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WHPUC 25SEP15 11:19

September 2, 2015

Martin Honigberg, Chairman
New Hampshire Site Evaluation Committee
29 Hazen Drive
Concord, NH 03301

Re: Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a/ Eversource Energy: Joint Application for a Certificate of Site and Facility for the Construction of a New High Voltage Electric Transmission Line in New Hampshire

Dear Chairman Honigberg:

Enclosed for filing in the above-referenced matter please find a Response to Intervention Request by Holderness Conservation Commission.

Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Needleman".

Barry Needleman

BN:slb
Enclosure

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

**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 for the
Construction of a New High Voltage Electric Transmission Line in New Hampshire**

SEC DOCKET NO. 2015-06

Response to Intervention Request by Holderness Conservation Commission

NOW COMES Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (the “Applicants”), by and through their Attorneys, McLane, Graf, Raulerson and Middleton, Professional Association, and submit this response to the Holderness Conservation Commission’s request to intervene, and state as follows:

1. The Holderness Conservation Commission (“HCC”) filed a Request to Intervene, dated August 6, 2015.

2. At present, there is no Application for this project pending before the Site Evaluation Committee (“SEC”). Until an Application has been filed and accepted, and the SEC has issued a procedural order governing, among other things, the intervention process, any requests for intervention are untimely and procedurally improper. *See e.g., Order Determining Application to be Incomplete*, Application of Atlantic Wind, LLC, NH SEC, Docket No. 2013-02, at 17 (Jan. 13, 2014) (“All motions to intervene in this docket shall be held in abeyance until such time as a complete Application has been accepted.”); *see also* Site 202.11 (a) (requiring that persons seeking to intervene shall file their petitions with the SEC and with parties identified in the notice of hearing).

3. It is reasonable to expect that this docket will generate substantial third-party interest and related motion practice. The Applicants believe that such practice should be handled in an orderly manner consistent with established SEC procedures. As such, all such motion

practice should be discouraged until an Application has been accepted, a procedural order has been issued and deadlines for the filing of petitions to intervene and objections have been established. Applicants reserve their rights to reply to the merits of the HCC Request.

WHEREFORE, the Applicants respectfully request that the SEC:

- A. Issue an Order holding that Petitions to intervene filed in advance of an order and notice of prehearing conference are inconsistent with Site 202.11 and therefore, the HCC Request will be held in abeyance until a procedural order has been issued;
- B. Post a notice stating that other intervention requests will not be accepted until a procedural order has been issued and appropriate deadlines have been established; and
- C. Grant such further relief as it deems appropriate.

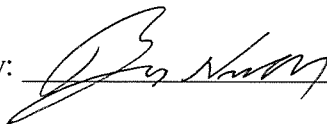
Respectfully Submitted,

Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy

By its attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON
PROFESSIONAL ASSOCIATION


Dated: September 2, 2015

By:  _____

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Certificate of Service

I hereby certify that on the 2nd day of September, 2015, an original and 18 copies of the foregoing Motion was hand-delivered to the New Hampshire Site Evaluation Committee.


Barry Needleman