

June 22, 2016

VIA FIRST CLASS MAIL AND EMAIL

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

**RE: 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 for Construction of
a New High Voltage Transmission Line in New Hampshire**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned matter with the New Hampshire Site Evaluation Committee is the **Partially-Assented to Motion of the Society for the Protection of New Hampshire Forests and City of Concord for Rehearing on Order on Motion for Protective and Confidential Treatment of May 25, 2016.**

Copies of this letter and its enclosure have this date been forwarded via email to all parties on the Distribution List.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Nicole M. Manteau
Office Manager

/nmm

Enclosure

cc: Distribution List (Rev. 6/9/2016) via email
Client



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

**PARTIALLY-ASSENTED TO
MOTION OF THE SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS AND
CITY OF CONCORD
FOR REHEARING ON ORDER ON MOTION FOR PROTECTIVE AND
CONFIDENTIAL TREATMENT OF MAY 25, 2016**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, and the City of Concord (“Concord”), by and through its Deputy City Solicitor, Danielle L. Pacik (collectively, “Movant”), move to rehear the Subcommittee of New Hampshire Site Evaluation Committee’s (“Subcommittee”) May 25, 2016 Order (“Order”) granting Northern Pass Transmission, LLC’s, and Public Service Company of New Hampshire d/b/a Eversource Energy’s (collectively, “Applicant”) Motion for Protective and Confidential Treatment, and state as follows:

1. Movant, as parties to this proceeding, may move for rehearing of the Order. RSA 162-H:11; RSAs 541:2 and :3; N.H. Admin R. Site 202.29(a). Reconsideration is justified when the Committee’s decision is unlawful, unjust, unreasonable, arbitrary, or capricious.” N.H. Admin R. Site 202.29(d) (1) and (2). The Subcommittee is authorized to grant a rehearing request for “good cause.” RSA 541:3.

2. In the Order, the Subcommittee granted Applicants’ Motion to protect and preserve the confidentiality of the information which was redacted from Julia Frayer’s pre-filed

testimony and report titled “Cost-Benefit and Local Economic Impact Analysis of Proposed Northern Pass Transmission Project.”

3. Not providing the redacted information to the parties and the public fails to meet the statutory objective set forth in RSA 162-H:1 of providing “full and complete disclosure to the public.”

4. The public benefits of the disclosure of redacted information outweigh the competitive interests of the Applicant.

5. The potential availability of this information by entering into a confidentiality agreement does not cure the failure; such requirement does not amount to “full and complete disclosure.”

6. Accordingly, the Order is unlawful, unjust, unreasonable, arbitrary, or capricious.

7. Movant incorporates by reference all prior arguments and statements they have made in support of full disclosure of the information, including the Objection Of The Society For the Protection of New Hampshire Forests To Applicants’ Unassented-To Motion For Protective Order and Confidential Treatment City Of Concord’s Response And Partial Objection To Motion For Protective Order And Confidential Treatment, both dated April 7, 2016.

8. The following parties take the following positions with respect to this request:

a. Concur

North Country Scenic Byways Council
Neil Lupton and Claire Lupton
Town of Dalton
Non-Governmental Organizations Group of Appalachian Mountain Club,
Conservation Law Foundation, Sierra Club Chapter of New Hampshire, and
Ammonoosuc Conservation Trust
Pemigewasset River Local Advisory Committee
New England Power Generators Association

Town of Pittsburg
Town of Clarksville
Town of Stewartstown
Coos County
Brigitte White and Tim White
R. Eric and Margaret Jones
Susan E, Percy for Percy Summer Club
Kris Pastoriza
Easton Conservation Commission
Susan Schibanoff
Grafton County Commissioners
Kevin Spencer
Mark Lagasse, dba Lagaspen Realty, LLC
Town of Northumberland
Town of Whitefield.
Town of Plymouth
Town of Bethlehem
Town of Sugar Hill
Town of Franconia
Town of Easton
Town of Bristol
Town of Littleton
Town of Woodstock
Town of West Ashland
Town of South Ashland
Town of New Hampton
Town of Deerfield
Town of Sugar Hill
Phil & Joan Bilodeau

Abutting Property Owners: Dalton –Whitefield- Bethlehem, which include the following individuals:

Jim and Judy Ramsdell
Bruce and Sondra Brekke
Donald and Betty Gooden
David Van Houten

Abutting Property Owners: Pittsburg-Clarksville-Stewartstown, which include the following individuals:

Charles and Donna Jordan
Sally A. Zankowski
Jon and Lori Levesque
Roderick and Donna McAllaster
Lynne Placey
Arlene Placey
Brad and Daryl Thompson
David Schrier

Nancy L. Dodge

Abutting Property Owners: Ashland-Deerfield, which include the following individuals:

Carol Currier
Mary A. Lee
Craig and Corinne Pullen
McKenna's Purchase Unit Owners Association
Taras and Marta Kucman
Kelly Normandea
Laura M. Bonk

Non-Abutting Property Owners: Ashland-Deerfield, which include the following individuals:

Joanna and Robert Tuveson
Nina and Elisha Gray
Rodney and Laura Felgate
The Webster Family Group
Lawrence and Maxine Phillips
Lisa Wolford
Pamela Hanglin
F. Maureen Quinn
Madelyn and Thomas Foulkes
Jean M. Menanrd, managing member of Pawtuckaway View, LLC

Non-Abutting Property Owners: Clarksville and Stewartstown, which include the following individuals:

Robert Martin
Roderick C. Moore, Jr.
Joseph John Dunlap
Shawn Patrick Brady
Christopher Thompson
E. Martin Kaufman
Bradley J. Thompson
John Petrofsky on behalf of 44 residents of Stewartstown and East Colebrook (Dixville Notch-Harvey Swell)

Non-Abutting Property Owners: Stark-Lancaaster-Whitefiled-Dalton-Bethlehem, which include the following individuals:

John Davidge for Prospect Farm-Lancaster, LLC
Rebecca Weeks Sherril More for Weeks Lancaster Trust
Mark W. and Susan Orzeck
Linda Upham-Bornstein
Richard McGinnis
Frederick Fitts
Gerald and Vivian Roy
Edward Piatek

Frank and Kate Lombardi
Marsha Lombardi
Wendy Doran
Alexandra and James Dannis
Andrew Dodge

b. Object

Applicants

c. Take No Position

Cities of Berlin and Franklin

The remainder of the parties did not respond to a request for their position.

WHEREFORE, the Forest Society and City of Concord respectfully request that the
Committee:

- A. Grant this Motion;
- B. Expediently schedule a rehearing on the Applicants' Unassented-to

Motion for Protective Order and Confidential Treatment; and

- C. Grant such further relief as it deems appropriate.

Respectfully Submitted,

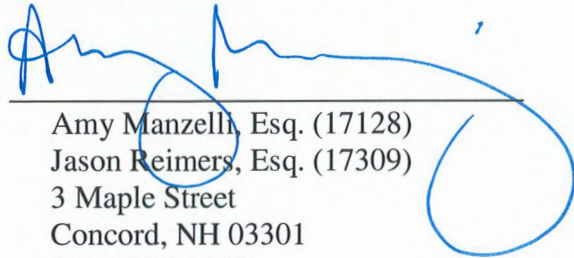
**SOCIETY FOR THE PROTECTION OF
NEW HAMPSHIRE FORESTS**

By its Attorneys,

BCM Environmental & Land Law, PLLC

Date: June 22, 2016

By:



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Jason Reimers, Esq. (17309)
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reimers@nhlandlaw.com

CITY OF CONCORD

By its Deputy City Solicitor,

Date: June 22, 2016

By:



Danielle L. Pacik, Esq. 14924
Deputy City Solicitor
41 Green St.
Concord, NH 03301
(603)225-85005
dpacik@concordnh.gov

CERTIFICATE OF SERVICE

I hereby certify that on this day, June 22, 2016, a copy of the foregoing Motion for Rehearing on Order on Motion for Protective Order and Confidential Treatment of May 25, 2016 was sent by electronic mail to persons named on the Service List of this docket.

Amy Manzelli, Esq.

