

BARRY NEEDLEMAN
Direct Dial: 603.230.4407
Email: barry.needleman@mclane.com
11 South Main Street, Suite 500
Concord, NH 03301
T 603.226.0400
F 603.230.4448

VIA HAND-DELIVERY

March 3, 2016

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

Re: NH Site Evaluation Committee Docket No. 2015-06: Joint Application of Northern Pass Transmission LLC ("NPT") and Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") 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-referenced docket, please find an original and one copy of the Applicants' Objection to Petition to Intervene of Daryl and Bradley Thompson.

Sincerely,

Barry Needleman

Enclosures

cc: Distribution List

STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

SEC DOCKET NO. 2015-06

JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC & PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY FOR A CERTIFICATE OF SITE AND FACILITY

APPLICANTS' OBJECTION TO PETITION TO INTERVENE OF DARYL AND BRADLEY THOMPSON

NOW COME Northern Pass Transmission LLC ("NPT") and Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") (collectively the "Applicants"), by and through their attorneys, McLane Middleton, Professional Association, and respectfully submit this Objection to the Petition to Intervene of Daryl and Bradley Thompson (the "Petitioners").

- 1. The Petitioners filed a Petition to Intervene with the Committee on March 2, 2016, which is 26 days after the February 5, 2016 intervention deadline set forth in the December 22, 2015 Procedural Order. It is also 5 days after the February 26, 2016 deadline for Applicants to respond to motions to intervene. This petition should be denied.
- 2. Ensuring the orderly and prompt conduct of these proceedings given the unique nature of this case may be a challenge. To meet this challenge, it is imperative that deadlines and established procedures for case management be respected.

WHEREFORE, the Applicants respectfully request that the Presiding Officer:

- A. Deny the Petitioners' Petition to Intervene; and
- B. Grant such further relief as is deemed appropriate.

Respectfully submitted,

Northern Pass Transmission LLC and

Public Service Company of New Hampshire d/b/a

Eversource Energy

By Its Attorneys,

McLANE MIDDLETON, PROFESSIONAL ASSOCIATION

Dated: March 3, 2016

By:

Barry Needleman, Bar No. 9446 Thomas Getz, Bar No. 923

Adam Dumville, Bar No. 20715 11 South Main Street, Suite 500

Concord, NH 03301

(603) 226-0400 barry.needleman@mclane.com

thomas.getz@mclane.com

adam.dumville@mclane.com

Certificate of Service

I hereby certify that on the 3rd of March, 2016, an original and one copy of the foregoing Motion was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.

Barry Needleman