



July 20, 2016

**VIA HAND-DELIVERY AND EMAIL**

Debra A. Howland, Executive Director  
NH Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

**RE: Northern Pass Transmission, LLC - Petition to Commence  
Business as a Public Utility  
DE 15-459**

Dear Ms. Howland:

Pursuant to Puc 203.18, the **Society for the Protection of New Hampshire Forests** (The Forest Society) by and through their undersigned legal counsel, BCM Environmental & Land Law, PLLC, submits this letter as public comment in the above captioned matter. We enclose an original and seven (7) copies. A copy of this letter has this date been forwarded via email to all parties on the Distribution List, including the Office of the Consumer Advocate.

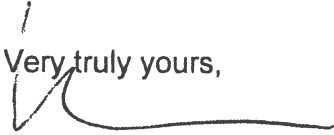
The Forest Society's concerns and interests in this docket have been expressed in its filings seeking intervenor status. Without belaboring those points but as a reminder, The Forest Society sought and obtained intervenor status in the underlying Northern Pass Transmission petition to the Site Evaluation Committee (SEC Docket No. 2015-06) and before this Commission in PUC docket numbers DE 15-460 and DE 15-464 because it holds significant property in fee and property rights in multiple towns along the proposed transmission line corridor. Due to those property rights, the Forest Society is particularly keen to ensure that neither now nor in the future, this Commission is adjudicating or resolving any property rights by including an explicit statement to that effect in its Final Decision if it grants Northern Pass' Petition to Commence Business as a Public Utility.

Additionally, The Forest Society requests a requirement that regardless of Public Utility status, at no time now or in the future may Northern Pass or any of its affiliates avail itself of the eminent domain process regardless of whether the law changes. Inclusion of this prohibition in this Commission's Decision will ensure protection for the Forest Society's property rights.





Finally, The Forest Society also requests this Commission affirmatively find that any public benefit does not violate any rules governing affiliate transactions. This request is a necessary safeguard particularly in light of Northern Pass' recently filed Petition for Approval of Power Purchase Agreement; preventing Northern Pass from boot-strapping between dockets, given the underlying project, is paramount to The Forest Society's ability to protect its property rights and property interests.

Very truly yours,  
  
Elizabeth A. Boepple, Esq.

cc: Distribution List (Rev. 7/19/16) via email  
Client

