

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

March 6, 2016

Re: Dr Deborah Warner's Response to Applicant's Objection to Certain Petitions to Intervene in Docket No. 2015-06

Dear Ms. Monroe:

I oppose the Applicant's request to deny my Petition to Intervene and respectfully submits that the Applicant's Objection is without merit, and state:

1. The Northern Pass Project will substantially and adversely impact my particular rights and substantial interests in the manner and for the reasons set forth in its Petition to Intervene (submitted February 4, 2016);
2. The interests of justice and the orderly and prompt conduct of these proceedings will not be impaired by allowing my intervention;
3. The Applicant's proposed standard for non-abutter intervention – that to establish a legal interest based on a property's proximity to the Project, the property should be within 100 feet of the Project – is arbitrary and capricious, and the fact that my land is more than 100 feet from the Project in no way diminishes my interests in the proceedings nor eliminates the substantial and adverse effects that the Project will indeed have on my property;
4. My interests will not be sufficiently represented by abutting property owners. The Applicant asserts that it "stands to reason" that our interests in the proceedings are encompassed by the interests of abutting property owners but fails to demonstrate that the my particular interests are identical to, substantially similar to, or otherwise congruent and harmonious with the interests of abutters and fails to show that the my interests will be adequately represented by them. None of the abutting property owners and non-abutting property owners within 100 feet of the Project who have petitioned to intervene own property between my property and the Project or share my particular view shed that will be substantially and adversely impacted by the Project;
5. Likewise, my interests will not be sufficiently represented by Counsel for the Public. The Trust's Petition to Intervene is not based on how the Site Evaluation Committee's action will affect the public in general, but on how it will affect my property in particular;
6. My participation in the proceedings will not be repetitive and will not impede the orderly and prompt conduct of the proceedings;
7. I respectfully submit that I am entitled to intervene in these proceedings in the circumstances presented.

Wherefore, I respectfully request that the Site Evaluation Committee overrule the Applicant's Objection to my Petition to Intervene and grant my Petition as stated.

Sincerely,
Dr Deborah Warner