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VIA ELECTRONIC MAIL

April 7, 2016

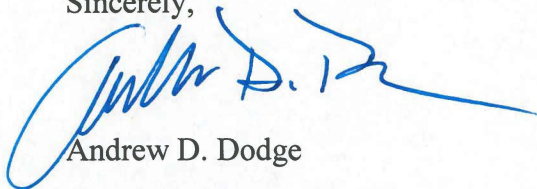
Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

**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-referenced matter please find an Objection to Applicants'
Request for Partial Waivers Under the Newly Adopted SEC Rules.

Sincerely,



Andrew D. Dodge

Enclosures

cc: Distribution 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**

**OBJECTION TO APPLICANTS' REQUEST FOR PARTIAL WAIVERS UNDER THE
NEWLY ADOPTED SEC RULES**

Background

1. Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the "Applicants") jointly submitted an Application of for a Certificate of Site and Facility for Construction of a New High Voltage Transmission Line in New Hampshire to the New Hampshire Site Evaluation Committee ("SEC") for review (Docket No. 2015-06). On February 26, 2016 the Applicants filed a Request for Partial Waivers Under the Newly Adopted SEC Rules (the "Applicant's Waiver Request"). On March 7, 2016 the Counsel for the Pubic filed an Objection of Counsel for the Public to Applicants' Request for Partial Waivers under the Newly Adopted SEC Rules (the "Counsel for the Public's Objection"). On March 11, 2016 the Society for the Protection of New Hampshire Forests (the "Forest Society") filed an Objection of the Society for the Protection of New Hampshire Forests to Applicants' Request for Partial Waivers Under the Newly Adopted SEC Rules (the "Forest Society's Objection").

Joining Objections of Counsels for the Public and the Forest Society

2. I hereby join in and incorporate by reference the objections of the Counsel for the Public and the Forest Society to the Applicants' Waiver Request respectively contained in the

Counsel for the Public's Objection and the Forest Society's Objection. For each of the reasons stated in the Counsel for the Public's Objection and the Forest Society's Objection, I object to the Applicants' Waiver Request and respectfully request that the SEC deny the Applicants' Waiver Request.

Process

3. In the SEC's March 18, 2016 Order on Petitions to Intervene (the "Order") the SEC granted my petition to Intervene. Order, at 18. In the Order the SEC also grouped me with 16 other intervenors (some of whom are themselves groups of, or acting for groups of, individuals) and ordered that this entire group (the "Group") designate a single spokesperson for the purposes of, among other things, filing pleadings. Id, at 19. Certain other intervenors were also grouped together and similarly ordered to designate a single spokesperson to file pleadings. For various reasons (as more specifically set forth in the numerous requests to review the Order that have been filed, including my own such request that was filed on March 28, 2016), not all of these groups have been able to designate a single spokesperson and so certain members of the groups have had to file pleadings themselves in order to do so within the applicable deadlines. The Applicants' have already objected to one such filing on the grounds that because the pleading was not filed by the spokesperson (which the Applicants, upon information and belief, admitted did not exist) the pleading was filed in violation of the Order. Applicants Objection to Kevin Spencer and Mark Lagasse D/B/A Lagaspense Realty Request to Fix Deadline to File Dispositive Motions Regarding Applicants' Claimed Right to Construct the Northern Pass on Easements, March 21, 2016, ¶¶ 2, 3 (the "Applicants' Objection").

4. In light of the Order and the Applicants' Objection, during the March 21, 2016 prehearing conference I asked the presiding officer, twice (because there was some initial

confusion on this point the first time), what intervenors that have been forced into a group and ordered to file pleadings through a spokesperson should do if the group is unable to agree upon a spokesperson. The presiding officer, twice (there was no confusion the second time), said we should file the pleadings individually (i.e., not through a spokesperson) and explain to the SEC in the pleading that the group had not designated a spokesperson. Accordingly, based on the guidance provided by the presiding officer at the March 21, 2016 prehearing conference, I am filing this pleading individually and not through a spokesperson because, to the best of my knowledge, the Group has not designated a spokesperson.

WHEREFORE, the undersigned respectfully requests that the Subcommittee:

- A. Deny the Applicant's Waiver Request; and
- B. Grant such further relief as it deems appropriate.

Date: April 7, 2016

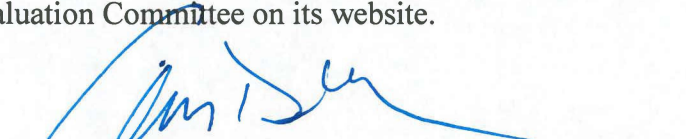
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2016 a copy of the foregoing document was sent by electronic mail to the persons named on the Distribution Email Address List for this docket that is provided by the New Hampshire Site Evaluation Committee on its website.



Andrew D. Dodge