

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

**Docket No. 2015-06**

**Joint Application of Northern Pass Transmission, LLC & Public Service Company  
of New Hampshire d/b/a/ Eversource Energy for a Certificate of Site and Facility**

**Motion to File Additional Data Requests**

The Deerfield Abutters seek to file forty-two additional data requests to Applicant. Pursuant to Rule 202.12 (a) and (b), any person granted intervenor status shall have the right to conduct discovery and, as such, shall have the right to serve data requests.

Although Rule 202.12 (c) calls for an intervenor or group of intervenors to serve 50 data requests, it provides an exception to the rule where the presiding officer finds the “proposed number of data requests is necessary to address the complexity of relevant issues and would not adversely affect the conduct of the proceeding.”

Many of the relevant topics are outlined in Rule 301.14 Criteria Relative to Findings of Unreasonable Adverse Effects; the Site Evaluation Committee (SEC) must examine a significant number of issues to meet its statutory mandate and reach a decision. The credentialing process relies on the parties, such as the Deerfield Abutters, to provide the Committee with the needed information on the impact of the proposed Project.

The Deerfield Abutters have fourteen individuals whose properties cross a large swath of Deerfield culminating in the substation expansion. They have had many discussions in compiling data requests and have discovered that, given the many complex issues at hand, 50 data requests are insufficient. Each abutter presents with differing concerns -- topography, wildlife, valuation, history, location and proximity to infrastructure -- regarding his or her property as it relates to the construction and development of this Project.

These concerns intersect with all of the statutory criteria -- wildlife, habitat, vegetation, water quality, wetlands, aesthetics and cultural landscape, financial impact, property value, historic impact, public health, sound, public safety, right-of-way, construction of overhead lines and towers, substation expansion, construction and traffic impacts, and others.

Applicant seeks to build a project of unprecedented size and scope in the State of New Hampshire having filed an Application containing over twenty-five thousand pages. The impact of this Project in the rural town of Deerfield also is unprecedented. Applicant seeks to put industrial sized towers and infrastructure across the Abutters' properties in a rural town without so much as a stoplight. The complexity of the issues for these fourteen Deerfield Abutters warrants the award of an additional forty-two requests. It will not, as Applicant contends, hinder or compromise the discovery process. Given the magnitude of what the Applicant seeks to take from the Deerfield Abutters, it is reasonable and just for the Presiding Officer to grant them forty-two additional data requests.

The Deerfield Abutters respectfully ask for leave to file forty-two additional data requests to Applicant, and for whatever such relief the Presiding Officer deems just and necessary.

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Jo Anne Bradbury on behalf  
Of the Deerfield Abutters

I certify that the above Motion has been forwarded to the distribution list.

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Jo Anne Bradbury

cc: Distribution List