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December 11, 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 Counsel for the Public's Motion to Amend Schedule

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of a Response to Counsel for the Public's Motion to Amend Schedule.

Please contact me should you have any questions or concerns.

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

<u>RESPONSE TO COUNSEL FOR THE PUBLIC'S</u> <u>MOTION TO AMEND SCHEDULE</u>

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 the Counsel for the Public ("CFP") on November 30, 2017, asking the Site Evaluation Committee ("SEC" or in this case "Subcommittee") to amend the September 12, 2017 Procedural Order as it applies to the deadlines for filing briefs.

1. On September 12, 2017, the Presiding Officer determined that final briefs would be filed by CFP and intervenors within fourteen days of the closing of the record, and that the Applicants' brief would be due seven days hence. The record is currently expected to close December 22, 2017, which results in deadlines of January 5, 2018, for CFP and intervenor briefs, and January 12, 2018, for the Applicants' brief.

2. On November 21, 2017, the Presiding Officer issued a Notice of Deliberations, scheduling 12 days of deliberations, beginning on January 30, 2018, and concluding on February 23, 2018. The schedule for deliberations is consistent with the September 18, 2017 Order Suspending Statutory Deadline, in which the Subcommittee determined that deliberations would be completed by the end of February 2018, and a written decision would be issued by March 31, 2018.

3. In its motion to amend schedule, CFP asks to extend the briefing deadlines by a week, until January 12 and 19, 2018, respectively. It suggests that additional time is a reasonable accommodation in light of the holidays and the chance that the final exhibit list and/or the final transcripts will not be available until the end of December.

4. The Applicants' chief concern is the timely completion of deliberations by February 23, 2018. Their concern is heightened by the course of the proceedings, which has seen each phase take longer than anticipated, and the time of year, which could lead to weatherrelated postponements. Consequently, the Applicants ask that the Subcommittee begin its deliberations earlier than January 30, 2018, and/or that additional dates be identified and reserved prior to February 23, 2018, in order to assure it can meet the suspended statutory timeline.

5. In conclusion, the Applicants' focus is less on the deadlines for briefs and more on the timely start and conclusion of deliberations. If CFP's motion were granted, the briefs from CFP and intervenors would be due on January 12, 2018, and the Applicants' brief would be due on January 19, 2018, followed 11 days later by the start of deliberations on January 30, 2018. The Applicants do not necessarily object to the extended briefing deadlines, so long as the Subcommittee begins its deliberations no later than January 30, 2018. If, however, the Subcommittee is of the opinion that it cannot grant CFP's motion and maintain the January 30, 2018 start of deliberations, then the Applicants oppose the CFP motion.

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WHEREFORE, the Applicants respectfully request that the Presiding Officer:

A. Advance the start of deliberations and/or reserve additional dates for deliberations prior to February 23, 2018; or

B. Deny the Motion; and

C. 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

By: re -GV Barry Needleman, Bar No. 9440 Thomas Getz, Bar No. 923 Adam Dumville, Bar No. 20715

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Certificate of Service

I hereby certify that on the 11th of December, 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

Dated: December 11, 2017