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April 7, 2016

**VIA EMAIL AND HAND-DELIVERY**

Ms. 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:

Please find enclosed for filing in the above-referenced matter an original plus eight copies of the Position of Conservation Law Foundation, Appalachian Mountain Club, Ammonoosuc Conservation Trust, and New Hampshire Sierra Club on Proposed Procedural Schedules.

Copies of this filing have, this date, been forwarded via email to all parties on the Service List in this docket.

Please feel free to contact me should you have any questions or concerns.

Sincerely,

Thomas F. Irwin, Esq.  
Vice President and Director,  
CLF New Hampshire

TFI/dlh

Encls.

cc: Docket No. 2015-06 Service List

**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

**POSITION OF CONSERVATION LAW FOUNDATION,  
APPALACHIAN MOUNTAIN CLUB, AMMONOOSUC CONSERVATION TRUST,  
AND NEW HAMPSHIRE SIERRA CLUB  
ON PROPOSED PROCEDURAL SCHEDULES**

Intervenors Conservation Law Foundation (“CLF”), Appalachian Mountain Club (“AMC”), Ammonoosuc Conservation Trust (“ACT”) and New Hampshire Sierra Club (“NHSC”) (collectively “Intervenors”) hereby assent to the procedural schedule proposed by the Society for the Protection of New Hampshire Forests (“Forest Society”).<sup>1</sup> The proposal filed by the Forest Society in the above-captioned docket represents a very active but reasonable schedule for this proceeding. The Intervenors also appreciate the procedural schedule proposed by Counsel for the Public,<sup>2</sup> but are concerned that it does not allow sufficient time, including as to the preparation of discovery and decisions as to motions, among other matters.

The Intervenors object to Applicants’ proposed schedule<sup>3</sup> which, on the basis of Applicants’ pre-filed testimony of 25 witnesses, as well as tens of thousands of pages of documents, is utterly unrealistic and unreasonable.<sup>4</sup> While Applicants reference the fact that the

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<sup>1</sup> Filed April 5, 2016.

<sup>2</sup> Filed April 1, 2016. We concur with Counsel for the Public that the timeframe established under RSA 162-H:7 should be suspended.

<sup>3</sup> Filed March 21, 2016.

<sup>4</sup> Among other grounds why it is unreasonable, the Applicants’ proposed schedule allows for only one round of intervenor discovery—scheduled before intervenors in the docket will have had time, following an order on interventions, to retain expert assistance; provides a mere three days for technical sessions regarding the Applicants’ 25 witnesses, and allows a wholly inadequate timeframe to conduct a hearing involving the examination of the unprecedented number of witnesses to participate in this matter.

Northern Pass project has been pending since 2010, it is noteworthy that it has been pending before the Committee only since December 2015, and that the six-year timeframe referenced by Applicants simply reinforces the complex and evolving nature of the project at issue in this docket. It is in fact as a result of the Applicants' decisions that this proposal has experienced such delays in finally reaching the Site Evaluation Committee process. We are disappointed that the Applicant has not consented to an extension of the standard statutory timeframe to allow for the meaningful and efficient review of a project and application of this magnitude.

Prior to this filing, AMC provided similar views on the procedural schedule in correspondence to the Site Evaluation Committee dated March 30, 2016.

**WHEREFORE**, CLF, AMC, ACT and NHSC respectfully request that the Site Evaluation Committee adopt the procedural schedule advanced by the Forest Society.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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April 7, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has on this 7th day of April 2016 been sent by email to the service list in Docket No. 2015-06.



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Thomas F. Irwin, Esq.  
Conservation Law Foundation