



TOWN OF PLYMOUTH

Office of Selectman
Plymouth, New Hampshire 03264

Phone: 536-1731

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January 25, 2016

Pamela Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301
Pamela.monroe@sec.nh.gov

Re: Town of Plymouth Motion to Intervene in Docket #2015-06

Dear Ms. Monroe:

We have included herewith the Town of Plymouth's Motion to Intervene in relation to the captioned matter for filing with the Site Evaluation Committee. Please advise if you require any additional information from us, and thank you for your assistance.

Very truly yours,

Michael Conklin, Chair
Plymouth Select Board

**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 to Construct a New High Voltage Transmission Line and Related Facilities in New Hampshire

Docket No. 2015-06

TOWN OF PLYMOUTH'S PETITION TO INTERVENE

The Town of Plymouth, by its Select Board, hereby petitions the Site Evaluation Committee to allow it to intervene in the above matter pursuant to NH RSA 541-A:32 and NH Admin. Rule Site 202.11, and in furtherance thereof, says as follows;

1. On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire, d/b/a Eversource Energy ("Applicants") filed an application for a Certificate of Site and Facility as captioned above. A portion of the proposed transmission line would pass through the Town of Plymouth.

2. The Applicant anticipates a significant impact on the Town of Plymouth. The proposed transmission line, as presently configured, is expected to be installed within the Route 3 right of way. Route 3 is a primary north-south highway through the state, and includes the primary business district in Plymouth on Main Street.

3. Unlike large portions of the proposed facility, NP plans to cross through a relatively dense business and residential area in Plymouth. This will involve a significant disruption of traffic and business in the downtown Plymouth and nearby areas, presumably for a significant, but unknown, period of time.

4. Plymouth State University is located in the Town of Plymouth, and the proposed area of disruption is immediately adjacent to portions of the campus. The university generates a significant amount of vehicular and pedestrian activity and traffic in the area, and this is also likely to be disrupted significantly.

5. The town is concerned about the impact the project will have on its business and residents, the extent and duration of the planned disruption, and the plans for minimizing the disruption and/or compensating the town and its residents for the disruption.

6. NH Administrative Rule Site 202.11 provides that:

"(b) The presiding officer shall grant a petition to intervene if:

(1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer's order of notice of the hearing, at least 3 days before the hearing;

(2) The petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and

(3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."

7. As set forth above, the proposed facility will impact the rights, duties, privileges, immunities and other substantial interests of the town. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

8. The Select Board of the Town of Plymouth has voted unanimously, with encouragement from local residents, to petition for intervenor status.

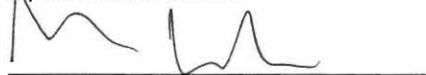
WHEREFORE, the Town of Plymouth respectfully requests that the Site Evaluation Committee:

- A. Grant the Town of Plymouth's Petition to Intervene.
- B. Grant such other and further relief as may be appropriate and just.

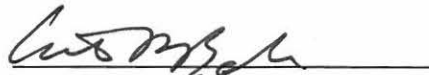
Dated this 26th day of January, 2016.

Respectfully submitted,

Town of Plymouth
By its Select Board



Michael Conklin



William Bolton



Neil McIver



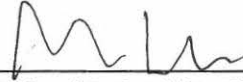
John Randlett



Michael Ahern

CERTIFICATE OF SERVICE

I hereby certify that on this 26 day of January, 2016, I have forwarded a copy of the foregoing Petition to Intervene to those persons named on the docket service list.



Michael F. Conklin, Chair
Plymouth Select Board