

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

Merrimack Valley Reliability Project
SEC Docket # 2015-05

OBJECTION
TO
MOTION TO STRIKE

On this 13th day of June, 2016, I Margaret Huard, object to striking any and all references made by me in my prefiled testimony relating to the January 2016 shock incident as requested by the applicant through their attorneys, McLane Middleton, in the MOTION to STRIKE dated June 10, 2016. I further object to the request that I be precluded from presenting any testimony or allegations about the shock incident that occurred in January 2016.

- On March 2, 2016, I provided prefiled testimony in which I claimed that I had gone into immediate cardiac arrest after taking pictures of a sign on one of the steel lattice towers.
- After more research and consideration of the experience, I subsequently amended that statement to state that “In January 2016, while taking pictures of a sign on a steel lattice tower, for these docket proceedings, I experienced simultaneous symptoms that often precede cardiac arrest: chest pain, leg pain, shortness of breath, dizziness and heart palpitations. According to standard charts on effects of electric currents on the human body, these symptoms are also standard signs of having come in contact with an electric current.”
- **Rule 202.21 states that all testimony shall be under oath or affirmation.**
- **I believed my statements made on March 2, 2016 to be true. I have subsequently amended my statement upon researching and considering the experience further. I also believe the statements made in this amendment to be true.**
- I provided the only competent relevant piece of evidence to support my allegations regarding this experience, a billing report from the Hudson Fire

Department. This report shows **physical vital statistics** that confirm that I did in fact have many of the symptoms I claim to have had, detected in a time period as close to the shock incident as possible. It also serves to report the incident as close to the time period of the incident as possible.

- I also provided the chart that I refer to in this statement along with numerous other references that I relied on to believe that what I experienced was in fact a level of electric shock.
- I additionally object to the adverse inference towards my unwillingness to comply with the continued unfounded and unconstitutional requests and order for private, irrelevant records.
- I have objected and refused to comply to the continued requests for medical records and emails erroneously deemed relevant to this incident because of the lack of ethics and legal basis used to compel them. Numerous statements made in the technical sessions and objections have been misinterpreted, misstated, ignored and incompletely addressed. I have made these concerns known and they still have not been satisfactorily resolved.
- I request that my assertions regarding the January 2016 incident be allowed to remain in my testimony.

Margaret Huard
Margaret Huard
Intervener

Certificate of Service

I hereby certify that on the 13th day of May, 2016, electronic copies have been served upon the SEC Distribution List.

Margaret Huard
Margaret Huard
Intervener