

July 29, 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**

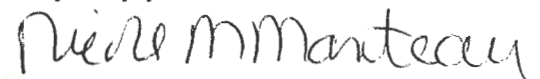
Dear Ms. Monroe:

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 to File Motions to Compel for All Intervenors**. Please note that the Forest Society has collaborated with several parties and the Applicant in the preparation of this motion and the extension requested is intended to be for all Intervenors.

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. 7/27/2016) 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 TO FILE MOTIONS TO COMPEL
FOR ALL INTERVENORS**

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 all intervenors 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, certain intervenors were to propound data requests upon the Applicants on or before May 31, 2016, to which the Applicants were to respond on or before July 8, 2016, and other intervenors were to propound data requests upon the Applicants on or before June 7, 2016, to which the Applicants were to respond on or before July 15, 2016.

2. On July 8, 2016, and July 15, 2016, the Applicants generally responded to the respective intervenors 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.

3. Subsequently, the Applicants produced 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.¹

4. Pursuant to N.H. Admin. Rule 202.12(k)(2), should any intervenor 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 have been construed to be July 18, 2016, for some intervenors and July 25, 2016, for other intervenors.

5. The Applicants—and other intervenors—have previously assented to a Motion of the Forest Society to an extension of the July 18, 2016 deadline to August 1, 2016, which was granted on July 21, 2016.

6. In addition, the following intervenors whose motions to compel are due on or about July 25, 2016, have filed assented-to or partially assented-to motions to extend their deadline to file motions to compel:

- i. Clarksville-Stewartstown Non-Abutters Group (Motion dated July 25, 2016)
- ii. Ashland to Deerfield Non-Abutters Group (Motion dated July 25, 2016)
- iii. Deerfield Abutters Group (Motion dated July 25, 2016)

7. By letter dated July 27, 2016, the Applicants indicated their assent to an extension for all intervenors with deadlines to file motions to compel regarding data request responses due from the Applicants on July 8, 2016, and July 15, 2016, to the single date of August 15, 2016.

¹ 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.

8. As the Applicants state in their July 27, 2016 letter—and to which the Forest Society agrees—this extension will “permit sufficient time to resolve disputes informally consistent with Site 202.12(k)(4).”

9. As a result, an extension to August 15, 2016 for all intervenors and intervenor groups to file motions to compel will result in a more orderly and efficient resolution of discovery issues.

10. To be clear, it is the intention of the Forest Society that the extension requested herein to August 15, 2016, will apply to all intervenors and intervenor groups—not only the Forest Society.

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

New England Power Generators Association (NEPGA)
Grafton County Commissioners
Ashland to Concord Abutting Property Owners
Clarksville-Stewartstown Non-Abutting Property Owners
Clarksville-Stewartstown Abutting Property Owners
Municipal Group 2
Municipal Group 3-South
Non-Governmental Organizations

WHEREFORE, the Forest Society respectfully requests that all intervenors—not only the Forest Society—be granted an extension until Monday August 15, 2016 to file any Motion to Compel with respect to the data requests propounded on or before May 31, 2016, and on or before June 7, 2015.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: July 29, 2016

By:



Amy Manzelli, Esq. (17128)
Jason Reimers, Esq. (17309)
3 Maple Street
Concord, NH 03301
(603) 225-2585
manzelli@nhlandlaw.com
reimers@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, July 29, 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.



Jason Reimers