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Via Hand-Delivery and Email

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

August 19, 2016

Re: 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, NH Site Evaluation Committee Docket No. 2015-06

Dear Ms. Monroe:

Please find enclosed for filing in the above-referenced matter an original and eight (8) copies of NGO Intervenor's Second Motion to Compel Regarding Set 1 Data Requests.

Copies of this letter and the attached have this day been forwarded via email to all parties on the Distribution List.

Thank you for your attention. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

Melissa E. Birchard

cc: Distribution List

**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

**NGO INTERVENORS' SECOND MOTION TO
COMPEL REGARDING SET 1 DATA REQUESTS**

Ammonoosuc Conservation Trust, Appalachian Mountain Club, and Conservation Law Foundation (collectively, the “NGO Intervenor”), pursuant to Site 202.12(k), submit this Second Motion to Compel Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the “Joint Applicants”) to produce certain GIS data and information with regard to the NGO Intervenor’s first set of data requests. The NGO Intervenor state as follows.

1. The NGO Intervenor respectfully incorporate by reference the assertions and argument they presented in the NGO Intervenor’s Motion to Compel Regarding Set 1 Data Requests dated August 15, 2016 (“First Motion to Compel”).

2. Despite the continued good faith efforts of the NGO Intervenor consistent with Site 202.12(k), and despite the numerous exchanges between the NGO Intervenor and the Joint Applicants described in the First Motion to Compel, the NGO Intervenor believe that the Joint Applicants still have not produced certain GIS data.

3. As noted in the First Motion to Compel, the NGO Intervenors reserved the right to supplement their First Motion to Compel by Friday, August 19, 2016 and Counsel for the Joint Applicants indicated consent to such further extension.

4. In addition to the issues with respect to NGO Intervenors DR 1-23 noted in the First Motion to Compel, the Joint Applicants have also failed to provide the emphasized portions of DR 1-23:

Please provide copies of all of the GIS geodatabases, shapefiles, and raster data sets, including both spatial data and any associated attribute information or related tables, that were used in any part of the Application, including but without limitation the production of: Appendix 1, Project Maps; Appendix 17 (Visual Impact Assessment), in particular Appendix 17A (Viewshed mapping), Supplemental Attachments 6, 7, 8, and 9, including without limitation the following GIS data sets: HVDC line; 345 kV line; Existing and relocated 115 kV line; Relocated Distribution line; **ROW boundary; Edge of corridor;** Existing, removed, and relocated Project Structures; Raster data used in the viewshed analyses including InterMap LiDAR data, Digital Terrain Model(s), classified Land Cover Data, Digital Surface Model(s), and visibility mask(s); Vector data associated with the viewshed analyses; Delineated wetlands; Property owner identification and associated table identifying owners by name; Applicant-owned parcels; **Building structures (residential, commercial, other);** ROW cross-section; and derived viewshed analysis raster file(s) attributed with number of structures that may be visible from each raster (pixel).

5. To the extent that the phrases “ROW Boundary” and “Edge of Corridor” are not clear, the intent is to receive data related to: (a) the legal boundary of the full extent of the ROW as it existed prior to the Project, not merely to the cleared or used portion of the ROW; (b) the legal boundary of the full extent of the ROW as it is proposed to exist after construction of the Project; (c) the boundary of the cleared or used portion of the ROW as it existed prior to the Project; and (d) the boundary of the cleared or used portion of the ROW as it is proposed to exist after construction.

6. The NGO Intervenors respectfully request that the Committee direct the Joint Applicants to produce to the NGO Intervenors the GIS data requested above, and in the format as described in the First Motion to Compel.

WHEREFORE, for the reasons stated above, the NGO Intervenors respectfully request that the Site Evaluation Committee grant the NGO Intervenors' Second Motion to Compel.

Respectfully submitted,



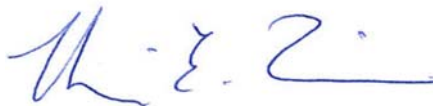
August 19, 2016

Melissa E. Birchard
Designated Spokesperson for the
NGO Intervenors

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has, on this 19th day of August, 2016, been sent by email to the service list in Docket No. 2015-06.



Melissa E. Birchard