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Please respond to our Meredith office

April 5, 2016

VIA REGULAR MAIL and
EMAIL TO Pamela.monroe@sec.nh.gov
New Hampshire Site Evaluation Committee
Pamela G. Monroe, Administrator
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: Northern Pass Transmission LLC and Public Service Company of New
Hampshire dba Eversource Energy for a Certificate of Site and Facility
SEC Docket No. 2015-06

Good Morning Ms. Monroe:

Enclosed please find for filing an original and 15 copies of the City of Berlin's Statement of Positions Concerning Applicants' Motion for Protective Order, Applicants' Request for Waivers From New SEC Rules, and Various Parties' Motions Concerning Schedule.

Please let me know if you have any questions. Many thanks for the collective time and attention to this detail.

Very truly yours,
DONAHUE, TUCKER & CIANDELLA, PLLC



Christopher L. Boldt, Esq.
cboldt@dtclawyers.com

Enclosures

cc: Client (via email)
Distribution List, Docket No. 2015-06 (via email)

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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

CITY OF BERLIN'S STATEMENT OF POSITIONS CONCERNING APPLICANTS'
MOTION FOR PROTECTIVE ORDER, APPLICANT'S REQUESTS FOR WAIVERS
FROM NEW SEC RULES, AND VARIOUS PARTIES' MOTIONS CONCERNING
SCHEDULE

NOW COMES the City of Berlin (“the City”), through its attorneys, Donahue, Tucker & Ciandella, PLLC, and files this Statement of Positions concerning Applicants’ Motion for Protective Order, Applicants’ Motion for Waivers from the new full Site Evaluation Committee (“the SEC”) Rules and various parties Motions concerning scheduling this docket.


1. The SEC has granted full intervenor status to the City.
2. The City’s only position on the Applicants’ Unassented-to Motion for Protective Order and for Confidential Treatment as filed with the SEC on or about October 19, 2015 is to ask that the SEC to condition any such Order on the ability of the City and another parties to obtain unredacted copies of any such confidential information upon the execution of a standard Non-Disclosure Agreement as has been used in various matters before the SEC, the NH Public Utilities Commission and our State Courts in matters concerning PSNH/Eversource and others. So long as such requested condition is imposed, the City does not object to the Applicants’ Motion for Protective Order and for Confidential Treatment.
3. The City takes no position on the Applicants’ Requests for Waivers from the new SEC Rules.
4. Finally, while the City has no preference on the ultimate schedule selected by the SEC, the City does suggest that the SEC stagger the Data Request deadlines of the Counsel for the Public and the ultimate pool of Intervenors so that the Counsel for the Public would issue his Data Requests first on what ever particular date is selected by the SEC (“Day X”), followed by a delayed deadline for the Data Requests of the Municipal, Historical and NGO Intervenors (Day X plus 7), followed by a further

delayed deadline for Data Requests of the remaining Intervenors (Day X plus 10). Applicants' response deadlines would be similarly staggered. In this way, the City would hope that a more efficient process of issuing non-repetitive Data Requests to the Applicants (and their more efficient and timely responses thereto) would result.

WHEREFORE, the City of Berlin respectfully submits this Statement of Positions for consideration by the Site Evaluation Committee.


Respectfully submitted,
The City of Berlin
By and through its City Attorney

4/5/10
Date _____

By: 
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CERTIFICATE OF SERVICE

I hereby certify that, on April 5, 2016, I caused the attached Statement of Positions to be sent via electronic mail to the parties named in the Distribution List of this Docket.


Christopher L. Boldt, Esq.