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October 14, 2016

Via Electronic Mail

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

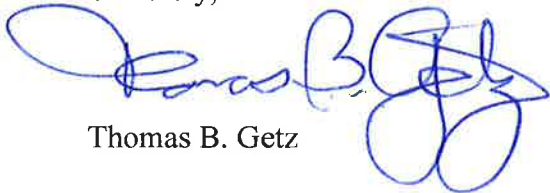
**Re: Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the "Applicants") for a Certificate of
Site and Facility
Applicants' Motion For Extension of Time To Supplement Responses**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find the Applicants' Motion For Extension of Time to Supplement Responses Pursuant to October 4, 2016 Motion to Compel.

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' MOTION FOR EXTENSION OF TIME TO SUPPLEMENT
RESPONSES PURSUANT TO OCTOBER 4, 2016 ORDER**

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 request a 10-day extension until October 24, 2016 to supplement certain responses pursuant to the Committee’s October 4, 2016 Order on Forest Society and Municipal Group 3 (South)’s Motion to Compel Documents Withheld (the “Order”).

1. The Committee issued an order on October 4, 2016, which ordered the Applicants to provide documents that were previously provided to Counsel for the Public to the Society for the Protection of New Hampshire Forests (“SPNHF”) and to Municipal Group 3 South (“MG3S”). The Applicants had already provided much of the information sought by SPNHF and MG3S to those parties that signed a confidentiality agreement, and have since provided other documents. They have since discovered, however, that not all the documents had been provided.¹

2. The Order requires that the Applicants (in addition to what they indicated in their September 19, 2016 objection had already been provided) supplement their previous responses, by October 14, 2016, to include bid-related documents related to CFP Data Requests 1-7, 1-8 and

¹ For a further description and status of the relevant documents, see the enclosed letter to the parties that was uploaded to ShareFile.

1-9, as well as four specific documents, which relate to CFP Data Requests 1-25, 1-26 and 1-27, which are: (1) Renewable Properties, Inc., and Northern Pass Transmission, LLC, Option to Lease Agreement, dated October 14, 2015; (2) Hydro Renewable Energy, Inc., and Northern Pass Transmission LLC Delivery Performance Agreement, dated as of January 22, 2016; (3) Northern Pass Transmission LLC and Hydro Renewable Energy, Inc., Amended and Restated Transmission Service Agreement, dated January 22, 2016; and (4) Section 5.2 of Eversource Energy's Proposal to the Tri-State Clean Energy RFP.

3. The Applicants will supplement their responses as required by the Order, except insofar as they intend to seek rehearing with respect to two documents, i.e., (1) the Hydro Renewable Energy, Inc., and Northern Pass Transmission LLC Delivery Performance Agreement, dated as of January 22, 2016; and (2) Section 5.2 of Eversource Energy's Proposal to the Tri-State Clean Energy RFP.

4. In accordance with RSA 541:3, the Applicants must file a motion for rehearing within 30 days of the order or decision. The Applicants anticipate filing their motion for rehearing by October 24, 2016. Therefore, the Applicants respectfully request a stay or extension of time of the Order for 10 days and sufficient time thereafter for the Committee to issue its ruling on the motion for rehearing.

5. The Applicants attempted to reach the parties on the afternoon of October 14, 2016 to obtain assent. The Cities of Berlin and Franklin took no position. The Applicants were unsuccessful in reaching any of the other parties.

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

- A. Grant an extension of time and stay the Committee's October 4, 2016 Order for 10 days in order for the Applicants to supplement responses; and

B. 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: October 14, 2016

By: 

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Certificate of Service

I hereby certify that on the 14th of October, 2016, the aforementioned motion was served electronically upon the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.


Thomas B. Getz

October 14, 2016

Via Upload to NPT ShareFile Site

**Re: 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 – Applicants’ Supplemental Responses Regarding the Committee’s
October 4, 2016 Order on Forest Society and Municipal Group 3 (South)’s Motion
to Compel Documents Withheld**

To All Parties in Docket 2015-06:

This letter responds to the Committee’s October 4, 2016 Order on Forest Society and Municipal Group 3 (South)’s Motion to Compel Documents Withheld (the “Order”).

The Committee’s Order granted the motions to compel of SPNHF and MG3S for the following: (1) Renewable Properties, Inc., and Northern Pass Transmission, LLC, Option to Lease Agreement, dated October 14, 2015; (2) Hydro Renewable Energy, Inc., and Northern Pass Transmission LLC Delivery Performance Agreement, dated as of January 22, 2016; (3) Northern Pass Transmission LLC and Hydro Renewable Energy, Inc., Amended and Restated Transmission Service Agreement, dated January 22, 2016; and (4) Section 5.2 of Eversource Energy’s Proposal to the Tri-State Clean Energy RFP. It also ordered the Applicant to provide additional responsive documents and information produced only to Counsel for the Public as outlined in the Forest Society and Municipal Group 3(South)’s pleadings, namely: CFP 1-1, CFP 1-2, CFP 1-3, CFP 1-7, CFP 1-8, CFP 1-9, CFP 1-10, CFP 1-12, CFP 1- 16, CFP 1-20, CFP 1-21, CFP 1-22, CFP 1-25, CFP 1-26, and CFP 1-27.

The Applicants respond as follows:

1. The RPI and NPT Option to Lease has been previously provided to those parties that signed a confidentiality agreement. *See Applicants’ Response to NA1 1-16.*
2. The Applicants will file a motion for rehearing.
3. The Applicants will provide a copy of the Northern Pass Transmission LLC and Hydro Renewable Energy, Inc., Amended and Restated Transmission Service Agreement, dated January 22, 2016 on a CD to those parties that have signed the confidentiality agreement via U.S. Mail.

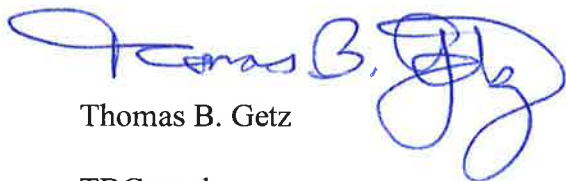
4. The Applicants will file a motion for rehearing.
5. The Applicants have already provided all “highly confidential” documents to those parties that signed a confidentiality agreement for CFP 1-1, CFP 1-2, CFP 1-3, CFP 1-10, CFP 1-12, CFP 1- 16, CFP 1-20, CFP 1-21, CFP 1-22, CFP 1-25, CFP 1-26, and CFP 1-27.
6. To the extent parties wish to view the responsive documents provided to Counsel for the Public in CFP 1-7 and CFP 1-8, the material requested is highly confidential, competitively sensitive, business information. Disclosure of this material would place the Applicants’ and its contractors at a significant competitive disadvantage. Specifically, should the information contained in these documents be released to competitors of PAR, ABB, and/or M.J. Electric, the Project’s contractors would be significantly and irreparably disadvantaged during bid processes for future projects.

Therefore, in order to balance these critical considerations with the Presiding Officer’s Order on October 4, 2016, the Applicants will make the requested information available for inspection to those parties that have signed a confidentiality agreement at the offices of McLane Middleton, 11 South Main Street, Suite 500, Concord, NH. However, based on the sensitivity of these documents, the Applicants will not agree to have the documents, or any copies/images of the documents, removed from McLane’s offices. The Applicants understand that parties may take notes during their review and that any such notes will be managed in strict accordance with the confidentiality requirements of this case. In compliance with the Order, the Applicants will make un-redacted copies of the requested bid documents available for inspection to those parties that have signed a confidentiality agreement.

7. To the extent the parties seek the responsive documents provided to Counsel for the Public in response to CFP 1-9, please refer to the Applicants’ Supplemental Response to GCC 1-29 following the Order on Motions to Compel, which was uploaded to the ShareFile Site on October 7, 2016.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:amd