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VIA ELECTRONIC MAIL

May 3, 2016

New Hampshire Site Evaluation Committee
Pamela G. Monroe, Administrator
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: SEC Docket No. 2015-05: Public Service Company of New Hampshire d/b/a
Eversource Energy and New England Power Company d/b/a National Grid: Joint
Application for a Certificate of Site and Facility for the Merrimack Valley
Reliability Project**

Dear Ms. Monroe:

Enclosed for filing in the above-referenced Docket, please find the Applicants' Response to Intervenor Huard's Motion for Restrictive Treatment of Medical Records.

Please contact me directly should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adam Dumville".

Adam M. Dumville

AMD:slb
Enclosure

cc: Distribution List

McLane Middleton, Professional Association
Manchester, Concord, Portsmouth, NH | Woburn, MA

McLane.com

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

SEC DOCKET NO. 2015-05

**JOINT APPLICATION OF NEW ENGLAND POWER COMPANY
D/B/A NATIONAL GRID &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**APPLICANTS' RESPONSE TO INTERVENOR HUARD'S MOTION FOR
RESTRICTIVE TREATMENT OF MEDICAL RECORDS**

NOW COME New England Power Company d/b/a National Grid ("NEP") and Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") (collectively the "Applicants") by and through their attorneys, McLane Middleton, Professional Association, and respectfully respond to Intervenor Huard's Motion for Restrictive Treatment of Medical Records. The Applicants respond as follows:

1. On May 2, 2016, Ms. Huard filed a motion with the New Hampshire Site Evaluation Committee (the "Committee") requesting confidential and protective treatment of her medical records. In addition, to the extent that she submits any medical records, she requests that such records not be released to the public. In support of her motion, Ms. Huard states that "Medical records contain private and confidential information that if placed in the wrong hands could be harmful and life threatening to an individual." *See* Huard Motion at 1.

2. The Applicants conditionally assent to Ms. Huard's motion insofar as she seeks general protective treatment of her medical records. The Applicants agree not to use Ms. Huard's medical information outside of these proceedings. However, it should be noted that Ms. Huard has made certain allegations about the Applicants and has alleged that she sustained injuries from existing transmission lines in the same right-of-way where the Project is proposed.

Ms. Huard should not be allowed to make such allegations and then assert that all records relating to medical care resulting from the alleged incidents are completely confidential.

3. The Applicants stress that Ms. Huard should be required to release her medical records to the Applicants for the purposes of discovery, during the technical sessions, and, as needed, in the final hearing of this proceeding. To the extent the Applicants choose to use Ms. Huard's medical records at the final hearings, the Applicants consent to having that portion of the record sealed.

4. To ensure that the technical sessions proceed in the most efficient manner possible, the Applicants respectfully request that Intervenor Huard provide her medical records to the Applicants before Thursday, May 5, 2016.

Respectfully Submitted,

New England Power Company and

Public Service Company of New Hampshire

By its attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: May 3, 2016

By: Adam Dumville

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Certificate of Service

I hereby certify that on the 3rd day of May, 2016 this Motion was sent electronically to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.



Adam Dumville