

CLF New Hampshire 27 North Main Street

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## Via Hand-Delivery and Email

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

October 2, 2017

Re: 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, NH Site

**Evaluation Committee Docket No. 2015-06** 

Dear Ms. Monroe:

Please find enclosed for filing in the above-referenced matter an original and eight (8) copies of NGO Intervenors' Notice of Cross-Examination.

Copies of this letter and the attached have this day been forwarded via email to all parties on the Distribution List.

Thank you for your attention. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

Melissa E. Birchard

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cc: Distribution List

## THE STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

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 the Construction of a New High Voltage Transmission Line in New Hampshire

Docket No. 2015-06

## NGO INTERVENORS' NOTICE OF CROSS-EXAMINATION

Ammonoosuc Conservation Trust, Appalachian Mountain Club, and Conservation Law Foundation, grouped together for purposes of this proceeding as the "NGO Intervenors," hereby submit the following list that serves as notice of cross-examination in accordance with the September 12, 2017 Order in this proceeding. By submitting this first-round witness cross-examination list, the NGO Intervenors do not waive any procedural due process rights or arguments, including the right to seek rehearing and/or otherwise seek review of the Order in accordance with the law. In addition, the NGO Intervenors do not waive the right to add and/or or remove areas of questions to the extent there are developments in the record as of the date of the filing of this notice, additional unexpected issues raised at hearing, and/or it is determined during preparation or the examination of witnesses that additional areas of questions are necessary to a full and true disclosure of the facts. The NGO Intervenors also do not waive the right to request to cross-examine additional witnesses based on developments and statements made at or during hearing.

The following examinations are necessary for a full and true disclosure of the facts. In particular, each of these examinations will provide an opportunity to respond to relevant issues raised by the Applicants or Counsel for the Public in supplemental pre-filed testimony, to address information concerning the proposed project that has been submitted or otherwise arisen

since the filing of pre-filed and supplemental testimony, and to respond to relevant facts and exhibits introduced at or during trial, including during cross-examinations and re-direct examinations.

WITNESS PANEL	ADVERSE/ NON-	AREA OF QUESTIONS AND OFFER OF		
	ADVERSE	PROOF		
MUNICIPAL GROUP 3-SOUTH				
Concord Beth Fenstermacher	Non-Adverse	Visual Impact Concerns (Scenic Resources, Maintaining Rural Landscape): This may include a response to supplemental testimony submitted		
Edward Roberge		and/or trial testimony of Northern Pass witnesses		
Heather Shank		(i.e., aesthetics witnesses) relative to concerns raised by the City of Concord witnesses about		
Gail Matson and Candace Bouchard		visual impact concerns (scenic resources, rural landscape).		
Jan McClure and Kristine Tardiff		Natural Resource Impacts (Wetlands, Karner Blue Butterfly): This may include a response to the		
Rick Van De Poll		supplemental testimony and/or trial testimony raised by Northern Pass witnesses.		
Peter Scott				
George Sansoucy	Non-Adverse	Limited examination on energy markets and economics to further full and true disclosure of the		
		facts related to testimony of other parties delivered		
		at hearing and regional or local energy developments since pre-filed testimony.		
SOCIE	TV FOR THE PR	ROTECTION OF NH FORESTS		
SOCIETI FOR THE I ROTECTION OF INIT FORESTS				
Jane Difley Will Abbott	Non-Adverse	Public Outreach and Communications – By Applicants to Date: Address the permanently conserved lands held by the Forest Society, describe other conserved lands that would experience unreasonable adverse impacts,		
		including on natural resources and on aesthetics.		

Raymond Lobdell	Non-Adverse	Wetlands/Natural Resources: Review and assess the proposed 192-mile transmission line project with respect to wetlands and associated environmental impacts. This may include a response to the supplemental testimony and/or trial testimony raised by Northern Pass witnesses and recent agency filings.	
NEPGA			
William S. Fowler	Non-Adverse	Limited examination on the subject of energy markets and economics to elicit new information or opinions related to: statements made by other witnesses at hearing, including Applicants' and/or Counsel for the Public's relevant witnesses; statements made by Mr. Fowler on the stand, such as in response to cross-examination by other parties; or relevant regional energy and economic developments and other recent changes.	

Respectfully submitted,

NON-GOVERNMENTAL INTERVENORS

By:

Melissa E. Birchard, Esq.
Designated Spokesperson for the NGO Intervenors

Conservation Law Foundation 27 North Main Street

Concord, NH 03301 Phone: (603) 225-3060 Email: mbirchard@clf.org

October 2, 2017

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day, October 2, 2017, a copy of the NGO Intervenors' Notice of Cross-Examination was sent by electronic mail to all persons named on the Service List in this docket.

Melissa E. Birchard