

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 Motion to Amend and Postpone (“Objection”):

1. Applicants claim that the Forest Society seeks to create a parallel system and therefore, redundancy, in which Applicants are required to file everything with the Committee and then separately with the Department of Environmental Services (“DES”).
2. If the process were as the Applicant claims it should be, then the Committee should simply ignore the jurisdictional criteria the legislature saw fit to bestow upon it and have no interaction with state agencies, and cease to serve as the central hub for streamlined review.
3. RSA 162-H:7, IV could not be clearer that the SEC is the hub of a centralized and streamlined administrative process: “Each application [to the SEC] shall contain sufficient information to satisfy the application requirements of each state agency having jurisdiction, under state or federal law, to regulate any aspect of the construction or operation of the proposed facility, and shall include each agency's completed application forms.”
4. What the Forest Society requests is precisely what the Legislature intended: that the Committee be the hub, the centralized point of information with which the state agencies

interact, a process through which parties gain real time information. This is not a parallel system; it is the system, the same one that required the wetlands application to be filed with the SEC.

5. The Forest Society simply requests that the legal process set forth in the statute be followed, the process where the Committee is the hub and everything branches out from there. The wetlands application was filed with the SEC. The logical next step in the process would be to file supplements to the wetlands application with the Committee as well.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC



Date: September 16, 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

CERTIFICATE OF SERVICE

I hereby certify that on this day, September 16, 2016, a copy of the foregoing Reply was sent by electronic mail to persons named on the Service List of this docket.



Amy Manzelli, Esq.