

**From:** Samantha Norcross [<mailto:snorcross@co.grafton.nh.us>]

**Sent:** Tuesday, July 05, 2016 12:27 PM

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**Subject:** Motion to Clarify

Good Afternoon,

Please see the attached Motion to Clarify. An original will follow by mail. A copy of the attached has been forwarded to all interested parties listed on the attached Distribution List by e-mail or mail, only if e-mail was not available. I would note that I sent an email last Friday and thought I attached it, but at least some people did not receive the attachment so I am resending it.

Thank you.

Lara Saffo on behalf of the Grafton County Commissioner's Intervenor's Group

**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 INTERVENORS GRAFTON COUNTY COMMISSIONER'S MOTION TO CLARIFY ORDER DATED JUNE 23, 2016 ON PENDING MOTIONS AND PROCEDURAL ORDER**

NOW COMES the Intervenor Group Grafton County Commissioners and states as follows:

1. The SEC issued an order on June 23<sup>rd</sup>, 2016 on Pending Motions and Procedural Order ("Order").
2. In the Order, the SEC noted that it granted the Society for the Protection of New Hampshire Forest's request for a second round of data requests (limited to issues raised In confidential documents).
3. However, the Grafton County Commissioners, who joined in this motion, were not granted a second round of data requests because it appears the SEC did not think this was requested by the Commissioners.
4. In joining the motion, the Commissioners thought they were also asking for a second round of data requests (limited to the information that was confidential at the time the first round was propounded).
5. Accordingly, the Commissioners are filing this motion asking for the ability to propound a second round, based on the same reasons.
6. In addition, we ask that we have additional time beyond July 8<sup>th</sup> to file this material until this pending motion is ruled upon. One month from the date it is ruled upon would be requested.
7. The following parties concur with the relief requested: Applicants, through Barry Needleman, assents to ability to propound more than 50 interrogatories (without conceding the interrogatories are appropriate); the Town of Plymouth, the Society for the Protection of NH Forests, the City of Concord, and the Middle Abutters Intervenor Group.

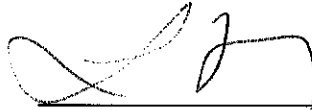
WHEREFORE, the State requests that this SEC:

- A. GRANT the Commissioner's Motion; or

- B. HOLD a hearing on the matter; and
- C. GRANT any other relief deemed proper and just.

July 1, 2016

Respectfully Submitted,  
THE GRAFTON COUNTY  
COMMISSIONERS



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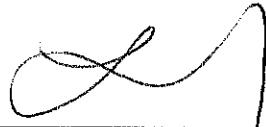
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has this day been forwarded to the individuals on the distribution list.

July 1, 2016

Respectfully Submitted,  
STATE OF NEW HAMPSHIRE



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Lara Joan Saffo, Esq.  
Grafton County Attorney's Office