

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