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VIA ELECTRONIC MAIL

October 19, 2016

New Hampshire Site Evaluation Committee
Pamela G. Monroe, Administrator
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: SEC Docket No. 2015-05: Public Service Company of New Hampshire d/b/a
Eversource Energy and New England Power Company d/b/a National Grid:
Applicants' Motion for Clarification**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find the Applicants' Motion for Clarification.

Please contact me directly should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adam Dumville".

Adam M. Dumville

AMD:slb
Enclosure

cc: Distribution List

McLane Middleton, Professional Association
Manchester, Concord, Portsmouth, NH | Woburn, Boston, MA

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THE STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

SEC DOCKET NO. 2015-05

**JOINT APPLICATION OF NEW ENGLAND POWER COMPANY
D/B/A NATIONAL GRID &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

APPLICANTS' MOTION FOR CLARIFICATION

NOW COME New England Power Company d/b/a National Grid ("NEP") and Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") (collectively the "Applicants") by and through their attorneys, McLane Middleton, Professional Association, and submit this motion for clarification to the Committee's Order and Certificate of Site and Facility with Conditions that relates to the Committee's condition for measuring electric and magnetic fields.

1. On October 4, 2016, the Committee issued a Decision and Order Granting Application for Certificate of Site and Facility and an Order and Certificate of Site and Facility with Conditions. The Order includes a requirement "that the Applicant, in consultation with the PUC's Safety Division, shall measure actual electro-magnetic fields associated with operation of the Project both before and after construction of the Project during peak-load, along each section number listed in Tables 12 and 13 of the Application" (the "Condition"). *See Order and Certificate*, at p. 4.

2. This Condition was initially proposed by Counsel for the Public during Closing Statements:

The final area that I would put forward to the Committee's consideration is with regard to public health and the electric and magnetic fields. We've heard

testimony that the projected modeling of the project suggested it was well within safe levels. And Counsel for the Public is convinced by that modeling. However, to ensure the safety of the public, I would recommend consideration of a condition requiring that the certificate holder conduct field testing of the electric and magnetic field strength at representative sampling of locations along the project following construction and energizing of the project, and submit those results to the Committee. That would ensure that the Committee has a sense that the project, after construction, actually meets the model results that have been presented.

Mr. Aslin Closing Statement, MVRP Hearing Transcript, Day 2 Afternoon Only, Page 169 – 170.

3. The Application for a Certificate of Site and Facility, Appendix AG, includes the results of Exponent’s calculations from modeling the electric fields and magnetic fields (“EMF”) in the vicinity of the right-of-way where the Project will be constructed (the “Project ROW”) at both pre- and post-Project annual average load (“AAL”) and at annual peak. *See id.* at Table A-1; Revised Appendix AG, Table A-1 (Dec. 23, 2015), submitted with Supplement No. 2 to the Application. Exponent, however, did not take actual field measurements of electric or magnetic fields at either AAL or peak-load along the Project ROW.

4. The Applicants seek clarification of the electric and magnetic field measuring Condition in the Certificate because the Applicants cannot comply with the condition as written for several reasons.

5. First, it is impossible to measure EMF associated with the operation of the Project before the Project is actually built; the 3124 Line does not exist, and therefore, cannot be measured before construction starts.¹

¹ It appears, however, from the Committee’s discussions relating to this topic that the Committee meant to have pre-construction tests done on the existing Project ROW (not on the Project per se) to confirm the accuracy of the calculations and modeling submitted with the Application. *See* MVRP Hearing Transcript, Deliberations Day 2, pp. 59 to 69.

6. Second, peak load conditions typically occur only during warmer times of the year. Thus, assuming that the Condition seeks to require the Applicants to take pre-construction EMF measurements of the Project ROW during peak-load before commencing construction of the Project, the Applicants would not be able to commence construction presumably until late spring or the summer of 2017 – barring a prolonged heat wave later this month. As we head into winter, the next peak load is not anticipated until late spring or summer 2017. It is the Applicants’ understanding that it was not the intent of Counsel for the Public’s, nor the intent of the Committee, to develop a condition that would prevent the Applicants from commencing construction for at least another seven to ten months.

7. As discussed during deliberations, the Applicants are willing to work with, and receive approval from, the New Hampshire Public Utilities Commission before finalizing a testing regimen. However, requiring the Applicants to conduct these tests during peak load conditions prior to commencing construction, would significantly delay construction of this necessary reliability project.

8. Third, the Applicants anticipate starting construction on the relocation of the Y-151 line in New Hampshire in October 2016 to support having the line ready for scheduled outages in April 2017. The construction of the Y-151 must commence this month in order to coordinate with the other upgrades currently being performed across the transmission system. New conductors for the relocated Y-151 line, which will affect the measured electric fields in the Project ROW, will likely be installed as early as January 2017. Therefore, peak load conditions will almost certainly not occur prior to commencing the relocation of the Y-151 line. Thus, the Applicants respectfully request that the condition in the Certificate be altered to allow pre-construction measurements to be taken prior to January 2017—and not specifically at peak

load—with appropriate adjustments to be made to the measured values that reflect peak load conditions.

9. The Applicants are committed to taking pre- and post-construction measurements of EMF at the requested locations. However, based on the abovementioned concerns, the Applicants respectfully request that the Committee clarify its requirement that the Applicants take measurements prior to commencing construction. As noted previously, it is not possible to take pre-construction measurements at peak loading without delaying the start of Project construction until late spring or summer 2017.

10. The Applicants, therefore, would suggest altering the Condition to read as follows:

. . . that the Applicant, in consultation with the PUC's Safety Division, shall measure actual electric and magnetic field levels along the Project ROW both before and after the Project is placed into service. If peak or near-peak conditions do not occur before elements of the Project are placed into service, pre-Project measurements should be presented in both raw form and adjusted to reflect a peak loading condition, at each measurement location. Post-construction measurements will be taken during the summer peak loading season and a similar procedure will be used, if necessary, in acknowledgement that the Applicant cannot know in advance when peak loading will occur and that the days planned for measurements may occur when line loadings are below the forecasted peak loading.

11. Counsel for the Public assents to the relief requested.

12. Intervener Huard takes no position on the motion.

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WHEREFORE, the Applicants respectfully request that the Committee:

- A. Clarify the EMF measuring Condition contained in the Order and Certificate of Site and Facility With Conditions; and
- B. Grant such further relief as requested herein and as deemed appropriate.

Respectfully Submitted,

New England Power Company and

Public Service Company of New Hampshire

By its attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: October 19, 2016

By: Adam Dumville

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Certificate of Service

I hereby certify that on the 19th day of October, 2016 this Motion was sent electronically to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.

A handwritten signature in cursive script, appearing to read "Adam Dumville", is written over a horizontal line.

Adam Dumville