

August 31, 2016

NHPUC SEP07'16 AM10:18

Pamela 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 (The Applicants) for a
Certificate of Site and Facility
Objection to Certain Motions to Compel**

Dear Ms. Monroe:

I am emailing as Spokesperson for the Abutters' Group I, the Abutters of Pittsburg, Clarksville, and Stewartstown, in response to the Applicants' August 25th Objection to Certain Motions to Compel.

The Applicants' response to our Abutters' Group I's Motion to Compel (page 52, 53 of said Motion) leaves me confused, bewildered, and somewhat irate. Here is the Applicants' response:

F. Abutters Group 1

149. The Applicants incorporate their initial statements contained in Sections III. and IV. The spokesperson for Abutters Group 1 did not make any effort to resolve their specific discovery issues as they pertain to individual questions. Moreover, all of these requests are simply argumentative or seek information that is not in the care, custody, or control of the Applicants at this time. Therefore, all of their specific requests should be denied. However, the Applicants are willing to continue to work with each municipality to address any perceived discovery issue.

150. A1 1, 3,4,11,12,13,14,15, 16, 18. The Applicants have fully responded to each and every one of these data requests and do not have additional responsive documents or information in their care, custody or control. Specifically, all of the requested follow-up information is not available; however, much of the requested information will be developed during the detailed design phase and prior to construction. The Applicants will provide any additional responsive information to these data requests should it become available. Moreover, the motion to compel on all of these data requests is simply argumentative. The intervenor group may elect to ask follow-up questions on this topic at the technical sessions.13

As far as my 'not making any effort to resolve specific discovery issues,' I point out that I asked for a phone conversation with a construction engineer to discuss my very real concerns. I did get a return call from Mr. Adam Dumville, Attorney at McLane, Middleton, basically asking me to withdraw my Motion to Compel. Attorney Dumville offered that they were overburdened with paper work.

For the Applicant to claim that they have fully responded to each and every one of my data requests is blatantly incorrect. To many of my questions, they have given me nothing.

Most of our data requests are direct questions dealing with construction techniques. How can the Applicant possibly be at a point of construction design and not possess complete knowledge of such items as manhole production, use of the three 2.5 buried conduit, types of ditch backfill, final road restoration, staging and laydown areas?

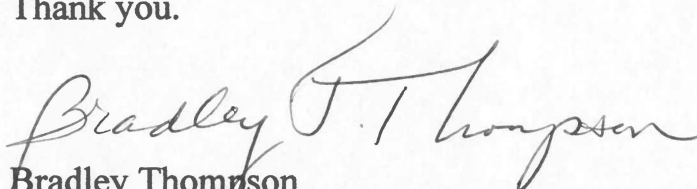
Our Abutters group needs to totally understand how the Applicant is going to "dig up our roads." When does the Applicants' "detailed design phase" occur?

We would certainly expect that answers to all of our questions would be available at the September 12th and September 14th Technical Session Construction Panel in Concord, NH. Again, I'm attempting to resolve specific issues —and get specific answers.

If The Applicant does not have complete information on design, then I would call the Applicants' application incomplete. And, if this is the case, I would call the upcoming Technical Sessions on Construction useless!

Enough of 30% documents. If the Applicant wants our group's blessing, it is time for 100% documentation to be provided.

Thank you.

A handwritten signature in cursive script that reads "Bradley Thompson". The signature is written in dark ink and is positioned above the printed name.

Bradley Thompson
Spokesperson for Abutters Group I,
Pittsburg, Clarksville, Stewartstown
Cc: Distribution List