

August 1, 2017

Via Electronic Mail & Hand Delivery

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

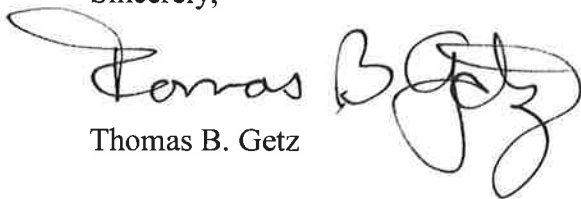
**Re: Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the “Applicants”) for a Certificate of
Site and Facility
Response to Motion for Additional Site Visits**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of a
Response to Motion for Additional Site Visits.

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**

RESPONSE TO MOTION FOR ADDITIONAL SITE VISITS

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 motion filed by Municipal Groups 1 South, 2, 3 South and 3 North (“Munis”) on July 25, 2017, asking the Site Evaluation Committee (“SEC” or in this case “Subcommittee”) to schedule two additional days of site visits. As explained below, two additional days are more than is necessary and would be contrary to the March 1, 2017 Order on Counsel for the Public’s Motion for Additional Site Inspections (“March 1 Order”).

1. The Munis recount in their motion the steps leading to the Subcommittee site visits held on July 27 and 28, 2017, beginning with the motion filed by Counsel for the Public (“CFP”) on January 31, 2017. As noted by the Munis, that motion led to the March 1 Order, which concluded that conducting two additional days of site visits was reasonable but that four additional days were more than should be necessary.

2. At p. 5 of their motion, the Munis “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.” In support of their motion, the Munis, among other things, acknowledge at p. 4 of their motion that they are seeking to include only “several locations that were not previously

visited by the Subcommittee.” As for including the numerous sites that were previously visited, they assert as bases for additional days that the sites were visited in very different weather conditions, before the hearings began, and “under the sole direction of the Applicants.” While it is correct to say that the previous site visits were held before the adjudicative hearings began, and that they were held in mid-March, not mid-summer, it is incorrect to say that the site visits were held under the sole direction of the Applicants and saying so diminishes the role of the Subcommittee.

3. With respect to the underlying CFP motion for additional site visits filed on January 31, 2017, the Applicants took the following position.

The Applicants are not persuaded that additional site visits are necessary or consistent with the efficient conduct of the proceeding but, in the event that the Subcommittee determines to make such visits, the Applicants ask that any additional dates not interfere with the scheduled adjudicative hearings. The Applicants appreciate the logistical challenges in establishing the current schedule, as well as conducting site visits, and are concerned about the challenges that would be involved in changing or expanding the schedule to accommodate additional site visits. As for the specific proposal made by the Counsel for the Public, the Applicants have concerns with the underlying premise, which seems to be that the site visits would be focused solely on certain key observation points/scenic area, sensitive areas, or the like. The Applicants believe that, if the Subcommittee determines to add some number of site visits, it should conduct them in consideration of the larger context in which any specific locations may occur. For instance, the Applicants would not oppose a general tour of the underground locations, recognizing that there may be areas of particular interest along the way.

4. The Applicants believe that the March 1 Order had it right when it concluded that four additional days of site visits were more than should be necessary. Therefore, given the limited number of locations not previously visited, one additional day should be sufficient to complete the site visits for this proceeding. Furthermore, the Applicants reiterate their original position, i.e., that, insofar as the Subcommittee determines to conduct an additional day of site visits, it should not interfere with the timely completion of the adjudicative hearings. Finally, an

additional day of site visits should focus on areas not previously visited, such as underground locations.

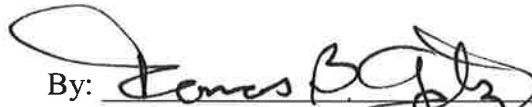
WHEREFORE, the Applicants respectfully request that the Presiding Officer:

- A. Allow one additional day of site visits; 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: August 1, 2017

By: 
Barry Needleman, Bar No. 9446
Thomas Getz, Bar No. 923
Adam Dumville, Bar No. 20715
11 South Main Street, Suite 500
Concord, NH 03301
(603) 226-0400
barry.needleman@mclane.com
thomas.getz@mclane.com
adam.dumville@mclane.com

Certificate of Service

I hereby certify that on the 1st of August, 2017, an original and one copy of the foregoing Response was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.


Thomas B. Getz