



November 30, 2016

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

Re: Joint Application of Northern Pass Transmission, LLC, et als.
Docket No. 2015-06

Dear Ms. Monroe,

Enclosed please find Sabbow's Response to the Applicants' Objection, for filing in the above-referenced matter.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'P. Scott', written over a light blue grid background.

Peter C. Scott, Esquire
General Counsel

cc: Viggo C. Fish, Esquire
SEC Distribution List (by email)

SABBOW AND CO., INC.
77 REGIONAL DRIVE ▪ CONCORD, NH 03301
TEL: (603) 225-2669 ▪ FAX: (603) 224-2927

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'S RESPONSE TO APPLICANTS' OBJECTION

1. Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (the "Applicants") appear to be making two arguments against intervention by Sabbow and Co., Inc. ("Sabbow"):
 - a. Sabbow's Petition does not meet the standard for intervention.
 - b. Sabbow does not present any issues relevant to the matter before the Site Evaluation Committee.

Relevancy of Issues.

2. Sabbow is primarily bringing two issues before the Committee:
 - a. The plans contain inconsistencies with respect to Sabbow's property, making it difficult to judge the impact.
 - b. The plans suggest significant impact on Sabbow's property, and therefore on Sabbow's business.
3. Sabbow has only reviewed two pages of the plans, but believes it has found a significant number of errors as detailed in testimony filed by the City of Concord.
5. The discovery of those errors, after reviewing those pages of the plans at the request of the City of Concord, prompted Sabbow to file its Petition to Intervene.
6. If Sabbow is correct, errors in only two reviewed pages out of hundreds of unreviewed pages should be an issue of great significance to the Committee.

7. As the Petition explained, the presence of these errors suggests that there may be other property owners similarly affected.

8. The presence of these errors make it difficult to assess the impact on Sabbow's property.

9. Any significant increase in impact, whether on one property owner or on many, should be an issue of great significance to the Committee.

Standard for Intervention.

10. The primary issue for intervention is whether the interests of justice are served and the primary issue for late filing is whether the intervention will impede the application process.

11. There is no doubt that the proposed project significantly impacts Sabbow.

12. If Sabbow is correct that the plans are incorrect, that is a significant issue that the Committee needs to address in the interests of justice.

13. If Sabbow is correct that the plans understate the impact on its property and business, that is a significant issue that the Committee needs to address in the interests of justice.

14. If Sabbow is correct that the project will, either during construction or when completed, amount to a taking beyond the rights granted, and the Applicants have not addressed that issue prior to their application, that is a significant issue that the Committee needs to address in the interests of justice.

15. Sabbow does not expect the Committee to award damages on any of these issues, but believes that the Committee should consider whether the Applicants have adequately addressed the impact on property owners before filing their application.

16. If the Committee is inclined to consider these issues, then allowing Sabbow to intervene will only assist in the application process, not impede it.

Respectfully submitted,

SABBOW AND CO., INC.



November 30, 2016

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this November 30, 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