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 RESCHEDULE 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 reschedule the Technical Session to November 1, 2016.
- 2. The Forest Society filed a Motion to Postpone Technical Session on August 25, 2016 in which it stated the Forest Society would file a Motion to Reschedule Technical Session once a mutually agreed-upon date was reached as there were scheduling conflicts with experts and witnesses.
- 3. After numerous back and forth between the SEC Administrator and several parties that did not result in any agreed-upon date, the Forest Society polled all parties electronically (with doodle), including Applicants, by providing eleven (11) potential dates

covering all of October and the first half of November to potentially reschedule the September 16, 2016 Technical Session.

- 4. Twelve parties, including grouped intervenors and Counsel for Public, responded that they were available on November 1, 2016. (There is no other date in October or the first half of November on which as many parties are available.)
- 5. The Applicants and the International Brotherhood of Electrical Workers ("IBEW") responded that they objected to such rescheduling and opted not to provide their availability.
- 6. For purposes of collecting the parties' position on this motion pursuant to Site 202.14, the Forest Society interprets the parties' response to the poll to indicate their positions on this motion, meaning that the parties who provided their availability concur; the Applicants and IBEW object, and all others who have not responded have not taken a position on the motion.
- 7. Postponing until November 1, 2016 so that the parties and their consultants can be available to have a single technical session on this topic achieves the optimal balance of affording parties meaningful participation and avoiding inefficient and piecemeal conduct of the technical session.

WHEREFORE, the Forest Society respectfully requests that the Committee:

- A. Grant this Motion;
- B. Postpone the September 16, 2016 Technical Session until November 1, 2016; 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

By:

Date: September 14, 2016

Amy Manzelli, Esq. (17128) Jason Reimers, Esq. (17309) 3 Maple Street Concord, NH 03301 (603) 225-2585 manzelli@nhlandlaw.com reimers@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, September 14, 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.

Amy Manzelli, Esq.