

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 for the Construction of a New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

**ASSENT OF THE TOWNS OF NEW HAMPTON, WOODSTOCK, BRIDGEWATER & LITTLETON TO MOTIONS OF CLF AND SPNHF**

NOW COME the Towns of New Hampton, Woodstock, Bridgewater, & Littleton (“towns”), by and through their attorneys, Mitchell Municipal Group, P.A., and hereby assent to and join the *Motion of Conservation Law Foundation for Additional or Deferred Public Hearings* and the Society for the Protection of New Hampshire Forest’s *Contested Motion for Due Process Upon Submission of Additional Information* (“motions”), stating 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 with the SEC (“Application”). By December 18, 2015 Order Accepting Application, the SEC determined that the Application contained sufficient information to satisfy the requirements of RSA 162-H, *et seq.*, and thereafter set the date of several required public hearings using the December 18, 2015 date of acceptance.

2. On December 15, 2015, new administrative rules governing the SEC became effective, and on December 28, 2015, the SEC informed Applicants it had readopted certain rules applicable to the Application. Thereafter, Applicants responded that they required an additional two months, or until March 15, 2016, to prepare supplemental

information to comply with the newly adopted rules.<sup>1</sup>

3. Meanwhile, the SEC has scheduled all five of the county-based pre-adjudicative public hearings based on the acceptance date of December 18<sup>th</sup>, with four hearings scheduled prior to March 15, 2016, and the last scheduled for March 16, 2016. See RSA 162-H:10, I-c.

4. Applicants submitted the supplemental information on February 26, 2016, allowing the public a matter of days before the scheduled public hearings begin on March 1<sup>st</sup>. The SEC has yet to comment on whether the supplemental information satisfies the newly adopted rules, but regardless, the public will have insufficient time to review and meaningfully participate in those hearings.

5. The towns therefore adopt and incorporate by reference herein the argument put forth by the Towns of Bristol, Easton, Franconia, Northumberland, Sugar Hill, and Whitefield, that the SEC has several viable options to address the apparent lack of opportunity to meaningfully participate as argued in the motions by CLF and SPNHF. See Assent of the Towns of Bristol, Easton, Franconia, Northumberland, Sugar Hill, and Whitefield to Motions of CLF and SPNHF, paras. 9-14.

6. Similarly, the towns believe it is in the public interest to postpone the currently scheduled hearings until after the SEC determines whether it is complete.

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<sup>1</sup> By February 26, 2016 filing, Applicants purported to submit the supplemental information required by the newly adopted rules.

WHEREFORE, the Towns of New Hampton, Woodstock, Bridgewater, & Littleton respectfully requests that the SEC:

- A. Re-evaluate the completeness of the Application and postpone the hearings or suspend the proceedings for a reasonable amount of time following receipt of the supplemental information; and
- B. Grant such other and further relief as the SEC deems just and necessary.

Respectfully submitted,

**TOWN OF NEW HAMPTON  
TOWN OF WOODSTOCK  
TOWN OF BRIDGEWATER  
TOWN OF LITTLETON**

By Its Attorneys  
**MITCHELL MUNICIPAL GROUP, P.A.**

Date: Feb 29, 2016

By:

  
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CERTIFICATION

I hereby certify that a copy of this motion has been emailed to persons named on the Service List of this docket.

Feb 29, 2016  
Date

  
Steven Whitley