

The State of New Hampshire
before the
Site Evaluation Committee

Docket No. SEC 2015-06

Application of Northern Pass Transmission LLC and Public Service Company of New
Hampshire dba Eversource Energy for a Certificate of Site and Facility

**BRUCE D. AHERN'S MOTION FOR RECONSIDERATION OF THE ORDER ON
PETITIONS TO INTERVENE**

I, Bruce D. Ahern, file this Motion for Reconsideration of the Order on Petitions to Intervene (The Order) specifically Section II(B)(2)(c) Abutting Property Owners Bethlehem – Plymouth which groups Bruce D. Ahern with other property owners that abut the project Bethlehem-Plymouth in this docket.

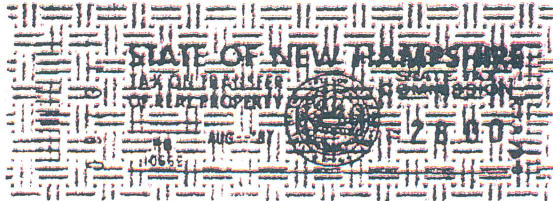
1. The Order states that “these property owners all express similar concerns about the effect of the Project and construction of the Project on the integrity of their homes, wells, property values, access to their property, noise, road integrity, health and safety, and enjoyment of life. They also challenge the Applicant’s right to construct the Project under the public rights-of-way abutting their properties.” Order at 19-20.
2. As set forth in my Motion to Intervene, my objection is that the Applicant does not have a property interest in the site passing through my property. My property does not just abut the right-of-way it encompasses it. My property is one of the original grants that were given when the Town of Plymouth was laid out. The Plymouth Selectmen laid out the original roadway through my property, and subsequently re-routed the roadway that became Route 3 passing through my property. I have an interest in the land under the road. I have buildings on both sides of the road. I have utilities under the road.
3. The utility easement through my property along Route 3 attached hereto as Exhibit A is very specific. It limits the utilities that can use the easement and it limits the space that can be used in a manner that makes it impossible to install the planned Northern Pass utility infrastructure.
4. My issues are not the same as the other interveners listed as they live in different towns and on different Rights-of-Way. A common spokesman cannot reasonably be expected to advocate my independent interest. A comparison of the issues raised in the Motions to Intervene of the other landowners in the group to my Motion would establish that I am not properly combined with their interventions.

Because my Objections are not in common with the other interveners in the group, I therefore respectfully request that the Presiding officer reconsider his position and grant me full party status separate from the other interveners in the group.

Respectfully submitted,

Bruce D. Ahern

0364R-NS1#87-107



POLE NUMBERS

28.00

We, Henry D. Ahern and Erma T. Ahern of R.F.D.#2-Box#463, Plymouth, New Hampshire 03264 (husband and wife) for consideration paid, grant to the NEW HAMPSHIRE ELECTRIC COOPERATIVE, INC., RFD #2 TENNEY MOUNTAIN HIGHWAY, PLYMOUTH, NEW HAMPSHIRE 03264, a New Hampshire corporation, and the New England Telephone and Telegraph Company, a New York corporation having a principal place of business at 185 Franklin Street, Boston, Massachusetts 02107, their respective successors and assign forever, with warranty covenant, the RIGHT and EASEMENT to construct, repair, operate, maintain, patrol, replace and remove overhead and underground lines consisting of wires, cables, ducts, poles and other apparatus necessary for the transmission and distribution of electricity and/or telephone service on, over, and under our land in New Hampshire, more particularly described as follows:

Land in the Town of Plymouth, County of Grafton on both side of U.S. Highway Three.

Easement is subject to the following stipulations:

- (1) The right of way granted on July 31, 1987 will revert back to landowners should the above utilities (or their successors or assigns) discontinue use of it.
- (2) Easement is limited to the above utilities (or their successors or assigns) and Cable TV (or successors) exclusively.
- (3) NHEC & NET will agree to sign over and abandon the existing right of way across these land owners property, which is between poles 31/27 through 31/32 by December 31, 1988.
- (4) When poles are replaced, the butts shall be pulled and not left in the ground to decompose.

This conveyance shall include the right to clear and keep clear a right-of-way of all trees and underbrush by such means as the grantees may select. Sprays or other chemical preparations may be employed to retard or eliminate the growth of vegetation, unless the land owner takes the necessary preventive steps to avoid this action. The land owners should contact New Hampshire Electric Cooperative, Inc. Right of Way Department for necessary information.

The center-line location of said right-of-way shall be determined by and restricted to the existing and proposed locations of the poles of the Grantees and adjacent to the land of the Grantors and become permanent upon the installation of the poles in said lines.

The width of the right-of-way clearing shall not exceed fifteen feet (15') either side of line. Necessary guy strands and anchors may be located beyond the cleared area.

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Henry and Erma Ahern - Easement

The Grantors shall continue to enjoy use of the property for any purposes not adverse to the grantees' rights. Planting of trees, building of structures, or storage of lumber and/or other materials within the granted right-of-way shall not be undertaken without the grantees' knowledge and consent. The grantee agrees to make reasonable modification of the lines within the grantor's property at the grantor's expense to accommodate future needs of the grantors in the use of their property.

The grantors release to the grantees all rights of dower/curtesy, homestead and other interest in the rights and easement hereby conveyed.

Witness our hands and seals this 31th day of JULY, 1987.

Erma C. Telfer
Witness

Erma T. Ahern
ERMA T. AHERN

Erma C. Telfer
Witness

Henry D. Ahern
HENRY D. AHERN

STATE OF NEW HAMPSHIRE
COUNTY OF GRAFTON

On this 31st day of JULY, 1987, before me the undersigned officer, personally appeared HENRY D. AHERN AND ERMA T. AHERN known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument that they executed the same for the purpose therein contained.

In witness whereof I hereunto set my hand and official seal.

CYNTHIA A. DOWNING, Notary Public
My Commission Expires April 20, 1992
(My Commission Expires)

Cynthia A. Downing
(Notary Public - Justice of the Peace)

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87 SEP -8 AM 9:09
GRAFTON COUNTY
REGISTRY OF DEEDS

EXAMINED, ATTEST Coral A. Elliott
GRAFTON COUNTRY REGISTRY OF DEEDS

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