# US Department of Energy

SEP 1 3 2013 Electricity Delivery and Energy Reliability

WILLIAM AND MICHELLE SHOEMAKER 447 BRUSH ROAD PEMBROKE, NH 03275 603-228-3284

September 13, 2013 Christopher Lawrence Office of Electricity Delivery and Energy Reliability (OE-20) US Department of Energy 1000 Independence Avenue, SW Washington, DC 20585

Dear Christopher,

Please find enclosed our request for Intervenor Status for the Northern Pass Transmission Project.

As our home is located within 100 feet of the current Right of Way, we are very much concerned and interested in the ongoing development of this project and hope you are compelled to grant our request.

Sincerely yours, Michille M Shoemaker

William & Michelle Shoemaker

Cc: Anne Bartosewicz, Northeast Utilities Mary Anne Sullivan, Hogan Lovells, LLP

### UNITED STATES OF AMERICA BEFORE THE OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY, DEPARTMENT OF ENERGY

Northern Pass Transmission, LLC Application for Presidential Permit OE Docket No. PP-371

#### MOTION TO INTERVENE OF THE WILLIAM D. SHOEMAKER JR JUNE 2007 REVOCABLE TRUST AND THE MICHELLE M. SHOEMAKER JUNE 2007 REVOCABLE TRUST

William and Michelle Shoemaker move to intervene as a party pursuant to Rules 212 and

214 of the Federal Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. §§

385.212, 385.214, as follows:

## **IDENTIFICATION OF MOVANTS AND AFFECTED REAL PROPERTY**

1. William D. Shoemaker, Jr is the trustee of the William D. Shoemaker Jr June

2007 Revocable Trust.

2. Michelle M. Shoemaker is the trustee of the Michelle M. Shoemaker June 2007

Revocable Trust.

3. The Shoemakers reside in a home they designed and built in Pembroke, New

Hampshire, known as Tax Map 260, Lot 38 and as 447 Brush Road ("Property").

4. Each of the trusts owns a half interest in the Property.

#### **MOVANTS' INTERESTS**

5. The Property is already subject to utility easement approximately 150 feet wide ("Existing Easement").

6. The originally proposed route for the Northern Pass Transmission LLC

("Northern Pass") proposal to construct, operate, maintain, and connect an electric transmission

line ("Project") includes both: the Existing Easement; and an additional 45-foot wide easement also across the Property that has yet to be acquired by Northern Pass (or related entities).

7. Upon information and belief, the route proposed in the amended application Northern Pass filed on July 1, 2013 includes the same route as it pertains to the Property.

8. The Shoemakers will be directly impacted should the Project be permitted, including if the Project is issued the requested Presidential Permit, because of its location right across the Property, among other possible impacts.

9. As a result of the direct impact upon their Property, the Shoemakers are concerned about the Project.

10. They also may be directly affected by the outcome should their rates of using or receiving electricity increase and their participation in this docket as intervenors would serve the public interest.

11. No other party can adequately represent the Shoemakers' interests in this proceeding.

#### NOTICES

12. All hard copy notices and other communication with respect to this proceeding should be addressed to the following:

William and Michelle Shoemaker

447 Brush Road

Pembroke, NH 03275

13. All electronic notices and other communication with respect to this proceeding should be addressed to the following: william.michelle.shoemaker@gmail.com

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WHEREFORE, the Shoemakers respectfully request the trusts be granted intervenor status.

Respectfully submitted,

## WILLIAM D. SHOEMAKER JR JUNE 2007 REVOCABLE TRUST

By

Date:

William D. Shoemaker, Jr. its duly authorized trustee

# MICHELLE M. SHOEMAKER JUNE 2007 REVOCABLE TRUST

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Date: 9/14/13

Michelle M. Shoemaker, its duly authorized trustee

Cc: Anne Bartosewicz, Northeast Utilities, 107 Selden Street, Berlin, CT 06037 Mary Anne Sullivan, Hogan Lovells, LLP, 555 13<sup>th</sup> St. NW., Washington, DC 20004