

# Orr&Reno

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March 23, 2018

**Via Hand Delivery and Electronic Mail**

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

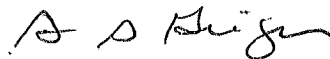
***Re: SEC Docket No. 2015-04 – Application of Public Service Company of New  
Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility  
– Seacoast Reliability Project***

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket please find the Town of Newington's Response to Applicant's Partially-Assented to Proposed Procedural Schedule.

Please contact me if there are any questions about this filing. Thank you.

Very truly yours,



Susan S. Geiger

Enclosure  
cc: Distribution List (electronic mail)  
Matthew and Amanda Fitch (U.S. Mail)  
Lawrence and Anne Gans (U.S. Mail)  
Deborah Moore (U.S. Mail)  
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**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**

**TOWN OF NEWINGTON'S RESPONSE TO  
APPLICANT'S PARTIALLY-ASSENTED TO PROPOSED  
PROCEDURAL SCHEDULE**

NOW COMES the Town of Newington ("Newington"), by and through its undersigned attorneys, and respectfully responds to Applicant's Partially-Assented to Proposed Procedural Schedule Following the Presiding Officer's Order on Applicant's Motion to Postpone Final Adjudicative Hearings ("Applicant's Proposed Schedule") by stating as follows:

1. Applicant's Proposed Schedule, at page 3, misstates Newington's position on the deadline for responses to technical session data requests contained in Applicant's original scheduling proposal. Newington's position, which was conveyed by its undersigned counsel via e-mail on March 15, 2018 to Eversource's counsel, Attorney Dumville, is that "May 28<sup>th</sup> is Memorial Day," so Newington would ask to change the deadline for responses to technical session data requests to May 31<sup>st</sup> to give Counsel for the Public and Intervenors two full weeks to respond to technical session data requests.

2. Applicant's Proposed Schedule incorrectly states that May 27<sup>th</sup> is Memorial Day. It also states that Applicant has changed the deadline for responses to technical session data requests to May 28<sup>th</sup> "to avoid Memorial Day and to remain generally consistent with prior SEC deadlines of 10 days for such responses." *Applicant's Proposed Schedule* (March 16, 2018), p. 3.

3. Newington believes that a deadline of May 28<sup>th</sup> for responses to technical session data requests is inappropriate and should be changed because, as previously noted, May 28<sup>th</sup> is Memorial Day. Newington continues to believe that a more appropriate deadline for these responses is May 31, 2018, and that Applicant will not be prejudiced by that deadline, as the deadline for Applicant's rebuttal prefiled testimony under the proposed schedule is not until July 27, 2018, or alternatively, July 20, 2018 under Durham/UNH's proposed schedule. In these circumstances, giving Counsel for the Public and the Intervenors a few more days after the Memorial Day holiday to answer data requests is reasonable.

4. Newington does not agree with Applicant's proposed deadlines for final briefs. Newington believes that all parties should have the same deadline for filing post-hearing briefs (i.e. within 14 days of the close of the record) and that all parties should be allowed to file post-hearing reply briefs within 21 days of the close of the record. Newington believes that this schedule is more equitable than Applicant's schedule, as it would give all parties the same deadline for initial briefs and enable all parties to respond to others' post-hearing briefs.

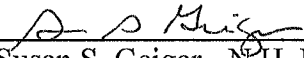
5. Newington agrees with Durham/UNH's proposed schedule.

WHEREFORE, Newington respectfully requests that the Committee:

- A. Approve Durham/UNH's proposed procedural schedule for the remainder of this docket; and
- B. Grant such further relief as it deems appropriate.

Respectfully submitted,

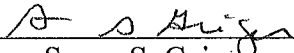
Town of Newington  
By Its Attorneys  
**Orr & Reno, P.A.**

  
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Dated: March 23, 2018

Certificate of Service

I hereby certify that on this 23<sup>rd</sup> day of March, 2018 a copy of the within Response was sent to persons named on the Service List either via electronic or U.S. mail, and the original copy was filed with the Site Evaluation Committee.

  
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Susan S. Geiger

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