

July 18, 2016

VIA FIRST CLASS MAIL 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 **Partially Assented-To Motion of the Society for the Protection of New Hampshire Forests to Extend Deadline**. Please note that the Forest Society has collaborated with several parties and the applicant in the preparation of this motion. Accordingly, the Forest Society seeks the relief sought on its own behalf, and on behalf of the other parties who have a July 18th deadline on motions to compel.

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. 7/8/2016) 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

**PARTIALLY ASSENTED-TO MOTION OF
THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS
TO EXTEND DEADLINE**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, requests a deadline extension for itself and others as follows:

1. On June 23, 2016 the New Hampshire Site Evaluation Committee (“SEC”) issued a Procedural Order (the “Order”) in this matter. Per the Order, Applicants shall respond to data requests propounded by Municipal Groups of Intervenors, City of Franklin and City of Berlin, Grafton County Commissioners, Non-Governmental Organizations Intervenors, Business and Organizations with Economic Interests Intervenors, Pemigewasset River Local Advisory Committee, and the New England Power Generators Association, Inc. (“NEPGA”) on or before July 8, 2016 (collectively, the “July 8th Parties”).¹

2. On July 8, 2016, Applicants generally responded to the July 8th Parties by providing narrative responses, stating objections, and providing materials responsive to the data requests limited to those materials the Applicants did not deem to be confidential. Applicants did not produce any materials to any of the July 8th Parties which the Applicants deem to be confidential.

¹ The July 8th Parties propounded the data requests in question by or before May 31, 2016, a deadline ordered orally at a hearing in this matter on May 19, 2016 and memorialized in the Order.

3. During the week of July 18, 2016, the Applicants plan to produce to individual parties compromising the July 8th Parties documents containing confidential information called for by particular data requests that the individual parties propounded upon the Applicants, so long as the particular propounding party has executed a confidentiality agreement.²

4. The July 8th Parties are at various stages of negotiating confidentiality agreements with the Applicants. Also ongoing, many of the July 8th Parties are experiencing difficulty accessing documents from the share site and are at various stages of working with the Applicants to resolve these issues.

5. Pursuant to N.H. Admin. Rule 202.12(k)(2), should any of the July 8th Parties decide it is necessary to move to compel with respect to the Applicants' responses to data requests, such motion must be "made within 10 days of receiving the applicable response or objection," which in this case could be construed to be July 18, 2016.

6. The Forest Society respectfully requests, on its own behalf and on behalf of all of the July 8th Parties, an extension of that deadline until Monday, August 1, 2016.

7. Applicants concur in this request, as do the following other parties:

Counsel for the Public
City of Concord
Town of Northumberland
Town of Whitefield
Town of Bethlehem
Town of Franconia
Town of Easton
Town of Sugar Hill
Town of Plymouth
Town of Bristol
NEPGA
Kevin Spencer and Mark Lagasse, dba Lagaspence Realty, LLC
Rodrigue & Tammy Beland

² The Applicants reserve the right to not produce certain materials that the Applicant claims an objection, confidentiality, or similar reason that the Applicant believes would permit the Applicant to not produce that material.

Eric, Elaine and Joshua Beland

Abutting Property Owners: Pittsburg-Clarksville-Stewartstown, which include the following individuals:

Charles and Donna Jordan
Sally A. Zankowski
Jon and Lori Levesque
Roderick and Donna McAllaster
Lynne Placey
Arlene Placey
Brad and Daryl Thompson
David Schrier
Nancy L. Dodge

Non-Abutting Property Owners: Clarksville and Stewartstown, which include the following individuals:

Robert Martin;
Roderick C. Moore, Jr., Joseph John Dunlap, Shawn Patrick Brady and Christopher Thompson; and
E. Martin Kaufman, Bradley J. Thompson, and John Petrofsky on behalf of 44 residents of Stewartstown and East Colebrook (Dixville Notch-Harvey Swell Location residents)

Non-Abutting Property Owners: Ashland –Deerfield, which include the following individuals:

Joanna and Robert Tuveson;
Nina and Elisha Gray;
Rodney Felgate and Laura Felgate;
The Webster Family Group;
Lawrence Phillips and Maxine Phillips;
Lisa Wolford and Pamela Hanglin;
F. Maureen Quinn;
Madelyn and Thomas Foulkes; and
Jeanne M. Menard as a managing member of Pawtuckaway View, LLC

The Cities of Franklin and Berlin take no position.

WHEREFORE, the Forest Society respectfully requests the Municipal Groups of Intervenors, City of Franklin and City of Berlin, Grafton County Commissioners, Non-Governmental Organizations Intervenors, Business and Organizations with Economic Interests Intervenors, Pemigewasset River Local Advisory Committee, and NEPGA be granted an

extension until Monday August 1, 2016 to file any Motion to Compel with respect to the data requests these parties propounded on or before May 31, 2016.

Respectfully Submitted,

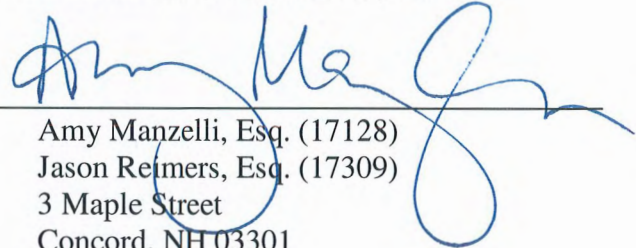
**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: July 18, 2016

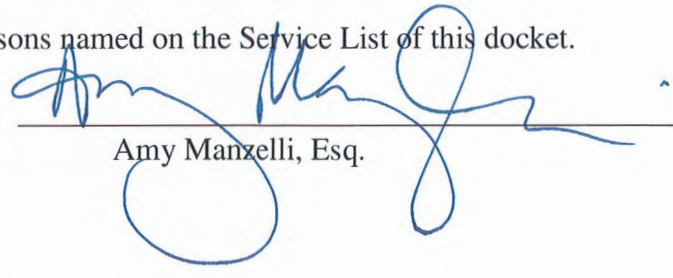
By:



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CERTIFICATE OF SERVICE

I hereby certify that on this day, July 18, 2016, a copy of the foregoing Partially Assented-to Motion of The Society for the Protection of New Hampshire Forests to Extend Deadline was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli, Esq.