

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket No. 2015-06

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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

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Objection to the Applicant's Motion to Strike the Pre-filed Testimony of
Intervenors Elmer (Neil) and Claire Lupton

Submitted
March 7, 2017

- Elmer and Claire Lupton (Luptons) have been involved in the opposition to the Northern Pass Project from its' inception.
- Luptons applied for and were accepted by the SEC as Intervenors.
- The proposed route of the Northern Pass is planned to go directly over property owned by Luptons meaning that Luptons have a compelling interest in the project.
- Luptons spent much time and effort researching, preparing and submitting their Pre-Filed Testimony.
- Luptons have spent hundreds of hours attempting to read the voluminous paperwork generated by this project.
- Luptons submitted Pre-Filed Testimony
- Luptons are representing themselves (pro se) and are not lawyers and have no legal training.
- Luptons were unaware that participation in the Technical sessions was mandatory and were unaware until after the date to respond that the request to exclude their testimony had been filed.
- Luptons are senior citizens and live in Massachusetts.
- Elmer Lupton has had severe hip pain during the fall and winter limiting his mobility. This has now been diagnosed as a fractured hip. Elmer Lupton also has two artificial knees.
- Had the Luptons known, that, in fact, the Technical Sessions were and are mandatory and had they been aware of the motion to strike their prefiled testimony, they would have made the substantial effort to participate, or at least applied to be excused. Luptons respectfully apologize for failure to comply with the requirements.
- Immediately upon learning of the deficiency, Luptons are filing this paper.
- If the Pre-Filed Testimony of the Luptons is retained, Luptons will make every effort to attend and participate in proceedings as is appropriate

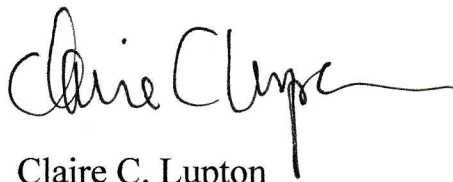
WHEREFORE, the Luptons respectfully request that this Committee:

- A. Deny the Applicant's Motion to Strike the Pre-Filed Testimony of Elmer (Neil) and Claire Lupton; and
- B. Grant such further relief as it deems appropriate.

Respectfully submitted. This document has been served on all parties to the proceeding.

A handwritten signature in black ink, appearing to read 'Elmer C. Lupton', with a large, sweeping flourish at the end.

Elmer C. Lupton

A handwritten signature in black ink, appearing to read 'Claire C. Lupton', with a long, horizontal flourish extending to the right.

Claire C. Lupton