

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

**MOTION OF THE SOCIETY FOR THE PROTECTION OF  
NEW HAMPSHIRE FORESTS TO POSTPONE TECHNICAL SESSION**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, moves to postpone the Technical Session on Project Economics and Market Benefits with Julia Frayer scheduled for September 16, 2016 (“Technical Session”) per the August 5, 2016 Technical Session Agenda (“Agenda”) issued by the Subcommittee of New Hampshire Site Evaluation Committee’s (“SEC”), and states as follows:

1. The Forest Society respectfully requests that the SEC postpone the Technical Session due to scheduling conflicts, the details of which follow.
2. Upon receipt of the Agenda, the Forest Society ascertained that one of its consultants is unavailable on September 16, 2016 (due to travel to Alaska for another client).
3. The Forest Society requires the presence of its consultant due to the technical and complicated nature of Ms. Frayer’s pre-filed testimony and report, which relate to the purported benefits of the Project, a critical component of the standards the SEC must evaluate pursuant to RSA 162-H.
4. The Forest Society then inquired with SEC Administrator, Pamela Monroe, about how to handle the scheduling conflict. After she consulted with SEC counsel, Michael Iacopino,

Administrator Monroe stated the Forest Society should inquire with the Northern Pass Transmission, LLC and Public Service Company of New Hampshire/b/a Eversource Energy's ("Applicants") about switching already scheduled technical sessions or rescheduling the technical session to either October 4<sup>th</sup> or 6<sup>th</sup>.

5. Upon inquiry to the Applicants, the Forest Society and the Applicants endeavored to determine if either of the October dates could work. But, the Forest Society has learned that Ms. Frayer is available on only one of the October dates, and on that date, a consultant for Counsel for the Public is unavailable.

6. Therefore, the Forest Society will be contacting Administrator Monroe to obtain additional possible dates and work with the Applicants and other parties to determine an alternate date.

7. Counsel for the Forest Society expects this process to take approximately one week and plans to file a motion requesting the Technical Session be rescheduled to the agreed-upon date once one has been determined.

8. This motion is filed now, before an agreed-upon date has been determined, to maximize advance notice of this possible change.

9. With respect to September 16, the Forest Society defers to the Subcommittee, but respectfully suggests holding the September 16, 2016 date as a Technical Session should prior Technical Sessions require more time.

10. The Applicants and Counsel for the Public concur on condition that the new date be a date that: (a) all applicable representatives and consultants from both parties are available; and (b) is not later than October 4, 2016. The following parties take the following positions with respect to this request:

- a. Concur
- Ammonoosuc Conservation Trust
  - Appalachian Mountain Club
  - Conservation Law Foundation
  - New England Power Generators Association
  - Pemigewasset River Local Advisory Committee
  - Town of Bridgewater
  - Town of New Hampton
  - Town of Littleton
  - Town of Ashland Water & Sewer
  - Town of Sugar Hill
  - Town of Franconia (Board of Selectmen, Planning Board, and Conservation Commission)
  - Town of Easton (Board of Selectmen, Planning Board, and Conservation Commission)
  - Town of Pembroke
  - Town of Woodstock
  - Town of Deerfield
  - Town of Plymouth
  - City of Franklin
  - City of Berlin
  - City of Concord
  - Grafton County Commissioners
  - Susan Percy for Percy Summer Club
  - Abutting Property Owners: Bethlehem - Plymouth
  - Abutting Property Owners: Ashland to Allenstown
  - Abutting Property Owners: Pittsburg-Clarksville-Stewartstown
  - Abutting Property Owners: Deerfield
  - Non-Abutting Property Owners: Stark- Bethlehem
  - Non-Abutting Property Owners: Clarksville and Stewartstown
  - Non-Abutting Property Owners: Ashland to Deerfield

The remainder of the parties did not respond to a request for their position.

**WHEREFORE**, the Forest Society respectfully requests that the Committee:

- A. Grant this Motion;
- B. Postpone the September 16, 2016 Technical Session; and
- C. Grant such further relief as it deems appropriate.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC



Date: August 25, 2016

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, August 25, 2016, a copy of the foregoing Motion for Postponement of Technical Session was sent by electronic mail to persons named on the Service List of this docket.



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Amy Manzelli, Esq.