

The 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 to Construct a New Voltage Transmission Line and Related Facilities in New Hampshire

Motion Requesting an Order Allowing Arthur B. Cunningham to Represent His Clients Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC at the Technical Sessions as Their Attorney

Status of Case

The Site Evaluation Committee has scheduled Technical Sessions beginning on September 6, 2016.

Motion

Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC, respectfully move the Site Evaluation Committee for an Order allowing them to be represented by their attorney Arthur B. Cunningham at the Technical Sessions.

Memorandum

The Technical Session Agenda directs that the questions posed to the Applicants' witnesses be posed through a group spokesperson. The Agenda does not recognize interveners' right to be represented by their attorney.

Interveners' vital interests are at stake in this proceeding. They are entitled to be represented by an attorney of their choice.

The attorney has the ethical duty to represent to represent his clients with competence. Rule 1.1, Competence, Rules of Professional Conduct. An attorney has the ethical duty to represent his client with reasonable promptness and diligence. Rule 1.3, Diligence, Rules of Professional Conduct.

The Agenda interferes with interveners right to be represented by an attorney. The Agenda interferes with interveners' attorney duties owed to his clients.

Applicants Do Not Concur

Interveners attorney, via an email exchange with Applicants' attorney, enquired if Applicants objected to their request to be represented at the Technical Sessions by their attorney without acting through a group spokesperson. Applicants objected.

Wherefore

Interveners Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC, respectfully request that they be permitted to be represented by their attorney Arthur B. Cunningham at the Technical Sessions and that Attorney Cunningham be granted full opportunity to fulfill his ethical duties to interveners at the Technical Sessions.

August 15, 2016

Respectfully submitted,

/s/ Arthur B. Cunningham

Arthur B. Cunningham

Attorney for Interveners

PO Box 511, Hopkinton, NH 03229

603-746-2196 (O); 603-219-6991 (C)

gilfavor@comcast.net

Bar # 18301

Certificate

I certify that this document was served in accordance with the New Hampshire Site Evaluation Committee.

August 15, 2016

/s/ Arthur B. Cunningham

Arthur B. Cunningham