

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

**MOTION OF THE SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS FOR LEAVE TO SUBMIT ADDITIONAL
SUPPLEMENTAL PRE-FILED TESTIMONY OF WILL ABBOTT**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, submits this Motion for Leave to respectfully ask that the Site Evaluation Committee (the “Committee”) accept brief, additional supplemental pre-filed testimony of Will Abbott. The Forest Society states the following in support:

1. Mr. Abbott’s additional supplemental testimony concerns the height of a tree at 49 Donovan Street, the venue where hearings in this matter are being held. The Forest Society believes that using such a tree as a common reference point will benefit the prompt and orderly conduct of the hearings, and will afford all involved a concrete example from which to accurately conceptualize the various heights involved in the proposed project.

2. Vertical height is material to nearly all of the RSA 162-H:16, IV substantive criteria that the Committee must consider, particularly orderly development, aesthetics, historic sites, and the public interest standard, including heights of existing towers; heights of proposed towers; heights of transition stations; heights of existing improvements; heights of trees and the treeline along the right-of-way, and more.

3. If the parties and the Subcommittee members are provided with the height of a particular tree that they can view at any time during the course of the proceedings, they will better understand the numerous heights involved in this docket, which will be a benefit to the considerations involved in this adjudication.

4. In the absence of a balloon demonstration, or any other concrete illustration of vertical height dimensions, this will serve as a beneficial reference point.

5. Nothing in the SEC's administrative rules prohibits additional supplemental testimony, and the provision of a concrete reference point for vertical height does not prejudice any party.

WHEREFORE, the Movant respectfully requests the Committee:

- A. Grant this Motion for Leave;
- B. Accept Mr. Abbott's additional supplemental prefiled testimony; and
- C. Grant such further relief as it deems appropriate.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,
BCM Environmental & Land Law, PLLC



Date: April 24, 2017

By: _____

Amy Manzelli, Esq. (17128)
Jason Reimers, Esq. (17309)
Elizabeth A. Boepple, Esq. (20218)
Stephen W. Wagner (268362)
3 Maple Street
Concord, NH 03301
(603) 225-2585
manzelli@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, April 24, 2017, a copy of the foregoing Motion was sent by electronic mail to persons named on the Service List of this docket.

A handwritten signature in black ink, appearing to read 'Jason Reimers', with a long horizontal stroke extending to the right.

Jason Reimers, Esq.