CONCURRENCE WITH APPLICANTS' MOTION FOR ADDITIONAL HEARING DATES AND EXTENDED HOURS

The International Brotherhood of Electrical Workers ("IBEW") submits this concurrence with respect to the Applicants’ recent motion for additional hearing dates and extended hours, and states:

1. On June 23, 2017, the Applicants filed a “Motion for Additional Hearing Dates and Extended Hours.” Within its motion, the Applicants request, amongst other things, the addition of 15 hearing days during July, August and early September and the extension of hours during which hearings are held. Having reviewed the Applicants’ motion, the IBEW concurs with the requests for relief contained within it.

2. As the declared purpose of RSA 162-H states, “it is in the public interest . . . that undue delay in the construction of new energy facilities be avoided. . . .” RSA 162-H:1. The IBEW and other similarly situated intervenors within its grouping are concerned that without additional hearing dates scheduled and without an extension of hours during which hearings are held, there will be undue and unreasonable delay in the evaluation of this project. Such further delay would be contrary to the plain language of RSA 162-H:1.

3. The IBEW is also concerned about the practical implications that undue delay would have. Undue and unreasonable delay in the evaluation of the project will, in turn,
adversely impact the interests of the IBEW and other similarly situated intervenors within its grouping as they relate to the benefits associated with this project. Simply put, further delay of this proceeding will delay the benefits that this project stands to bring.

4. Like the Applicants, the IBEW appreciates the Presiding Officer’s and Subcommittee’s efforts in managing this proceeding to date. However, the IBEW asks that the Presiding Officer and Subcommittee take these additional assertions into consideration when assessing the Applicants’ motion and requests for relief contained within it.

5. The IBEW has consulted other intervenors within its group. The following intervenors join in this submission and assertions contained within it:

   (i) Cate Street Capital, Inc.; and

   (ii) Coos County Business and Employers Group

WHEREFORE, the IBEW respectfully requests that the SEC:

A. Grant the Applicants’ Motion for Additional Hearing Dates and Extended Hours; and

B. Grant such other and further relief as may be just.

Respectfully submitted,

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

By Its Attorney,

Dated: 6/27/2017

[Signature]

Alan Raff
International Representative for Business Development
International Brotherhood of Electrical Workers
Certificate of Service

I hereby certify that on this day the foregoing submission was sent to the New Hampshire Site Evaluation Committee and a copy was sent by electronic mail or U.S. Mail, postage prepaid to persons named on the SEC distribution list.

Dated: 6/27/2017

By: [Signature]

[Signature]

(Alan Hall)