

**RE: Objection of Rejection of our petition to intervene  
NH SEC Docket No 2015-06**

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

March 11, 2016

**RE: Thomas and Madelyn Foulkes's Response to Applicant's Objection to Certain Petitions to Intervene in Docket No. 2015-06**

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

1. The Northern Pass Project will substantially and adversely impact our 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 our 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 our interests in the proceedings nor eliminates the substantial and adverse effects that the Project will indeed have on our property and this community. We find it ironic that the towers can be higher than the 100 feet the applicant wants to use as a cut off for eligible interveners.
4. 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 the our particular interests are identical to, substantially similar to, or otherwise congruent and harmonious with the interests of abutters and fails to show that 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 share our particular view shed that will be 22adversely impacted by the Project;
5. Likewise, 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.
6. We respectfully submit that we are entitled to intervene in these proceedings in the circumstances presented.

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

Sincerely,  
Madelyn Foulkes

Thomas Foulkes

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Date March 11, 2016