

October 29, 2015

VIA HAND-DELIVERY AND EMAIL

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**RE: 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 for Construction of a New High Voltage
Transmission Line in New Hampshire**

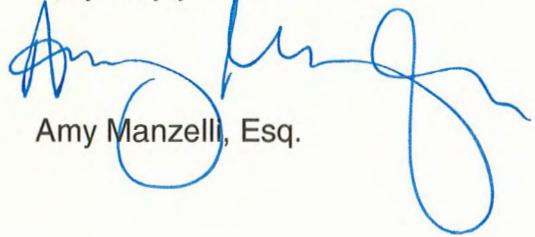
Dear Ms. Monroe:

Enclosed for filing in the above-captioned matter with the New Hampshire Site Evaluation Committee are the Appearances of Amy Manzelli, Esq. and Jason Reimers, Esq. and a Limited Objection of Society for the Protection of New Hampshire Forests to Applicants' Unassented-to Motion for Protective Order and Confidential Treatment.

Copies of this letter and its enclosures have this date been forwarded via email to all parties on the Distribution List.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,


Amy Manzelli, Esq.

/nmm

Enclosures

cc: Distribution List (as of 10-29-15) via email
Client



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

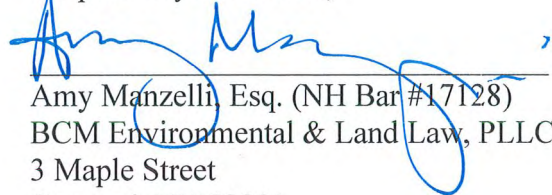
APPEARANCE

Pursuant to NH Admin. Rule Site 202.04, please take notice that the undersigned appears as counsel for Society for the Protection of New Hampshire Forests (the "Forest Society") in the above-captioned matter.

The matter involves an application by Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a certificate of site and facility to construct and operate a 192-mile electric transmission line.

The undersigned, Amy Manzelli, is an attorney admitted to practice in the State of New Hampshire and is permitted to represent the Forest Society in these proceedings.

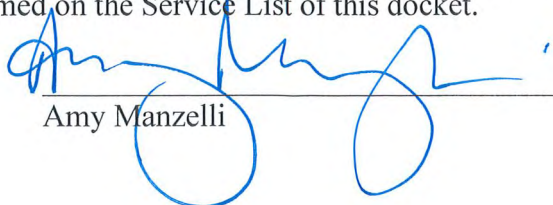
Respectfully Submitted,



Amy Manzelli, Esq. (NH Bar #17128)
BCM Environmental & Land Law, PLLC
3 Maple Street
Concord, NH 03301
(603) 225-2585
manzelli@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, October 29, 2015, a copy of the foregoing Appearance was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli

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

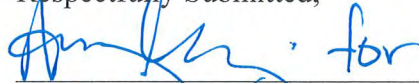
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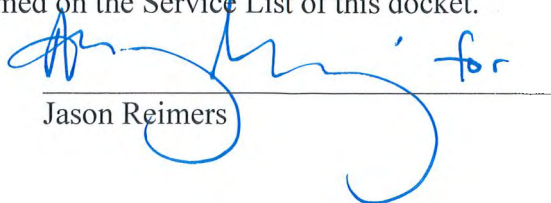
Respectfully Submitted,



Jason Reimers, Esq. (NH Bar #17309)
BCM Environmental & Land Law, PLLC
3 Maple Street
Concord, NH 03301
(603) 225-2585
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I hereby certify that on this day, October 29, 2015, a copy of the foregoing Appearance was sent by electronic mail to persons named on the Service List of this docket.



Jason Reimers

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

**LIMITED OBJECTION OF SOCIETY FOR THE PROTECTION OF NEW
HAMPSHIRE FORESTS TO APPLICANTS' UNASSENTED-TO MOTION FOR
PROTECTIVE ORDER AND CONFIDENTIAL TREATMENT**

The Society for the Protection of New Hampshire Forests (the "Forest Society"), by and through its attorneys, BCM Environmental & Land Law, PLLC, submits this Limited Objection, pursuant to Site 202.14(f), in response to Applicants' Unassented-to Motion for Protective Order and Confidential Treatment ("Motion") and states as follows:

1. On or about October 19, 2015, the Applicants filed an application for a certificate of site and facility ("Application") with the Site Evaluation Committee.

2. In its current Motion, the Applicant seeks "a protective order to preserve the confidentiality of the following information: (1) archaeological resources data; (2) information on the status, location, and distribution of native plant and animal species and natural communities, [sic] and (3) proprietary and confidential business information relating to the assessment of economic impacts and benefits of the proposed Project." (Footnote omitted.)

3. As the Applicants acknowledge, the docket currently involves no parties aside from the applicants, however, more parties are likely to appear and seek to intervene.

4. To allow to-be parties meaningful opportunity to read the voluminous Application and make reasonably informed decisions about whether to respond to the Motion, it would be appropriate for the Committee to abstain from ruling on the Motion until some weeks after the

deadline for intervention has passed, as the Committee has done in the past. *See, e.g., Order on Unassented-to Motion for Protective Order and Confidential Treatment*, Application of Antrim Wind Energy, LLC, NH SEC, Docket No. 2012-01 (June 4, 2012).

5. The Forest Society anticipates that the Committee will issue a procedural order, as authorized by Site 202.14(f), setting forth several deadlines and procedures including the deadline by which to-be parties must move to intervene.

6. Such order would also be the appropriate way to set a deadline to respond to the Applicants' Motion.

7. The Forest Society reserves its right to respond to the merits of the Motion.

WHEREFORE, the Forest Society respectfully requests that the Committee:

- A. Forbear ruling on the Motion until some weeks after the deadline for intervention has passed;
- B. Set a deadline by which intervening parties may respond to the Motion; and
- C. Grant such further relief as it deems appropriate.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: October 29, 2015

By: 

Amy Manzelli, Esq. (17128)

Jason Reimers, Esq. (17309)

3 Maple Street

Concord, NH 03301


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reimers@nhlandlaw.com

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Amy Manzelli