— to break the cycle of intergenerational incarceration.

MEMBER  
American Society  
of Landscape Architects

Eight Linden Lane Essex Junction, Vermont, 05452  
PH/FAX 802-878-2778 C 802-578-9591  
mike@mclasla.com



## **EDUCATION**

University of Michigan – Ann Arbor, Michigan  
Bachelor of Landscape Architecture – 1969

## **EMPLOYMENT HISTORY**

Michael Lawrence & Associates PLC – Landscape Architects – Essex Junction, Vermont  
Founder, Landscape Architect 1988 - present.

The Site Concern Inc. – Landscape Architects – Burlington, Vermont  
Co-founder, Landscape Architect 1977 – 1988.

Siteworks Inc. - Landscape Design/Build Firm – Hinesburg, Vermont  
Co-founder, Design/Build Landscape Contractor 1974 – 1977

Burlington Associates - Architects – Burlington, Vermont  
Landscape Architect 1972 – 1973

The Office of Terrence Boyle – Landscape Architects – Burlington, Vermont  
Landscape Architect 1971 – 1972

M. Paul Friedberg Associates – Landscape Architects – New York, New York  
Landscape Designer 1970 – 1971

Miceli-Weed-Kulik – Landscape Architects – East Rutherford, New Jersey  
Landscape Designer 1969 – 1970

Ole Norgaard – Havearkitekt – Copenhagen, Denmark  
Landscape Architectural Draftsperson – 1967

## **PROFESSIONAL REGISTRATION**

Landscape Architect—State of Vermont—#125.0070756

## **AFFILIATIONS**

Alpha Rho Chi -Architectural Professional Fraternity

American Horticultural Therapy Association

American Public Gardens Association

American Society of Landscape Architects

Burlington Tree Committee – Promoting Urban Forestry

Friends of Central Park – Preserving the quality of New York City's Central Park

Gospelfest Choir—Interfaith Community Choir

Kairos – Vermont State Board Chairman & National Board Member

Rock Point Urban Reserve Natural Resources Committee - Member

Three Cathedral Square Elder Housing -Member Board of Directors

Camp Agape - Co-founder & Member Board of Directors

Habitat for Humanity—Construction Volunteer

## PARTIAL LIST OF PROJECTS

<b>Apple Hill Solar Project</b> Visual Assessment of Proposed Solar Array in View of VT Welcome Center	Bennington, VT.
<b>Anbaric Energy Project</b> Visual Assessment of New Regional Scale Energy Facility	New Haven, VT.
<b>Berlin Residence</b> Visual Assessment of Proposed Power Transmission Line in Scenic Vista	Charlotte, VT.
<b>Bishop Brady Center Master Plan</b> Site Master Plan for Historic Urban Lakefront Property	Burlington, VT.
<b>Bluffs at Northshore</b> Master Site Development Plan for 75 Unit Lakefront Residential Development Visual Impact Analysis from Perspectives on Lake Champlain	Burlington, VT.
<b>Bove's Foodprocessing Facility</b> Landscape Plan for New Processing Facility	Milton, VT.
<b>Bowers Windturbine Project</b> Visual Assessment & Maine LURC Testimony—Windturbines on Scenic Lakes	Carroll & Kossuth, ME.
<b>Butler's Corners Highway Improvement Project</b> Master Landscape Plan for Stormwater Detention Area	Essex, VT.
<b>Burlington International Airport</b> Long Range Site Development Plan Master Landscape Plan for Parking Garage Expansion Landscape Plans to Upgrade Planting for Aesthetics & Maintenance Green Roof accessible to the Public Living Wall Sound Barrier	Burlington, VT.
<b>Burlington Waterfront Park</b> Master Plan for Downtown Park on Lake Champlain	Burlington, VT.
<b>Calais Celltower</b> Visual Impact Assessment of Proposed Celltower	Calais, VT.

Cathedral Church of St. Paul  
Master Site Plan including Memorial Garden for Urban Cathedral  
Burlington, VT.

Cider Mill Neighborhood  
Traditional Neighborhood Development Master Plan  
South Burlington, VT.

College & Battery Street Residences  
Master Site & Landscape Plan for Dense Downtown Residential Facility  
Burlington, VT.

Cottonwood Crossing  
Master Site & Landscape Plan Including Small Parks for New Community  
Williston, VT.

Denecker Chevrolet  
Visual Assessment and Photo Sims of Proposed Building in Scenic Corridor  
Vergennes, VT.

Eastview Continuing Care Facility  
Visual Assessment and Photo Simulations of Proposed Elder Building Complex  
Middlebury, VT.

Elm & Union Elementary Schools  
Site Development and Landscape Plans for Elementary School Rehabilitations  
Springfield, VT.

Essex Town Center  
Master Plan for Traditional Neighborhood Development  
Essex Junction, VT.

Essex Alliance Church  
Site Plan for Suburban Church Expansion  
Essex, VT.

Essex Cinema  
Landscape Plan for Theater Addition  
Essex, VT.

Fairpoint Communications Tower  
Visual Assessment of Proposed Cell Tower  
Berkshire, VT.

Fairpoint Communications Tower  
Visual Assessment of Proposed Cell Tower  
Grand Isle, VT.

Fairpoint Communications Tower  
Visual Assessment of Proposed Cell Tower  
Milton, VT.

Franklin Park  
Master Plan & Visual Assessment of Residential Development along Interstate Corridor  
St. Albans, VT.

**Hakone at Smugglers**  
Design for Japanese-style Garden

Smugglers' Notch, VT

**Handy Auto Dealership**  
Master Plan & Visual Assessment of Auto Sales Facility in I-89 Corridor

St. Albans, VT.

**Hamlet Residential Neighborhood**  
Landscape & Lighting Plan for New Traditional Neighborhood Development

Williston, VT.

**Hardwick Veteran's Memorial Park**  
Master Plan to Upgrade Small Historic Community Park

Hardwick, VT.

**Hardwick Downtown**  
Revitalization Plan for Village Shopping Street

Hardwick, VT.

**Hilton Hotel**  
Urban Garden overlooking Lake Champlain

Burlington, VT.

**Homestead Residences**  
Visual Assessment for Multi-story Residences visible from Interstate-89

St. Albans, VT.

**IBM Corporation**  
Site & Landscape Plans for New 1 Million SF HQ Facility

Southbury, CT.

**IBM Corporation**  
Plans for Renovating Site of Large Manufacturing Facility

Essex Jct. VT.

**Key Bank**  
Landscape Plan for New Branch Bank

Burlington, VT.

**Lost Cove Residences**  
Master Plan for 12 Home Sites on Bluffs overlooking Lake Champlain

Colchester, VT.

**Lowell Windtowers**  
Photo simulations of Proposed Windtowers from Vermont's Long Trail

Lowell, VT.

**Marriott Residence Inn**  
Landscape Plan for 90 Unit Inn

Colchester, VT.



<b>Marriott Residence Inn</b> Landscape Plan for 80 Unit Inn	Williston, VT.
<b>Meach Cove Trust</b> Visual Assessment of Transmission Line Proposed to Cross Historic Farm	Shelburne, VT.
<b>Merced Property</b> Visual Impact Assessment of Transmission Line Proposed in Bucolic Setting	Newfane, VT.
<b>Mount Mansfield Corporation Ski Lightings</b> Assessment of Visual Impact of Night Ski Lighting	Stowe, VT.
<b>NestGeneration Solar Project</b> Aesthetic Analysis for Proposed 2.2 MW Solar Array	New Haven, VT.
<b>Police Station</b> Construction Documentation for New Urban Police Center	Boston, MA.
<b>Prentiss Farm</b> Visual Assessment and Vermont PSB Testimony for Rural Wind Tower	Huntington, VT.
<b>Quimonda North America Research Facility</b> Visual Assessment of Proposed Office Building	Williston, VT.
<b>Quinby Residence</b> Design Integrating Street Storm Drainage into Rear-yard Rain Garden	Burlington, VT.
<b>Reinhart Foods Facility</b> Landscape Plan for New Commercial Facility	Essex, VT.
<b>REM Commercial Development</b> Visual Assessment & Mitigation Plan for Commercial Facility in I-89 Visual Corridor	Williston, VT.
<b>Rock Point Conference Center</b> Master Plan for Three Building Retreat Center Overlooking Lake Champlain	Burlington, VT.
<b>Rokeby Museum</b> Landscape Plan for New Museum Commemorating Underground Railroad	North Ferrisburgh, VT.



<p><b>Roxbury Latin School</b>  Site Plan for Athletic Fields &amp; Parking Adjacent in Historic Neighborhood</p>	<p>West Roxbury, MA.</p>
<p><b>Ryder Brook Golf Course Residences</b>  Plan for New Residences and Club Center along Existing Golf Course</p>	<p>Morristown, VT</p>
<p><b>Saddleback Wind Turbines</b>  Aesthetic Assessment for Proposed Wind Turbine Project in Scenic Area</p>	<p>Weld, ME.</p>
<p><b>St Anne's Shrine</b>  Master Development Plan for Seasonal Retreat Center on Lake Champlain</p>	<p>Isle La Motte, VT.</p>
<p><b>Saxon Hill Industrial Park</b>  Master Plan to Integrate Recreation &amp; Commerce on 600 Acre Land Parcel</p>	<p>Essex, VT.</p>
<p><b>Senecal Quarry</b>  Visual Assessment and Impact of Proposed Stone Quarry on Public Corridor</p>	<p>Essex, VT.</p>
<p><b>Silver Bay YMCA Camp</b>  Site &amp; Memorial Garden Plans for Historic Camp on Lake George in Adirondacks</p>	<p>Lake George, NY</p>
<p><b>South Meadow Neighborhood</b>  Master Plan for 120 Affordable Housing Units, including Streetscape &amp; Parks</p>	<p>Burlington, VT.</p>
<p><b>South Village Solar Array</b>  Landscape Mitigation Plan for Solar Panel Project</p>	<p>South Burlington, VT.</p>
<p><b>Suncommon Solar Project</b>  Aesthetic Analysis &amp; Testimony before PSB on Proposed 150 kW Solar Array</p>	<p>Addison, VT.</p>
<p><b>Suncommon Solar Project</b>  Aesthetic Analysis &amp; Testimony before PSB on Proposed 150 kW Solar Array</p>	<p>New Haven, VT.</p>
<p><b>Three Cathedral Square</b>  Parking Design &amp; Courtyard Entry for 90 Unit Senior High Rise Bldg.</p>	<p>Burlington, VT.</p>
<p><b>Texas Falls</b>  Design for Universal Access to Scenic Waterfall in Green Mountain National Forest</p>	<p>Hancock, VT.</p>

**University of Vermont**

Inventory and Donor Plan for Trees on Historic Campus Green  
Landscape Renovation for Campus Housing  
Landscape at Historic Centennial Athletic Field  
Landscape Renovation Plan for President's Residence

Burlington, VT.

**Vermont AllSun Solar Project**

Aesthetic Analysis and Vermont PSB Testimony for Proposed 500kW Solar Project

Charlotte, VT

**Vermont Federal Credit Union**

Landscape Design for New Branch Bank

South Burlington, VT

**Vermont Tent Co.**

Landscape Plan for Commercial Warehouse Expansion

South Burlington, VT.

**Wagon Wheel**

Visual Assessment & Landscape Design for Truck Stop Visible from I-89

St. Albans, VT.

**Wake Robin Continuing Care Retirement Community**

Landscape Design & Visual Assessment for Project Expansion  
Therapeutic Garden for People Living with Dementia & Alzheimer's

Shelburne, VT.

**Walmart Bennington**

Landscape Design & Aesthetic Assessment—New Store

Bennington, VT.

**Walmart Derby**

Landscape Design & Aesthetic Assessment—New Store

Derby, VT.

**Walmart St. Albans**

Landscape Design & Aesthetic Assessment—New Store

St. Albans, VT.

**Williston Fire Station**

Landscape Design for New Fire Station

Williston, VT.

**Williston Police Station**

Landscape Design for New Police Station

Williston, VT.