

**Nina and Elisha Gray
809 Blake Hill Road
New Hampton, NH 03256**

March 7, 2016

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

Dear Ms. Monroe:

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

We oppose the Applicant's request to deny its Petition to Intervene and respectfully submit that the Applicant's Objection is without merit:

1. The Northern Pass Project will substantially and adversely impact our particular rights and substantial interests in the manner for the reasons set forth in our Petition to Intervene (submitted January 17, 2016).
2. 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 unreasonable.
3. The SEC is to consider, among other aspects, the aesthetic and economic affects of a proposed siting. This is not restricted to distance from the project.
4. Northern Pass in its application that includes maps and visual affects from distances recognizes that non-abutting properties within the view-shed have an interest in the aesthetic and economic impacts the proposed project will have on those properties. Its capricious objection counters the project's prior representations.
5. The fact that our property overlooks the proposed towers from approximately 1300 feet renders our view even more expansive that were we under the proposed towers. (See attached map. Our property begins in the triangle on the east side.) This perspective creates an extended view of the proposed lines and enlarges the substantial adverse effects that the Project will have on our property interests.
6. Our 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:
 - a. Our particular interests are identical to, substantially similar to, or otherwise congruent and harmonious with the interests of abutters
 - b. Our 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 our property and the Project or share our particular view shed that will be substantially and adversely impacted by the Project.
7. Our interests will not be sufficiently represented by Counsel for the Public. Our 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 our property in particular.
8. Our participation in the proceedings will not be repetitive and will not impede the orderly and prompt conduct of the proceedings.
9. Disqualifying our Petition along with those of others misrepresents the overwhelming degree to which this project is opposed by citizens, residents and property-owners in this state.
10. We incorporate in this rebuttal valid arguments presented by other Interveners that also pertain to our Petition to Intervene.

We respectfully submit we are entitled to intervene in these proceedings in the circumstances presented and request that the Site Evaluation Committee overrule the Applicant's Objection to its Petition to

Intervene and grant its Petition as stated.

Yours sincerely,

Nina and Elisha Gray

Cc: Site Evaluation Distribution List

