

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**

**NOTICE OF CROSS-EXAMINATION FOR INTERVENORS:
DAVID SCHRIER; RODERICK C. MOORE, JR., JOSEPH JOHN DUNLAP,
SHAWN PATRICK BRADY AND CHRISTOPHER THOMPSON;
RODRIGUE AND TAMMY BELAND; and ERIC, ELAINE and JOSHUA OLSON**

Through their undersigned counsel, the above-named intervenors (the “Intervenors”) hereby give notice of the witnesses they may cross-examine in response to the Order dated September 12, 2017 as modified. This notice is made without waiver of, or prejudice to: (a) the Intervenors’ rights to due process and equal protection; and (b) the full and fair exercise of their rights to cross-examination witnesses in the same manner as those accorded to the Applicants.

1. Business and organizations with Economic Interests. The remaining witness in this group, Mr. Otten, is adverse because he has taken positions in this proceeding that are directly opposed to the interests of the Intervenors and the host communities in which their properties are located.

2. Municipal Group 1 North Panel. Not adverse. The areas for potential cross-examination include matters of fact within the knowledge of the panel that have occurred or arisen since the panel filed its pre-filed testimony; matters in contention in this proceeding of which the panel had no knowledge when it filed its pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants’ witnesses in this proceeding after the panel filed its pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; the positions taken by the U.S. Environmental Protection Agency on what has been called “Hybrid Alternative 7”; orderly development; and/or matters related to the Applicants’ proposed use of town maintained roads to site their proposed project. The reasons for the proposed cross-examination of this panel are that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee’s jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

3. Municipal Group 1 South representatives of the Towns of Northumberland and Whitefield. Not Adverse. The areas for potential cross-examination include matters of fact

within the knowledge of these panels that have occurred or arisen since the panels filed their pre-filed testimony; matters in contention in this proceeding of which the panels had no knowledge when they filed their pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after the panels filed their pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; the positions taken by the U.S. Environmental Protection Agency on what has been called "Hybrid Alternative 7"; orderly development and/or matters related to the Applicants' proposed use of PSNH rights of way to site their proposed project. The reasons for the proposed cross-examination of these panels are that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

4. Municipal Group 1 South panel for the Town of Bethlehem. Not adverse. Cross examination of this panel is not anticipated, but the Intervenors reserve their rights to cross-examine in the same areas and for the same reasons set forth in paragraph 3 above.

5. Municipal Group 2, all panels. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of these panels that have occurred or arisen since the panels filed their pre-filed testimony; matters in contention in this proceeding of which the panels had no knowledge when they filed their pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after the panels filed their pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; orderly development; and/or matters related to the Applicants' proposed use of state roads to site their proposed project. The reasons for the proposed cross-examination of these panels are that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

6. Municipal Group 3 North, Panel for the Town of North Hampton. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of the panel that have occurred or arisen since the panel filed its pre-filed testimony; matters in contention in this proceeding of which the panel had no knowledge when it filed its pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after the panel filed its pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and

filed in this proceeding as an exhibit by the Applicants; orderly development and/or matters related to the Applicants' proposed use of existing PSNH right of way to site their proposed project. The reasons for the proposed cross-examination of this panel are that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

7. Municipal Group 3 North panel for the Town of Bristol. Not adverse. Cross examination of this panel is not anticipated, but the Intervenors reserve their rights to cross-examine in the same areas and for the same reasons set forth in paragraph 6 above.

8. Municipal Group 3 South. Panel for Concord. Not adverse. The areas for potential cross-examination include matters of fact within the knowledge of the panel that have occurred or arisen since the panel filed its pre-filed testimony; matters in contention in this proceeding of which the panel had no knowledge when it filed its pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after the panel filed its pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; orderly development; and/or matters related to the Applicants' proposed use of existing PSNH right of way to site their proposed project. The reasons for the proposed cross-examination of this panel are that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

9. Municipal Group 3 South. Panels for Pembroke and Deerfield. Not Adverse. Cross examination of these panels is not anticipated, but the Intervenors reserve their rights to cross-examine in the same areas and for the same reasons set forth in paragraph 8 above.

10. Joint Municipal Groups. George E. Sansoucy. Not Adverse. Cross examination of this witness will include matters of fact within the knowledge of the witness that have arisen since he filed his pre-filed testimony; matters in contention in this proceeding of which he had no knowledge when he filed his pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after this witness filed his pre-filed testimony; financial issues related to the Applicants' project and route selection; the Department of Energy's Final Environmental Impact Statement; public interest issues; energy market issues; tourism; property taxes and alternatives, including that proposed by the U.S. Environmental Protection Agency and referred to as "Hybrid Alternative 7." . The reasons for the proposed cross-examination of this witness are that he will elicit information that is relevant to the issues that the Committee must determine; that he will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that he will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

11. Grafton County Commissioners. Linda Lauer. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of this witness that have occurred or arisen since she filed her pre-filed testimony; matters in contention in this proceeding of which she had no knowledge when she filed her pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after she filed her pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; orderly development; and/or matters related to the Applicants' proposed use of Grafton County state roads to site their proposed project. The reasons for the proposed cross-examination of this witness are that she will elicit information that is relevant to the issues that the Committee must determine; that she will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that she will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

12. Society for the Protection of NH Forests. Jane Difley, Will Abbott, Raymond Lobdell and Harry Dodson. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of these witnesses that have occurred or arisen since they filed their pre-filed testimony; matters in contention in this proceeding of which these witnesses had no knowledge when they filed their pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after these witnesses filed their pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; orderly development; environmental impacts; forest fragmentation; alternatives; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the Applicants; the positions taken by the U.S. Environmental Protection Agency on what has been called "Hybrid Alternative 7"; and/or matters related to the Applicants' proposed use of state and town maintained roads to site their proposed project. The reasons for the proposed cross-examination of these witnesses is that it will elicit information that is relevant to the issues that the Committee must determine; that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants; and/or that it will explore facts important to the Committee's jurisdictional limitations under RSA Chapter 162-H and other relevant statutes of this state.

13. Appalachian Mountain Club, Conservation Law Foundation and Ammonoosuc Conservation Trust (NGOs). All Witnesses. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of these witnesses that have occurred or arisen since they filed their pre-filed testimony; matters in contention in this proceeding of which these witnesses had no knowledge when they filed their pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants' witnesses in this proceeding after these witnesses filed their pre-filed testimony; the importance of historical sites (including scenic and cultural resources) that were dismissed, determined to not be adversely impacted or not considered by the Applicants; orderly development; environmental impacts; forest fragmentation; alternatives; the contents of the Final Environmental Impact Statement published in August 2017 by the Department of Energy and filed in this proceeding as an exhibit by the

Applicants; the positions taken by the U.S. Environmental Protection Agency on what has been called “Hybrid Alternative 7”; and/or matters related to the Applicants’ proposed use of state and town maintained roads to site their proposed project. The reasons for the proposed cross-examination of these witnesses is that it will elicit information that is relevant to the issues that the Committee must determine; and/or that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants.

14. NEPGA. William S. Fowler. Not Adverse. The areas for potential cross-examination include matters of fact within the knowledge of this witness that have occurred or arisen since he filed his pre-filed testimony; matters in contention in this proceeding of which this witness had no knowledge when he filed his pre-filed testimony; matters that have been filed by the Applicants or asserted by the Applicants’ witnesses in this proceeding after this witnesses filed his pre-filed testimony; the missing “participant funding” in the Applicants’ proposed project; recent developments in energy markets; current energy supply and demand in New England; the Massachusetts RFP; alternatives to the Applicants’ proposed project; the absence of public benefits and savings claimed by the Applicants; and the potential for excessive public ratepayer risk and expense arising from the Applicants’ proposal. The reasons for the proposed cross-examination of this witness is that it will elicit information that is relevant to the issues that the Committee must determine; and/or that it will tend to rebut matters asserted by the Applicants in documents and testimony introduced in this proceeding by the Applicants.

Respectfully submitted,

/s/ Alan Robert Baker

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