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Via Hand-Delivery and Email

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

October 21, 2016

Re: 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, NH Site Evaluation Committee Docket No. 2015-06

Dear Ms. Monroe:

Please find enclosed for filing in the above-referenced matter an original and eight (8) copies of a Joinder of Appalachian Mountain Club and NGO Intervenors in Counsel for the Public's Motion to Amend Procedural Order and Joinder by the Society for the Protection of New Hampshire Forests Together With Motion for Additional Relief.

Copies of this letter and the attached have this day been forwarded via email to all parties on the Distribution List.

Thank you for your attention. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

Melissa E. Birchard

cc: Distribution List

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 APPALACHIAN MOUNTAIN CLUB AND NGO INTERVENORS IN
COUNSEL FOR THE PUBLIC'S MOTION TO AMEND PROCEDURAL
ORDER AND JOINDER BY THE
SOCIETY FOR PROTECTION OF NEW HAMPSHIRE FORESTS TOGETHER WITH
MOTION FOR ADDITIONAL RELIEF**

The Appalachian Mountain Club (the "AMC"), a member of the Non-Governmental Intervenor ("NGO Intervenor"), composed of the AMC, Conservation Law Foundation and Ammonoosuc Conservation Trust, and the NGO Intervenor join in the Motion to Amend Procedural Order filed on October 4, 2016 by the Counsel for the Public ("CFP Motion") and in the Joinder to the CFP Motion by the Society for Protection of New Hampshire Forests ("SPNHF Joinder") filed October 7, 2016 and seek additional relief. In support, the AMC and the NGO Intervenor state as follows:

1. The AMC intends to submit pre-filed testimony on the issues of natural resources and aesthetics. AMC's testimony will contain analyses of the Applicants' pre-filed testimony on these subjects as supplemented by information obtained from the Applicant through data requests and technical sessions.
2. The AMC cannot complete its analysis of the aesthetics issues without having received the Applicant's responses to certain data requests; specifically data request 23 of the NGO Intervenor's Data Requests having to do with the digital terrain model and digital surface model (DTM and DSM respectively).

3. In his Order dated September 22, 2016, the Chair directed the Applicants to provide AMC with the data requested in request 23. AMC and the Applicants have met on more than one occasion and involved Attorney Iacopino in an effort to come to agreement on the provision of this data but, to date, the Applicants have not provided the data.
4. The AMC cannot complete its analysis of the aesthetics issues without completing its questioning of the Applicants' aesthetics experts, Mr. DeWan and Ms. Kimball, and without receiving the data requested during the technical session with Mr. DeWan held on October 6, 2016.
5. The AMC has not had an opportunity to question Ms. Kimball, who is the co-author of the Applicants' pre-filed testimony on aesthetics and to whom Mr. DeWan deferred many technical session questions. The Committee has required Ms. Kimball to be available for further questioning but the date for that technical session has not yet been set and, as of the Revised Technical Session Agenda issued on October 13th, will not occur until sometime in November at the earliest.
6. The AMC cannot complete its analysis of the natural resource issues covered by the environmental panel without having received the Applicant's responses to certain data requests (TS-3, Request 7); specifically data request to provide correspondence from the Natural Heritage Bureau that identifies its results of the exemplary natural community assessment. AMC signed the required confidentiality agreement prior to our data request, but has yet to receive this information as was agreed to during the September 20th Environmental Panel.

7. The Environmental Panel session is not yet complete and the next scheduled date is October 18, 2016.
8. The NGO Intervenors' pre-filed testimony, including without limitation the AMC's pre-filed testimony, should be set forth in one cohesive filing and not be bifurcated according to issues addressed.
9. The AMC and the NGO Intervenors adopt and reassert the facts, law and arguments set forth in the CFP Motion and the SPNHF Joinder.
10. The following parties assent, oppose, or take no position on this filing:

Assent

- Abutting Property Owners (overhead portion), Deerfield
- Abutting Property Owners (overhead portion), Whitefield, Dalton, and Bethlehem
- Abutting Property Owners (underground portion), Bethlehem to Plymouth
- Abutting Property Owners (underground portion), Clarksville-Stewartstown
- McKenna's Purchase
- Municipal Group 2
- Non-Abutting Property Owners (overhead portion), Clarksville and Stewartstown
- Non-Abutting Property Owners (overhead portion), Stark, Lancaster, Whitefield, Dalton, and Bethlehem
- Society for the Protection of New Hampshire Forests
- Towns of Bridgewater, New Hampton, Littleton, Woodstock, Deerfield

Oppose

No responses received.

No Position


No responses received.

WHEREFORE, the AMC and the NGO Intervenors respectfully request that the Site Evaluation Committee:

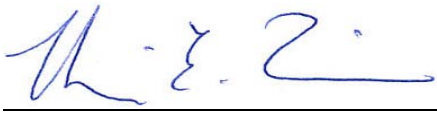
- A. Extend the deadline by which the AMC/NGO Intervenors must file pre-filed testimony on (a) natural resources and (b) aesthetics to December 30, 2016;
- B. Extend the deadline by which the Applicants must serve data requests on the NGO Intervenors and the deadline by which the NGO Intervenors must 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 CFP Motion; and
- E. Grant such other and further relief as is just and equitable.

Respectfully submitted,

APPALACHIAN MOUNTAIN CLUB

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NON-GOVERNMENTAL INTERVENORS

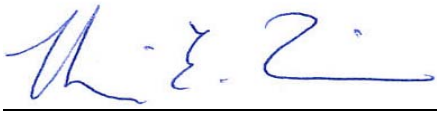
By: 
Melissa E. Birchard
Designated Spokesperson for the
NGO Intervenor

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Dated: October 21, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this day, October 21, 2016, a copy of the foregoing Joinder of the Appalachian Mountain Club and NGO Intervenor in Counsel for the Public's Motion to Amend Procedural Order and Joinder by the Society for Protection of New Hampshire Forests together with Motion for Additional Relief was sent by electronic mail to all persons named on the Service List in this docket.


Melissa E. Birchard