

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

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

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC respectfully replies as follows to the Applicants’ Objection to the Forest Society’s Reply and Request for Hearing (“Objection”):

1. Applicants erroneously claim that the Forest Society’s request for a hearing on its Motion to Compel amounts to a motion pursuant to Site 102.28.

2. A request for a hearing on a pending motion is not a motion in and of itself. It is not a request for “an order or ruling directing some act to be done.” Site 102.28. The “act to be done” that the Forest Society seeks is for the SEC to compel production from the Applicants. Requesting a hearing is simply asking for a specific path for the SEC to make a decision.

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

- A. Schedule a hearing for the Subcommittee’s consideration of the Forest Society’s Motion to Compel; and
- B. Grant such other and further relief as is just and equitable.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC



Date: September 14, 2016

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

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

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, September 14, 2016, a copy of the foregoing Reply was sent by electronic mail to persons named on the Service List of this docket.



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Amy Manzelli, Esq.