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VIA ELECTRONIC MAIL

November 7, 2018

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

**Re: SEC Docket No. 2015-04: Public Service Company of New Hampshire d/b/a
Eversource Energy for a New 115k Transmission Line from Madbury Substation to
Portsmouth Substation
Applicant's Response to Town of Newington Motion for Extension of Deadline to
File Briefs**

Dear Ms. Monroe:

Enclosed for filing in the above-referenced docket is the Applicant's Response to the Town of Newington's Motion for Extension of Deadline to File Briefs.

Please call me with any questions.

Sincerely,



Adam M. Dumville

AMD:slb
Enclosure

Cc: SEC Distribution List

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

SEC DOCKET NO. 2015-04

**APPLICATION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANT’S RESPONSE TO TOWN OF NEWINGTON MOTION FOR EXTENSION
OF DEADLINE TO FILE BRIEFS**

NOW COMES Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) (the “Applicant”), by and through its attorneys, McLane Middleton, Professional Association, and responds to the Town of Newington’s Motion for Extension of Deadline to File Briefs. In support of its response, the Applicant states as follows:

1. On October, 26, 2018 the record in the above-referenced proceeding was closed pursuant to Site 202.26.
2. On October 31, 2018, the Presiding Officer issued a notice with a schedule for the submission of final briefs, namely, that Counsel for the Public and the intervenors shall file their final briefs no later than November 13, 2018 and that the Applicant shall file its final brief no later than November 20, 2018.
3. On November 2, 2018, Counsel for the Public Filed a Motion to Strike NH DES’s Revised Final Decision. The Applicant anticipates filing an objection.
4. Also on November 2, 2018, the Applicant submitted a Partially Assented-To Motion to Re-Open the Record for a Limited Purposed along with a three-page Addendum to the Visual Assessment Regarding Sites that have been Determined Eligible. The Addendum supplements the existing record by addressing a very narrow and discrete issue, namely, confirming that no Determined Eligible Sites that are scenic resources within the area of

potential visual impact were overlooked in the original visual assessment (“VA”). The additional information does not materially change the application or amend the Project in anyway.

5. On November 7, 2018, the Presiding Officer issued a Notice of Provisional Hearing, which scheduled a provisional hearing on November 15, 2018 to allow parties an opportunity to cross-examine the Applicant’s witness, Mr. David Raphael, if the Applicant’s Motion to Re-Open the Record is granted. The Notice also provides that “If the Motion is granted, Counsel for the Public and the Intervenors will be allowed to supplement their final briefs on or before November 19, 2018.” The Notice does not address the Town of Newington’s Motion for Extension of Deadline to File Briefs directly, but it appears that the Presiding Officer desires to maintain the current deliberation schedule if possible.

6. Based on the facts and circumstances described herein, and those described in the Town of Newington’s Motion at ¶ 5, the Applicant agrees, in part, with the Town of Newington’s requested relief. Specifically, the Applicant does not object to a reasonable extension for parties to file their briefs. The Applicant suggests that all parties be given an additional three (3) days to submit their final briefs, namely, until 4:00 PM on November 16, 2018. The Applicant would similarly then request that it be granted an additional one (1) day to respond to other parties’ briefs, namely, until November 21, 2018.

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WHEREFORE, the Applicant respectfully asks that the Subcommittee:

- A. Modify the briefing schedule so that Counsel for the Public and interveners must file their briefs on or before November 16, 2018 (no later than 4:00 PM) and that the Applicant must file its brief on or before November 21, 2018;
- B. Deny the Town of Newington's request to provide an extension of time to respond the Addendum and to file their briefs on November 27, 2018;
- C. Grant such other further relief as is deemed just and appropriate.

Respectfully Submitted,

Public Service Company of New Hampshire d/b/a
Eversource Energy

By its attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: November 7, 2018

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Certificate of Service

I hereby certify that on the 7th day of November, 2018, an electronic copy of this response was filed with the NH Site Evaluation Committee and an electronic copy was sent to the Distribution List.

Adam Dumville
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