

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

DE 15-460

NORTHERN PASS TRANSMISSION LLC

Petition to Cross Public Waters

**OBJECTION TO LATE-FILED PETITION TO INTERVENE
ON BEHALF OF THE EASTON CONSERVATION COMMISSION**

NOW COMES Northern Pass Transmission LLC (“NPT”) by and through its attorneys, McLane Middleton, Professional Association, and respectfully submits this objection to the untimely petition to intervene filed on behalf of the Easton Conservation Commission (“Easton CC”) in the above-captioned docket. NPT contends that good cause has not been shown to grant such intervention at this juncture.

1. On May 10, 2016, Kris Pastoriza submitted a late-filed petition to intervene in this proceeding on behalf of the Easton CC, six weeks after the deadline for petitions to intervene. Ms. Pastoriza indicates that she is the Chair of the Easton CC and she asserts that “the proposed facility will impact the rights, duties, privileges, immunities and other substantial interests of the environmental and cultural resources in Easton.” She makes a number of allegations about NPT’s proposed crossings below the Ham Branch, and expresses concern that the crossing is not necessary to meet the reasonable requirements of service to the public and cannot be exercised without substantially affecting the public rights in the Ham Branch.

2. Subsequently, on May 18, 2016, Ms. Pastoriza “re-filed” the petition she filed on May 10, 2016. The re-filed petition appears to be identical to the May 10, 2016 petition, except for different dates on the cover letter and petition. Ms. Pastoriza does not provide an explanation for the re-filing.

3. On April 27, 2016, the New Hampshire Public Utilities Commission (“Commission” or “PUC”) denied Ms. Pastoriza’s petition to intervene in the above-captioned proceeding. She now seeks to intervene through an *alter ego*, pursuing substantially the same issues she raised in her individual petition filed March 31, 2016. NPT objected to Ms. Pastoriza’s petition on April 15, 2016, and reiterates its positions here. Moreover, as NPT discussed in its May 2, 2016 Legal Memorandum, the bases Ms. Pastoriza cited as support for her intervention, and cites now for the intervention of the Easton CC are beyond the scope of this proceeding.

4. NPT asks that the Commission deny the untimely petition filed on behalf of the Easton CC inasmuch as Ms. Pastoriza has failed to show that intervention would be in the interests of justice and would not impair the prompt and orderly conduct of the proceeding.

WHEREFORE, NPT respectfully requests that the Commission:

- A. Deny Ms. Pastoriza’s late-filed petition on behalf of the Easton CC; and
- B. Grant such other and further relief as may be just and equitable.

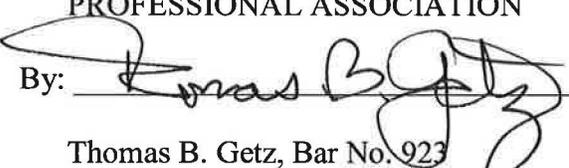
Respectfully submitted,

NORTHERN PASS TRANSMISSION LLC

By Its Attorneys,

MCLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

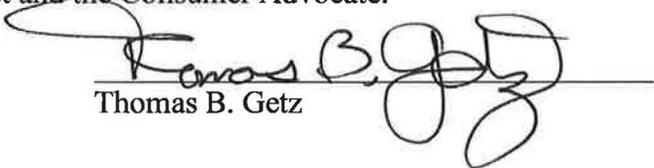
Dated: May 20, 2016

By: 

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Certificate of Service

I hereby certify that on the 20th of May, 2016, an original and one copy of the foregoing Motion was hand-delivered to the New Hampshire Public Utilities Commission and an electronic copy was served upon the Service List and the Consumer Advocate.


Thomas B. Getz