

**THE STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

Petition for Approval of Lease Agreement Between Public Service Company of New Hampshire  
d/b/a Eversource Energy and Northern Pass Transmission LLC

Docket No. DE 15-464

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**  
**D/B/A EVERSOURCE ENERGY'S OBJECTION**  
**TO MOTION FOR RECONSIDERATION**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07 and RSA 541:3, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") hereby objects to the "Motion for Reconsideration" of Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC (the "Reconsideration Motion") submitted by Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty, LLC (the "Movants") on November 3, 2017. In support of this objection, Eversource states the following:

1. On October 19, 2015, Eversource filed a petition for approval of a lease transaction between it and Northern Pass Transmission LLC ("NPT") whereby PSNH would lease to NPT certain real estate rights owned by PSNH. Following an extensive process reviewing certain legal issues and other matters, a procedural schedule was approved by the Commission on June 20, 2017 setting out dates and deadlines for two rounds of discovery to be served upon and answered by Eversource. That schedule was minimally amended on August 21, 2017 to add an additional technical session relating to discovery answered by Eversource. Despite having ample opportunity to develop and serve discovery on Eversource, the Movants sought, through a motion filed on October 2, 2017, to ask additional discovery. Eversource and Staff objected to the motion and by a

Secretarial Letter of October 30, 2017, the Commission denied the motion. The Movants now seek reconsideration of the Commission's decision, but have presented no new facts or information, and no other justification for reconsideration. Accordingly, the Reconsideration Motion should be denied.

2. Pursuant to RSA 541:3, the Commission may grant rehearing or reconsideration when a party states good reason for such relief. *Public Service Company of New Hampshire*, Order No. 25,361 (May 11, 2012) at 4. Good reason may be shown by identifying new evidence that could not have been presented in the underlying proceeding or by identifying specific matters that were overlooked or mistakenly conceived by the deciding tribunal. *Id.* at 4-5. A successful motion for rehearing does not merely reassert prior arguments and request a different outcome. *Id.* at 5.
3. Initially, the same lack of clarity that infected the underlying motion besets the Reconsideration Motion. That is, it is not clear at whom the request is aimed. The Reconsideration Motion (as with the initial motion) refers to an appraisal report filed by the Commission Staff with its testimony on September 18, 2017 and, on the basis of that report, seeks to ask questions of the "Applicants," which presumably means Eversource. As with the initial motion, it is not clear what relief is requested or from what party.
4. As noted in Eversource's objection to the initial motion, in that the Movants' issues apparently arise from the Staff's submission, the Movants should have, but did not, seek discovery from the Staff by issuing discovery on September 26, consistent with the Commission's September 21, 2017 secretarial letter. The Movants have no cause to serve additional discovery on Eversource. Also as noted in Eversource's objection to the initial motion, should the Commission determine that Eversource is somehow the proper

subject of the Movants' request, the request is even more untimely. Nothing about the Reconsideration Motion changes the Commission's deadlines or the Movants' failure to meet them. The Movants' contention that the information in the Staff report was different from the information in Eversource's report falls well short of providing any basis for additional discovery, particularly after the relevant deadlines have passed.

5. The Reconsideration Motion is nothing other than a restatement of prior arguments, and presents no new information nor any other basis for demonstrating any error by the Commission. Accordingly, the Reconsideration Motion should be denied.

WHEREFORE, Eversource respectfully requests that the Commission:

- (1) Deny the Reconsideration Motion, with prejudice; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

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

November 7, 2017  
Date

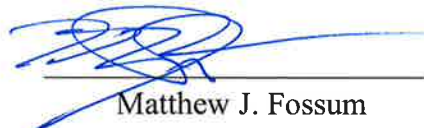
By: 

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### **CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

November 7, 2017  
Date

  
Matthew J. Fossum