

STATE OF NEW HAMPSHIRE 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 for a Certificate of Site and Facility

OBJECTION OF NON-ABUTTING PROPERTY OWNERS BETHLEHEM TO PLYMOUTH TO
BUSINESS INTERVENOR GROUP'S MOTION FOR RECUSAL

The Non-abutting Property Owners Bethlehem to Plymouth (NAPOBP) respectfully request that the Site Evaluation Committee (SEC) deny the Motion for Recusal filed by the International Brotherhood of Electrical Workers and the Coos County Business and Employers Group, collectively, "Business Intervenor Group" (BIG), for the following reasons.

BIG interprets statements made by Committee Members Bailey and Weathersby to mean that both have "a predetermined purpose to reach a determined end" and that therefore they lack the necessary impartiality to render a fair and objective judgment on the Applicants' pending rehearing request. BIG maintains that this would deprive it of its due process rights. BIG thus requests that Members Weathersby and Bailey recuse themselves from further participation in Docket 2015-06.

To reach this conclusion, BIG misconstrues statements made by both Members Bailey and Weathersby.

Member Bailey's implicated statement of February 1, 2018 concerns whether the SEC should deliberate conditions for statutory criteria other than the orderly development criterion. Apparently based on its incorrect assumption that the SEC was required to deliberate all statutory criteria even after it had found the Application deficient on the Orderly Development criterion, BIG would rather that Member Bailey had focused "on the appropriate procedure for evaluating the Application." This fails to show lack of impartiality on Member Bailey's part.

BIG alleges that Member Weathersby's February 1, 2018 statement concerning the Applicants' premature motion for rehearing -- "my opinion still stands, that they did not meet their burden concerning orderly development of the region" -- evidences her unwillingness to objectively entertain any future motion for rehearing on facts or arguments that the SEC overlooked. There is no basis for making this claim. Member Weathersby's reasoned conclusion concerning the premature motion for rehearing must not be incorrectly generalized into a statement of future bias.

WHEREFORE, NAPOBP respectfully requests that the Presiding Officer:

- A. Deny BIG's Motion for Recusal; and
- B. Grant such further relief as deemed appropriate.

Respectfully submitted on behalf of NAPOB,

Susan Schibanoff

Spokesperson

Date: May 2, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this day, May 2, 2018, a copy of this Objection was sent by electronic mail to persons currently named on the Service List of Docket 2015-06.

Susan Schibanoff