

Susan Schibanoff
P. O. Box 59
Franconia NH 03580-0059
susan.schibanoff@unh.edu
March 4, 2016

**Re: Response to Applicants' Response and Objection to Certain Petitions to Intervene,
February 26, 2016.**

New Hampshire Site Evaluation Committee
Docket No. 2015-06 Northern Pass

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Dear Ms. Monroe:

I hereby respond and object to the Applicants' effort to limit the scope of my intervention and to combine it with the interventions of other abutting landowners as set forth in the Applicants' February 26th "Response and Objection" filing referenced above.

On February 4, 2016, I petitioned the Site Evaluation Committee (SEC) to intervene on the grounds that I own: a) historic residential rental property that abuts a proposed underground portion of the Northern Pass project along Rte. 116 in Franconia; b) property in Easton encumbered with a PSNH easement that was on Northern Pass's proposed route until August 2015.

Owning two properties, one on a now preferred route, the other on a now alternate route, and one of which has unique characteristics as a rental residence on the National Register of Historic Places (NRHP) not shared by any other petitioned property substantively distinguishes my interests, rights, and duties from those of other petitioners.

Regarding my property located in Easton on a formerly proposed route, the Applicants state in their "Response and Objection" of February 26, 2016 that although they "are required by law to include this formerly proposed route in this proceeding, the route is not actually under consideration" (emphasis added). In "Application Updates re: New Rules," the Applicants further state that they no longer consider this route "feasible," and therefore it is "unavailable."

Nevertheless, per the legal requirement that the Applicants reference, they include maps of this “unavailable” route in Attachment 1 of “Application Updates.” (Attachment 1 is entitled “NPT Project Maps – Alternate Route. Preliminary Design. February 2016 Additional Information.”) This latest “preliminary design” for my property in Easton occurs on Map Sheets 88 and 89, each dated February 19, 2016, of Attachment 1. These latest maps differ from their predecessors of July 2013. For example, the February 2016 maps contain much more data on wetlands, thereby calling into question the Applicants’ stated disavowal of all interest in the alternate route across my land in Easton.

In any case, since it is legally required to include this alternative route in the Applicants’ SEC application, property owners along it should have the right to intervene to protect their interests should this route come back into play, regardless of who -- the Applicants, the SEC, or some other party -- might resurrect it.

Regarding my residential rental property in Franconia listed on the NRHP, my rights, duties, privileges concerning it are unique. I would pursue protection of this historic property on a proposed underground route very differently than I would seek to protect my other property in Easton on an overhead route, and justice demands that I have the freedom to do so unlimited by the combination with other landowners sought by the Applicants to expedite the proceeding to their benefit.

I respectfully request the SEC to overrule the Applicants’ Response to my petition as an abutting landowner by granting me the right to intervene without the limitations sought by the Applicants. To combine my interests with those of others would limit my procedural rights and would hinder my ability to protect my property effectively, as is my statutory right.

Sincerely,

Susan Schibanoff

Susan Schibanoff

Cc: SEC distribution list for Docket No. 2015-06 as of March 4, 2016.