

THE STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

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 for the Construction of a New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

SABBOW AND CO., INC.'S LATE PETITION TO INTERVENE

Sabbow and Co., Inc. petitions the Site Evaluation Committee to allow it to intervene in the above-captioned matter in accordance with RSA 541-A:32 and NH Admin. Rule Site 202.11, stating as follows:

1. On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (the "Applicants") filed an application for a Certificate of Site and Facility with the Site Evaluation Committee.
2. Sabbow and Co., Inc. ("Sabbow") is a New Hampshire corporation, with a principal place of business at 77 Regional Drive, Concord, New Hampshire ("Regional Drive property").
3. Sabbow employs between 70 and 80 people at its Regional Drive property.
4. A portion of the proposed facility will be located on Sabbow's Regional Drive property.
5. The plans for the facility, particularly Sheet 612 and Sheet 163, indicate that the project will have significant impact on Sabbow, and may make it impossible to continue with their business at that location.
6. Sabbow seeks to intervene in order to address the temporary and permanent impacts on its property.
7. The plans also contain several inaccuracies or inconsistencies as they affect the Sabbow property, which need to be addressed.

8. The presence of these errors suggests that there may be other property owners similarly affected.

9. The magnitude of the impact on Sabbow's property, both temporary and permanent, amount to an increase in the use of the property beyond what was anticipated by the initial easement, and therefore amount to a taking of property.

10. Allowing Sabbow to intervene would therefore assist in the administration of justice in this matter.

WHEREFORE, Sabbow respectfully requests that the Site Evaluation Committee:

- A. Grant Sabbow's Petition to Intervene; and
- B. Grant such other and further relief as may be just.

Respectfully submitted,

SABBOW AND CO., INC.



November 16, 2016

By: _____

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CERTIFICATE OF SERVICE

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



Peter C. Scott, Esquire