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May 4, 2017

Via Electronic Mail & Hand Delivery

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

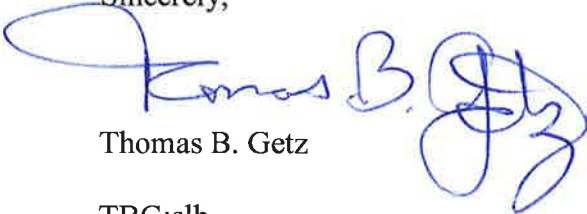
**Re: Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the “Applicants”) for a Certificate of
Site and Facility
Objection to SPNHF Motion to Submit Supplemental Testimony**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of an
Objection to Society For The Protection of New Hampshire Forests Motion to Submit
Supplemental Testimony.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:slb

cc: SEC Distribution List

Enclosure

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**OBJECTION TO SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE
FORESTS MOTION TO SUBMIT SUPPLEMENTAL TESTIMONY**

Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (the “Applicants”), by and through their attorneys, McLane Middleton, Professional Association, hereby respond to the late-filed motion made by the Society for the Protection of New Hampshire Forests (“SPNHF”) asking the Site Evaluation Committee (“SEC” or in this case “Subcommittee”) for leave to file supplemental testimony consisting of a picture of a tree in the parking lot near the site of the hearings in this proceeding (“Tree Motion”). As explained below, the picture that SPNHF offers as testimony does not provide a useful context for the Subcommittee’s deliberations.

1. On March 1, 2017, the Presiding Officer issued an Order on Pending Motions that, among other things, set deadlines for filing supplemental testimony. Supplemental testimony on Track 1 topics was due March 24, 2017, and supplemental testimony on Track 2 topics was due April 17, 2017.

2. On April 24, 2017, SPNHF filed its Tree Motion. It says that the SEC rules do not prohibit additional supplemental testimony. SPNHF also says that “the provision of a concrete [wooden?] reference point for vertical height does not prejudice any party.”

3. SPNHF argues that if the “Subcommittee members are provided with the height of a particular tree that they can view at any time during the course of the proceeding, they will

better understand the numerous heights involved in this docket.” The problem with using a particular tree nowhere near the Project route as a reference point, however, is that, without any relative or comparative context to the structures proposed for the Project, the height of a single object remains an abstract notion. The Subcommittee members could as easily take note of the height of other objects that they see in their daily travels. For instance, a member driving north on I-93 to Concord could observe the 445-foot chimney stack at Merrimack Station in Bow, or a member driving south on I-93 could observe the 399-foot wind turbines in Groton, which were both the subject of proceedings before the SEC.

4. It is not entirely clear whether the Tree Motion was filed in complete seriousness, but it does raise procedural and substantive issues, as well as the question of whether the Subcommittee would miss the forest for the tree. Accordingly, the Applicants ask that the Presiding Officer deny leave to file the Tree Motion because, at its root, SPNHF has offered no good reason for filing after the deadline and, as a reference point without a reference, the picture offered as supplemental testimony would tend to confuse rather than clarify matters. Rather, the numerous view simulations that have been filed in the proceeding will afford the Subcommittee the accurate conceptualization of heights, which has been assisted as well by the site visits already conducted, and those to be conducted.

WHEREFORE, the Applicants respectfully request that the Site Evaluation Committee:

- A. Deny the Tree Motion; and
- B. Grant such further relief as is deemed just and appropriate.

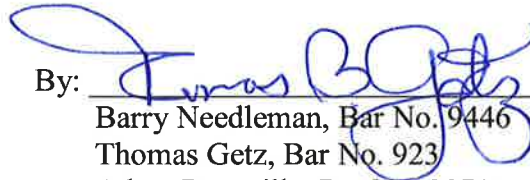
Respectfully submitted,

Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy
By Its Attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: May 4, 2017

By:



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Certificate of Service

I hereby certify that on the 4th of May, 2017, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.



Thoma B. Getz