

New Hampshire Site Evaluation Committee
21 South Fruit Street
Suite 10
Concord, MA 03305

Merrimack Valley Reliability Project
SEC Docket # 2015-05

MOTION TO OBJECT
DATA REQUEST 7
REQUEST FOR ANY AND ALL THIRD PARTY EMAILS
CONCERNING ELECTRIC SHOCK INCIDENT IN 1/2016

On this 12th day of May, 2016, I Margaret Huard, object to providing the applicant with any and all emails to/from any **third parties** regarding an incident of electric shock in January of 2016.

- On May 5, 2016, the applicant, through their attorneys, McLane Middleton, held a technical session.
- On May 5, 2016, McLane Middleton was given a billing report from the Hudson Fire Department providing a detailed summary regarding the assist made for the electric shock that took place in January 2016, including vital statistics taken soon after the incident.
- Upon review of this billing report by McLane Middleton on behalf of the applicant, a request was made for ALL email correspondences made with the **community** merely because the report noted that the call for assist was made directly to the fire department as opposed to calling 911.
- The data request summary for the technical session held on May 5, 2016 incorrectly requests any and all **third party** emails regarding the January 2016 incident. This is an inaccurate summary of the request made and agreed upon in the technical session for all email correspondences made with the **community**.

- **Community** is generally defined as and accepted to be the group of people in one's city or town.
- This is an unduly invasive search of my email records.
- This is an arbitrary, repetitious request for information that would merely duplicate information already provided the applicant in the billing report, pre-filed testimony, responses to discovery request, as well as provide information that is equally available.
- In accordance with New Hampshire Site Evaluation Rule 202.12 (1), the purpose of a **technical session** is to acquire evidence admissible in a proceeding in front of the **NH Site Evaluation Committee**.

Respectfully

Margaret Huard

Margaret Huard

Intervener

Certificate of Service

I hereby certify that on the 12th day of May, 2016, electronic copies have been served upon the SEC Distribution List.

Margaret Huard

Margaret Huard

Intervener