

PRIMMER PIPER EGGLESTON & CRAMER PC

Attorneys at Law

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March 20, 2017

By E-Mail & U.S. Mail

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
pamela.monroe@sec.nh.gov

Re: Docket No. 2015-06 – 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

Dear Ms. Monroe:

Enclosed is Counsel for the Public's Addendum to Motion to Compel Production of London Economics International, LLC's Economic Model From the Applicants, or, Alternatively, Motion to Strike Testimony.

Thank you.

Sincerely,



Thomas J. Pappas

TJP/scm - 2769545_1

Enclosure

cc: Peter C.L. Roth, Esq.
Elijah J. Emerson, Esq.

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

Docket No. 2015-06

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

**COUNSEL FOR THE PUBLIC'S ADDENDUM TO
MOTION TO COMPEL PRODUCTION OF LONDON ECONOMICS
INTERNATIONAL, LLC'S ECONOMIC MODEL FROM THE APPLICANTS, OR,
ALTERNATIVELY, MOTION TO STRIKE TESTIMONY**

Counsel for the Public, by his attorneys, the Office of the Attorney General and Primmer Piper Eggleston & Cramer PC, respectfully files this addendum to his Motion to Compel Production of London Economics International, LLC's Economic Model From the Applicants, or, Alternatively, Motion to Strike Testimony (the "Motion").

1. Counsel for the Public filed the Motion on March 15, 2017.
2. After the Motion was filed, Counsel for the Public realized that the Motion was inadvertently filed without seeking concurrence from the parties pursuant to N.H. Admin. Rule Site 202.14(d).
3. Counsel for the Public immediately corrected the oversight by seeking concurrence from the parties.
4. The Spokespersons for the following Intervenors concur in this Motion:
 - (a) Municipal Group 2
 - (b) Municipal Group 3-South
 - (c) NEPGA
 - (d) Appalachian Mountain Club, Conservation Law Foundation, Sierra Club Chapter of NH, and Ammonoosuc Conservation Trust
 - (e) Grafton County Commissioners

- (f) Pemigewasset River Local Advisory Committee
 - (g) Abutting Property Owners (overhead portion) Ashland, Northfield, Canterbury, Concord
 - (h) Abutting Property Owners (overhead portion) Deerfield
 - (i) Non-Abutting Property Owners (overhead portion) Ashland to Deerfield
 - (j) Non-Abutting Property Owners (overhead portion), Stark, Lancaster, Whitefield, Dalton, and Bethlehem
 - (k) Society for the Protection of New Hampshire Forests
 - (l) Abutting Property Owners (underground portion), Bethlehem to Plymouth
5. Applicants object to the Motion.
6. The remaining parties have not responded.

Respectfully submitted,

COUNSEL FOR THE PUBLIC,

By his attorneys,



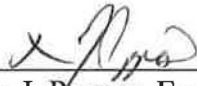
Dated: March 20, 2017

By: Peter C.L. Roth, Senior Assistant Attorney General
Environmental Protection Bureau
33 Capitol Street
Concord, NH 03301-6397
(603) 271-3679

PRIMMER PIPER EGGLESTON & CRAMER PC,

Dated: March 20, 2017

By:



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-and-


Elijah D. Emerson, Esq. (N.H. Bar No. 19358)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing ADDENDUM TO MOTION TO COMPEL PRODUCTION OF LONDON ECONOMICS INTERNATIONAL, LLC'S ECONOMIC MODEL FROM THE APPLICANTS, OR, ALTERNATIVELY, MOTION TO STRIKE TESTIMONY has this day been forwarded via e-mail to persons named on the Distribution List of this docket.

Dated: March 20, 2017

By:



Thomas J. Pappas, Esq. (N.H. Bar No. 4111)