

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

**MCKENNA'S OBJECTION TO NORTHERN PASS TRANSMISSION LLC'S MOTION  
FOR  
ADDITIONAL HEARING DATES AND EXTENDED HOURS**

NOW COMES McKenna's Purchase Unit Owners Association, (McKenna) by and through its attorneys, Wadleigh, Starr & Peters, P.L.L.C. and files the following Objection, stating as follows:

1. On June 23, 2017, the Applicants filed a motion seeking to add additional hearing dates in July, August and September, as well as to extend the hearing hours (including adding evening hours).
2. McKenna joins the objection filed by the Municipal Groups on June 26, 2017 and raises the following additional objections to the requested relief.
3. The Applicants are critical of the time spent cross examining the construction panel. Much of that time was wasted by answers from the panel that were incomplete or evasive. The Project is not developed enough for complete answers regarding, among other things, a comprehensive construction schedule or the type of foundations. Property was purchased for the Project; it took numerous questions from several Intervenors to establish that the property was purchased by an Eversource subsidiary, Renewable Properties, not some amorphous "Project Team" as originally answered.
4. In July, undersigned counsel will be attending a graduation ceremony for my

daughter with my family in Europe. I will leave the country on July 1 and return on July 20. Undersigned counsel highlighted this issue on the record at a prehearing conference when there were no conflicting hearings. After tickets were purchased and reservations complete, the SEC added July 18, 19 and 21 (July 20 is reserved for public comments). I understand that the SEC has many interests to balance.

5. In this instance, it is not just my schedule. A key witness for cross examination by McKenna is James Chalmers. There is no lawyer at my firm who can substitute for me for this witness. After the additional hearing dates were added, I worked with Applicants' counsel to try to arrange Mr. Chalmers testimony no earlier than July 21. Counsel for Applicants has been courteous and responsive and cannot make any guarantees but the current estimated schedule will bring Mr. Chalmers to the stand no earlier than July 21. If Mr. Chalmers completes his testimony while I am unavailable, under these circumstances, it may well create an issue for appeal.

6. Finally, the request to extend the hearing hours is contrary to a law beyond the control of the SEC, the law of diminishing returns. Adding additional hours is not likely to speed up the process.

WHEREFORE, McKenna respectfully request that the Site Evaluation Committee:

- a. deny Applicants' Motion for Additional Hearing Dates and Extend Hours; and
- b. Grant such further relief as it deems appropriate.

Respectfully Submitted,

McKenna's Purchase Unit Owners Association  
By its Attorneys

