

MCLANE
MIDDLETON

THOMAS B. GETZ
Direct Dial: 603.230.4403
Email: thomas.getz@mclane.com
Admitted in NH and NY
11 South Main Street, Suite 500
Concord, NH 03301
T 603.226.0400
F 603.230.4448

September 1, 2016

Via Electronic Mail & Hand Delivery

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

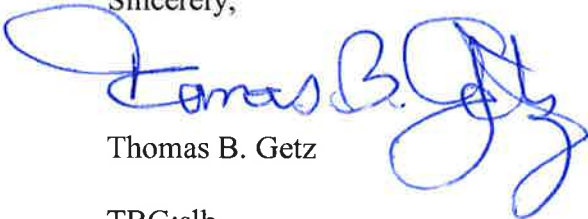
**Re: New Hampshire Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the "Applicants") for a Certificate of
Site and Facility
Objection to Motion to Postpone Technical Session**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of the Applicants' Objection to Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty Motion to Postpone Technical Session.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:slb

cc: SEC Distribution List

Enclosure

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANTS' OBJECTION TO KEVIN SPENCER AND MARK LAGASSE D/B/A
LAGASPENCE REALTY MOTION TO POSTPONE TECHNICAL SESSION**

NOW COME Northern Pass Transmission LLC (“NPT”) and Public Service Company of New Hampshire d/b/a Eversource Energy (“PSNH”) (collectively the “Applicants”), by and through their attorneys, McLane Middleton, Professional Association, and object to Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty’s (“Lagaspence” or “Petitioner”) Motion to Postpone Technical Session (“Motion”). The Applicants object as explained below.

1. On August 24, 2016, the Petitioner asked that the Site Evaluation Committee (“SEC) postpone the September 16, 2016 technical session, which concerns the testimony of Ms. Frayer, regarding project economics and market benefits. The Petitioner’s Attorney, Mr. Cunningham, indicates that he has a conflict in his trial schedule for that day. He does not indicate whether he has made any attempt to coordinate with the spokesperson for the Petitioner’s group to ask questions on behalf of the Petitioner at the technical session.

2. The Petitioner is part of Abutters Group 2, which relates to the overhead portion of the Project in the towns of Dummer, Stark and Northumberland. The Petitioner is one of ten parties comprising the Group, which is one of 23 intervenor groups. The SEC established the groups to ensure the prompt and orderly conduct of the proceeding. Granting the Petitioner’s request would have the opposite effect, impairing the prompt and orderly conduct of the proceeding and inconveniencing the other parties.

3. The Presiding Officer has already rejected the Petitioner's underlying position. In his Order of August 29, 2016, Chairman Honigberg, in ruling on the Petitioner's motion to be represented by Mr. Cunningham during the technical sessions, held:

To the extent that the motion seeks permission for Lagaspence to act as a separate intervenor party at the technical session the motion is denied.

The Petitioner is not only seeking to act as a separate intervenor party but as an indispensable party, without whom the case may not proceed. Mr. Cunningham may provide questions to the group spokesperson for use at the September 16, 2016 technical session in order to get a better understanding of the testimony.

4. The Petitioner does not provide good reason for postponing the technical session nor does the Petitioner demonstrate that the interests of justice would be impaired if the technical session were not postponed. Accordingly, the motion should be denied.

WHEREFORE, the Applicants respectfully request that the Presiding Officer:

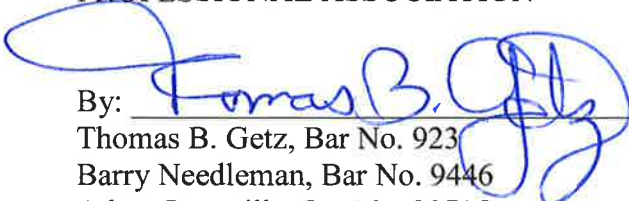
- a. Deny Petitioner's Motion and
- b. Grant such further relief as it deems appropriate.

Respectfully submitted,

Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy

By Their Attorneys,
McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: September 1, 2016

By: 
Thomas B. Getz, Bar No. 923
Barry Needleman, Bar No. 9446
Adam Dumville, Bar No. 20715
11 South Main Street, Suite 500
Concord, NH 03301
(603) 226-0400
barry.needleman@mclane.com
thomas.getz@mclane.com
adam.dumville@mclane.com

Certificate of Service

I hereby certify that on the 1st of September, 2016 the foregoing Objection was electronically served upon the SEC Distribution List and the original and one copy will be hand delivered to the NH Site Evaluation Committee.


Thomas B. Getz