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VIA ELECTRONIC MAIL

June 6, 2016

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

**Re: SEC Docket No. 2015-05: Public Service Company of New Hampshire d/b/a
Eversource Energy and New England Power Company d/b/a National Grid: Joint
Application for a Certificate of Site and Facility for the Merrimack Valley
Reliability Project**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find the Applicants' Objection to Intervenor Huard's Motion to Reconsider.

Please contact me directly should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Needleman".

Barry Needleman

BN:slb
Enclosure

cc: Distribution List

McLane Middleton, Professional Association
Manchester, Concord, Portsmouth, NH | Woburn, MA

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THE STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

SEC DOCKET NO. 2015-05

**JOINT APPLICATION OF NEW ENGLAND POWER COMPANY
D/B/A NATIONAL GRID &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANTS' OBJECTION TO INTERVENOR HUARD'S
MOTION TO RECONSIDER**

NOW COME New England Power Company d/b/a National Grid ("NEP") and Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") (collectively the "Applicants") by and through their attorneys, McLane Middleton, Professional Association, and Object to Intervenor Margaret Huard's Motion to Reconsider Order on Pending Motions.

1. On June 1, 2016, the Presiding Officer issued an Order on Pending Motions addressing a Motion to Compel filed by the Applicants and numerous motions filed by Intervenor Huard, including, three objections to data requests propounded by the Applicants at the May 5, 2016 technical session for Ms. Huard, a Motion to Clarify Medical Records, a Motion to Clarify E-mail, and a Motion Objecting to Continued Unduly Oppressive and Unconstitutional Treatment. The Order granted the Applicants' Motion to Compel and denied Ms. Huard's other motions and requests for relief. Ms. Huard has now filed a Motion to Reconsider.

2. Ms. Huard's Motion does not (1) identify any error of fact, error of reasoning, or error of law which the moving party wishes to have reconsidered; (2) describe how each error causes the Committee's order or decision to be unlawful, unjust or unreasonable; or (3) state concisely the factual findings, reasoning or legal conclusion proposed by the moving party. *See* Site 202.29(d). Therefore, Ms. Huard's motion does not meet the requirements for rehearing.

3. Further, it is clear that Ms. Huard did not object to any of the requests at the technical session. Ms. Huard's claim that she "attempted to object" is not supported by the transcript or the record.

4. Lastly, the Presiding Officer unquestionably has the authority to compel Ms. Huard to comply with the data requests. *See* Site 202.02(d) ("presiding officer . . . shall hear and decide procedural matters that are before the committee, including . . . [d]iscovery motions in proceedings."); Site 202.12(l) ("presiding officer . . . shall authorize other forms of discovery, including technical sessions, requests for admission of material facts, depositions, and any other discovery method permissible in civil judicial proceedings before a state court, when such discovery is necessary to enable the parties to acquire evidence admissible in a proceeding.").

WHEREFORE, the Applicants respectfully request that the Presiding Officer:

- A. Deny Intervenor Huard's Motion to Reconsider;
- B. Grant such further relief as requested herein and as deemed appropriate.

Respectfully Submitted,

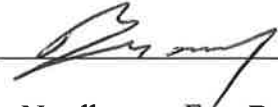
New England Power Company and

Public Service Company of New Hampshire

By its attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION


Dated: June 6, 2016

By:  _____

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Certificate of Service

I hereby certify that on the 6th day of June, 2016 this Motion was sent electronically to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.



Barry Needleman