



**APPALACHIAN
MOUNTAIN CLUB**
YOUR CONNECTION TO THE OUTDOORS

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

Re: Appalachian Mountain Club support of the Society for the Protection of New Hampshire Forest's proposed procedural schedule for SEC Docket 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).

March 30, 2016

Dear Ms. Monroe and Chairman Honigberg,

The Appalachian Mountain Club (AMC) urges the SEC to adopt the Procedural Schedule proposed by the Society for the Protection of New Hampshire Forests, dated March 21, 2016.

This complex and historic proceeding will have long-term impacts on the natural and historic character of the State of New Hampshire. The precedent-setting number of citizens and towns impacted by this 192-mile project through the heart of New Hampshire who have legitimately requested intervention status, the volume of data to be assessed, and the many issues involved, clearly far exceed what might be anticipated as a typical proceeding for which the 365 day schedule may be appropriate. Further timing complexities arise because of the adoption of new SEC rules after the Application was submitted, requiring the Applicants to provide supplemental data, which was not made accessible to the public until early March. Finally, the SEC's ongoing consolidation of Intervening Parties requires massive substantive and geographic coordination, amplifying the procedural complexities for both Interveners and the SEC.

Adhering to a twelve-month schedule, as proposed by the Applicant, is not reasonable, advisable, or fair, and does not respect or serve the interests of the Intervening Parties. For example, the Applicant's timeline calls for Interveners to submit data requests when they may not have had time to engage experts. Nor does the Applicant's schedule include time for discovery disputes, which should be expected in this very controversial project. A one year timeline undoubtedly at some point will need to be deviated from; in the meantime, the SEC will have imposed a chaos-inducing schedule that will be nearly impossible for most Parties to meet efficiently and effectively.

Further consideration should be given to the fact that this project is not needed to keep the lights on, and is but one of many currently proposed in the region to bring

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hydropower from Canada to the New England grid. After five years following its application for a Presidential Permit from the US Department of Energy and a Special Use Permit from the White Mountain National Forest, the Applicant finally came forth with this still very controversial Application to the SEC. A sudden need for urgency on the Applicant's part is not substantiated by its record to date. In other words, what is the rush?

AMC strongly urges the SEC to adopt the more workable schedule submitted by the Society for the Protection of New Hampshire Forests that adds twelve months to the SEC schedule. The SEC has the authority pursuant to RSA 162-H:14 to temporarily suspend and modify its timeframe to serve the public interest, and this proceeding exemplifies why that authority has been granted to you.

Sincerely,

Susan Arnold

Vice President for Conservation

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