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Town of Easton
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STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DE 15-460

NORTHERN PASS TRANSMISSION LLC

Petition to Cross Public Waters

EASTON CONSERVATION COMMISSION LATE PETITION TO INTERVENE

The Easton Conservation Commission respectfully petition the New Hampshire Public Utilities Commission ("PUC") for late intervention in the above-captioned proceedings pursuant to RSA 541-A:32 and PUC Rule 202.17 because the proposed facility will impact the rights, duties, privileges, immunities and other substantial interests of the environmental and cultural resources in Easton that we are charged with protecting, and the interests of justice and orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. In support of our request we state the following:

1. The three proposed "crossings" (horizontal direct drillings) under the Ham Branch River involved 1,400', 700' and 125' (horizontal) of boring at depths still unknown, or at least not indicated on the diagram provided by the applicant.
2. Depending on the depth of the borings, their actual length will be considerably longer than the

numbers indicated by measuring the road, for example the 700' boring, given the submitted diagram, would involved 1,000' actual boring length. If the boring goes deeper, it will be longer.

3. A stratified drift aquifer underlies the proposed horizontal boring locations.
4. The specs. provided by the applicant show incorrect road ROW widths.
5. The information provided by the applicant does not show visual simulations for the overhead crossings, which would be necessary to assess the effect of the crossings on public rights in these waters.
6. The applicant failed to provide the list of public waters which was used and the criteria for public waters are unknown.
7. We are concerned that the proposed crossing is (a) not necessary to meet the reasonable requirements of service to the public; and (b) cannot be exercised without substantially affecting the public rights in public waters.

Wherefore, we respectfully request that the Public Utilities Commission:

A. Grant the Easton Conservation Commission's Late Petition to Intervene.

B. Grant such other and further relief as may be just.

Respectfully submitted



Kris Pastoriza, Chair

^{18th}
May ~~10~~¹⁸th, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this day, May 10th a copy of the foregoing petition was sent by electronic mail or U.S. Mail to persons named on the Service List of this docket.

By:



Kris Pastoriza