## THE STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

## 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

## OBJECTION OF ATTORNEY GENERAL JOSEPH A. FOSTER TO UNASSENTED-TO MOTION FOR PROTECTIVE ORDER AND CONFIDENTIAL TREATMENT

Joseph A. Foster, Attorney General, by his attorneys, the office of the Attorney General (the "Attorney General"), hereby objects to the Applicants' Unassented-To Motion For Protective Order and Confidential Treatment (the "Joint Applicants' Motion"). The Attorney General objects because the Joint Applicants' Motion is premature. In support hereof, the Attorney General respectfully represents as follows:

- Pursuant to RSA 162-H:9, the Attorney General shall appoint an
  Assistant Attorney General to serve as Counsel for the Public. Counsel for the Public is afforded all of the rights, privileges and responsibilities of a party in the case.
- 2. Typically the Chairman of the Committee notifies the Attorney General of the application, which spurs the appointment. This process has recently been started but has not, as of this writing, been completed..
- 3. No other party has been allowed to intervene so far but public interest in this case is very high. It can therefore be expected that many intervening parties will seek to participate.
- 4. Ruling on the Joint Applicants' Motion is premature where none of the other parties, including Counsel for the Public, are in the case. The Motion should be

tabled until such time as the deadline for intervention has passed followed by a reasonable time to respond to the Motion.

Wherefore, the Attorney General prays that the Committee deny the Joint Applicants' Motion, or, alternatively post-pone consideration of it until the deadline for intervention has passed and intervening parties have an opportunity consistent with the rules to review it and, if desired, object, and grant such other and further relief as may be just.

Respectfully submitted,

JOSEPH A. FOSTER

By his attorneys

Dated: October 28, 2015

Peter C.L. Roth

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## Certificate of Service

I Peter CL Roth, certify that on October 28, 2015, I caused a true coy of the foregoing to be served upon Counsel for the Joint Applicants by e-mail.

Dated: October 28, 2015

Peter C.L. Roth