

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket No. 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

**PRE-HEARING MEMORANDUM OF THE SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS TO IDENTIFY TRACK 3 PRE-HEARING
CONFERENCE ISSUES**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, submits this Memorandum to identify issues to address during the Track 3 Pre-Hearing Conference scheduled for August 9, 2017. This Memorandum is intended to assist the orderly process by raising for consideration and discussion the following issues during the Track 3 Pre-hearing Conference, and to be addressed in the report and order that will be issued afterwards. This memo does not seek to establish a comprehensive list of all issues. Also, the Forest Society notes as in its’ Track 1 and 2 Pre-hearing Memoranda, that the resolution of issues for Tracks 1 and 2 should not be dispositive of those same issues with respect to Track 3. In support, the Forest Society states as follows:

ISSUES

1. **Hearing Dates, Memo Deadline & Deliberation Dates.** It would greatly assist the orderly conduct of this proceeding to have all of the hearing and deliberation dates scheduled and for one deadline to be set for all parties for the submission of post-hearing memoranda of law. Approximately four to six weeks following the last day of hearing with the last witness would be an appropriate amount of time.

2. **Order of Inquiry.** The parties should establish an order of inquiry. Generally, we presume that Counsel for the Public will go first, followed by the other parties as listed in the current order of inquiry, with the Applicant going last.

3. **Panels & Witnesses.** Presumably, some intervenors will testify as panels, as appropriate. (We acknowledge that there will be exceptions to this due to weather, logistical, or other constraints.) The Forest Society requests that its witnesses be grouped together in the following panels, and will call its witnesses in the following order:

- a. Jane Difley and Will Abbott;
- b. Donald Bilodeau, Diane Bilodeau, Dawn Bilodeau Scribner and Dana Bilodeau; and
- c. John Conkling, Dean Wilber, Kelly O'Brien Normandeau, Lore Moran Dodge, and Lise Moran.

The Forest Society requests that its witnesses Ray Lobdell and Harry Dodson testify individually (not part of a panel). Mr. Lobdell will be called second to last, and Mr. Dodson will be called last.

4. **Order of Witnesses.** The parties should establish the sequence in which witnesses will testify. Presumably, witnesses for Counsel for the Public will go first. Aside from that, it may be sensible to have witnesses appear in the same order as the current order of inquiry for cross examination.

5. **Estimated Duration of Cross Examination of CFP Witnesses.** The Forest Society estimates as follows:

- a. Construction Panel – 1.5 hour
- b. Local Economics Panel (KRA) – 2 hours
- c. Historical & Cultural Panel – 2 hours

- d. Environmental Panel – 1.5 hours
- e. Aesthetics – 2 hours
- f. Market Economics (Brattle) – 1 hour

These are our current best estimates and subject to change.

6. **Conclusion Time of Hearing Days.** As with Tracks 1 and 2, we anticipate hearing days will begin at 9:00 a.m. and conclude within the same time range of 4:30 p.m. to 5:15 p.m. for all of the same reasons discussed during the first and second prehearing conference, and in connection with recent pleadings and order.

7. **Public Comment.** It would be helpful to have confirmation of whether any additional time will be set aside for further public comment, as was noted at the conclusion of the most recent public comment.

8. As stated above, this is not an exclusive list of issues, but will hopefully prove useful for assisting the discussion in the upcoming Pre-Hearing Conference.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,
BCM Environmental & Land Law, PLLC



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Date: August 8, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this day, August 8, 2017, a copy of the foregoing Memorandum was sent by electronic mail to persons named on the Service List of this docket.

A handwritten signature in blue ink, appearing to read "Amy Manzelli". The signature is fluid and cursive, with the first name "Amy" and last name "Manzelli" clearly distinguishable.

Amy Manzelli, Esq.