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[www.nepga.org](http://www.nepga.org)

March 28, 2016

**Via Electronic Mail**

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

**Re: 2015-06—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; NEPGA's Partially Assented-to Request for Reconsideration of Denial of Petition for Limited Intervention**

Dear Ms. Monroe:

In accordance with the Notice of Hearing on Pending Motions and Order of Notice of Deadlines issued on March 25, 2016 in the above-captioned docket, please find attached a Partially Assented-to Request for Reconsideration of Denial of Petition for Limited Intervention, filed on behalf of the New England Power Generators Association, Inc.

Please contact me if you have any questions in this regard. Thank you for your assistance.

Very truly yours,

Carol J. Holahan

cc: Service List 2015-06 (electronic mail only)













benefit economically from the proposed project is permitted, it is patently unfair to deny intervention to the trade association representing those entities will be economically disadvantaged by the proposed project.

14. The disparate treatment of NEPGA and IBEW and NEPGA and CSC for the purposes of determining intervention, despite similarity of circumstances, is unwarranted, unjust and unreasonable. This is especially so where the Order neither addresses in any meaningful way the basis for such denial, nor proffers justification for treating NEPGA's intervention differently from similarly situated intervenors.
15. Since the Applicants themselves have promised that the project will deliver economic benefits directly related to energy costs and the region's energy future as direct evidence of how the project meets the "public interest" standard, it has placed the project's economic impact on the region's supply and demand in issue. To deny the generating facilities directly and adversely affected by that purported economic impact the ability to contest those assertions is unjust and unreasonable and denies the petitioners equal protection under the law.
16. NEPGA has demonstrated that its members have a direct and substantial interest in issues before the SEC in this proceeding and NEPGA's intervention will not impair the orderly conduct of this



proceeding. Accordingly, NEPGA has satisfied both the statutory and Committee's standard for intervention.

17. Finally, NEPGA asserts that it has in-depth experience on economic issues placed in issue by the Applicants before the Committee and believes it will be a constructive part of the adjudicative process in assisting the Committee to develop an adequate record with regard to the application under its consideration.
18. In accordance with N.H. Code of Admin. Rules Site 202.14, Public Counsel and the Society for the Protection of New Hampshire Forests assent to NEPGA's Request for Reconsideration. In light of Applicants objection to NEPGA's Petition for Limited Intervention, concurrence of the Applicants in this Motion as provided by has not been attempted.

WHEREFORE, NEPGA respectfully requests that the SEC:

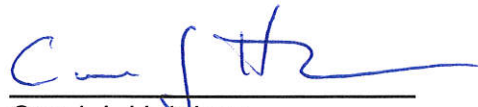
1. Reverse the Presiding Officer's March 18, 2016 ruling denying NEPGA's Petition for Limited Intervention and grant its request to be heard; and
2. Grant such other and further relief as the SEC deems just and reasonable.

Dated: March 28, 2016

Respectfully submitted,

**New England Power  
Generators Association, Inc.**

By its Attorney,



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**Certificate of Service**

I hereby certify that a copy of the foregoing Partially Assented-to Request for Reconsideration has on this 28th day of March 2016 been sent by email to the service list in 2015-06.

By:   
Carol J. Holahan