## 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

## JOINDER OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS IN MOTION TO AMEND PROCEDURAL ORDER OF COUNSEL FOR THE PUBLIC

The Society for the Protection of New Hampshire Forests (the "Forest Society"), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully joins in the Motion to Amend Procedural Order filed on October 4, 2016 by the Counsel for the Public ("Motion"). The Forest Society states as follows in support:

- 1. Like Counsel for the Public ("CFP"), the Forest Society has consultants who cannot complete their prefiled testimony in the absence of information from the Applicants.
- 2. The Forest Society has relied on requests for information CFP has made to the Applicants to avoid duplication of requests. The Forest Society also lacks all of the information identified in Exhibit A to the Motion.
- 3. Like Counsel for the Public's prefiled testimony, the Forest Society's prefiled testimony should be set forth in one cohesive filing, not bifurcated (for example, as is currently ordered with respect to the natural environment).
- 4. The Forest Society reasserts on its own behalf all of the facts, law, and arguments set forth in the Motion.

**WHEREFORE**, the Forest Society respectfully requests the Site Evaluation Committee:

- A. Extend the deadline by which the Forest Society must file pre-filed testimony on (a) market economic issues; (b) local economic issues; (c) natural resources; and (d) aesthetics to December 30, 2016;
- B. Extend the deadline by which Applicants must serve data requests on the Forest Society and the deadline by which the Forest Society must respond, by the equal number of days;
- C. Extend other portions of the Procedural Schedule by an equal number of days;
- D. Amend the Procedural Order as set forth in Exhibit B to the Motion; and
- E. Grant such and further relief as may be just.

Respectfully Submitted,

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

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: October 7, 2016

Amy Manzelli, Esq. (17128) Jason Reimers, Esq. (17309) Elizabeth A. Boepple, Esq. (20218) 3 Maple Street Concord, NH 03301 (603) 225-2585 manzelli@nhlandlaw.com

reimers@nhlandlaw.com

boepple@nhlandlaw.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day, October 7, 2016, a copy of the foregoing Joinder was sent by electronic mail to persons named on the Service List of this docket.

Amy Manzelli, Esq.