

April 7, 2016

VIA EMAIL

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

Dear Ms. Monroe:

Re: New Hampshire Site Evaluation Committee ("SEC") Docket No. 2015-06: Joint
Application of Northern Pass Transmission LLC and Eversource

Please find enclosed (following) the Statement of Position of the Nonabutting Property Owners:
Ashland-Deerfield regarding the proposed procedural scheduling orders.

Electronic copies are being sent by email to the Docket Service List.

Thomas Foulkes will be attending the hearing on April 12 in Lincoln and will be speaking on
behalf of this abutter group in matters discussed at the hearing.

Respectfully,

Margaret C. Mumford (of Webster Family Group)

mmumford@holderness.org

Temporary spokesperson of the Nonabutting
Property Owners: Ashland-Deerfield intervenor
group.

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Date: April 7, 2016

Re: New Hampshire Site Evaluation Committee ("SEC") Docket No. 2015-06 Northern Pass
Nonabutting Property Owners: Ashland-Deerfield Statement of Position regarding Procedural Scheduling

This Position addresses the three procedural schedules submitted : the Applicant's Proposed Procedural Scheduling Order (Comment Tab 309 dated March 21,2016), the Counsel for the Public's Proposed Procedure Schedule (Comment Tab 302 dated March 18, 2016), and The Society for the Protection of New Hampshire Forests Proposed Procedural Schedule (Comment Tab 307and Docket Tab 288, dated March 21, 2016 and designated Amy Manzelli).

RSA 162-H:7 provides that "[w]ithin 365 days of the acceptance of an application, the Committee shall issue or deny a certificate for an energy facility." However, the statutory scheme clearly anticipates that not all applications can be considered within this time frame; RSA 162-H:14 clearly provides that "[i]f the site evaluation committee, at any time while an application for a certificate is before it, deems it to be in the public interest, it may temporarily suspend its deliberations and timeframe established under RSA 162-H:7."

We, the group identified as "Nonabutting Property Owners: Ashland-Deerfield" ask that the Site Evaluation Committee recognize that it is in the public interest to temporarily suspend the timeframe under RSA 162-H:7. We urge the SEC to adopt the Proposed Procedural Schedule put forth by the Society for the Protection of New Hampshire Forests, which calls for Deliberations and Decision by November 2017. We are furthermore in support of each timeframe allotted in this proposed schedule, having reviewed these steps and noting the significant responsibilities involved in participation in this process. We believe that the sheer numbers of parties involved and the scope of the project warrants the temporary suspension of the 365 day deadline.

As a volunteer group, despite our wide geographic disparity and clear differences in interest, we are for now amenable to our grouping. We, however, note that such grouping will necessitate significant time for appropriate communication within our group. Additional communication among groups will undoubtedly be necessary into order to avoid redundancy and lack of efficacy and efficiency in the process. We further agree that it is appropriate for the SEC to request that groups of intervenors act primarily through designated spokespeople. The use of spokespeople will undoubtedly make the process more manageable for the SEC. Their use is likely to ensure that the submissions of the group represent reasonable positions and motions that are clear, concise and directed for reasonable SEC consideration, as explicitly requested in the prehearing conference. But spokespeople cannot be effective unless there is enough time at every step of the process for the communications necessary to ensure that the spokespeople can act in a representative capacity. Each group will need to circulate materials within themselves with due time for interaction and the building of consensus. To put it simply, if the grouping of intervenors is to serve the purpose intended by the SEC, more time will be necessary than that provided in Applicant's Schedule.

As is the case with several other intervenor groups, we will be attempting to engage in this coordinating activity, at the request of and for the benefit of the SEC, in addition to maintaining our obligations in our various lines of professional work.

The Applicant argues that the fact that it has engaged in many public meetings should somehow reduce the need for full analysis of its formal submissions to the SEC. The contrast between the information informally presented at those earlier events and the technical matter included in its submission suggests the contrary.

We believe that the unreasonableness of Applicant's timeline is already apparent. It shows April 11 as the deadline for Interveners to propound discovery requests upon Applicants on all topics. This implies the interveners should have only two weeks after the Applicant filed its redacted economic report to finalize questions, not only on that matter, but on all others. This, when final groupings will not even have been decided until at least April 12, and many groups will still be sorting out spokesperson designation and potential legal representation.

We believe that the SEC itself will be able to spend more of its time and energy considering the merits of the Application if it suspends the timeframe at the outset. A hurried process will only lead to more requests, at each step in the process, for the extension of deadlines and petitions for out-of-time filings.

Applicant's preferred time frame is unworkable. If additional time is not provided, the rush to completion of the process will prevent us from carrying out our obligations and maintaining our rights as interveners, which will in turn hinder the ability of the SEC to carry out its obligations in these proceedings.

Respectfully submitted,

Joanna and Robert Tuveson

Nina and Elisha Gray

Rodney Felgate and Laura Felgate

Webster Family Group

Lawrence Phillips and Maxine Phillips

Lisa Wolford and Pamela Hanglin

F. Maureen Quinn

Madelyn and Thomas Foulkes

Jeanne M. Menard

NON ABUTTING PROPERTY OWNERS: ASHLAND - DEERFIELD