

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

Merrimack Valley Reliability Project  
SEC Docket # 2015-05

**INTERVENER'S PARTIAL OBJECTION TO APPLICANTS' MOTION FOR CLARIFICATION**  
**CONDITION ON EMF TESTING**

On this 26<sup>th</sup> day of October, 2016, I, Margaret Huard provide the following partial objections to the applicants' MOTION for CLARIFICATION dated October 19, 2016, disputing the condition listed in the final ORDER AND CERTIFICATE OF SITE AND FACILITY WITH CONDITIONS, issued by the NH SEC on October 4, 2016, regarding the requirements to test the electric and magnetic fields before and after the construction of the MVRP.

The condition regarding the testing of the electric magnetic fields is listed in the final ORDER AND CERTIFICATE OF SITE AND FACILITY WITH CONDITIONS as follows.

*"Further Orders 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; and it is,"*

*"Further Ordered that the Applicant shall file the results of the electro-magnetic fields measurements conducted pursuant to the conditions of the Certificate with the Committee; and it is,"*

*"Further Ordered that, if the results of the electro-magnetic fields measurements exceed the guidelines of the International Committee on Electromagnetic Safety of the International Commission on Non-ionizing Radiation Protection, the Applicant shall file with the Committee a mitigation plan designed to reduce the levels so that they are lower than the Commission's or Committee's standard; and it is,"*

While I agree to their argument that, "it is impossible to measure EMF associated with the operations of the Project BEFORE the PROJECT is built, the 3124 Line does not exist, and therefore cannot be measured BEFORE construction starts.", the NH SEC subcommittee DOES NOT actually state this in the motion made during Day 2 of their deliberations. The motion made during day 2 of deliberation is quite clear and concise as to the intent of the NH SEC subcommittee regarding this condition.

Motion as made by Commissioner Bailey (Lines 14-24, page 68 and lines 1-10, page 69 of Day 2 of the NH SEC Deliberations)

*"I move we make a finding that there are no reasonable adverse effects on public health and safety, **subject to the condition** that the Applicant will conduct measurements along each section number listed in Table 12 and 13 in the Application, in consultation with the Public Utilities Commission's Safety Division, and that such measurements will be taken during **peak load BEFORE construction** and **AFTER***

*construction, and that they are also subject to Department of Transportation and Department of Safety requirements during construction, and that the results of the measurements be filed with the Committee, compared with the results in the tables that were modeled, and if they exceed the guidelines of the international committees that I mentioned before, that they provide a mitigation plan to the Committee to reduce the levels so that they are lower than the standards articulated by those two bodies.”*

The condition listed in the FINAL order IS NOT an exact interpretation of the motion made by the NH SEC during Day 2 of their deliberations. This motion does not refer to the testing being done on the **project**, yet refers to specific locations along the sections listed in the applicants’ exhibits summarizing the modeled measurements. This motion is specific in requiring it to be done before and after construction, with out any reference to testing the “project”. The word project is not even used in this motion.

I feel that the MOTION made and accepted by the NH SEC subcommittee during their final deliberations should be the condition without exception. This motion as made by the subcommittee provided for an **actual** measurement that would provide some reassurance the modeled/calculated levels of EMFs are accurate and that the final project did not increase the level of dangers and risks associated with the electric magnetic fields.

The Order also states the following.

*“NOW THEREFORE, it is hereby ORDERED that the Application of the NEW England Power Company d/b/a National Grid and Public Service of Company of New Hampshire d/b/a Eversource Energy, as amended, is approved **SUBJECT TO THE CONDITIONS** set forth herein and this Order shall be deemed to be the Certificate of Site and Facility pursuant to RSA 162-H:4: and it is,”*

Therefore, this condition should be met, BEFORE another any part of the construction begins, including taking another tree down.

These large mature trees provide a barrier to strong electric fields. To remove the large amount of trees BEFORE the actual testing of EMFs before the project is constructed would not provide a valid actual reading of the electric magnetic fields that existed BEFORE construction. The removal of the trees should be deemed as part of the construction.

I request that the condition be amended to match the motion that was made by the NH SEC in Day 2 of their deliberations, that the ACTUAL EMFs be tested BEFORE any other part of the construction of this project take place, including the tree removal, at peak conditions.

The applicants are already removing vegetation and trees in violation of this condition of this order in the area of McCrady Drive, Hudson, NH. I request that all vegetation and tree removal activities **cease immediately** until all required EMF readings are taken.

I object to the applicants request to begin the relocation of the Y151, related construction and tree removal before this testing is done.

I object to the applicants’ request that they be allowed to disregard the requirement to perform these tests at PEAK load conditions. The applicant claims that peak conditions only occur during warmer times.

Furthermore, they claim to be forced to wait until such peak loading times, would delay the beginning of the construction.

Since it is customary for the final order to draw conditions from the motions made in deliberations of the NH SEC, the applicant knew about this requirement at the end of the final deliberations on July 11, 2016, giving them ample opportunity to test the conditions during the hottest part of the summer of 2016, yet did not perform the requested tests.

The applicants request to take measurements outside of peak load conditions and make “appropriate adjustments” to these measured values that reflect peak load conditions DOES NOT reflect actual readings and once again the applicant is asking to provide another calculated figure instead of an actual one.

According to the ISO NE website, while the summer peak is higher, a winter peak exists as well. According to the COO Report for September of 2016, available on the ISO NE website, the highest demand for the summer of 2016 was 25,466 MW on 8/12/16. Currently, the forecasted peak listed on the Morning Report for today is only 15,930 MW and yesterday’s actual peak was 15,724 MW. It is not acceptable to substitute ADJUSTED actual EMF readings taken during months of lower usage for months of such high peak usage as in the winter and summer peak times.

Additionally, the reactions that I have had with the existing high voltage transmission lines occurred in the colder weather with snow on the ground. I personally did not experience any adverse reactions during the hotter, dryer conditions of July and August of 2016.

It is of the utmost importance to determine the safety of these fields. The applicant and NH SEC subcommittee have already negligently disregarded the actual dangers that have been communicated to them. This should in no way be allowed to continue by allowing the requests made in this MOTION FOR CLARIFICATION.

*Margaret Huard*

Margaret Huard  
Intervener  
October 26, 2016

#### **Certificate of Service**

I hereby certify that on the 26th day of October, electronic copies have been served upon the SEC Distribution List.

*Margaret Huard*

Margaret Huard  
Intervener

