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September 15, 2016

Via Electronic Mail & Hand Delivery

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

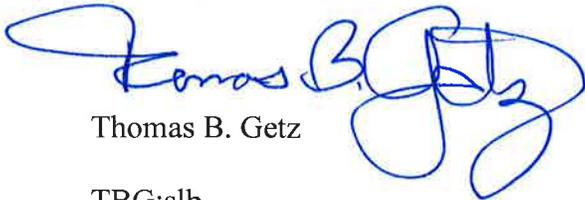
**Re: New Hampshire Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the "Applicants") for a Certificate of
Site and Facility
Objection to SPNH Motion to Reschedule Technical Session**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of the Applicants' Objection to Motion to Reschedule Technical Session filed by the Society for Protection of New Hampshire Forests on September 14, 2016.

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 MOTION
TO RESCHEDULE 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 respectfully submit this Objection to the Motion of the Society for the Protection of New Hampshire Forests (“SPNHF”) to Reschedule Technical Session (“Motion”) filed in the above-captioned proceeding.

1. On August 25, 2016, SPNHF filed a Motion to Postpone Technical Session in which it explained that one of its consultants would not be available for the September 16, 2016 technical session. The Applicants agreed, along with Counsel for the Public, to try and work out an alternative date, which would be no later than October 4, 2016. However, a consensus alternative date could not be found.

2. On September 12, 2016, SPNHF emailed the party spokesperson distribution list to determine the availability of the various parties in October and the first half of November for a rescheduled technical session. The Applicants informed SPNHF that they opposed rescheduling the September 16, 2016 technical session beyond October 4, 2016.

3. On September 14, 2016, SPNHF filed its Motion, which seeks to postpone the September 16, 2016 technical session on Project Economics and Market Benefits with Julia Frayer. SPNHF proposes instead that the technical session be held on November 1, 2016. It asserts, at p. 2 of its Motion, that this nearly seven-week postponement “achieves the optimal balance of affording parties meaningful participation and avoiding inefficient and piecemeal conduct of the technical session.”

4. Rescheduling the September 16, 2016 technical session is unnecessary in light of a proposal described at the technical session on September 14, 2016. Mr. Iacopino, Counsel to the Site Evaluation Committee, communicated to the parties a suggestion made by Mr. Boldt, counsel for the City of Berlin, pursuant to which the session on September 16, 2016 would be videotaped and provided to SPNHF in order that its absent witness may prepare for a subsequent opportunity for SPNHF to inquire of Ms. Frayer. The Applicants indicated that they did not object to such an approach. They did, however, object to postponing the follow-up session until November 1, 2016.

5. Mr. Boldt’s proposal would cause no undue hardship or inconvenience to SPNHF, and it would promote the orderly and efficient conduct of the proceeding. See, e.g., Puc 202.04 and 203.13 for relevant standards for extending timelines and postponing hearings, respectively. Under the proposal, SPNHF would, in fact, gain an advantage because its inquiry would occur last, and its witness would have substantial additional time to review the videotape.

6. As for SPNHF’s proposal, delaying the technical session until November 1, 2016, would impose a burden on the Applicants, the Applicants’ witness, Julia Frayer, and any party or individual who made arrangements to be present on the scheduled date. Postponing the Technical Session for a single party in this multi-party proceeding because its consultant is not

available, moreover, discounts the interests of the other 24 parties to this proceeding, including the Applicants. Furthermore, it would needlessly set the procedural schedule back. This is especially so if the nearly seven-week postponement to accommodate SPNHF's witness leads to a motion to postpone the November 15, 2016 deadline for filing testimony

7. Given the interests expressed in Ms. Frayer's report and testimony, as demonstrated in the data requests submitted to the Applicants, and Counsel for the Public's track record so far in the proceedings, it is reasonable to expect that the inquiry of Ms. Frayer on September 16, 2016 will not end early in the day. Accordingly, holding the technical session as scheduled, and setting a follow-up session with SPNHF at a later date promotes the orderly and efficient conduct of the proceeding.

8. As part of the informal discovery in this proceeding, and in order for SPNHF to get a better understanding of Ms. Frayer's testimony, the Applicants are prepared to arrange a discussion between Ms. Frayer and SPNHF's witness at the soonest mutually agreed upon date among the Applicants, Ms. Frayer, SPNHF, and its witness. In the event, however, that the Presiding Officer should conclude that the follow-up session must be in the form of another technical session, the Applicants believe that it is the schedule of the Applicants, SPNHF, Mr. Iacopino, and Ms. Monroe that should be controlling. Other parties, including Counsel for the Public, would have the opportunity to attend but their schedules should not be controlling because they would already have had their opportunity to inquire of Ms. Frayer. As with all the other technical sessions, the follow-up session would be audio recorded and available to all parties if they were not able to attend. Accordingly, there is no hardship or inconvenience to any party.

9. To be clear, the Applicants propose that only SPNHF would have the opportunity to question Ms. Frayer at the follow-up session because all other parties will have had the opportunity to question Ms. Frayer at the September 16, 2016 technical session. Granting other parties the opportunity for a second round of questions would place the Applicants at a disadvantage in this proceeding and would be contrary to prevailing practice. The result of Mr. Boldt's proposal would be that SPNHF would be moved to last in the order of inquiry set out in the August 5, 2016 Technical Session Agenda. The Applicants believe that this proposal "achieves the optimal balance of affording parties meaningful participation and avoiding inefficient and piecemeal conduct of the technical session" so long as the follow-up session is held promptly.

WHEREFORE, the Applicants respectfully request that the Site Evaluation Committee:

- A. Deny the Motion;
- B. Approve the alternative proposal described herein; and
- C. Grant such further relief as is deemed just and appropriate.

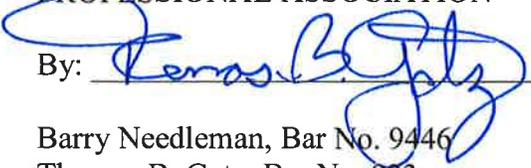
Respectfully submitted,

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

By Its Attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

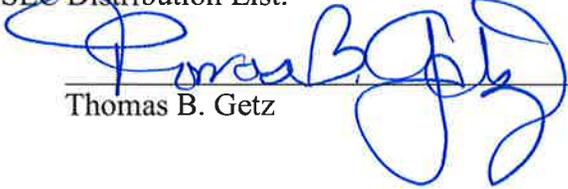
Dated: September 15, 2016

By:  _____

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Certificate of Service

I hereby certify that on the 15th of September, 2016, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.



Thomas B. Getz