

New Hampshire Site Evaluation Committee

Docket No. 2015-06

Joint Application of Northern Pass Transmission LLC ("NPT") and Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") for a Certificate of Site and Facility for the Construction of a New High Voltage Electric Transmission Line and Related Facilities in New Hampshire

Bradley and Daryl Thompson, on behalf of the Intervenors of Group 1 North, file this Objection to the Applicant's Motion to Strike the Pre-Filed Video Testimony of the Combined Intervenors Group of Pittsburg, Clarksville and Stewartstown. We ask that Applicant's Motion be DENIED.

Background

The Combined Intervenors of Group I North, Pittsburg, Clarksville and Stewartstown (CICS), in collaboration with neighbors constituting a group of ten (10), created a video in the fall of 2016. The video includes drone photography, and narratives from the perspective of PROPERTY OWNERS who know the area well—all of whom will be directly impacted by the proposed Northern Pass project (NPT).

The CICS submitted the same video as Video Pre-Filed Testimony to Pamela Monroe on November 10, 2016, and provided thumb-drives to the Applicants.

Discussion

1. It was the intent of the Intervenors and their Neighbors, of Pittsburg, Clarksville and Stewartstown, to provide a Visual Overview of the proposed route of the Northern Pass Transmission Line Project in OUR area of northern Coos County, New Hampshire. This is an area where the Applicant does not hold a Right of Way.

Because not everyone is familiar with our specific part of New Hampshire's North Country, this 21-minute video offers a visual opportunity to see and understand the geography of the area and the impact of the proposed route. We believe it would be difficult for those unfamiliar with this area to visualize what is being proposed, using exclusively written documentation, as in the NPT Application.

2. The Applicant states that the video does not constitute "admissible evidence," because it is not "authenticated." Should the SEC wish, we would be happy to provide written testimony from each participant in the video that it is a "True" document and, therefore, primary, authentic, evidence.

3. The Applicant objects to the narrative, stating that “the video does not constitute the testimony of a witness as to any facts or the opinion of an expert.” Each participant in the video speaks factually to how the NPT project will impact their land, their families, their businesses, their lives. We believe the SEC committee members will benefit from hearing from each participant, to fully understand how this proposed project will interfere with the orderly development of the region. It will have unreasonable adverse effects on public benefit, aesthetics, historic and cultural sites, and the fragile natural environment. *Please see our offer in # 2 above.*

4. The Applicant states, “three of the witnesses are intervenors, seven are not.” We do not understand why this is the basis for an objection. All the participants in the video are neighbors and property owners who work together; all will be impacted by this project. *Please see our offer in #2 above.*

5. Just as with a written document, this video allows members of the SEC multiple opportunities at viewing, so the Committee can fully grasp the impact of the proposed route throughout our area. This video enhances the Discovery process in a way that limited "visualizations" by a contractor from Maine or Vermont cannot provide.

Conclusion

We believe the Intervenor’s Group Video will enrich the SEC members’ knowledge of the North Country and the Impact of the project. We, therefore, request that the members of the Site Evaluation Committee be given the opportunity to view this video at the forthcoming Adjudicative Hearings. We believe it will provide a better understanding of the geographic area and the impact of the proposed route of the NPT project on the Public Interest in our area.

For these reasons, Bradley and Daryl Thompson, on behalf of the Combined Intervenor’s of Pittsburg, Clarksville and Stewartstown, Group I North, request that the APPLICANT’S MOTION TO STRIKE be DENIED.

Respectfully submitted,

Bradley J. Thompson
Daryl D. Thompson
599 Noyes Road
Stewartstown, NH 03576