

**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 Site and Facility for the Construction of a  
New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

**PARTIALLY ASSENTED-TO MOTION OF  
THE CLARKSVILLE-STEWARTSTOWN NON-ABUTTERS  
TO EXTEND DEADLINE**

The Non-Abutting Property Owners of Clarksville and Stewartstown as a group hereby request a deadline extension as follows:

1. By Procedural Order dated June 23, 2016, the New Hampshire Site Evaluation Committee (“SEC”) directed the Applicants to file responses to individual intervenor group Data Requests by July 15, 2016.

2. On July 15, 2016, Applicants filed responses and objections to the Data Requests filed by the Clarksville-Stewartstown Non-Abutters Group but did not file any documents or responses that the Applicants claimed were confidential stating that they would produce certain (but not necessarily all) claimed and withheld confidential materials, if the parties entered into a confidentiality agreement.

3. On July 21, the Clarksville-Stewartstown Non-Abutters Group received a proposed form of confidentiality agreement prepared by the Applicants and that Group is in the process of communicating with Applicants’ counsel regarding issues raised therein with a view to negotiating an agreeable way to proceed to obtain at least some of the documents and information that the Applicants are withholding under a claim of confidentiality.

4. On July 25, 2016, a satisfactory resolution was reached on the terms of a confidentiality agreement, but it will still take time to obtain signatures from members of the group and to get and distribute the additional information produced by Applicants and then to

negotiate over remaining objections. If agreement cannot be obtained on any outstanding production issues, then time will also be required to prepare and file a Motion to Compel.

5. Pursuant to NH Admin. Rule 202.12(k)(2), any Motion to Compel the Applicants' to respond to Data Requests must be made within 10 days of receiving the applicable responses or objections. Arguably, that deadline date might be claimed to be as early as today, July 25, 2016, which is impossible to meet.

6. Accordingly, the Clarksville-Stewartstown Non-Abutters Group are requesting an extension of that deadline for filing any Motion to Compel until Monday, August 15, 2016.

7. Applicants partially concur in this request and have agreed to extend the deadline for any Motion to Compel until Monday, August 8, 2016—but not August 15, 2016.

8. Other parties have not taken any position on this Motion as of the time of filing.

WHEREFORE, the Clarksville-Stewartstown Non-Abutters Group respectfully requests that it be granted an extension until Monday, August 15, 2016 to file any Motion to Compel with respect to the data requests that is has propounded.

Dated: July 25, 2016

Respectfully submitted,

Non-Abutting Property Owners: Clarksville  
and Stewartstown, as a group

By /s/ Alan Robert Baker  
Alan Robert Baker, Spokesperson for  
Non-Abutting Property Owners: Clarksville  
and Stewartstown, as a group

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of July, 2016, a copy of the foregoing was sent to the parties listed on the electronic Distribution List for this docket.

/s/ Alan Robert Baker

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Alan Robert Baker