

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 5
REQUEST FOR ANY AND ALL EMAILS TO THE HUDSON
FIRE DEPARTMENT CONCERNING THE PROJECT (MVRP)

On this 12th day of May, 2016, I Margaret Huard, object to providing the applicant with any and all emails to/from the Hudson Fire Department concerning **the Project** (the MVRP).

- 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 copies of emails with the Hudson Fire Department pertaining to my concerns generally to high voltage transmission lines not the Project as noted in the data request summary. This request was made merely because the report noted that the call for assist was made directly to the fire department as opposed to calling 911.
- This is an unduly invasive search of my email records.

- This is an arbitrary, repetitious request for information regarding the Project (MVRP) or high voltage transmission lines that would merely duplicate information already provided the applicant in the billing report, pre-filed testimony, responses to discovery requests, as well as provide information that is equally available.
- The emails sent to the Hudson Fire Department were sent to the fire chief in his role protecting the public health of the Hudson community. While they included duplicative description and details of the Project/MVRP/HVTLs and related mutually available attachments, they were sent as a separate complaint of potential wrong doing against the public health of Hudson, NH. They are therefore confidential communications and should be treated with privilege.
- 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

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Objection to Data Request 5
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Intervener