



**National Trust for
Historic Preservation**
Save the past. Enrich the future.



February 5, 2016

VIA EMAIL & U.S. MAIL

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

**Re: 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. 2015-6) - Petition for Intervention by the
New Hampshire Preservation Alliance and the National Trust for Historic
Preservation**

Dear Ms. Monroe:

Enclosed please find for filing the Petition for Intervention by the New Hampshire Preservation Alliance and the National Trust for Historic Preservation in the administrative review proceeding of the "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" before the Site Evaluation Committee (SEC Docket No. 2015-6).

Copies of this letter and Petition for Intervention have on this date been forwarded via email to all parties on the distribution list for this matter.

If you have any questions or concerns, please forward them to us.

Sincerely,

Handwritten signature of Elizabeth S. Merritt in blue ink.

Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation

Handwritten signature of Jennifer Goodman in blue ink.

Jennifer Goodman
Executive Director
New Hampshire Preservation Alliance

cc: Distribution List

THE STATE OF NEW HAMPSHIRE
before the
SITE EVALUATION COMMITTEE

Docket No. 2015-6

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

**PETITION FOR INTERVENTION BY NEW HAMPSHIRE PRESERVATION
ALLIANCE AND THE NATIONAL TRUST FOR HISTORIC PRESERVATION**

NOW COME the Petitioners, the New Hampshire Preservation Alliance
("Alliance") and the National Trust for Historic Preservation ("National Trust") and
respectfully petition the New Hampshire Site Evaluation Committee ("the SEC" or "the
Committee") to grant leave for the Alliance and the National Trust to intervene in these
proceedings pursuant to New Hampshire Code of Administrative Rules, Site 202.11, and
RSA 541-A:32. In support of this petition, the Alliance and the National Trust state the
following:

1. The Alliance is a 501(c)(3) non-profit preservation organization that is
organized under the laws of New Hampshire and headquartered at 7 Eagle Square,
Concord, New Hampshire.
2. The National Trust is a congressionally chartered 501(c)(3) non-profit
organization, 54 U.S.C. § 312102, which is organized under the laws of the District of
Columbia and headquartered at The Watergate Office Building, 2600 Virginia Avenue
NW, Suite 1100, Washington, D.C. 20037. The National Trust has a Field Office in
Boston at 7 Faneuil Hall Marketplace, Boston, Massachusetts, 02109.
3. The New Hampshire Preservation Alliance, established in 1985, strengthens
communities and stimulates local economies by encouraging the protection and revival of

historic buildings and places. Throughout our 30-year history, we have worked to revive buildings, healthy downtowns, and to protect vital landscapes throughout the state. We strive to demonstrate that historic preservation is an integral part of new economic and environmental trends and that community development and environmental sustainability are compatible with historic preservation practices. We do this through strategic coaching, technical assistance, planning grants, workshops, training, an easement program, and other services. We regularly communicate with approximately 5,000 members and supporters in New Hampshire. We work with approximately 100 preservation initiatives each year, and named rural agricultural landscapes to our *Seven to Save* list in 2014. We are actively assisting preservation projects in towns along the proposed Northern Pass route including Ashland, Boscawen, Concord, Dixville, Lancaster, Stark and Whitefield.

4. The National Trust for Historic Preservation, chartered in 1949, 54 U.S.C. § 312102, is a privately funded nonprofit organization that works to save America's historic places. From our headquarters in Washington, D.C. and our field offices around the country, we take direct, on-the-ground action when historic sites are threatened. Our work helps build vibrant, sustainable communities. Our congressional mandate is to "facilitate public participation" in the preservation of sites, buildings, and objects of national significance or interest. We advocate with governments to save America's heritage, and we strive to create a cultural legacy that is as diverse as the nation itself so all of us can take pride in our part of the American story. We have 800,000 members and supporters, and nearly 1,200 of our members live in New Hampshire.

For decades, the National Trust has worked throughout New Hampshire on preservation advocacy projects, and for the last thirty years, frequently in partnership with the New Hampshire Preservation Alliance. Seven New Hampshire hotels participate in our Historic Hotels of America Program, one of which is potentially within the viewshed of the proposed project.¹ Nine Main Street America communities² are located in the state, including one in Colebrook. In 2015, the National Trust selected Scenic Landscapes of New Hampshire as a National Treasure in direct response to the proposed Northern Pass transmission line. Our National Treasures program is a portfolio of irreplaceable, threatened places of national significance where the National Trust is making a long-term, deep organizational investment. Through this program, the National Trust has an opportunity to demonstrate the value of preservation and utilize our more than 60 years of experience, to take direct action to protect these places and promote their history and significance.

5. Both the Alliance and the National Trust have been involved with the proposed Northern Pass transmission line since at least 2011, including, but not limited to:

- A. Participating in the ongoing US Department of Energy's National Environmental Policy Act review for the issuance of a Presidential Permit for the Northern Pass Transmission Line.
- B. Participating as consulting parties in the Department of Energy's review under Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, 36 C.F.R. Part 800.

¹ Mountain View Grand Resort & Spa (Whitefield).

² The National Main Street Center is a subsidiary of the National Trust for Historic Preservation. The communities are Colebrook, Lisbon, Enfield, Ossipee, Rochester, Dover, Goffstown, Wilton, and Jaffrey.

C. Participating as a member of the public (to date) in SEC proceedings related to the Northern Pass Transmission line.

6. This Petition is filed in response to an application by Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (“Applicants”), on October 19, 2015 to construct, operate and maintain an approximately 192-mile transmission line from Pittsburg to Deerfield (“the Proposal”).

7. The New Hampshire Preservation Alliance brings specific expertise related to the historic and cultural resources of the state and knowledge of the communities and people along the proposed route.

8. The National Trust brings more than sixty years of experience and expertise related to the identification and assessment of historic and cultural resources, archaeology, historic and cultural landscapes, heritage tourism, and the economics of historic preservation.

9. The Alliance, the National Trust, and their members’ interests, along with people who live in or visit the Main Street communities and Historic Hotel, will be directly affected by the Proposal, including its impacts to the historic, cultural, archaeological resources, cultural landscapes, scenic byways, traditional cultural properties, recreation, and heritage tourism of New Hampshire. The Alliance and the National Trust have a legitimate interest in participating in the proceedings and can offer a unique and expert perspective on the aforementioned issues.

10. The Alliance and the National Trust both have significant expertise and a record of collaborative work with state agencies that can inform the SEC deliberations.

11. Having participated in commenting on the recent revisions to the New Hampshire SEC rules on energy siting and certification, and given our involvement in commenting on both the public aspects of the applicant's proposal to the SEC and the applicant's submissions to the Department of Energy's federal review process related to historic preservation, the Alliance and the National Trust are already familiar with the Proposal. Our participation as intervenors will not impair the orderly and prompt conduct of the proceedings, and would help to serve the interests of justice.

12. The foregoing facts clearly demonstrate that the rights, duties, privileges, immunities or other substantial interests held by the Alliance and the National Trust may be affected by the Proposal.

13. Participation by the Alliance and the National Trust as intervenors is unlikely to delay or disrupt the proceedings, but instead will be helpful to the Subcommittee and serve the interests of justice.

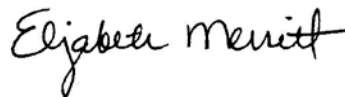
REQUEST FOR RELIEF

WHEREFORE, the Alliance and the National Trust respectfully request that the SEC issue an order granting their petition for intervention and granting such other further relief as the SEC deems appropriate.

Respectfully Submitted,



Jennifer Goodman
Executive Director
N.H. Preservation Alliance
7 Eagle Square
Concord, NH 03301
603-224-2281 ext 12
jg@nhpreservation.org



Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation
2600 Virginia Ave. NW, Ste. 1100
Washington, DC 20037
202-297-4133
emerritt@savingplaces.org

Date: February 5, 2016

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Petition to Intervene to be served via electronic mail or first class mail to the parties named in the Distribution List of this Docket.

A handwritten signature in black ink, appearing to read "Sharee Will", with a stylized flourish at the end.

Sharee Williamson, Esq.

Date: Feb. 5, 2016

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Subcommittee Members

Chairman, Public Utilities Commission Martin Honigberg, Chairman 21 South Fruit St., Suite 10 Concord, NH 03301 Martin.honigberg@puc.nh.gov	Dept of Environmental Services Craig Wright, Director, Designee 29 Hazen Dr., P.O. Box 95 Concord, NH 03302-0095 Craig.Wright@des.nh.gov
Commissioner, Public Utilities Commission Kathryn M. Bailey 21 S. Fruit St., Suite 10 Concord, NH 03301 kate.bailey@puc.nh.gov	Commissioner, Dept of Resources & Economic Development Christopher Way, Deputy Director, Designee 172 Pembroke Rd., Concord, NH 03302-1856 christopher.way@dred.state.nh.us
Commissioner, Department of Transportation William Oldenburg, Designee Assistant Director of Project Development 7 Hazen Dr. Concord, NH 03302-0483 woldenburg@dot.state.nh.us	Public Member Patricia Weathersby Weathersby Law PLLC P.O. Box 685 Rye, NH 03870 weathersbylawpllc@gmail.com
Alternate Public Member Rachel Whitaker 22 Fogg Road Stark, NH 03583 rwhitaker@ccsnh.edu	

Committee Staff

Administrator, Site Evaluation Committee Pamela Monroe 21 S. Fruit St., Suite 10 Concord, NH 03301 Pamela.monroe@sec.nh.gov Jody Carmody jody.carmody@puc.nh.gov	Brennan, Caron, Lenehan & Iacopino SEC Counsel Michael J. Iacopino, Esq. 85 Brook St. Manchester, NH 03104 miacopino@brennanlenehan.com Iryna Dore ldore@brennanlenehan.com Tina Munroe cmunroe@brennanlenehan.com
Assistant Attorney General, Department of Justice Brian Buonamano, Counsel 33 Capitol St. Concord, NH 03301 Brian.buonamano@doj.nh.gov	

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Parties

<p>Counsel for the Applicant McLane, Middleton, Professional Association Barry Needleman 11 South Main St., Suite 500 Concord, NH 03301 Barry.needleman@mclane.com</p>	<p>McLane, Middleton, Professional Association Jeremy T. Walker 900 Elm St., P.O. Box 326 Manchester, NH 03105 Jeremy.walker@mclane.com</p>
<p>McLane, Middleton, Professional Association Adam Dumville 11 South Main St., Suite 500 Concord, NH 03301 Adam.dumville@mclane.com</p>	<p>McLane, Middleton, Professional Association Rebecca S. Walkley 900 Elm St., P.O. Box 326 Manchester, NH 03105 Rebecca.walkley@mclane.com</p>
<p>McLane Middleton, Professional Association Thomas B. Getz 11 South Main St., Suite 500 Concord, NH 03301 Thomas.getz@mclane.com</p>	<p>Devine Millimet George Dana Bisbee 111 Amherst St. Manchester, NH 03101 dbisbee@devinemillimet.com</p>
<p>Senior Counsel Public Service Company of New Hampshire d/b/a/ Eversource Energy Christopher J. Allwarden 780 North Commercial St. Manchester, NH 03101 Christopher.allwarden@eversource.com</p>	<p>Senior Counsel Eversource Energy Marvin Paul Bellis 107 Selden Street Berlin, Connecticut 06037 Email: marvin.bellis@eversource.com</p>
<p>Northern Pass Transmission, LLC Elizabeth Maldonado 56 Prospect St. Hartford, CT 06103 Elizabeth.maldonado@eversource.com</p>	<p>Director, Transmission Business Operations Eversource Energy Robert P. Clarke 107 Selden Street Berlin, Connecticut 06037 Robert.clarke@eversource.com</p>
<p>Counsel for the Public NH Department of Justice Peter C.L. Roth, Senior Assistant Attorney General 33 Capitol St. Concord, NH 03301 Peter.roth@doj.nh.gov</p>	<p>Laura Maynard NH Department of Justice 33 Capitol St. Concord, NH 03301 Laura.maynard@doj.nh.gov</p>
<p>Dawn Gagnon McLane Middleton, Professional Association 900 Elm St., P.O. Box 326 Manchester, NH 03105 dawn.gagnon@mclane.com</p>	<p>Denise Frazier McLane Middleton, Professional Association 900 Elm St., P.O. Box 326 Manchester, NH 03105 denise.frazier@mclane.com</p>

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Primmer Piper Eggleston & Cramer Thomas Pappas 900 Elm Street Manchester, NH tpappas@primmer.com	Primmer Piper Eggleston & Cramer Eli Emerson 106 Main Street Littleton, NH eemerson@primmer.com
Communications Manager Eversource Energy Russ Kelly 780 N. Commercial Street Manchester, NH 03101 russ.kelly@eversource.com	McLane Middleton Viggo Fish 11 South Main St., Suite 500 Concord, NH 03301 Viggo.fish@mcclane.com

Interested Persons

New Hampshire Public Radio Environment Reports Sam Evans-Brown 2 Pillsbury St., 6 th floor Concord, NH 03301 Sevans-brown@nhpr.org	NH Department of Environmental Services Land Resources Management Collis G. Adams, Wetlands Bureau Administrator 29 Hazen Dr. Concord, NH 03302 Collis.adams@des.nh.gov
Cindy Kudlik Grafton, NH cindykudlik@hotmail.com	NH Association of Conservation Commissions Elaine Planchet 54 Portsmouth St. Concord, NH 03301 elaineplanchet@nhacc.org
Dr. Deborah Warner 135 Rock Strain Dr. Littleton, NH 03561 drwarner@ncia.net	North Country Council Mt. Eustis Commons Tara Bamford 262 Cottage St., Suite 246 Littleton, NH 03561 tbamford@nccouncil.org
Susan Schibanoff P.O. Box 59 Franconia, NH 03580 Susan.schibanoff@unh.edu	Dept of Resources and Economic Development Division of Parks and Recreation Eric Feldbaum 172 Pembroke Rd. Concord, NH 03301 Eric.feldbaum@dred.nh.gov
Thomas Masland Ransmeier & Spellman PC One Capitol Street Concord, NH 03302 tmasland@ranspell.com	Caroline V. Bone, CFA US Electric Utilities & Power Equity Research Deutsche Bank Securities, Inc. 60 Wall Street, New York, NY 10005 Caroline.bone@db.com

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

<p>Dept of Resources and Economic Development Division of Parks and Recreation Bill Gegas 172 Pembroke Rd. Concord, NH 03301 bill.gegas@dred.nh.gov</p>	<p>BCM Environmental & Land Law, PLLC Amy Manzelli 3 Maple Street Concord, NH 03301 manzelli@nhlandlaw.com</p>
<p>Deputy City Solicitor Danielle L. Pacik 41 Green Street Concord, NH 03301 dpacik@concordnh.gov</p>	<p>BCM Environmental & Land Law, PLLC Jason Reimers 3 Maple Street Concord, NH 03301 reimers@nhlandlaw.com</p>
<p>Allison Morris Concord Monitor amorris@cmonitor.com</p>	<p>Coos County Commissioner District Three Rick Samson 804 Piper Hill Road Stewartstown NH. 03576 higherground@wildblue.net</p>
	<p>Gregory Reiss Millennium Management LLC 666 Fifth Avenue, 8th Floor New York, NY 10103 Gregory.Reiss@mlp.com</p>
<p>Stanley Holz Town of Whitefield saholz@myfairpoint.net</p>	<p>Deborah Stever Town of Easton steverselectperson@gmail.com</p>
<p>C. Christine Fillmore Gardner Fulton & Waugh PLLC 78 Bank Street Lebanon, NH 03766 cfillmore@townandcitylaw.com</p>	<p>Margo Connors Town of Sugar Hill connorsmargo@gmail.com</p>
<p>Meredith Hatfield NH Office of Energy and Planning 107 Pleasant Street, Johnson Hall Concord, NH 03301 Meredith.hatfield@nh.gov</p>	<p>Tracey Boisvert NH Office of Energy and Planning 107 Pleasant Street, Johnson Hall Concord, NH 03301 Tracey.boisvert@nh.gov</p>
<p>Chris Jensen NH Public Radio cjensen@nhpr.org</p>	<p>Edith Tucker Salmon Press 13 Cold Brook Rd Randolph, NH 03593 edithtucker@ne.rr.com</p>

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Dorene Hartford Conservation Law Foundation dhartford@clf.org	Melissa Birchard Conservation Law Foundation mbirchard@clf.org
Caroline V. Bone, CFA US Electric Utilities & Power Equity Research Deutsche Bank Securities, Inc. 60 Wall Street, New York, NY 10005 Caroline.bone@db.com	Bill Carpenter NH Dept. of Resources and Econ. Development Land Management Administrator william.carpenter@dred.nh.gov
Sharon Penney Plymouth Town Planner 6 Post Office Square Plymouth, NH 03264 spenney@plymouth-nh.org	Jeanette Foisy Town Administrator Town of Deerfield PO Box 159 Deerfield, NH bos@townofdeerfieldnh.com
Nancy Martland 16 Post Road Sugar Hill, NH nancy.martland@gmail.com	Erick Berglund, Jr. Deerfield Conservation Comm. 23 Nottingham Rd. Deerfield, NH 03037 erickb@metrocast.net
Alexandra and James Dannis 117 McGinty Road Dalton, NH sandydannis@gmail.com	Nik Coates, Town Administrator Town of Bristol 230 Lake Street Bristol, NH 03222 townadmin@townofbristolnh.org
Alan Robert Baker Attorney at Law 481 Meriden Hill Rd. Columbia NH 03590 abobbaker@aol.com	Michelle Kleindienst Association Manager McKenna's Purchase Unit Owner's Assoc. kleindienstm@gmail.com
Bruce Ahern 503 Daniel Webster Highway Plymouth, NH bruceahern@roadrunner.com	
Kevin Spencer 161 Sullivan Road Stark, NH 03582-6451 Kkspencerbwi161@gmail.com	Laurence M Rappaport NH State Representative Coos District One lmrapp@lmrapp.com

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

<p>Ashland Conservation Commission PO Box 517 Ashland, NH 03217 Ashland Conservation Commission ashlandconcom@gmail.com</p>	<p>Franconia Planning Board Thaddeus D. Presby Franconia, NH 03580 Thad.presby@presbyc.com</p>
<p>Donald & Betty Gooden 76 Lancaster Rd. Whitefield, NH 03598 dbklogging@myfairpoint.net</p>	<p>Elisha Gray 809 Blake Hill Road New Hampton, NH 03256 yarge@comcast.net</p>
<p>Kris Pastoriza 294 Gibson Road Easton, NH 03580 krispastoriza@gmail.com</p>	<p>Roy R. Stever Chair Easton Conversation Commission 1060 Easton Valley Road Easton, NH 03580 Roy.stever@gmail.com</p>

THE STATE OF NEW HAMPSHIRE
before the
SITE EVALUATION COMMITTEE

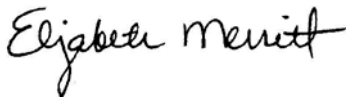
Docket No. 2015-6

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 OF ELIZABETH S. MERRITT & SHAREE WILLIAMSON

Pursuant to NH Admin Rule Site 202.04, please take notice that the undersigned appears as counsel for proposed intervenor, National Trust for Historic Preservation, 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 are attorneys that are admitted to practice in the District of Columbia, but are not admitted to practice in the State of New Hampshire.

Respectfully submitted,



Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation
2600 Virginia Ave. NW, Ste. 1100
Washington, DC 20037
202-297-4133
emerritt@savingplaces.org



Sharee Williamson
Associate General Counsel
National Trust for Historic Preservation
2600 Virginia Ave. NW, Ste. 1100
Washington, DC 20037
202-588-6194
swilliamson@savingplaces.org

CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Appearance to be served via electronic mail or first class mail to the parties named in the Distribution List of this Docket.



Sharee Williamson, Esq.

Date: Feb. 5, 2016

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Subcommittee Members

Chairman, Public Utilities Commission Martin Honigberg, Chairman 21 South Fruit St., Suite 10 Concord, NH 03301 Martin.honigberg@puc.nh.gov	Dept of Environmental Services Craig Wright, Director, Designee 29 Hazen Dr., P.O. Box 95 Concord, NH 03302-0095 Craig.Wright@des.nh.gov
Commissioner, Public Utilities Commission Kathryn M. Bailey 21 S. Fruit St., Suite 10 Concord, NH 03301 kate.bailey@puc.nh.gov	Commissioner, Dept of Resources & Economic Development Christopher Way, Deputy Director, Designee 172 Pembroke Rd., Concord, NH 03302-1856 christopher.way@dred.state.nh.us
Commissioner, Department of Transportation William Oldenburg, Designee Assistant Director of Project Development 7 Hazen Dr. Concord, NH 03302-0483 woldenburg@dot.state.nh.us	Public Member Patricia Weathersby Weathersby Law PLLC P.O. Box 685 Rye, NH 03870 weathersbylawpllc@gmail.com
Alternate Public Member Rachel Whitaker 22 Fogg Road Stark, NH 03583 rwhitaker@ccsnh.edu	

Committee Staff

Administrator, Site Evaluation Committee Pamela Monroe 21 S. Fruit St., Suite 10 Concord, NH 03301 Pamela.monroe@sec.nh.gov Jody Carmody jody.carmody@puc.nh.gov	Brennan, Caron, Lenehan & Iacopino SEC Counsel Michael J. Iacopino, Esq. 85 Brook St. Manchester, NH 03104 miacopino@brennanlenehan.com Iryna Dore ldore@brennanlenehan.com Tina Munroe cmunroe@brennanlenehan.com
Assistant Attorney General, Department of Justice Brian Buonamano, Counsel 33 Capitol St. Concord, NH 03301 Brian.buonamano@doj.nh.gov	

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
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Distribution List**

Parties

<p>Counsel for the Applicant McLane, Middleton, Professional Association Barry Needleman 11 South Main St., Suite 500 Concord, NH 03301 Barry.needleman@mclane.com</p>	<p>McLane, Middleton, Professional Association Jeremy T. Walker 900 Elm St., P.O. Box 326 Manchester, NH 03105 Jeremy.walker@mclane.com</p>
<p>McLane, Middleton, Professional Association Adam Dumville 11 South Main St., Suite 500 Concord, NH 03301 Adam.dumville@mclane.com</p>	<p>McLane, Middleton, Professional Association Rebecca S. Walkley 900 Elm St., P.O. Box 326 Manchester, NH 03105 Rebecca.walkley@mclane.com</p>
<p>McLane Middleton, Professional Association Thomas B. Getz 11 South Main St., Suite 500 Concord, NH 03301 Thomas.getz@mclane.com</p>	<p>Devine Millimet George Dana Bisbee 111 Amherst St. Manchester, NH 03101 dbisbee@devinemillimet.com</p>
<p>Senior Counsel Public Service Company of New Hampshire d/b/a/ Eversource Energy Christopher J. Allwarden 780 North Commercial St. Manchester, NH 03101 Christopher.allwarden@eversource.com</p>	<p>Senior Counsel Eversource Energy Marvin Paul Bellis 107 Selden Street Berlin, Connecticut 06037 Email: marvin.bellis@eversource.com</p>
<p>Northern Pass Transmission, LLC Elizabeth Maldonado 56 Prospect St. Hartford, CT 06103 Elizabeth.maldonado@eversource.com</p>	<p>Director, Transmission Business Operations Eversource Energy Robert P. Clarke 107 Selden Street Berlin, Connecticut 06037 Robert.clarke@eversource.com</p>
<p>Counsel for the Public NH Department of Justice Peter C.L. Roth, Senior Assistant Attorney General 33 Capitol St. Concord, NH 03301 Peter.roth@doj.nh.gov</p>	<p>Laura Maynard NH Department of Justice 33 Capitol St. Concord, NH 03301 Laura.maynard@doj.nh.gov</p>
<p>Dawn Gagnon McLane Middleton, Professional Association 900 Elm St., P.O. Box 326 Manchester, NH 03105 dawn.gagnon@mclane.com</p>	<p>Denise Frazier McLane Middleton, Professional Association 900 Elm St., P.O. Box 326 Manchester, NH 03105 denise.frazier@mclane.com</p>

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
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Distribution List**

Primmer Piper Eggleston & Cramer Thomas Pappas 900 Elm Street Manchester, NH tpappas@primmer.com	Primmer Piper Eggleston & Cramer Eli Emerson 106 Main Street Littleton, NH eemerson@primmer.com
Communications Manager Eversource Energy Russ Kelly 780 N. Commercial Street Manchester, NH 03101 russ.kelly@eversource.com	McLane Middleton Viggo Fish 11 South Main St., Suite 500 Concord, NH 03301 Viggo.fish@mcclane.com

Interested Persons

New Hampshire Public Radio Environment Reports Sam Evans-Brown 2 Pillsbury St., 6 th floor Concord, NH 03301 Sevans-brown@nhpr.org	NH Department of Environmental Services Land Resources Management Collis G. Adams, Wetlands Bureau Administrator 29 Hazen Dr. Concord, NH 03302 Collis.adams@des.nh.gov
Cindy Kudlik Grafton, NH cindykudlik@hotmail.com	NH Association of Conservation Commissions Elaine Planchet 54 Portsmouth St. Concord, NH 03301 elaineplanchet@nhacc.org
Dr. Deborah Warner 135 Rock Strain Dr. Littleton, NH 03561 drwarner@ncia.net	North Country Council Mt. Eustis Commons Tara Bamford 262 Cottage St., Suite 246 Littleton, NH 03561 tbamford@nccouncil.org
Susan Schibanoff P.O. Box 59 Franconia, NH 03580 Susan.schibanoff@unh.edu	Dept of Resources and Economic Development Division of Parks and Recreation Eric Feldbaum 172 Pembroke Rd. Concord, NH 03301 Eric.feldbaum@dred.nh.gov
Thomas Masland Ransmeier & Spellman PC One Capitol Street Concord, NH 03302 tmasland@ranspell.com	Caroline V. Bone, CFA US Electric Utilities & Power Equity Research Deutsche Bank Securities, Inc. 60 Wall Street, New York, NY 10005 Caroline.bone@db.com

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Distribution List**

<p>Dept of Resources and Economic Development Division of Parks and Recreation Bill Gegas 172 Pembroke Rd. Concord, NH 03301 bill.gegas@dred.nh.gov</p>	<p>BCM Environmental & Land Law, PLLC Amy Manzelli 3 Maple Street Concord, NH 03301 manzelli@nhlandlaw.com</p>
<p>Deputy City Solicitor Danielle L. Pacik 41 Green Street Concord, NH 03301 dpacik@concordnh.gov</p>	<p>BCM Environmental & Land Law, PLLC Jason Reimers 3 Maple Street Concord, NH 03301 reimers@nhlandlaw.com</p>
<p>Allison Morris Concord Monitor amorris@cmonitor.com</p>	<p>Coos County Commissioner District Three Rick Samson 804 Piper Hill Road Stewartstown NH. 03576 higherground@wildblue.net</p>
	<p>Gregory Reiss Millennium Management LLC 666 Fifth Avenue, 8th Floor New York, NY 10103 Gregory.Reiss@mlp.com</p>
<p>Stanley Holz Town of Whitefield saholz@myfairpoint.net</p>	<p>Deborah Stever Town of Easton steverselectperson@gmail.com</p>
<p>C. Christine Fillmore Gardner Fulton & Waugh PLLC 78 Bank Street Lebanon, NH 03766 cfillmore@townandcitylaw.com</p>	<p>Margo Connors Town of Sugar Hill connorsmargo@gmail.com</p>
<p>Meredith Hatfield NH Office of Energy and Planning 107 Pleasant Street, Johnson Hall Concord, NH 03301 Meredith.hatfield@nh.gov</p>	<p>Tracey Boisvert NH Office of Energy and Planning 107 Pleasant Street, Johnson Hall Concord, NH 03301 Tracey.boisvert@nh.gov</p>
<p>Chris Jensen NH Public Radio cjensen@nhpr.org</p>	<p>Edith Tucker Salmon Press 13 Cold Brook Rd Randolph, NH 03593 edithtucker@ne.rr.com</p>

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
Eversource Energy
SEC 2015-06
Distribution List**

Dorene Hartford Conservation Law Foundation dhartford@clf.org	Melissa Birchard Conservation Law Foundation mbirchard@clf.org
Caroline V. Bone, CFA US Electric Utilities & Power Equity Research Deutsche Bank Securities, Inc. 60 Wall Street, New York, NY 10005 Caroline.bone@db.com	Bill Carpenter NH Dept. of Resources and Econ. Development Land Management Administrator william.carpenter@dred.nh.gov
Sharon Penney Plymouth Town Planner 6 Post Office Square Plymouth, NH 03264 spenney@plymouth-nh.org	Jeanette Foisy Town Administrator Town of Deerfield PO Box 159 Deerfield, NH bos@townofdeerfieldnh.com
Nancy Martland 16 Post Road Sugar Hill, NH nancy.martland@gmail.com	Erick Berglund, Jr. Deerfield Conservation Comm. 23 Nottingham Rd. Deerfield, NH 03037 erickb@metrocast.net
Alexandra and James Dannis 117 McGinty Road Dalton, NH sandydannis@gmail.com	Nik Coates, Town Administrator Town of Bristol 230 Lake Street Bristol, NH 03222 townadmin@townofbristolnh.org
Alan Robert Baker Attorney at Law 481 Meriden Hill Rd. Columbia NH 03590 abobbaker@aol.com	Michelle Kleindienst Association Manager McKenna's Purchase Unit Owner's Assoc. kleindienstm@gmail.com
Bruce Ahern 503 Daniel Webster Highway Plymouth, NH bruceahern@roadrunner.com	
Kevin Spencer 161 Sullivan Road Stark, NH 03582-6451 Kkspencerbwi161@gmail.com	Laurence M Rappaport NH State Representative Coos District One lmrapp@lmrapp.com

**Northern Pass Transmission LLC and Public Service Company of New Hampshire dba
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SEC 2015-06
Distribution List**

Ashland Conservation Commission PO Box 517 Ashland, NH 03217 Ashland Conservation Commission ashlandconcom@gmail.com	Franconia Planning Board Thaddeus D. Presby Franconia, NH 03580 Thad.presby@presbyc.com
Donald & Betty Gooden 76 Lancaster Rd. Whitefield, NH 03598 dbklogging@myfairpoint.net	Elisha Gray 809 Blake Hill Road New Hampton, NH 03256 yarge@comcast.net
Kris Pastoriza 294 Gibson Road Easton, NH 03580 krispastoriza@gmail.com	Roy R. Stever Chair Easton Conversation Commission 1060 Easton Valley Road Easton, NH 03580 Roy.stever@gmail.com