

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  
ORDER ON PENDING MOTIONS  
June 1, 2016

On this 2nd day of June, 2016, I Margaret Huard, respond to the order dated June 1, 2016 regarding multiple **Motions to Object** to providing certain emails, additional medical records, the applicants' **Motion to Compel** the same documents, **Motion to Clarify (2)** and one final **Motion to Object to Unduly Oppressive and Unconstitutional Treatment**.

- You have provided one order in response to all of these motions. By doing so, you have missed addressing and ignored several points that I have made in these motions.
- I will not comply with your order until you have explicitly shown me what legal authority you have to make this order.
- I will also not ever provide any email with any medical information unless it is explicitly included under the protective order for my medical records.
- You have misinterpreted and misquoted the transcript from the technical sessions and have ignored parts of my motion to object.
- You have also failed to address my Motion for Consideration dated May 17, 2016 in regards to MEDICAL RECORDS. I have checked my email confirmations and show this email was received. I have included it with this motion.
- You claim that I agreed to provide the Applicant with the requested emails in the technical session on 5/5/16, despite the fact I point out that I attempted to object and Attorney Needleman interrupted me and talked right over my

objection. See Page 64, line 5 of the confidential session of the technical session dated 5/5/16.

- The order requires me to provide any and all emails to any THIRD PARTIES despite the fact that this IS NOT even what remotely appears that I agreed to in the technical session. See page 63, line 18 of the confidential session of the technical session, indicating that the request was for anyone else in the community, not any third party.
- Your claims that your orders are not unduly oppressive and unconstitutional are incorrect and you have failed to show me what authority you have to DEMAND and ORDER that I provide my own personal objects to another party!!!! This order only adds to this continued unduly oppressive and unconstitutional treatment.

I will not comply with any further ORDER until

1. I have a satisfactory order explicitly referring to what regulation gives you the authority to make such demands.
2. Each and every separate issued raised in my objections are addressed clearly.
3. Each Motion to Object is addressed in a separate order.
4. My Motion for Reconsideration on Medical Records is accurately considered and addressed.

*Margaret Huard*

Margaret (Peggy) Huard  
Intervener

### **Certificate of Service**

I hereby certify that on the 2<sup>nd</sup> day of June, 2016, electronic copies have been served upon the SEC Distribution List.

*Margaret Huard*

Margaret (Peggy) Huard  
Intervener