

Rebecca W. S. More, PhD
Weeks Lancaster Trust
60 Weeks Rd
Lancaster, New Hampshire 03584

March 6, 2016

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

Dear Ms. Monroe:

Re: The Weeks Lancaster Trust's Response to Applicant's Objection to Certain Petitions to Intervene in Docket No. 2015-06

The Weeks Lancaster Trust opposes the Applicant's request to deny its 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 The Weeks Lancaster Trust's particular rights and substantial interests in the manner and for the reasons set forth in its Petition to Intervene (submitted February 3, 2016);
2. The interests of justice and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of the Weeks Lancaster Trust;
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 Weeks Lancaster Trust lands are more than 100 feet from the Project in no way diminishes the Trust's interests in the proceedings nor eliminates the substantial and adverse effects that the Project will indeed have on Trust members and property;
4. The Weeks Lancaster Trust 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 Trust's particular interests are identical to, substantially similar to, or otherwise congruent and harmonious with the interests of abutters and fails to show that the Trust's 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 the Trust property and the Project or share our particular view shed that will be substantially and adversely impacted by the Project;
5. Likewise, the Weeks Lancaster Trust 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 Trust property in particular;
6. The Weeks Lancaster Trust's participation in the proceedings will not be repetitive and will not impede the orderly and prompt conduct of the proceedings;
7. The Weeks Lancaster Trust respectfully submits that it is entitled to intervene in these proceedings in the circumstances presented.

Wherefore, the Weeks Lancaster Trust respectfully requests that the Site Evaluation Committee overrule the Applicant's Objection to its Petition to Intervene and grant its Petition as stated.

Sincerely,



Rebecca W. S. More, PhD
Weeks Lancaster Trust

cc: Timothy T. More, Esq., trustee, Weeks Lancaster Trust