

May 2, 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**

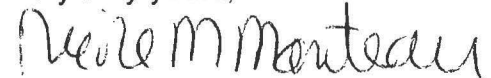
Dear Ms. Monroe:

Enclosed for filing in the above-captioned matter with the New Hampshire Site Evaluation Committee is the **Motion of the Society for the Protection of New Hampshire Forests to Clarify Order & Temporary Procedural Schedule of April 22, 2016.**

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

/nmm

Enclosure

cc: Distribution List (Rev. 4/29/2016) via email
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

**MOTION OF THE SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS TO
CLARIFY ORDER & TEMPORARY PROCEDURAL SCHEDULE OF APRIL 22, 2016**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully requests the Chair of the Subcommittee clarify as follows:

1. The Order and Temporary Procedural Schedule dated April 22, 2016 (“Order”) set the following staggered set of deadlines for data requests to be propounded upon the joint applicants: May 13, 2016 for Counsel for the Public; May 20 for Non-Governmental Organizations (including the Forest Society), Municipal Groups, Cities of Franklin and Berlin; Grafton County Commissioners; Economic Interest Groups, N.E. Power Generators Association; and Pemigewasset Local River Advisory Committee; and May 23, 2016 for the remainder of the intervenors.

2. The Order was silent as to whether intervenors would have a second opportunity to propound data requests (assuming that an intervenor had not used its allotment of data requests or had secured agreement from the joint applicants or permission from the Subcommittee or Chair to exceed its allotment).

3. Since the Order was made, the Forest Society has acted expeditiously on its own behalf to prepare data requests and to coordinate amongst intervenors. The Forest Society will propound data requests on or before its deadline of May 20, 2016.

4. However, the Forest Society is unable to develop all of its data requests because of the following three issues, all of which involve information not yet known.

5. First and second, the joint applicants have requested a waiver of certain regulatory requirements and confidential treatment of certain allegedly commercially-sensitive information. See Joint Applicants' Unassented-to Motion for Protective Order and Confidential Treatment and Appearance filed October 19, 2015; Joint Applicants' Request for Partial Waivers Under the Newly Adopted SEC Rules filed February 26, 2016; and Joint Applicants' letter enclosing Appendix 43, Cost - Benefit and Local Economic Impact Analysis and Direct testimony of J. Frayer filed March 28, 2016.

6. It is not possible for the Forest Society to formulate data requests in the absence of knowing whether these requests will be granted, denied, or granted only in part. It is also not possible to formulate data requests in the absence of evaluating the information that the joint applicants' would develop and provide in the event that one or both of the requests is not granted in full.

7. Third, as the temporary procedural schedule acknowledges, Counsel for the Public has a leading role in propounding data requests. Among other benefits of staggering data request deadlines and having Counsel for the Public lead off, such an approach seems designed to and ought to have the effect of reducing the volume of duplicative or partially duplicate data requests.

8. To the extent that the Chair or the Subcommittee grants Counsel for the Public additional time to propound data requests until a period of time after Counsel for the Public has received an order approving retention of consultants, so too should the intervenors be granted an extension to propound a second set of data requests. This will help maintain the efficient and orderly conduct of the proceeding in the same way that the current May 13 / May 20 / May 23 staggering will.

9. The Forest Society will file a supplement noting other parties' positions with respect to this motion.

WHEREFORE, the Forest Society respectfully requests that the Subcommittee:

- A. Order that the Forest Society be allowed to propound a second set of data requests within one month after the latest to occur of all of the following three events:
 - a. The Subcommittee or Chair grants in full the Joint Applicants' waiver request, or the Joint Applicants provide the information required as a result of the Subcommittee or Chair denying or only partially granting the request;
 - b. The Subcommittee or Chair grants in full the Joint Applicants' request for Protective Order and Confidential Treatment, or the Joint Applicants provide the information required as a result of the Subcommittee or Chair denying or only partially granting the request; and
 - c. The Subcommittee or Chair denies a request from the Counsel for the Public for additional time to propound another set of data requests

until a period of time after Counsel for the Public has received an order approving retention of consultants, or the deadline for Counsel for the Public to propound another set of data requests has passed; and

B. Grant such further relief as it deems appropriate.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: May 2, 2016

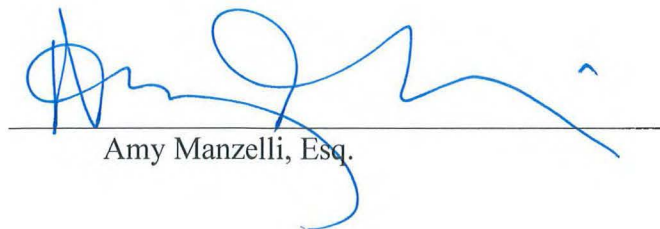
By: _____



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CERTIFICATE OF SERVICE

I hereby certify that on this day, May 2, 2016, a copy of the foregoing Motion of the Society for the Protection of New Hampshire Forests to Clarify Order & Temporary Procedural Schedule of April 22, 2016 was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli, Esq.