

April 11, 2016

VIA HAND-DELIVERY AND EMAIL

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:

Enclosed for filing in the above-captioned matter with the New Hampshire Site Evaluation Committee is the Reply of the Society for the Protection of New Hampshire Forests to the International Brotherhood of Electrical Workers' Consolidated Objection to Counsel for the Public and The Forest Society's Respective Proposed Procedural Schedules.

Copies of this letter and its enclosure have this date been forwarded via email to all parties on the Distribution List.

If you have any questions or concerns, please do not hesitate to contact US.

Very truly yours,

Nicole M. Manteau Office Manager

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/nmm **Enclosure**

Distribution List (Rev. 4/8/2016) via email CC:

Client



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

REPLY OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS TO THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS' CONSOLIDATED OBJECTION TO COUNSEL FOR THE PUBLIC AND THE FOREST SOCIETY'S RESPECTIVE PROPOSED PROCEDURAL SCHEDULES

The Society for the Protection of New Hampshire Forests (the "Forest Society"), by and through its attorneys, BCM Environmental & Land Law, PLLC, replies as follows to the above-referenced objection:

- 1. The Forest Society's participation in legislative processes (SB 99) and changes (SB 245) in no way served as any agreement, endorsement, or acknowledgement, tacit or otherwise, that the Northern Pass application should be decided on a 365-day schedule.
- 2. To the contrary, the Forest Society has long held the belief that the Northern Pass project, which involves an unprecedented scale and level of participation, is the exact exception for which lawmakers originally provided RSA 162-H:14, and more recently why they decided to keep the exception when they overhauled the law through SB 245.
- 3. When the Forest Society learned of the voluminous and data-dense nature of the Northern Pass application, seemingly approaching thirty thousand pages at the latest, this cemented the Forest Society's strong belief that a meaningful review—one where parties and the Subcommittee actually have the temporal ability to at least read the application—requires the schedule the Forest Society proposed.

Respectfully Submitted,

SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: April 11, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on this day, April 11, 2016, a copy of the foregoing Reply of the Society for the Protection of New Hampshire Forests to the International Brotherhood of Electrical Workers' Consolidated Objection to Counsel for the Public and the Forest Society's Respective Proposed Procedural Schedules was sent by electronic mail to persons named on the Service List of this docket.

Amy Manzelli Esq.