

March 11, 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 our Petition to Intervene and respectfully submit that the Applicant's Objection is without merit for the following reasons:

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 our Petition to Intervene submitted February 5, 2016.
2. The Applicants's proposed standard for non-abutter intervention - that to establish legal interest based on the property's proximity to the Project, the property should be within 100 feet of the Project - is arbitrary and unreasonable. The entire town of Deerfield and State of New Hampshire will be adversely impacted by the Northern Pass Project in one way or another. The visual, noise, aesthetic, economic, environmental and health impacts of the project will not be restricted to within 100 feet of the right of way. All affected residents should be allowed to participate in the process.
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. We would experience daily the aesthetic affects of the proposed siting and our major investment in our property over the past 41 years would be irrevocably and substantially diminished as a result of this private for profit project.
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 our particular interests are identical to, substantially similar to or otherwise congruent and harmonious with the interests of abutters.
5. Our interests will not be sufficiently represented by the 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 how it will affect our property in particular.
6. Our participation in the proceedings will not be repetitive and will not impede the orderly and prompt conduct of the proceedings.
7. 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 New Hampshire.
8. We incorporate in this rebuttal valid arguments presented by other Interveners that also pertain to our Petition to Intervene.

We respectfully submit that 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 our Petition to Intervene and grant our Petition as stated.

Yours most sincerely,  
Barbara G. Mathews  
Robert G. Mathews

47 Candia Road  
Deerfield, NH 03037

Cc: Site Evaluation Committee Distribution List