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August 31, 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
Objection to Showing Prefiled Video Testimony**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of an
Objection to Showing Prefiled Video Testimony.

Please contact me directly should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas B. Getz". The signature is stylized and cursive.

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**

OBJECTION TO SHOWING PREFILED VIDEO TESTIMONY

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 Amended Motion to Clarify the Showing of the Intervenors’ Group Video (“Amended Motion”) filed by the Combined Intervenors, Pittsburg to Stewartstown, Group I North (“Group I North”) on August 21, 2017. As explained below, the video is pre-filed testimony and should be treated no differently than other pre-filed testimony in this proceeding.

1. On November 29, 2016, Group I North submitted a 21- minute video that it described as pre-filed testimony along with a letter dated November 30, 2016, saying that the video was produced with two themes in mind, i.e., “to act as guided-tour of Northern Pass’s proposed route” and “to impress the importance of tourism.” The video was discussed again at p. 3 of the supplemental testimony filed by Mr. Thompson on behalf of Group I North on March 26, 2017, where he asserted, without any supporting rationale, that “it needs to be shown on the large screen in front of the SEC Committee.”

2. The Applicants moved to strike the video on March 29, 2017, pursuant to the procedural schedule. On April 24, 2017, the Presiding Officer issued an Order Denying

Applicants' Motion to Strike. Among other things, he concluded that the video contained relevant information and that evidence may be presented in different forms.

3. Subsequent to the Third Prehearing Conference in this proceeding, held August 9, 2017, Group I North filed a motion to clarify the showing of their video, which was superseded by the Amended Motion. The Amended Motion points out that, given that the video has been allowed as pre-filed testimony, there is a dispute as to whether it is appropriate to permit Group I North to also show its 21-minute video at the hearings.

4. The Applicants recognize that a determination has been made to consider the pre-filed video testimony and that the Subcommittee will "determine the weight to accord the videos." They believe, however, that no determination has been made to treat video testimony different from written testimony and that there is no good reason for doing so. The Subcommittee members have volumes of written pre-filed testimony that they peruse at their convenience in preparation for hearings and the same approach should apply to this video. Inasmuch as authors of written pre-filed testimony are not permitted the additional opportunity to read their written pre-filed testimony at the hearings for dramatic effect, so too should the producers of video pre-filed testimony not be permitted the additional opportunity to show their video at the hearings, because it defeats the purpose of pre-filing. The fact that this testimony has been offered in a different format does not mean that it should be treated differently.

5. Pre-filing testimony promotes the prompt and orderly conduct of a proceeding. In the normal course of an SEC proceeding, a witness files written testimony, the testimony is subject to discovery, the witness appears at the hearings, the witness adopts the testimony, and the witness is then subject to cross-examination. This approach, common to administrative proceedings, contributes to the orderly and efficient conduct of the proceeding. Group I North,

however, has failed to provide any basis for departing from the normal course, other than to argue, without explanation, that the video *needs* to be shown. To the extent this assertion could be construed a request for a waiver of SEC practice, Group I North has not demonstrated that showing the video serves the public interest and that showing the video will not disrupt the orderly and efficient resolution of matters before the Subcommittee. See Site 202.15.

6. In summary, the video in issue here has been available to the Subcommittee for nine months and showing it at the hearings would be repetitious and unnecessary. Furthermore, allowing its showing will impair the prompt and orderly conduct of the proceeding by needlessly consuming valuable time.

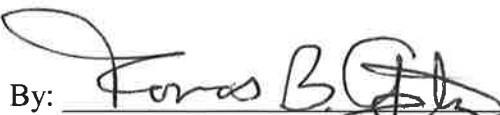
WHEREFORE, the Applicants respectfully request that the Presiding Officer:

- A. Determine that the video may not be shown at the hearings; 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,

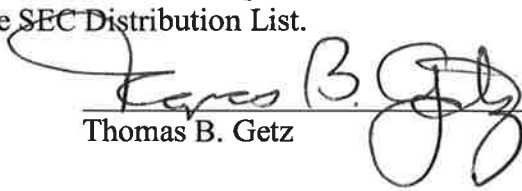
McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: August 31, 2017

By: 
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Certificate of Service

I hereby certify that on the 31st day of August, 2017, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.



Thomas B. Getz