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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

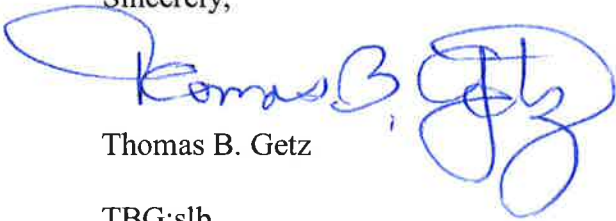
**Re: New Hampshire Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the “Applicants”) for a Certificate of
Site and Facility
Objection to Motion for Rehearing**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of the Applicants’ Objection to Lagaspence Realty Motion for Rehearing of August 29, 2016 Order.

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 LAGASPENCE REALTY
MOTION FOR REHEARING OF AUGUST 29, 2016 ORDER**

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 for Reconsideration of the Chair’s August 29, 2016 Order Denying Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty, LLC Request for an Order Allowing Arthur B. Cunningham to Represent His Clients Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty, LLC at the Technical Sessions as Their Attorney (“Motion for Rehearing”).

1. On August 15, 2016, the Petitioner submitted a motion requesting that the Chairman of the Site Evaluation Committee (“SEC” or “Committee”) issue an order allowing the Petitioner to be represented by its attorney at the Technical Sessions, apparently for all witnesses and under all circumstances.

2. The Applicants objected to the Petitioner’s motion on August 25, 2016, pointing out, among other things, that the motion was procedurally improper and that the Petitioner had already been denied individual intervenor status.

3. On August 29, 2016, the Presiding Officer granted in part and denied in part the Petitioner's motion, reaffirming that the Petitioner may not act as a separate intervenor party at the technical session

4. The Petitioner argues on rehearing that Chairman Honigberg's ruling "mistakenly provides that *the grouping imposed for the convenience of the Applicants* takes precedence over Mr. Spencer's and Mr. Lagasse's due process right to be represented by an attorney as they seek to protect their property." (Emphasis supplied.) The Petitioner then provides two pages of "Background" unrelated to its claim on rehearing.

5. The Petitioner is mistaken when it alleges that the groupings established by the Site Evaluation Committee were "imposed for the convenience of the Applicants." The SEC, consistent with the provisions of RSA 541-A:32, established the groups to ensure the prompt and orderly conduct of the proceeding. See Presiding Officer's March 18, 2016 Order on Petitions to Intervene, p. 16.

6. The Petitioner does not provide a good reason for rehearing of the August 29, 2016 Order; it simply asks for a different result. Furthermore, the Motion does not satisfy the requirements of Site 201.29 (d). Finally, inasmuch as the Presiding Officer did not overlook or mistakenly conceive anything in his original decision, the Motion should be denied. See, *Dumais v. State*, 118 N.H. 309, 311 (1978).

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: 
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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