

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 6**  
**REQUEST FOR ALL EMAILS TO HUDSON FIRE**  
**DEPARTMENT CONCERNING ELECTRIC SHOCK**  
**INCIDENT IN 1/2016**

On this 12th day of May, 2016, I Margaret Huard, object to providing the applicant with the requested emails to/from the Hudson Fire Department 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 Hudson Fire Department regarding the incident in January 2016; merely because the billing 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 and repetitious request for information that has already been provided the applicant in the billing report, pre-filed testimony, responses to discovery request, as well as 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 January 2016 incident 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 12<sup>th</sup> day of May, 2016, electronic copies have been served upon the SEC Distribution List.

*Margaret Huard*

Margaret Huard

Intervener

