

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

**REPLY OF THE SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS TO APPLICANTS' OBJECTION TO SUBMIT
SUPPLEMENTAL 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, reply to the Applicants' May 4, 2017, Objection to the Forest Society's Motion to Submit Additional Supplemental Testimony of Will Abbott. The Forest Society states the following in support:

1. The Applicants question whether the Supplemental Testimony "was filed in complete seriousness." Objection at ¶ 4. The Forest Society filed the Supplemental Testimony in good faith as it has done with every pleading that it has filed in this docket.

2. The relevance of the fifty-eight (58) foot tall tree outside of 49 Donovan Street was demonstrated by the Applicants' Construction Panel, which offered sixty (60) feet as a representative tree line in New Hampshire.

3. While view simulations, as the Applicants point out, are useful to conceptualize heights, a known tree that is at the approximate tree line is another useful reference point in a case in which the heights of the proposed towers are relevant to many of the RSA 162-H:16 criteria, including, but not limited to, public interest, orderly development, aesthetics, and historic sites. Looking at an object that is actually 58-feet tall is likely to assist anyone considering this project.

WHEREFORE, the Movant respectfully requests the Committee:

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

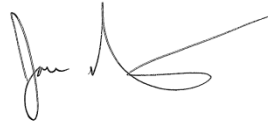
Respectfully Submitted,

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

Respectfully Submitted,

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

By its Attorneys,
BCM Environmental & Land Law, PLLC



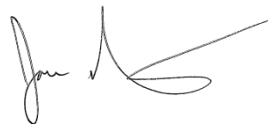
Date: May 8, 2017

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this day, May 8, 2017, a copy of the foregoing Reply was sent by electronic mail to persons named on the Service List of this docket.



Jason Reimers