

# **Attachment F**

## **Supplemental Joint Pre-Filed Testimony of Bryan Hudock and David L. Plante**



**Attachment F**

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
SITE EVALUATION COMMITTEE**

**SEC Docket No. 2015-05**

**APPLICATION OF NEW ENGLAND POWER COMPANY AND  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE FOR A  
CERTIFICATE OF SITE AND FACILITY FOR  
CONSTRUCTION OF A NEW 345 kV TRANSMISSION LINE**

**JOINT PRE-FILED TESTIMONY OF BRYAN HUDOCK ON BEHALF OF  
NEW ENGLAND POWER COMPANY AND  
DAVID PLANTE, PE ON BEHALF OF  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**

**Supplement to PFT of Hudock/Plante – Real Estate Rights**

Merrimack Valley Reliability Project

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1           **Q. Please describe whether the Applicants have a current right, an option, or other**  
2 **legal basis to acquire the right, to construct, operate, and maintain the facility on, over, or**  
3 **under the site.**

4           **A.** As previously stated in the Application and in our originally filed Pre-Filed Direct  
5 Testimony, the portions of the Project not situated within or across public roadways, or across  
6 public waters or State-owned lands, will be sited in existing NEP and PSNH ROWs between the  
7 New Hampshire/Massachusetts State border, and PSNH's Scobie Pond 345 kV Substation in  
8 Londonderry, NH. Both the NEP ROW and PSNH ROW to be used for the Project are  
9 comprised of either land parcels which the Applicants own in fee ownership, or real estate rights  
10 and interests comprised of various licenses and permanent easements owned by the Applicants  
11 for the purposes of the construction, operation and maintenance of electric power lines. Each of  
12 us has consulted with and been informed by our respective Real Estate Departments that each of  
13 the Applicants has the current right, either because of its land ownership, or under its existing  
14 easements which it already owns, to construct, operate and maintain the Project and its  
15 components within and along the respective ROWs owned and managed respectively by the  
16 Applicants in the Towns of Pelham, Windham, Hudson and Londonderry, NH.

17           **Q. Please address the requirement in recently adopted Site 301.03 (c) (7) that the**  
18 **application contain evidence that the applicant has a current or conditional right of access**  
19 **to private property within the boundaries of the proposed energy facility site sufficient to**  
20 **accommodate a site visit by the Committee.**

1           A. Unlike a power generator, wind turbine facility or other similar energy facility located  
2 on a discrete private property site, the Project is proposed to be sited within and along a 17.9  
3 mile ROW owned by NEP and PSNH situated in four towns in NH, and already occupied by  
4 other electric power transmission lines owned and operated by the Applicants. These ROWs are  
5 regularly accessed by the Applicants and their contractors in connection with the operation and  
6 maintenance of their existing power line facilities. The combination of land parcels owned by the  
7 Applicants, and numerous public access points (roadways and public land locations) on, within  
8 or adjacent to the ROW to be used for the Project, will supply more than adequate and sufficient  
9 access to accommodate a site visit by the committee to view the proposed Project site. Therefore,  
10 the Applicants do not need to secure private property rights of access to allow committee  
11 members to visit the site of the proposed Project.