

April 5, 2016

**VIA HAND-DELIVERY AND EMAIL**

Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**RE: New Hampshire Site Evaluation Committee Docket No. 2015-06  
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 Construction of a New High Voltage  
Transmission Line in New Hampshire**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned matter with the New Hampshire Site Evaluation Committee is the **Partially Assented-to Motion of the Society for the Protection of New Hampshire Forests to Suspend Time Frame for Public Interest.**

Copies of this letter and its enclosures have this date been forwarded via email to all parties on the Distribution List.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Nicole M. Manteau  
Office Manager

/nmm

Enclosure

cc: Distribution List (Rev. 3/30/2016) via email  
Client



STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

Docket No. 2015-06

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

**PARTIALLY ASSENTED-TO  
MOTION OF THE SOCIETY FOR THE PROTECTION OF  
NEW HAMPSHIRE FORESTS  
TO SUSPEND TIME FRAME FOR PUBLIC INTEREST**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully requests the Subcommittee exercise its authority pursuant to RSA 162-H:14 to suspend the time frame established under RSA 162-H:7 and adopt the procedural schedule attached as Exhibit A.

1. With the following point of emphasis and two exceptions, the Forest Society concurs with and incorporates by reference Counsel for the Public’s Partially-Assented to Motion to Suspend the Time Frame Established Under RSA 162-H:7 dated April 1, 2016. To be clear, do not mistake the brevity with which the Forest Society concurs for weak concurrence. Indeed, it is the Forest Society’s very strong belief that the public interest requires suspending the time frame.

2. The Forest Society emphasizes the following point made by the Counsel for the Public: if the Subcommittee adopted the Applicant’s proposed schedule “the Subcommittee likely will be faced with numerous motions for extensions of time, which could result in gaps in the schedule while the motions are decided, and which could result in the need to revisit prior activities.” The Forest Society adds that this scenario of working through an unworkable

schedule would likely expend an inordinate amount of the parties' and the Subcommittee's collective time, funds, and other resources. Not only are numerous and possibly inconsistent motions to extend and motions for late filings highly likely, but then objections to those should also be anticipated. And finally, the Chair or the Subcommittee (if the matter is more than merely procedural) will need time to decide or deliberate the motions and write and issue orders. Spending such resources for these purposes is completely needless and avoidable at this time by exercising the authority to suspend the time frame to adopt a realistic schedule.

3. The Forest Society's first exception to its concurrence is that to the extent the motion of the Counsel for the Public does not seek to suspend all of the following three deadlines, the Forest Society does. The Forest Society requests the Subcommittee extend the time frame of the following deadlines set in RSA-H:7: (a) the 150-day deadline set in subsection VI-b for state agencies to report progress; (b) the 240-day deadline set in subsection VI-c for state agencies' final decisions with any conditions; and (c) the 365-day deadline set in subsection VI-d for the Subcommittee to act on the application.

4. All of the reasons the Counsel for the Public set forth in his motion also justify authorizing the State Agencies additional time. The deadlines set throughout RSA 162-H and to be set by the forthcoming procedural order follow a certain cadence and sequence. Suspending only the 365-day deadline without also suspending the states agencies' deadlines will put that cadence and sequence out of step, and likely exacerbate inefficiencies in this already ungainly process.

5. As the second exception to the Forest Society's concurrence, the Forest Society requests the Subcommittee adopt the procedural schedule attached as Exhibit A, which calls for the Subcommittee to deliberate its action on this application in November of 2017.

6. The attached schedule is realistic given the magnitude of this matter, as that magnitude is described by the Counsel for the Public in its motion. Deadlines generally occur on the last weekday of most months, which is not only a simple and efficient approach but also allows for a steady pace through to the Subcommittee's decision. As noted, setting a realistic schedule now will avoid the needless diversion of efforts and resources towards maintaining the schedule, and instead will allow all of us to focus on the substance.

7. Following is the position of other parties with respect to this motion.

a. Concur<sup>1</sup>

Linda Upham-Bornstein  
Russell and Lydia Cumbee  
Rodrigue and Tammy Beland  
David Schrier  
Eric Olson  
Elaine Olson and Joshua Olson, individually and as trustees  
Rodney Moore  
Susan Schibanoff  
City of Concord  
Bruce Ahern  
Kris Pastoriza  
Easton Conservation Commission  
Conservation Law Foundation  
Abutting Property Owners: Bethlehem – Plymouth, which included the following individuals:  
Nigel Manley and Judy Ratzel;  
Russel and Lydia Cumbee;  
Walter Palmer and Kathryn Ting;  
G. Peter and Mary S. Grote;  
Paul and Dana O'Hara;  
Virginia Jeffryes;  
Carol Dwyer;  
Gregory and Lucille Wolf;  
Susan Schibanoff;  
Ken and Linda Ford;  
Campbell McLaren, M.D.;  
Eric and Barbara Meyer;

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<sup>1</sup> Several who concurred individually may also be part of a group that did not respond to undersigned request, and those individuals may or may not have requested to be grouped differently. Some who concurred may have been denied intervention, but currently seek the Subcommittee to grant intervention.

Robert W. Thibault;  
Frank Pinter  
Dennis Ford;  
Carl Lakes and Barbara Lakes; and  
Bruce D. Ahern  
Claire & Elmer Lupton  
Robert and Joanna Tuveson  
Lori & Jon Levesque  
Mark W. and Susan Orzeck  
Town of Bridgewater  
Town of New Hampton  
Town of Littleton  
Town of Woodstock  
Appalachian Mountain Club and the Ammonoosuc Conservation Trust

b. Object

Applicants  
City of Franklin

c. Take No Position

City of Berlin

The remainder of the parties did not respond to a request for their position.

**WHEREFORE**, the Forest Society respectfully requests that the Subcommittee:

- A. Adopt the procedural schedule attached as Exhibit A; and
- B. Grant such further relief as it deems appropriate.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF  
NEW HAMPSHIRE FORESTS**

By its Attorneys,

BCM Environmental & Land Law, PLLC

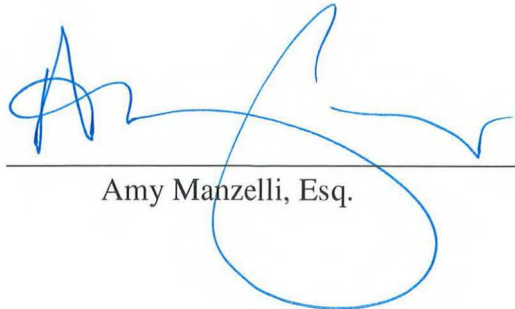
Date: April 5, 2016

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, April 5, 2016, a copy of the foregoing Partially Assented-To Motion of the Society for the Protection of New Hampshire Forests to Suspend Time Frame for Public Interest was sent by electronic mail to persons named on the Service List of this docket.

  
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Amy Manzelli, Esq.

## EXHIBIT A

### STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

Docket No. 2015-06

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

### **PROPOSED PROCEDURAL SCHEDULE OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

**April & May, 2016:**

Two additional public hearings;  
“Appeals” of intervention decision;  
SEC rules on intervention “appeals”

**April 29, 2016:**

Objections to Applicants’ Waiver Requests  
and Request for Confidential Treatment of  
Financial Report

**May 31, 2016:**

Committee rules on the Applicants’  
Requests for Waivers and for Confidential  
Treatment of Financial Report

**June 30, 2016:**

State agencies shall report progress, draft  
permits and draft conditions

**July 29, 2016:**

Intervenors and Counsel for the Public  
propound data requests

**August 31, 2016:**

Applicants’ response to data requests

**September & October, 2016:**

Technical sessions with App. witnesses

**December 31, 2016:**

Pre-filed testimony of intervenors and  
Counsel for the Public

**January 31, 2017:**

Applicants’ propound data requests

**February 28, 2017:**

Responses to Applicants’ data requests

**March & April, 2017:**

Technical sessions with witnesses for  
intervenors and Counsel for the Public

**April 28, 2017:**

State agencies - final permits and conditions

**May 31, 2017:**

Supp. pre-filed testimony from all parties

**June 30, 2017:**

Pre-hearing motions, stipulated facts, etc.

**July, 2017:**

Final pre-hearing conference

**August & September, 2017:**

Adjudicative hearing  
Site Visits in 5 counties

**November, 2017:**

Deliberations and decision