

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

Merrimack Valley Reliability Project  
SEC Docket # 2015-05

**MOTION TO RECONSIDER AND AMMEND**  
**NH SEC ORDER**  
**ORDER GRANTING IN PART AND DENYING IN PART MOTION FOR**  
**RESTRICTIVE TREATMENT OF MEDICAL RECORDS**

On this 17<sup>th</sup> day of May, 2016, I, Margaret Huard motion for reconsideration of the ORDER made on MEDICAL RECORDS dated May 6, 2016 and request that it be amended accordingly for the record.

- On May 6, 2016 an order was issued by the New Hampshire Site Evaluation Committee GRANTING IN PART AND DENYING IN PART MOTION FOR RESTRICTIVE TREATMENT OF MEDICAL RECORDS.
- This order states, “The Applicant is entitled to receive Ms. Huard’s medical records to **verify Ms. Huard’s allegations**”, referring to allegations I made in prefiled testimony regarding electric shock, with further orders to provide applicant’s attorneys, medical records related to the “shock” incidents described in my pre-filed testimony.
- Ms. Huard has provided the applicant through their attorney a billing report for the medical assist made by the Hudson Fire Department containing a description of the January 2016 electric shock incident along with vital statistics.
- The Hudson Fire Department through its EMS services were the earliest witnesses to the incident. They responded within 15 minutes of the incident when symptoms of electric shock were still present.
- The applicant, through their attorney, seeks additional medical records claiming that they need them to support my allegations, yet haven’t even asked me any pertinent questions about the actual incident.
- Any medical professional that provided services in the weeks following were too far removed from the incident. They were not eyewitnesses to the incident or any time period remotely close to the time period. Any information they would provide would be heresy. They were not specialists in electric shock. Their services were insufficient to provide a conclusive determination whether electric shock was sustained. Symptoms that were present were detected and treated without regard to their origin. Consequently, there is no

evidence in these medical records to verify my allegations, rendering these medical records irrelevant.

- Furthermore, the privacy of medical records of this nature is protected by the Federal Health Insurance Portability and Accountability Act.
- Once medical records are released from their intended confidential state, there is a greater risk they will get into the wrong hands regardless of the intent to protect them outside their confidential status. The risk of injury from the misuse of my medical records far out-weighs any interest the applicant through their attorneys may gain with the disclosure of the information contained in them.
- I hereby request and demand that the NH Site Evaluation reconsider and amend their order dated May 6, 2016 regarding my medical records.

Respectfully,

*Margaret Huard*

Margaret Huard  
Intervenor

#### **Certificate of Service**

I hereby certify that on the 17th day of May, 2016, electronic copies have been served upon the SEC Distribution List.

*Margaret Huard*

Margaret Huard  
Intervener