



**National Trust *for*  
Historic Preservation**  
*Save the past. Enrich the future.*

March 7, 2016

VIA EMAIL

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

**Re: Application of Northern Pass Transmission, LLC and Public Service  
Company of New Hampshire d/b/a/ Eversource Energy for a  
Certificate of Site and Facility (SEC Docket No. 2015-6)**

Dear Ms. Monroe:

Included with this letter please find for filing the Reply of New Hampshire Preservation Alliance and the National Trust for Historic Preservation to Applicants' Response and Objection to Certain Petitions to Intervene in the above-referenced matter.

A copy of this letter and Reply have on this date been forwarded via email to all parties on the distribution list for this matter.

Sincerely,

A handwritten signature in black ink that reads "Sharee Williamson".

Sharee Williamson  
Assoc. General Counsel  
National Trust for Historic Preservation

cc: Distribution List

THE STATE OF NEW HAMPSHIRE  
before the  
SITE EVALUATION COMMITTEE

Docket No. 2015-6

Joint Application of Northern Pass Transmission, LLC and Public Service Company of  
New Hampshire d/b/a/ Eversource Energy for a Certificate of Site and Facility

**REPLY OF NEW HAMPSHIRE PRESERVATION ALLIANCE AND THE  
NATIONAL TRUST FOR HISTORIC PRESERVATION TO APPLICANTS'  
RESPONSE AND OBJECTION TO CERTAIN PETITIONS TO INTERVENE**

NOW COME the New Hampshire Preservation Alliance (“Alliance”) and the National Trust for Historic Preservation (“National Trust”) and respectfully object to certain requests included in the “Applicants’ Response and Objection to Certain Petitions to Intervene” (“Intervention Objection”) filed by the Applicant on February 26, 2016. In support of this Reply, the Alliance and the National Trust state the following:

1. On February 5, 2016, the National Trust and the Alliance filed a joint Petition for Intervention (“Joint Petition”) in this proceeding.
2. In their Intervention Objection, the Applicant did not object to the intervention of the National Trust and the Alliance in these proceedings. However, the Applicants do attempt to limit participation by the National Trust and the Alliance by requesting that the Committee order them to be combined with the Sugar Hill Historic Museum for the purposes of discovery, presentation of evidence, examination of witnesses and argument.
3. The National Trust and the Alliance understand the Committee’s interest in ensuring the orderly conduct of these proceedings and the need to timely process the Applicant’s permit request. In an effort to avoid duplication of evidence and consolidate interests, the National Trust and the Alliance voluntarily filed a joint intervention request

and intend to cooperate for the purposes of discovery, presentation of evidence, examination of witnesses and argument.

4. Despite this voluntary effort to consolidate interests, the Applicant has requested that the National Trust and the Alliance be further limited in their ability to participate by being joined with the Sugar Hill Historic Museum. To support this request, the Applicant states, without further support or elaboration, that these three organizations “share interests.”

5. Based on the intervention request filed by the Sugar Hill Historic Museum, it is clear that the organization is a regionally focused museum organization that is concerned about the impacts that this project would have on historic resources located in the town of Sugar Hill and in the counties of Grafton and Coos. Thus Sugar Hill Historic Museum’s interests are very regionally specific, and they should have the opportunity to focus their participation on addressing these specific regional impacts. Combining the Sugar Hill Historic Museum’s participation with the National Trust and the Alliance would unduly prejudice their ability to represent the regional interests identified in their intervention request.

6. In contrast, the Joint Petition specifically outlined the interests of the National Trust and the Alliance in support of their request for intervention in this proceeding, with a focus on each organization’s efforts to protect historic resources throughout the *entire state* of New Hampshire. The Joint Petition identifies interests related to: (1) the project’s impacts to historic and cultural resources statewide; (2) impacts to historic, cultural and scenic landscapes statewide; (3) impacts on New Hampshire Main Street communities; (4) impacts to heritage tourism and other historic preservation economic concerns

statewide; (5) impacts to archaeological resources statewide; and (6) impacts to the scenic byways, traditional cultural properties, and recreational resources statewide.

7. The Joint Petition further noted the parties' long history of working together by stating that "[f]or decades, the National Trust has worked throughout New Hampshire on preservation advocacy projects, and for the last thirty years, frequently in partnership with the New Hampshire Preservation Alliance." The Joint Petition also noted the history of both parties working together in the federal review process for this project. The National Trust and the Alliance do not have a comparable working relationship with the Sugar Hill Historic Museum. As a result, requiring that all three organizations coordinate in this matter will present an unnecessary logistical burden on their participation.

8. Requiring the National Trust and the Alliance, who share a common goal of addressing the impacts to historic resources across the state of New Hampshire, to combine their discovery efforts, presentation of evidence, examination of witnesses and arguments with the regionally focused Sugar Hill Historic Museum is unnecessary, unreasonable and would not improve the orderly conduct of these proceedings.

9. Further, the Applicant's Intervention Objection requests that the participation of the National Trust and the Alliance "be limited only to issues regarding historic, cultural and archaeological resources insofar as they relate to the Project." As described in the Joint Petition, as well as above, the interests that the National Trust and the Alliance seek to address in this proceeding include: (1) the project's impacts to historic and cultural resources statewide; (2) impacts to historic, cultural and scenic landscapes statewide; (3) impacts on New Hampshire Main Street communities; (4) impacts to heritage tourism and other historic preservation economic concerns statewide; (5) impacts

to archaeological resources statewide; and (6) impacts to the scenic byways, traditional cultural properties, and recreational resources statewide. Insofar as Applicant's request is intended to prohibit the National Trust and the Alliance from addressing any of the aforementioned interests during these proceedings, such request should be denied. Granting such request would unnecessarily restrict the SEC from receiving relevant information that could inform and support sound decision-making in this process from two organizations that are experts in historic preservation issues. Moreover, granting this request would unduly prejudice<sup>1</sup> the ability of the National Trust and the Alliance to protect their rights, duties, privileges, immunities and other substantial interests that may be affected by the project. Further, granting the Applicant's request would not improve the orderly conduct of these proceedings and would not serve the interests of justice.

10. The Alliance and the National Trust both have significant expertise and a record of collaborative work with state and federal agencies in permit review processes, including the federal review process for this project. The parties have demonstrated by their participation in these proceedings that they can and will present their case in a manner which will not interfere with the orderly conduct of the Committee's business or unduly delay the processing of the application.

11. An unsuccessful attempt was made on March 7, 2016 on behalf of the National Trust and the Alliance to contact counsel for the Applicant and Counsel for the Public prior to filing this motion.

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<sup>1</sup> As an example of prejudice, if the Applicant's request for consolidation of the parties were granted, then the National Trust and the Alliance would not have the independent ability to seek discovery pursuant to SEC 202.12(d).

**REQUEST FOR RELIEF**

WHEREFORE, the Alliance and the National Trust respectfully request that the SEC deny the Applicant's request to join their participation in this matter with the Sugar Hill Historic Museum; deny the Applicant's request to limit the National Trust and the Alliance's participation in any way that would prohibit representation of the interests described above, and granting such other and further relief as the SEC deems appropriate.

Respectfully submitted,



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Date: March 4, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, I caused the attached Reply to be served via electronic mail or first class mail to the parties named in the Distribution List of this Docket.



Sharee Williamson, Esq.

Date: March 7, 2016