

July 8, 2016

Via Electronic Mail and Hand-Delivery

Ms. Pamela Monroe, Administrator New Hampshire Site Evaluation Committee 21 Fruit Street, Suite 10 Concord, NH 03301

Re: 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

Dear Ms. Monroe:

Enclosed for filing in the above-referenced action, please find a Partially Assented-to Motion to Extend Time in which to Propound Discovery Requests, filed on behalf of the New England Power Generators Association, Inc.

Please contact me if you have any questions in this regard. Thank you for your assistance.

Very truly yours,

Carol J. Holàhan

cc: Service List 2015-06 (electronic mail only)

STATE OF NEW HAMPSHIRE

BEFORE THE

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

Partially Assented-to Motion by New England Power Generators Association, Inc. for an Extension of Time in which to Propound

<u>Data Requests</u>

NOW COMES The New England Power Generators Association (NEPGA) and respectfully requests that the Site Evaluation Committee (SEC) extend NEPGA's July 8, 2016 deadline to propound data requests to July 25 2016. In support of this motion, NEPGA states as follows:

- In its Order on Pending Motions and Procedural Order dated June 23,
 2016 ("Procedural Order") the SEC expressly recognized NEPGA's right to review an unredacted version, subject to the execution of a confidentiality agreement, of the economic analysis and further required that NEPGA issue data requests relating to this information by July 8, 2016.
- 2. Despite good faith efforts by counsel for NEPGA and counsel for NPT aimed at reaching an agreement regarding confidentiality, the parties did not reach an agreement until July 8, 2016.

- 3. In light of the fact that NEPGA has not yet had the opportunity to review the confidential information referred to in the SEC's Procedural Order, NPT and NEPGA have also agreed to extend the time period for NEPGA to propound its second round of data requests on economic issues until July 25, 2016.
- 4. The following parties concur in this Motion: Northern Pass Transmission, LLC, Society for the Protection of New Hampshire Forests, Bridgewater, New Hampton, Woodstock, Littleton, Deerfield, Ashland Water and Sewer, Stewartstown Clarksville non-abutters group, Bethlehem, Bristol, Easton, Franconia, Northumberland, Plymouth, Sugar Hill and Whitefield, Dummer, Stark and Northumberland abutting property intervenors, Conservation Law Foundation, and City of Concord.

The following parties take no position: Berlin and Franklin.

WHEREFORE, NEPGA respectfully requests that the SEC:

- A. Extend the deadline for NEPGA to propound data requests on economic issues until July 25, 2016; and
 - B. Grant such further relief as it deems appropriate.

Dated: July 8th, 2016

Respectfully submitted,

New England Power Generators Association, Inc.

By its Attorney,

Carol J. Holahan

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Certificate of Service

I hereby certify that a copy of the foregoing Partially Assented-to Request for Reconsideration has on this 8th day of July 2016 been sent by email to the service list in 2015-06.

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