

STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**DE 15-464****PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE
ENERGY Petition to Lease Rights-of-Way to Northern Pass Transmission, LLC****MOTION TO EXTEND DEADLINE FOR LEGAL MEMORANDA**

Petitioners, Intervenors Jo Anne Bradbury, Jeanne Menard, and Erick and Kathleen Berglund, hereby file this Motion to Extend Deadline for Legal Memoranda and state:

1. On October 19, 2015, Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) filed a petition for approval of a lease agreement between Eversource and Northern Pass Transmission, LLC (NPT) with the NH Public Utilities Commission ("the Commission"). The proposed lease between Eversource and NPT is the agreement whereby portions of Eversource's rights-of-way would be leased to NPT for construction of the NPT line. The Eversource rights-of-way that are the subject of the lease are located in 19 municipalities and are principally comprised of Eversource easements from private property owners and land owned by Eversource.
2. Jo Anne Bradbury, Jeanne Menard, and Erick and Kathleen Berglund, own property in Deerfield, NH with rights of way that are the subject of this action.
3. In May 2016, Jo Anne Bradbury, Jeanne Menard, and Erick and Kathleen Berglund, filed Petitions to Intervene in this action.
4. On September 12, 2016, the Commission granted the petitions to intervene of Ms. Menard, Ms. Bradbury, and Mr. and Mrs. Berglund because their properties include rights-of-way at issue in this action.
5. Three days later, on September 15, 2016, the Commission filed an Order for Legal Memoranda, Order No. 25,943. The Order states that Legal Memoranda must be filed by October 7, a mere twenty-one days after the Order was issued and only twenty-four days granting the Petitioners Intervenor status.
6. Order No. 25,943 mandates that the parties address the scope of some of Eversource Energy's easements and their transferability to Northern Pass Transmission, LLC. The Legal Memoranda and the three questions cut to the very core of this action.
7. The timeline is further shortened given that Eversource has until September 23, 2016, to provide a final decisions regarding placement of the line to the PUC.

8. Petitioners are asking for an extension of four weeks to submit the Legal Memoranda to the PUC. Petitioners appeared pro se in this action and are seeking legal representation to assist with the Legal Memoranda now that they have been granted Intervenor status.

9. Additionally, Petitioners are also Intervenors in the SEC action regarding Northern Pass. Currently the SEC action is focused on the Applicants' experts technical sessions which have involved day long sessions for almost the entire month of September. It also appears it will be bumped into October. The four-week extension will enable Petitioners to fully brief the questions that are now defined by the Commission.

10. Given the significant interests at stake, Petitioners are seeking a reasonable extension of four weeks of time, which will serve the interests of justice and will not impair orderly and prompt conduct of the proceedings.

Wherefore, Petitioners, Intervenors Jo Anne Bradbury, Jeanne Menard, and Erick and Kathleen Berglund, hereby ask the Commission to grant the Motion to Extend Deadline for Legal Memoranda and extend the deadline by four weeks.

Respectfully Submitted,



Jeanne Menard

cc: Service list / docket file