

**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

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 the Construction of a New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

**THE TOWNS OF BRIDGEWATER, BRISTOL, EASTON, FRANCONIA, LITTLETON,  
NEW HAMPTON, NORTHUMBERLAND, SUGAR HILL, WHITEFIELD AND  
WOODSTOCK, THE CITY OF CONCORD AND ASHLAND WATER & SEWER  
DEPARTMENTS' NOTICE OF JOINDER IN THE MOTION TO CLARIFY ORDER  
AND TEMPORARY PROCEDURAL SCHEDULE OF APRIL 22, 2016 FILED BY THE  
SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

The Towns of Bridgewater, Bristol, Easton, Franconia, Littleton, New Hampton, Northumberland, Sugar Hill, Whitefield and Woodstock, the City of Concord and Ashland Water & Sewer Department submit this Notice of Joinder to the Motion to Clarify Order and Temporary Procedural Schedule of April 22, 2016 that was filed by the Society for the Protection of New Hampshire Forests ("Forest Society"), stating as follows:

1. The Forest Society filed a motion to clarify the temporary procedural schedule of April 22, 2016. In the motion, the Forest Society seeks clarification as to whether the intervenors will have a second opportunity to propound data requests after the deadline of May 20, 2016. The additional data requests are necessary because the intervenors still have not received unredacted copies of reports that were filed under seal relative to: (1) archeological resources data; (2) information on the status, location and distribution of native plant and animal species and natural communities; and (3) information relating to the alleged economic value of the project to New Hampshire and the assessment of the environmental impacts of the proposed project. Without copies of these reports, the intervenors are severely prejudiced in their ability to propound data requests on these particular issues.

2. The Forest Society also seeks to ensure that to the extent that Public Counsel is provided an extension of time to propound data requests, the intervenors should be similarly provided an extension. This will help to ensure that duplicative data requests are not propounded, and the intervenors will then be able to use their limited amount of data requests to obtain information specific to their particular interests.

3. For the foregoing reasons, the Towns of Bridgewater, Bristol, Easton, Franconia, Littleton, New Hampton, Northumberland, Sugar Hill, Whitefield and Woodstock, the City of Concord and Ashland Water & Sewer Department are filing this Notice to join the motion to clarify filed by the Forest Society, which is incorporated herein by reference.

4. The Deerfield Conservation Commission, Deerfield Board of Selectmen and Town of Canterbury assent to the relief. The position of the Deerfield Planning Board, Pembroke Board of Selectmen and Pembroke Planning Board has not yet been received.

WHEREFORE, it is respectfully requested that the Site Evaluation Committee:

- A. Accept this Notice of Joinder in the Motion to Clarify Order and Temporary Procedural Schedule of April 22, 2016 that was filed by the Forest Society;
- B. Grant the relief sought by the Forest Society in their motion; and
- C. Grant such other and further relief as may be just.

Respectfully submitted,

**CITY OF CONCORD**

By: 

\_\_\_\_\_  
Danielle L. Pacik, Esq., Bar#14924  
Deputy City Solicitor  
41 Green Street  
Concord, New Hampshire 03301  
Telephone: (603) 225-8505  
Facsimile: (603) 225-8558  
dpacik@concordnh.gov

Dated: May 3, 2016

**TOWNS OF BRIDGEWATER, LITTLETON,  
NEW HAMPTON AND WOODSTOCK AND  
ASHLAND WATER & SEWER  
DEPARTMENT**

By and through their attorneys,  
MITCHELL MUNICIPAL GROUP, P.A.

Dated: May 3, 2016

By:

  
\_\_\_\_\_  
Steven M. Whitley, Esq., Bar #17833  
25 Beacon Street East  
Laconia, New Hampshire 03246  
Telephone: (603) 524-3885  
[steven@mitchellmunigroup.com](mailto:steven@mitchellmunigroup.com)

**TOWNS OF BRISTOL, EASTON,  
FRANCONIA, NORTHUMBERLAND, SUGAR  
HILL AND WHITEFIELD**

By and through their attorneys,  
GARDNER, FULTON & WAUGH, PLLC

Dated: May 3, 2016

By:

  
\_\_\_\_\_  
C. Christine Fillmore, Esq., Bar #13851  
Gardner, Fulton & Waugh, PLLC  
78 Bank Street  
Lebanon, New Hampshire 03766-1727  
Telephone: (603) 448-2221  
Facsimile: (603) 448-5949  
[cfillmore@townandcitylaw.com](mailto:cfillmore@townandcitylaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of May 2016, a copy of the foregoing was sent by electronic mail to persons named on the Service List of this docket.

Dated: May 3, 2016

By:

  
\_\_\_\_\_  
Danielle L. Pacik, Deputy City Solicitor