

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

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 for the Construction of a New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

**MUNICIPAL GROUPS 1 SOUTH, 2, 3 SOUTH AND 3 NORTH'S MOTION
FOR ADDITIONAL SITE INSPECTIONS**

Municipal Intervenor Groups 1 South, 2, 3 South and 3 North (collectively “the Referenced Municipal Groups”) respectfully submit the following motion for additional site inspections by the Subcommittee, stating as follows:

Procedural History:

1. On January 31, 2017, Counsel for the Public filed a Motion for Additional Site Inspections and suggested that the Subcommittee should set aside up to four (4) days for additional site inspections.
2. By Order dated March 1, 2017, the Subcommittee provided for two (2) additional days of site visits, and directed the parties to come up with a reasonable two-day schedule, or for Counsel for the Public to submit a proposed schedule if the parties could not reach an agreement.
3. On March 15, 2017, Counsel for the Public submitted a proposed schedule for two days of stops and requested that the Subcommittee consider a third day of visits to view the 7.5 miles of proposed underground burial route in Clarksville and Stewartstown where the roads are closed until May 1, and also proposed additional aboveground sites in northern New Hampshire that are more easily accessed after May 1.

4. On March 30, a Notice and Order of Site Visits was issued, scheduling the site visits for April 6 and 7 and including a list of locations to be visited. On April 5, a Notice and Order was issued postponing and rescheduling the site visits due to inclement weather.

5. On July 12, 2017, a Notice and Order of Site Visits was issued for July 27 and 28, including a list of locations to be visited. This list includes a portion of the sites that were planned but postponed in April, 2017, as well as a majority of the underground and aboveground sites that were proposed by Counsel for the Public in the northern part of the State that are only accessible after May 1.

6. The planned locations for the July 27 and 28 site inspections do not include any locations between the Town of Plymouth and the Town of Deerfield on the proposed route that were originally included in the March 30, 2017 Notice and Order of Site Visits.

7. The July 12 Notice and Order stated that motions for additional site visits “shall be submitted in writing in accordance with N.H. Code of Admin. Rules Site 202.14.

8. On June 29, SEC Administrator Pamela Monroe held a meeting with Attorney Iacopino (counsel to the Subcommittee), Counsel for the Public, counsel for the Applicants, counsel for the Society for the Protection of New Hampshire Forests, and the spokespersons for Municipal Groups 1 South, 2, and 3 North to discuss potential itineraries for the rescheduled site visits.

9. Participants at that meeting were informed that, in order to include sites that are only accessible after May 1, the original 2-day schedule for the postponed site visits would be modified by adding those northern locations, streamlining some of the originally planned stops, and eliminating everything from Plymouth southward along the proposed route, with the

explanation that these locations would be covered on a third day which had not yet been identified¹.

10. However, the July 12 Notice and Order does not set a third day for site visits and/or a date to visit sites in the City of Concord, and instead instructs the parties to file a motion for any additional site visits.

Motion for Additional Site Inspections

11. Many locations along the middle and southern portion of the proposed route present complex issues regarding the potential impacts of the Project, including but not limited to locations in downtown Plymouth, New Hampton's scenic easement area, the Ashland Water & Sewer lagoons, the residential, environmentally-sensitive and densely populated areas in Concord, and Deerfield Center and the Deerfield substation expansion site. These locations present issues and concerns that are distinct from what the Subcommittee will observe during the July 27 and July 28 site visits, for example:

- A. The impacts from the proposed underground line in Plymouth, where the line will disrupt a major access route through the center of town (which is a dense commercial and residential area), are unique to Plymouth and are not identical to the issues in the northern part of the state;
- B. The impacts from the proposed overhead line at the Ashland Water & Sewer lagoons, where the line will be in close proximity to the town's water treatment facility and sewage lagoons, are unique to Ashland and are not identical to the issues in the northern part of the state;

¹ Prior to that meeting, legal counsel for the City of Concord was notified that it would be unnecessary to attend the June 29, 2017 meeting because the sites in Concord would be visited on a third day that would be scheduled.

- C. The impacts from the proposed overhead line in Concord, where the line will go through its most densely populated area and dense commercial and industrial zones, are unique to the City of Concord and are not identical to the issues in the northern part of the state; and
- D. The impacts from the proposed overhead line in Deerfield, where the line will be visible from the historic town center and also includes a significant expansion to the existing substation, are unique to Deerfield and are not identical to the issues in the northern part of the state.

12. While the Subcommittee has made site inspections of some locations in Plymouth and in some other host communities south of Plymouth along the proposed route, those inspections occurred in March of 2016. *See* Notice and Order of Site Inspection, March 10, 2016 (Bridgewater, Bristol, Franklin, Thornton and Plymouth); Motion and Order of Site Inspection, March 11, (Concord, Pembroke, Allentown and Deerfield).

13. Since that time, the Subcommittee has heard testimony regarding construction issues, traffic disruption, and other impacts that may be caused by the Project in these locations. The Subcommittee is also scheduled to hear testimony regarding tourism, aesthetic impacts and orderly development impacts in coming months. Additional site visits to communities in Plymouth and to the south will be timely and will further educate the Subcommittee as it evaluates whether the Applicants have satisfied their burden of proof to warrant the issuance of a Certificate of Site and Facility.

14. The Referenced Municipal Groups seek to include several locations that were not previously visited by the Subcommittee. With respect to the sites that were visited previously, a fresh view of these locations, which were last viewed in March 2016 under the sole direction of

the Applicants, in very different weather conditions, and before the hearings in this matter began, will provide the Subcommittee with a more comprehensive understanding of the impacts of the proposed Project.

15. Therefore, the Referenced Municipal Groups strongly urge the Subcommittee to schedule at least one additional day of site inspections concentrated on locations along the proposed route from the Town of Plymouth to the Town of Deerfield, as well as a separate later date for the City of Concord. A list of the sites that the Referenced Municipal Groups seek to visit, including a proposed schedule, is attached hereto as Exhibit A.

16. The following parties have responded that they concur to the relief sought herein:

- a) Counsel for the Public;
- b) Grafton County Commissioners;
- c) Society for the Protection of New Hampshire Forests;
- d) Non-Governmental Intervenors, comprised of the Ammonoosuc Conservation Trust, Appalachian Mountain Club and Conservation Law Foundation;
- e) Pemigewasset River Local Advisory Committee;
- f) McKenna's Purchase;
- g) Deerfield Abutters Intervenor Group;
- h) Bethlehem to Plymouth Abutters Intervenor Group;
- i) Whitefield to Bethlehem Abutters Intervenor Group;
- j) Stark, Dummer, Northumberland Overhead Abutters Intervenor Group;
- k) Southern (Ashland to Deerfield) Non-Abutters Intervenor Group; and
- l) Bethlehem to Plymouth Non-Abutters Intervenor Group.

As of the time of this filing, a response has not been received from the other parties.

WHEREFORE, the Referenced Municipal Groups respectfully request that the Site Evaluation Committee:

- a. Schedule additional days of site inspections for locations from Plymouth southward along the proposed route; and
- b. Grant such further relief as it deems appropriate.

Respectfully submitted,

TOWNS OF NEW HAMPTON, LITTLETON,
DEERFIELD, PEMBROKE, and ASHLAND
WATER & SEWER DEPARTMENT

By and through its attorneys,

MITCHELL MUNICIPAL GROUP, P.A.

Dated: July 25, 2017

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TOWNS OF BRISTOL, EASTON, FRANCONIA,
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By and through their attorneys,

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Dated: July 25, 2017

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CITY OF CONCORD

Dated: July 25, 2017

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CERTIFICATE OF SERVICE

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

Dated: July 25, 2017

By: /s/ Danielle L. Pacik
Danielle L. Pacik, Esq., Bar #14924

EXHIBIT A

Northern Pass Proposed Site Visit Schedule (Plymouth to Deerfield)

LOCATION DESCRIPTION	TYPE: PAUSE (STAY ON BUS), STOP (GET OFF BUS) OR DRIVE-BY	ESTIMATED AMOUNT OF TIME NEEDED ON SITE
Downtown Plymouth Plymouth, NH	Stop (get off bus)	20 minutes
Milepost 74, Interstate 93	Pause	5 minutes
Milepost 71, Interstate 93 (either north or south)	Pause	5 minutes
Ashland Water and Sewer via Collins Street/Squam River Ashland, NH	Get off bus (get off bus – note, may need to use van to access site)	20 minutes
Peaked Hill/Locke Road Exit 23, Interstate 93 ¹	Stop (get off bus)	10 minutes
Pemi Crossing/ River Road	Stop (get off bus)	20 minutes
Rte 104 Bristol/New Hampton Viewscape	Stop (get off bus)	5 minutes
Brookwood Development Brookwood Drive and Fox Run Road Concord, NH	Pause	5 Minutes
41 Hoit Road Concord, NH	Pause	1 Minute
Portsmouth Street Concord, NH	Pause	3 Minutes
Alton Woods Concord, NH	Stop (get off bus)	10 Minutes
Shaws Parking Lot Loudon Road Concord, NH	Stop (Potential Break)	TBD
McKenna's Purchase Concord, NH	Stop (get off bus)	15 Minutes

¹ Back to Route 104, continue towards Bristol where there the ROW crosses the Pemigewasset River.

77 Regional Drive Concord, NH	Drive-by	N/A
Route 28 North Pembroke Road Pembroke, NH	Stop (get off bus)	20 minutes
Mt. Delight Road Deerfield, NH	Pause	10 minutes
Deerfield Center Deerfield, NH	Stop (get off bus)	20 minutes
Nottingham Road Deerfield, NH	Drive by/pause	5 minutes