



January 11, 2017

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 Motion for Reconsideration, for filing in the abovereferenced matter.

Very truly yours,

Peter C. Scott, Esquire General Counsel

cc: SEC Distribution List (by email)

## 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 MOTION FOR RECONSIDERATION

- 1. The Site Evaluation Committee has dismissed Sabbow's Petition to Intervene, apparently claiming that Sabbow had notice of the impact of the project on its property and failed to act in a timely manner.
- 2. Such reasoning overlooks the point that it is precisely because Sabbow does not know the impact of the project on its property that it has filed its Petition.
- 3. As claimed earlier, Sabbow has only reviewed two pages of the plans, but believes it has found a significant number of errors and omissions as detailed in testimony filed by the City of Concord.
- 4. While the testimony Sabbow filed for the City of Concord would be sufficient to bring the issue before the Committee, it is not evident that any existing party will pursue the issue, either generally or with respect to the Sabbow property.
- 5. If Sabbow is correct, errors and incompleteness in only two reviewed pages out of hundreds of unreviewed pages should be an issue of great significance to the Committee.
- 6. Based upon an admittedly small sample size, the plans appear conceptual in nature, as acknowledged by the engineers when they visited the Sabbow property following the filing of the Petition.
- 7. If the plans are indeed conceptual, then the Committee is reviewing a pig in a poke.

- 8. Sabbow is as good a party as any to observe that the emperor has no clothes.
- 9. Sabbow is less concerned with the aesthetics, and with electromagnetic fields (except to the extent that it interferes with radio communication), then it is with the actual effect of the construction on the ground.
- 10. Sabbow still does not know what the impact will be despite repeated requests to, and several visits from, the Applicants.
- 11. If the Committee is inclined to consider the accuracy and completeness of the plans, then allowing Sabbow to intervene will only assist in the application process, not impede it.

Respectfully submitted,

SABBOW AND CO., INC.

January 11, 2017

By:

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this January 11, 2017, a copy of the foregoing was sent by electronic mail to persons named on the Service List of this docket.

Peter C. Scott, Esquire