

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

**MOTION OF THE ABUTTING PROPERTY OWNERS: BETHLEHEM TO
PLYMOUTH INTERVENOR GROUP TO SUSPEND THE TIME FRAME, AND TO ADOPT
THE PROCEDURAL SCHEDULE PROPOSED BY THE SOCIETY FOR THE PROTECTION
OF NEW HAMPSHIRE FORESTS.**

The Abutting Property Owners: Bethlehem To Plymouth Intervenor Group (the “Intervenor Group”) respectfully requests the Subcommittee exercise its authority pursuant to RSA 162-H:14 to suspend the time frame established under RSA 162-H:7 for the subject docket. The Intervenor Group further requests that the Subcommittee adopt the procedural schedule proposed by the Society for the Protection of New Hampshire Forests (SPNHF) in its April 5, 2016 motion entitled : PARTIALLY ASSENTED-TO MOTION OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS TO SUSPEND TIME FRAME FOR PUBLIC INTEREST. SPNHF’s proposed procedural schedule is attached below as Exhibit A.

The Intervenor Group concurs with and incorporates by reference SPNHF’s April 5, 2016 motion in its entirety. It is the Intervenor Group’s strongly held position that the public interest requires suspending the time frame established in RSA 162-H:7 (the “current time frame”), and adopting the procedural schedule proposed by SPNHF. The basis of our position and of our present motion is as follows:

1. The Northern Pass project is one of the largest and most controversial projects ever submitted to the SEC for a certificate of siting. The Subcommittee’s action on this docket could have major, far-reaching, and long-term consequences for NH. Thousands of NH residents and organizations have a direct stake in the outcome of the Northern Pass docket, and many of these have become intervenors to the docket. It is legally incumbent on the Subcommittee to ensure that all parties to the docket are afforded an opportunity to conduct discovery, present testimony, cross-examine testimony presented by other parties, and otherwise fully represent their positions to the Subcommittee. The Subcommittee’s primary responsibility is to fully hear out and thoroughly consider the representations of all parties, and gather and consider all information pertinent to the docket, before reaching a decision of such enormous potential import to the people of NH. This responsibility far supersedes the need to adhere to any preconceived time frame. The notion that the Subcommittee should limit or suppress participation by legally established parties to the docket or rush decision-making in order to adhere to the current time frame is counter to the letter and intent of the statutes governing SEC, and counter to the public interest.

The current time frame simply does not allow sufficient time for all parties to the docket to present their testimony and participate fully in the proceedings. The procedural schedule proposed by SPNHF (i.e., Exhibit A) would be far more likely to allow sufficient time for the necessary activities under the Northern Pass docket.

2. The current time frame is unworkable for the reasons presented above, and if the Subcommittee were to attempt to proceed with the Northern Pass docket on the basis of the current time frame, the result would be a highly disorganized and inefficient process. The Subcommittee would constantly find itself running out of time for steps in the process, without having been able to complete those steps. This would necessitate repeated revision of the procedural schedule and postponement of later steps. As pointed out by the Counsel to the Public¹ "the Subcommittee likely [would] 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."

Repeated interruption and revision of the procedural schedule would be highly disruptive and costly to all parties to the docket. Given the complexity of the Northern Pass application and the number of parties involved, it would be irresponsible and would not serve the public interest for the Subcommittee to begin procedures under this docket on the basis of an unworkable time frame. The procedural schedule proposed by SPNHF is a far more realistic schedule that would ultimately lead to a more efficient and orderly process. SPNHF's proposed procedural schedule should therefore be adopted by the Subcommittee at the outset of the proceedings under the Northern Pass docket.

Members of the Abutting Property Owners: Bethlehem To Plymouth Intervenor Group concur unanimously with this motion. 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 Jeffryes
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

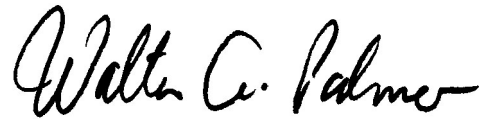
¹ Counsel for the Public's Partially-Assented to Motion to Suspend the Time Frame Established Under RSA 162-H:7 dated April 1, 2016

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

1. Suspend the time frame established in RSA 162-H:7
2. Adopt the procedural schedule proposed by SPNHF and attached as Exhibit A; and
3. 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
1900 Easton Road
Apartment 5
Franconia, NH 03580
(603) 348-0558

Date: April 7, 2016

EXHIBIT A

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

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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