

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

DE-15-460

NORTHERN PASS TRANSMISSION LLC

Petition to Cross Public Waters

OBJECTION TO OBJECTION TO PETITION TO INTERVENE OF KRIS PASTORIZA

1. On April 15th, 2016 Northern Pass Transmission LLC stoops to argumentum ad hominem (or is it ad mulierem?) yet fails to refute the data I submitted, which supports my intervention.
2. That my petition of January 7th, 2016 to the SEC for intervention in the Northern Pass Transmission LLC Docket 2015-06 was denied is irrelevant to my petition to intervene in this docket.
3. My failure to follow procedure in the SEC docket is regrettable but did not interfere with the orderly conduct of the proceedings and pales in comparison with the applicant's disorderly conduct in placing pressure on various state agencies and local selectboards.
4. I did not state that the Town of Easton did not receive adequate notice. The Town Clerk in Easton signed for the notice of this docket on March 18th but did not pass the notice on to the Selectboard until March 28th.
5. Under RSA 541-A:32 II the PUC "may grant one or more petitions at any time upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings."
6. It would be in the interests of justice to have the information regarding the width of the ROW of Route 116 where it crosses the Ham Branch made clear.
7. It would be in the interests of justice to have the list of public waters included as part of the application so that standards for this designation are made clear and perhaps changed, since the underground "crossing" method proposed by Northern Pass is unprecedented in this state and not addressed in statute, except by omission.
8. It would be in the interests of justice to have broad participation in this docket by all those with knowledge of the planned "crossing" methods and local terrain.

WHEREFORE, I respectfully request that the Commission:

- A. Accept my late-filed petition to Intervene; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted

KRIS PASTORIZA

Dated: April 16th, 2016



Kris Pastoriza
294 Gibson Rd.
Easton, NH 03580

Certificate of Service

I hereby certify that on the 18th of April, 2016 an original and six copies of the foregoing Motion were sent to the New Hampshire Public Utilities Commission and on April 16th an electronic copy was served upon the Service List and the Consumer Advocate.



Kris Pastoriza