

**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

**TOWN OF WHITEFIELD'S ASSENTED-TO MOTION TO CLARIFY
MOTION TO STRIKE CERTAIN PRE-FILED TESTIMONY**

The Town of Whitefield, by and through its attorneys, Gardner, Fulton & Waugh PLLC, moves to clarify the Motion to Strike Certain Pre-Filed Testimony, stating as follows:

1. On December 2, 2016, Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the "Applicants") filed a motion seeking to strike certain pre-filed testimony ("Motion"). The list of the pre-filed testimony that the Applicants sought to strike includes the pre-filed testimony of Lise Moran on behalf of The Society for the Protection of New Hampshire Forests ("SPNHF").
2. The Town of Whitefield also submitted, separately from any filings by SPNHF, pre-filed testimony of Lise Moran as a witness for the Town in her capacity as the President of the Whitefield Historical Society. That pre-filed testimony, prepared specifically for the Town of Whitefield in connection with this proceeding, discusses the Town's concerns relative to impacts of the proposed Northern Pass Project on Whitefield's historic sites and tourism.
3. Although Applicants list "Lise Moran o/b/o The Society for the Protection of New Hampshire Forests" in Paragraph 1 of the Motion, their prayer for relief requests the Committee simply "strike the Pre-Filed Testimony of Lise Moran" without noting that Ms. Moran submitted separate and different pre-filed testimony for a different party in this matter, and without

qualifying that the request refers to Ms. Moran's pre-filed testimony for SPNHF and **not** to her pre-filed testimony for the Town of Whitefield (*see* Motion, paragraph F).

4. Undersigned counsel has confirmed with Applicants' counsel that the Motion was not intended to reference, move to strike, or affect Ms. Moran's pre-filed testimony on behalf of the Town of Whitefield. Applicants have assented to this Motion to Clarify.

WHEREFORE, the Town of Whitefield respectfully requests the Site Evaluation Committee:

- A. Clarify that the Motion does not refer to, and the Committee's ruling on such Motion does not strike or affect, the Pre-Filed Testimony of Lise Moran on behalf of the Town of Whitefield; and
- B. Grant such other and further relief as may be just.

Respectfully submitted,


TOWN OF WHITEFIELD

By Its Attorneys,

GARDNER, FULTON & WAUGH PLLC

December 12, 2016

By:


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Certificate of Service

I hereby certify that on this 12th day of December 2016, a copy of the foregoing was sent by electronic mail to persons named on the Service List of this docket.

December 12, 2016

By:


C. Christine Fillmore, Esq.