February 5, 2016

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

RE: NH 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

Dear Ms. Monroe:

Pursuant to RSA 541-A:32 and New Hampshire Administrative Rule Site 202.11, please find for filing with the New Hampshire Site Evaluation Committee the Coos County Business and Employers Group’s Petition to Intervene in the above-captioned matter.

Very truly yours,

James J. Bianco, Jr., Esq.

Enclosures

cc: Distribution List for Docket No. 2015-06
NOW COMES the Coos County Business and Employers Group ("Group") and petitions the Site Evaluation Committee ("SEC") to allow it to intervene in the above-captioned matter in accordance with RSA 541-A:32 and New Hampshire Administrative Rule Site 202.11. In support of its petition, the Group says:

1. On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy filed the above-referenced joint application for a Certificate of Site and Facility with the SEC to construct and operate a 1,090 MW electric transmission line and related facilities from the Canadian border in Pittsburg, New Hampshire to Deerfield, New Hampshire.

2. The Group is a non-profit voluntary corporation organized pursuant to RSA Chapter 292. The Group was organized to encourage and cultivate economic development and opportunities across business sectors—including, but not limited to, manufacturing, forestry, construction, technology, hospitality, and recreation—for the promotion of growth and prosperity of cities, towns, villages, and unincorporated locations within Coos County, New Hampshire.

3. The Group has a substantial interest in the above-captioned project. If the SEC grants a Certificate of Site and Facility to the applicants to construct the proposed project, the project will: (a) create new jobs during construction; (b) provide annual energy cost savings for
New Hampshire consumers; (c) contribute roughly $30 million in additional state and local tax revenue annually; and (d) provide support for economic development programs, clean energy innovations, and programs to grow jobs and support tourism. More specifically, the project’s Job’s Partnership ensures that preference will be given to hiring New Hampshire workers and that there will be opportunities for local contractors and businesses when bidding on construction-related work. Moreover, the project will also enable the 200 Million Dollar Forward NH Fund to support forward-looking initiatives and programs for community betterment expanding tourism and economic development. The project will also enable a 7.5 million dollar investment for the North County Job Creation Fund for further economic and community development and jobs creation, training and retention. These benefits will, in turn, lead to economic prosperity in the region, which advances the goals and mission of the Group.

4. RSA 541-A:32 and Site 202.11 govern petitions to intervene. Pursuant to newly enacted administrative rules governing the SEC, “[p]ersons seeking to intervene in a proceeding shall file petitions with the committee . . .” Site 202.11(a).

5. Site 202.11(b) further provides that the SEC, or its 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 order of notice of the hearing or prehearing conference, not less than 3 days before the hearing or prehearing conference;

   (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 or hearing officer, as applicable, determines that the interests of justice and the orderly and prompt conduct of the proceeding would not be impaired by allowing the intervention.

6. Here, the Group has met the requirements of Site 202.11(b).
7. The Group has submitted its petition in writing and in a timely manner, and has mailed copies as required by the rules. See Site 202.11(b)(1).

8. Additionally, the Group has set forth facts that are sufficient to demonstrate that its “rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding.” See Site 202.11(b)(2). As detailed above, the goal of the Group is to encourage and cultivate economic development and opportunities across all business sectors in Coos County, which will in turn lead to economic growth and prosperity in the region. The goals of the Group would be advanced through the above-captioned project, as the project has potential to strengthen Coos County’s economy. Based on the facts detailed herein, the Group has sufficiently demonstrated its “rights, duties, privileges, immunities or other substantial interests” will be affected by the proceeding. See Site 202.11(b)(2).

9. Finally, the “interests of justice and the orderly and prompt conduct of the proceeding would not be impaired” by allowing the Group to intervene. The Group respects the importance of this proceeding and is committed to ensuring that its intervention will not impair the prompt and orderly conduct of the proceeding.

10. Given the above considerations, the Group has met the requirements of Site 202.11(b). As a result, the Group respectfully requests that the SEC grant its Petition to Intervene.

WHEREFORE, the Group respectfully requests that the SEC:

A. Grant the Group’s Petition to Intervene; and

B. Grant such other and further relief as may be just.
Respectfully submitted,
COOS COUNTY BUSINESS AND EMPLOYERS GROUP

By Its Attorney,

By: 

James J. Bianco, Jr., Esq. (NH Bar #4)
Leigh S. Willey, Esq. (NH Bar #16193)
Bianco Professional Association
18 Centre Street
Concord, NH 03301
603-225-7170
jbianco@biancopa.com
lwilley@biancopa.com

Certificate of Service

I hereby certify that on this day, an original and one copy of the foregoing petition was sent to the New Hampshire Site Evaluation Committee and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.

Dated: February 5, 2016

By: 

James J. Bianco, Jr., Esq. (NH Bar #4)
THE 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  
SEC Docket No. 2015-06

APPEARANCE OF JAMES J. BIANCO, JR.

Pursuant to New Hampshire Administrative Rule Site 202.04, please enter the appearance of James J. Bianco, Jr. as counsel for the Coos County Business and Employers Group (“Group”) in the above-captioned matter.

The above-captioned matter involves an 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 with the SEC to construct and operate a 1,090 MW electric transmission line and related facilities from the Canadian border in Pittsburg, New Hampshire to Deerfield, New Hampshire. The undersigned, James J. Bianco, Jr., is an attorney admitted to practice in the State of New Hampshire.

Respectfully submitted,
COOS COUNTY BUSINESS AND EMPLOYERS GROUP

By Its Attorney,

Dated: February 5, 2016

By:  

James J. Bianco, Jr., Esq. (NH Bar #4)  
Bianco Professional Association  
18 Centre Street  
Concord, NH 03301  
603-225-7170  
jbiano@biancopa.com
Certificate of Service

I hereby certify that on this day, an original and one copy of the foregoing petition was sent to the New Hampshire Site Evaluation Committee, and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.

Dated: February 5, 2016

By: James J. Bianco, Jr., Esq. (NH Bar #4)
THE 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

SEC Docket No. 2015-06

APPEARANCE OF LEIGH S. WILLEY

Pursuant to New Hampshire Administrative Rule Site 202.04, please enter the appearance of Leigh S. Willey as counsel for the Coos County Business and Employers Group ("Group") in the above-captioned matter.

The above-captioned matter involves an 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 with the SEC to construct and operate a 1,090 MW electric transmission line and related facilities from the Canadian border in Pittsburg, New Hampshire to Deerfield, New Hampshire. The undersigned, Leigh S. Willey, is an attorney admitted to practice in the State of New Hampshire.

Respectfully submitted,
COOS COUNTY BUSINESS AND EMPLOYERS GROUP

By Its Attorney,

Dated: February 5, 2016

By: Leigh S. Willey, Esq. (NH Bar #16193)
Bianco Professional Association
18 Centre Street
Concord, NH 03301
603-225-7170
lwilley@biancopa.com
Certificate of Service

I hereby certify that on this day, an original and one copy of the foregoing petition was sent to the New Hampshire Site Evaluation Committee, and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.

Dated: February 5, 2016

By: 
Leigh S. Willey, Esq. (NH Bar #16193)