

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

**ABUTTING PROPERTY OWNERS: BETHLEHEM TO PLYMOUTH INTERVENOR GROUP
OBJECTION TO, AND MOTION TO DENY, APPLICANT'S REQUEST FOR PARTIAL
WAIVERS UNDER THE NEWLY ADOPTED SEC RULES, AND JOINDER IN THE
OBJECTION OF PUBLIC COUNSEL TO SAID REQUEST**

Public Counsel has filed an objection with the Site Evaluation Committee ("SEC") entitled "Objection Of Public Counsel to Joint Applicants' Request for Partial Waivers Under the Newly Adopted Sec Rules" and dated March 7, 2016. The Abutting Property Owners: Bethlehem to Plymouth Intervenor Group (the "Intervenor Group") joins and incorporates hereto by reference Public Counsel's 3/7/2016 objection, and for brevity will not repeat the history and points presented in the Public Counsel's objection.

The Intervenor's Group makes the following additional objections.

1. It is the strongly held position of the Intervenor Group that the Applicant must submit a full and detailed decommissioning plan for the entire Northern Pass project. This plan must include detailed provisions for a fund of sufficient size to cover the cost of decommissioning, to be set aside and held until needed at the time of decommissioning. Failure to require such a decommissioning plan increases the likelihood that the Northern Pass infrastructure will be abandoned in place at the end of its productive life.
2. If the Northern Pass infrastructure is abandoned in place:
 - the cable and splice boxes installed in the underground portions of the line located in town centers will be obstructions to underground infrastructure installation, maintenance, or enhancements by the affected towns. The economic development of these towns could be permanently hindered, and town infrastructure improvements could pose burdensome costs on local taxpayers;
 - the underground cable and splice boxes could cause issues (e.g., heaving, etc.) for the roads beneath which they are installed, over time. The cost for rectifying such roadway problems caused by abandoned Northern Pass infrastructure would be borne by the State or local taxpayers;
 - the underground cables and/or splice boxes could disintegrate over time, causing ground contamination or unsafe surfaces. Again, the cost for rectifying or cleaning up these issues would have to be borne by local residents or the State; and

- abutters to the transfer stations and overhead portions of Northern Pass will be left with the eyesore of decaying towers, transfer stations, and other equipment, resulting in reduced quality of life and severely affected land values;
 - the costs of removing Northern Pass infrastructure that becomes problematic over time will have to be borne by local taxpayers or the State. It is unacceptable that NH residents should bear the costs of decommissioning Northern Pass.
3. New technologies that render Northern Pass obsolete or uncompetitive could become available earlier than currently anticipated. This could shorten the useful lifespan of Northern Pass. Because the useful lifespan of Northern Pass is not predictable, a decommissioning plan should be required as a condition of initial permitting of the project, and not left to be developed at some later, unspecified time. Lack of decommissioning plan and funds to implement the plan at the time that Northern Pass becomes unviable will almost certainly result in abandonment in place of the Northern Pass infrastructure.

For these reasons, it is critical that a detailed decommissioning plan be developed and submitted by the Applicant as a condition of proceeding with the Northern Pass docket.

Members of the Abutting Property Owners: Bethlehem To Plymouth Intervenor Group concur unanimously with the objection and motion stated above. This Intervenor Group includes the following intervenors in the Northern Pass docket:

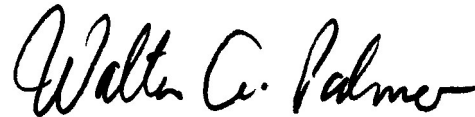
Nigel Manley
Judy Ratzel
Russel and Lydia Cumbee
Walter Palmer
Kathryn Ting
G. Peter and Mary S. Grote
Paul and Dana O'Hara
Virginia Jeffries
Carol Dwyer
Gregory and Lucille Wolf
Susan Schibanoff
Frank Pinter
Ken and Linda Ford
Campbell McLaren, M.D.
Eric and Barbara Meyer
Robert W. Thibault
Dennis Ford
Carl Lakes and Barbara Lakes
Bruce D. Ahern

WHEREFORE, the Abutting Property Owners: Bethlehem To Plymouth Intervenor Group respectfully requests that the Subcommittee:

1. Deny Applicant's Request For Partial Waivers Under The Newly Adopted SEC Rules;
2. Require Applicant to comply in full with the newly adopted SEC rules as a condition of proceeding with the docket;
3. In particular, require Applicant to submit a complete decommissioning plan, including a plan for funding decommissioning, in compliance with the newly adopted SEC rules; and
4. Grant such further relief as it deems appropriate.

Respectfully Submitted,
Abutting Property Owners: Bethlehem To
Plymouth Intervenor Group

By its designated spokesperson

A handwritten signature in black ink that reads "Walter A. Palmer". The signature is written in a cursive, flowing style.

Walter A. Palmer
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Franconia, NH 03580
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Date: April 7, 2016