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May 19, 2017

VIA EMAIL AND HAND DELIVERY

Ms. Pamela Monroe, Administrator New Hampshire Site Evaluation Committee 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 ("PSNH") and New England Power Company d/b/a National
Grid ("NEP"): Joint Application for a Certificate of Site and Facility for the
Merrimack Valley Reliability Project – Pelham Substation Tap Line Relocation

Dear Ms. Monroe:

This letter is a follow-up to our discussion regarding whether the relocation of two tap line structures within the Merrimack Valley Reliability Project (the "Project") right-of-way ("ROW") would require an amendment to the Certificate of Site and Facility granted in the above-referenced docket. Because, as explained below, the tap line work will not have any material impacts, NEP strongly believes that the structure relocation does not warrant such an amendment.

In order to facilitate your review, NEP encloses the following materials:

- Attachment A Page 41 of 103, Appendix F of MVRP Application, December 16, 2017
- Attachment B Drawing 400298-C-R-306, Appendix Q of Supplement #3 to Application
- Attachment C Proposed Site Layout Plan Approved by Town of Pelham
- Attachment D Approvals from Town of Pelham
- Attachment E Proposed Plan Tap Line Structure Alterations, February 21, 2017

A. Background on Proposed Relocation of Structures P-1 and P-2

NEP is undertaking an independent project to expand and upgrade the existing Pelham #14 Substation, located at 196 Main Street, Pelham, and adjacent to the MVRP ROW. See Attachment C. The existing Substation contained one transformer connected via a tap line to the Y-151 mainline located on the MVRP ROW, and NEP currently is installing a second

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transformer that will also be connected to the Y-151 via a new second tap line (the "Tap Lines"). That Substation project was permitted separately by the Town of Pelham.

More specifically, the Tap Line project involves the installation of three new Structures: a second terminal structure (P2-0) within the Substation fence and two new supporting structures within the ROW (P1-1 and P2-1). See Attachment A and B. Terminal structures P1-0 and P2-0 will remain as shown in the MVRP Application for a Certificate of Site and Facility; however, Structures P1-1 and P2-1 were originally located east of Wetland 45. Refer to Attachment E for proposed location of tap line structures.

As you may recall, the MVRP involved relocating the Y-151 from the middle of the ROW to the western side of the ROW (farthest from the Pelham #14 Substation). The relocation of the Y-151 necessitated an extension of the existing Tap Line and the installation of the second Tap Line across the ROW. Although a separate project, NEP nevertheless included this Tap Line work in its MVRP filing because it anticipated that the Pelham Substation upgrades, including the installation of the second transformer, would have been completed prior to the commencement of work on MVRP thereby allowing the Tap Line work to be coordinated with the MVRP. That is no longer the case as the Substation project lags behind MVRP.

Following the administrative proceeding for MVRP, the design of the Pelham Substation expansion evolved to include a retaining wall on the western perimeter of the expanded substation to maintain a level substation yard. The overall footprint of the substation yard expanded as part of the permit approvals received locally from the Town of Pelham. Once the Pelham substation expansion design was complete, the height of the retaining wall and associated fencing also increased in order to maintain access to the right-of-way. As a result, the Tap Lines as designed would no longer comply with the safety clearance standards required under the National Safety Electric Code ("NESC"). In order to achieve the necessary clearances, NEP has to relocate Tap Line Structure P1-1 approximately 64 feet to the west and Structure P2-2 approximately 43 feet to the west, from the locations originally proposed outside of Wetland 45 to within Wetland 45. Compare Attachment A with Attachment E.

Importantly, NEP only needs to relocate Structures P1-1 and P2-1; the structure type, design and height will all remain the same. The structure heights, final design, and structure type included in the SEC Application conform to structure drawing 400298-C-S-19, originally submitted with the Application at Appendix R and updated in the Applicants' Supplemental Summary, dated February 19, 2016, at Attachment Q, Revised NEP Engineering Drawings. See Attachment B.

As further discussed below, the proposed structure relocations will not result in any material impacts. Accordingly, NEP believes this Tap Line relocation work will not trigger the need to amend the Certificate of Site and Facility granted for the MVRP, and instead can be

See Notices of Decision of Zoning Board of Adjustment and Planning Board, dated September 12 and 19, 2016, provided together as Attachment D.

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approved by the DES pursuant to its authority granted by the Committee "to specify the use of any appropriate technique, methodology, practice or procedure approved by the Subcommittee within the Certificate, as may be necessary, to effectuate conditions of the Certificate, the Wetlands Permit, the Alteration of Terrain Permit, and the Shoreland Permit." See Order at 3.

B. Potential Impacts Relative to Criteria Under RSA 162-H:16

As described by NEP in the original Project Application and all supplements, and determined by the Committee, the Project will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety. NEP has provided the proposed structure modifications to each of its experts to review and assess the alterations relative to the criteria found in RSA 162-H:16. NEP's experts have reviewed the proposed structure move, and opined that the relocations will not have any further adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety, as described below.

1. Environmental

The relocation of the tap structures into WA 45 will not result in additional overall impacts to wetlands because the tap structures are replacing two similar existing H-frame structures within an area of the wetland that was permitted for temporary construction impact. Structure 27-A and Structure 1 on the existing Y-151 Line, as depicted on the EFI plan dated February, 21 2017, Attachment E, will be permanently removed from the wetland as part of the Y-151 Line relocation. Removal of these structures and restoration of the impacted wetland was not considered (i.e., deducted) in the calculation of permanent wetland impacts. Therefore, VHB concludes that the proposed structure replacements will not increase wetland impacts above existing conditions or affect the wetland mitigation executed for MVRP.

2. Aesthetics

The Applicants' aesthetic expert, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C ("EDR") has reviewed the proposed changes. The visual impact assessment prepared by EDR did not include a photosimulation at the location of the proposed structure shifts. Based on the short distance of the relocations and the fact that the structures will remain within the ROW already occupied by transmission lines, EDR has opined that the potential visual impacts at this location will essentially be unchanged, and the conclusions reached in the May 2015 visual impact assessment will remain the same.

3. Historic Sites

The Applicants historic experts at Public Archeology Laboratory have reviewed the proposed structure moves and concluded that it will not have any adverse effect on any above or below ground historic sites. The Applicants are also providing a copy of this letter to New Hampshire Department of Historical Services ("DHR") for their review and comment.

i. Above Ground Historic Sites

The relocation of the structures will have no effect on historic architectural properties. The DHR and the SEC previously found that the Project would not cause any direct or indirect effects to historic architectural properties because of the extensive transmission line infrastructure that already exists in the ROW. The relocated poles will not be taller than those originally proposed and no historic architectural resources are located within visual range of the ROW.

ii. Below Ground Historic Sites

As part of the Application, the Applicants conducted a Phase IA&IB survey of the NEP portion of the ROW in New Hampshire, from the Massachusetts/New Hampshire border in Pelham to the PSNH portion of the ROW in Hudson. The DHR and the SEC previously found that the Project would not have an adverse effect on archeological resources. There are no areas of archeological sensitivity in the area of the proposed structure relocations. Therefore, there will be no unreasonable adverse effect on archeological sites due to the proposed structure relocations.

4. Electric and Magnetic Fields

Exponent has opined that the move will not affect or alter electric and magnetic fields in this area. Based on the structure relocation, the southern tap line is part of cross-section 8b found in Revised Appendix AG of the Application (December 23, 2015), which will not change as a result of the structure relocation. The northern tap falls into cross-section 8c which will not change as a result of the structure relocation.

C. Conclusion

Based on the fact that the structure relocations will not result in any additional impacts, together with the specific delegation to DES to approve minor modifications, NEP believes the Tap Line structure relocations within the ROW may proceed with DES approval and without the SEC having to approve an amendment of the MVRP Certificate of Site and Facility. NEP anticipates performing this work in September 2017, subject to the receipt of the necessary state approvals.

The Application did not contain a specific cross-section for the two tap lines connecting the Pelham Substation and the Y-151 line. Such tap lines are generally not modeled, but are reviewed when examining a specific cross-section of a Project.

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Please do not hesitate to contact me with any questions.

Sincerely,

Barry Needleman

for Barry Needleman

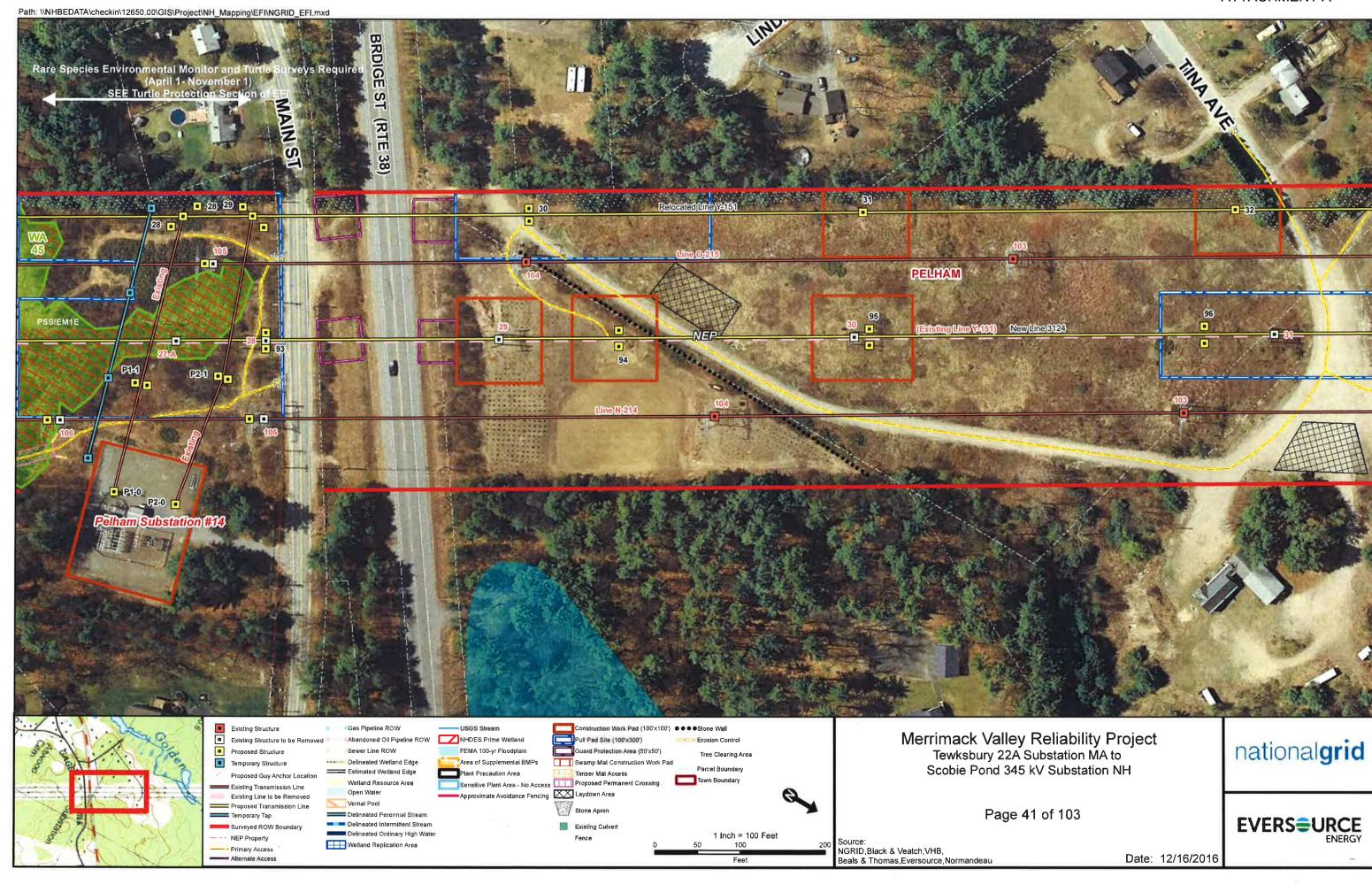
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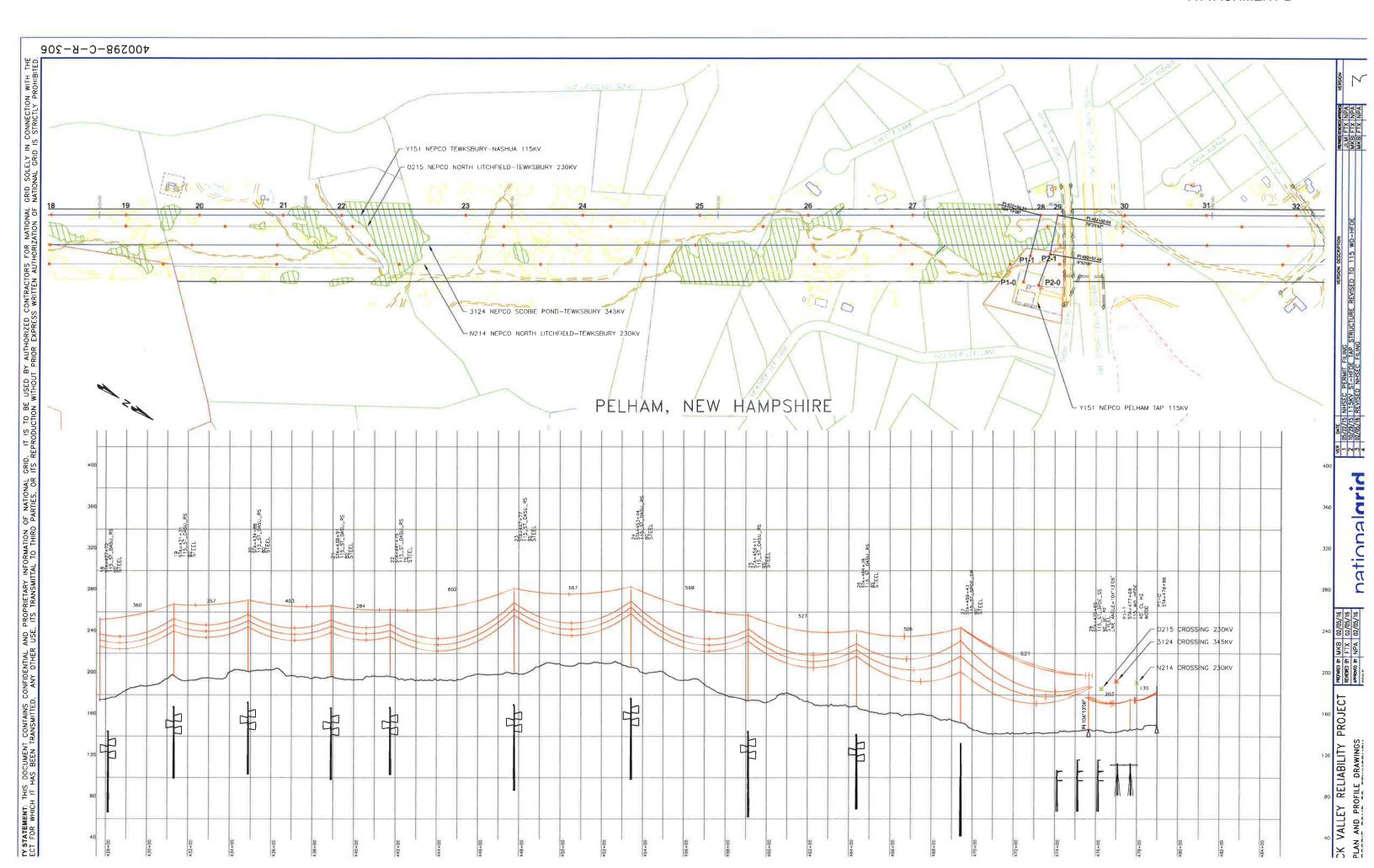
Cc: SEC Distribution List

Michael Iacopino, Esq.

New Hampshire Department of Environmental Services

New Hampshire Division of Historical Resources





Project Drawing Index

nationalgrid

Engineer:

Jess Farrell

Work Order:

90000155414 (Y151)

90000178166 (N214 and O215)

Project:

New 115kV Y151 Tap to Pelham Substation

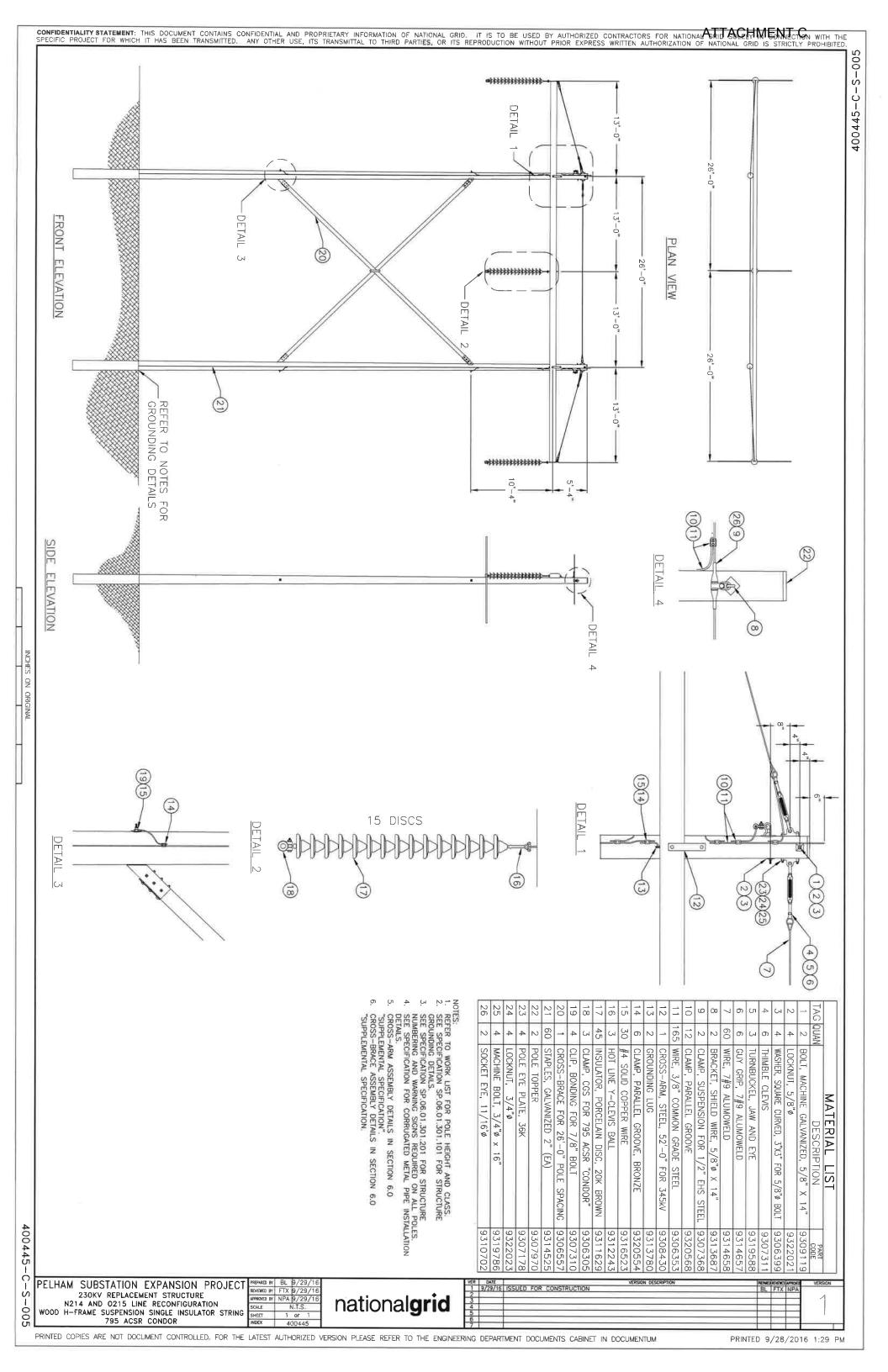
Modifications to 230kV N214 & O215 Lines

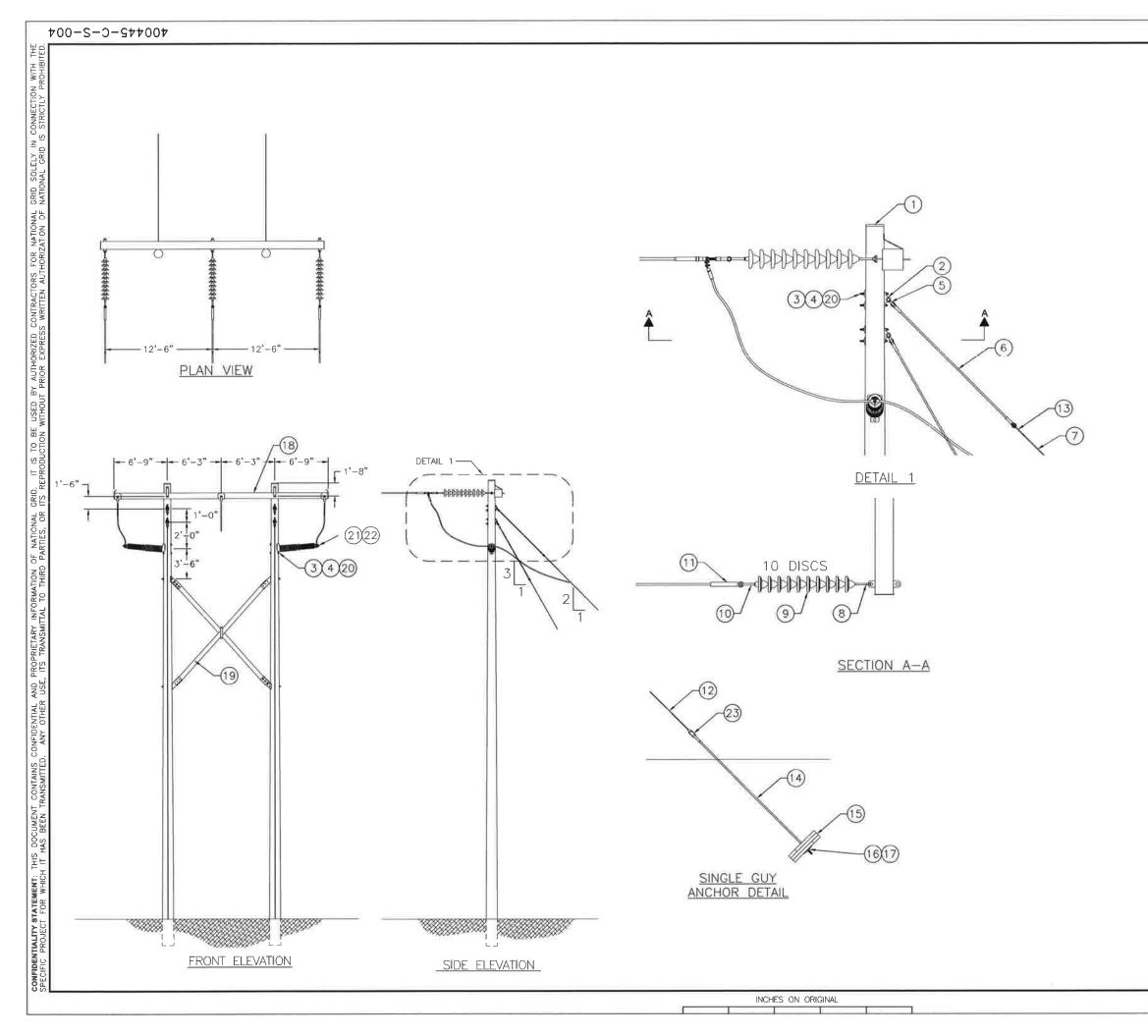
Company:

10 - New England Power

Temporary 115kV Y151 Tap to Mobile Transformer

	Dwg. No.	Date	Status	Title
1	400445-C-L-001	09/29/16	ISSUED	PELHAM SUBSTATION EXPANSION PROJECT DETAILED PLAN
	+00++3-C-L-001	07/29/10	1330121	OVERVIEW
2	400445-C-S-001	09/29/16	ISSUED	115KV Y151 LINE, WOOD H-FRAME DEADEND, SINGLE INSULATOR
	100115-6-001	07/27/10	ISSCED	STRING-795 ACSS-HS285 DRAKE
				115KV Y151 LINE TEMPORARY STRUCTURE, WOOD H-FRAME
3	400445-C-S-002	09/29/16	ISSUED	SUSPENSION – TEMPORARY STRUCTURE, SINGLE INSULATOR
				STRING-795 ACSS-HS285 DRAKE
				115KV Y151 LINE TEMPORARY STRUCTURE (MOBILE – 1), WOOD H-
4	400445-C-S-003	09/29/16	ISSUED	FRAME DEADEND, SINGLE INSULATOR STRING-795 ACSS-HS285
				DRAKE
				115KV Y151 LINE TEMPORARY STRUCTURE (MOBILE – 4), WOOD H-
5	400445-C-S-004	09/29/16	ISSUED	FRAME DEADEND –, SINGLE INSULATOR STRING-795 ACSS-HS285
				DRAKE
6	400445-C-S-005	09/29/16	ISSUED	230KV N214 & O215 LINE, WOOD H-FRAME SUSPENSION, SINGLE
0	400445-C-3-005	09/29/10	1330ED	INSULATOR STRING-795 ACSR CONDOR





MATERIAL LIST						
TAG	QUAN	DESCRIPTION	PART CODE			
1	2	CAP, WOOD POLE TOP PROTECTION	9307970			
2	4	PLATE, POLE EYE, 36K	9307178			
3	12	LOCKNUT, 3/4"	9322023			
4	12	BOLT, MACHINE, 3/4" x 16"	9319786			
5	4	ANCHOR SHACKLE 60K	9307404			
6	4	INSULATOR, FIBERGLASS STRAIN, 78"	9307240			
7	150	7#6 ALUMOWELD	9306397			
8	3	HOT LINE Y-CLEVIS BALL	9312243			
9	30	INSULATOR, PORCELAIN DISC, 30K, BROWN	9311710			
10	3	HOT LINE SOCKET EYE, 1-1/16"	9305993			
11	3	DEAD END, COMP ASSY, 795 ACSR/ACSS DRAKE	9308006			
12	4	MARKER, GUY, YELLOW	9313584			
13	4	GUY GRIP, 7#6 ALUMOWELD	9320256			
14	4	ANCHOR ROD, $1-1/4" \times 10'-0"$	9319512			
15	12	ANCHOR PLANK 2" x 12" x 24"	9306949			
16	4	WASHER, ROUND, 6", UNTHREADED FOR 1-1/4" BOLT	9319597			
17	4	PLATE, BACKUP, SQUARE FLAT 8"x 8"x1/2"	9306400			
18	1	CROSSARM, STEEL, 115KV DE, 26'-0"	9308440			
19	1	CROSSBRACE ASSY, HEAVY DUTY, 12'-6"	9308173			
20		WASHER, SQUARE CURVED FOR 3/4"Ø BOLT	9320428			
21	2	INSULATOR, LINE POST, 115KV	9386600			
22	2	CLAMP, LINE POST, TRUNNION FOR 1.00" TO 1.50"	9312462			
23	4	AUTOMATIC GUY GRIP FOR 7#6 AW	9306574			

ATTACHMENT C

NOTES:

1. REFER TO WORK LIST FOR POLE HEIGHT AND CLASS.

2. SEE SPECIFICATION SP.06.01.301.201 FOR STRUCTURE NUMBERING AND WARNING SIGNS REQUIRED ON ALL POLES.

3. SEE SPECIFICATION SP.06.01.31.401 FOR CORRUGATED METAL PIPE INSTALLATION DETAILS.

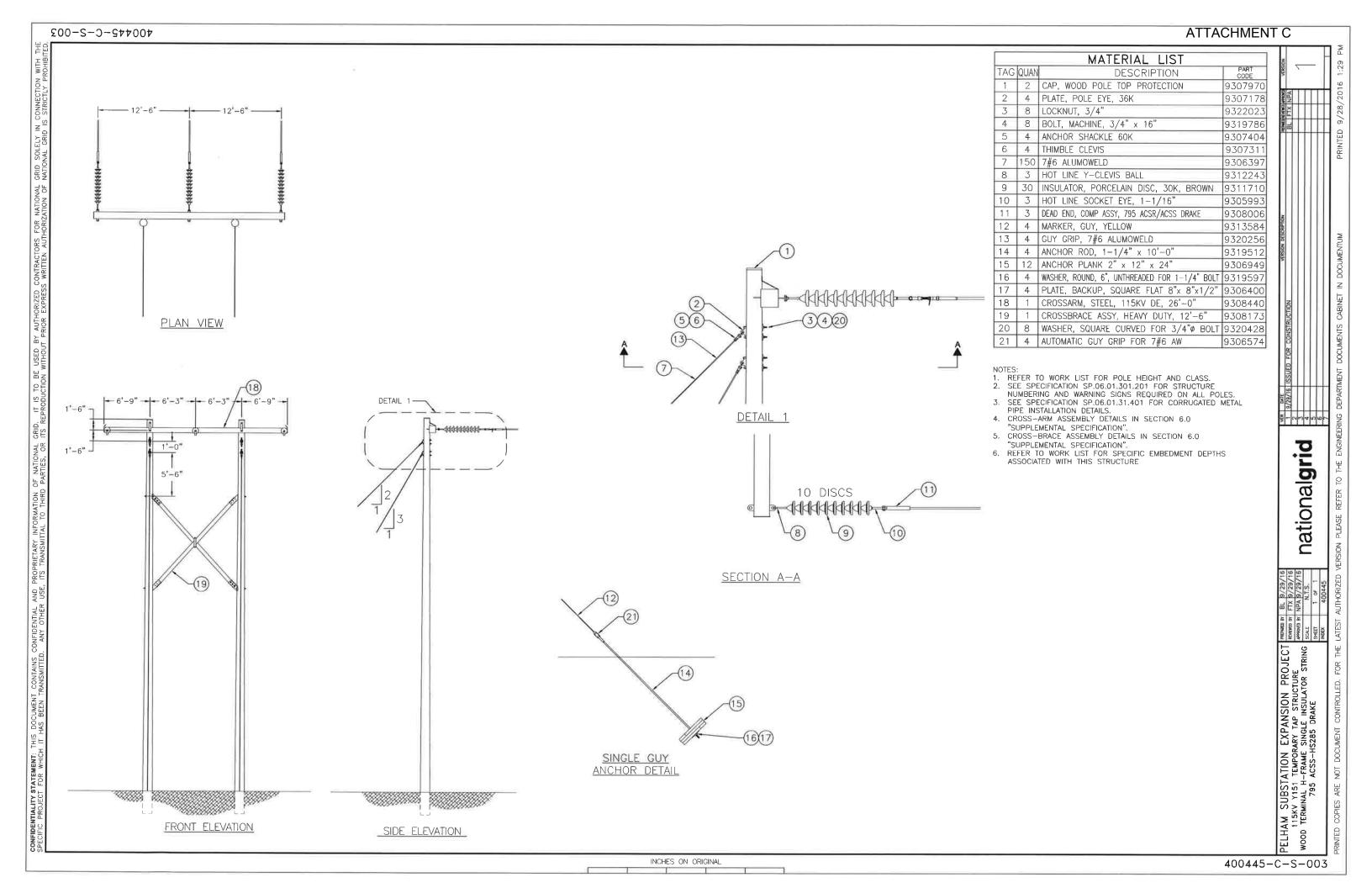
4. CROSS—ARM ASSEMBLY DETAILS IN SECTION 6.0 "SUPPLEMENTAL SPECIFICATION".

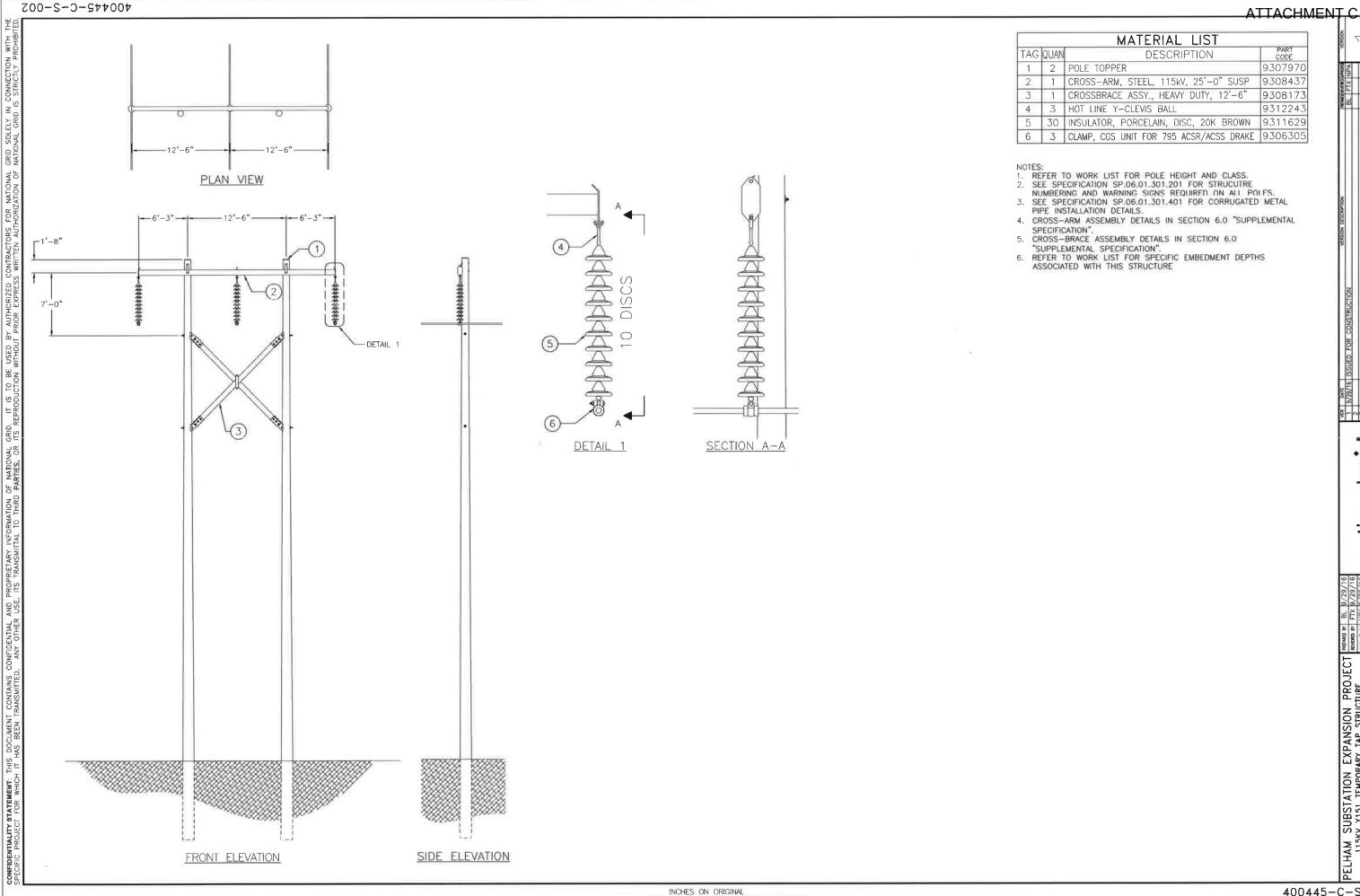
5. CROSS—BRACE ASSEMBLY DETAILS IN SECTION 6.0 "SUPPLEMENTAL SPECIFICATION".

"SUPPLEMENTAL SPECIFICATION".
REFER TO WORK LIST FOR SPECIFIC EMBEDMENT DEPTHS
ASSOCIATED WITH THIS STRUCTURE

national**grid**

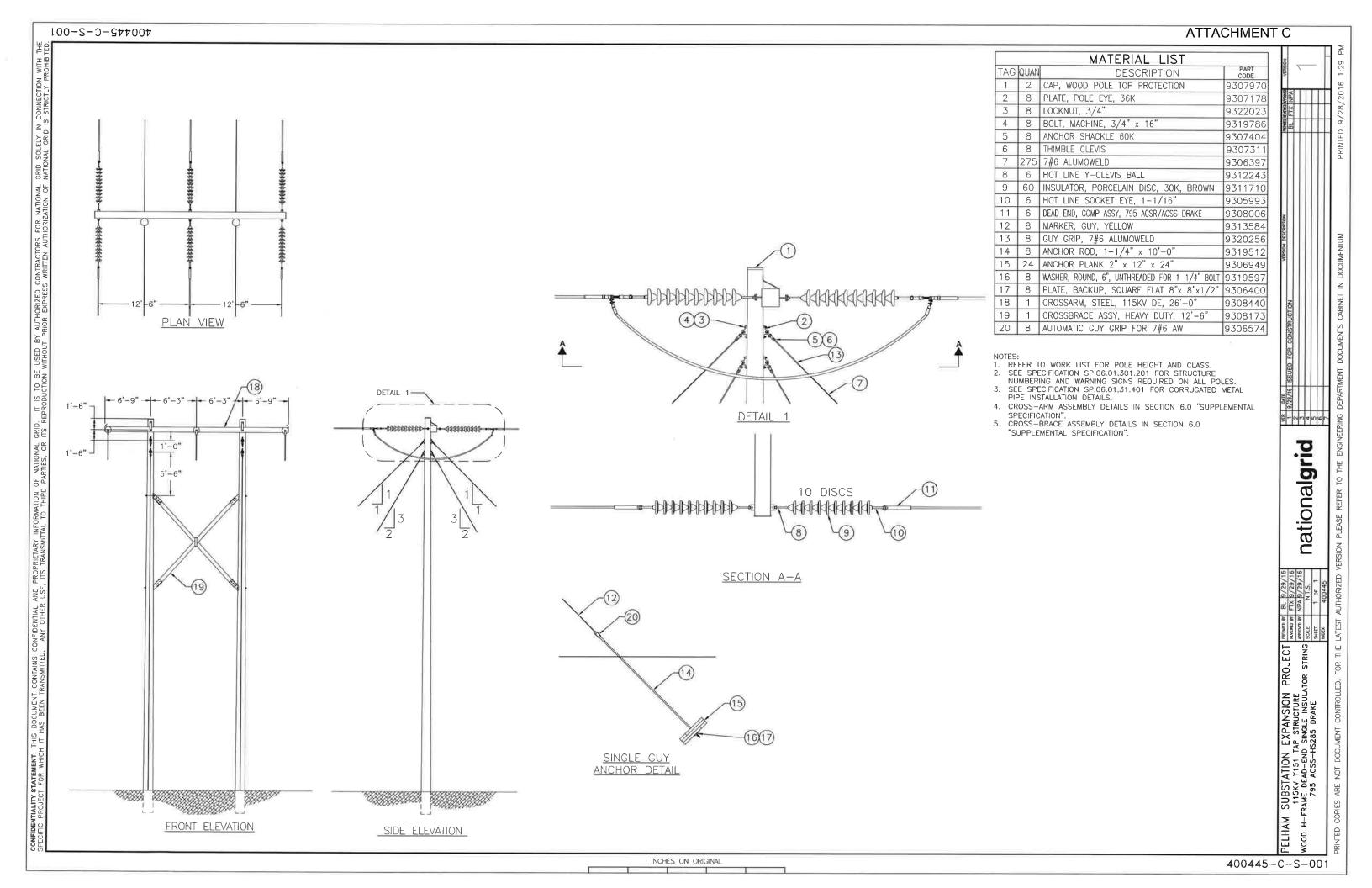
PELHAM SUBSTATION EXPANSION PROJECT 115KV Y151 TEMPORARY TAP STRUCTURE WOOD H-FRAME DEAD—END SINGLE INSULATOR STRING BACK SPAN TO MOBILE TRANSFORMER 795 ACSS—HS285 DRAKE

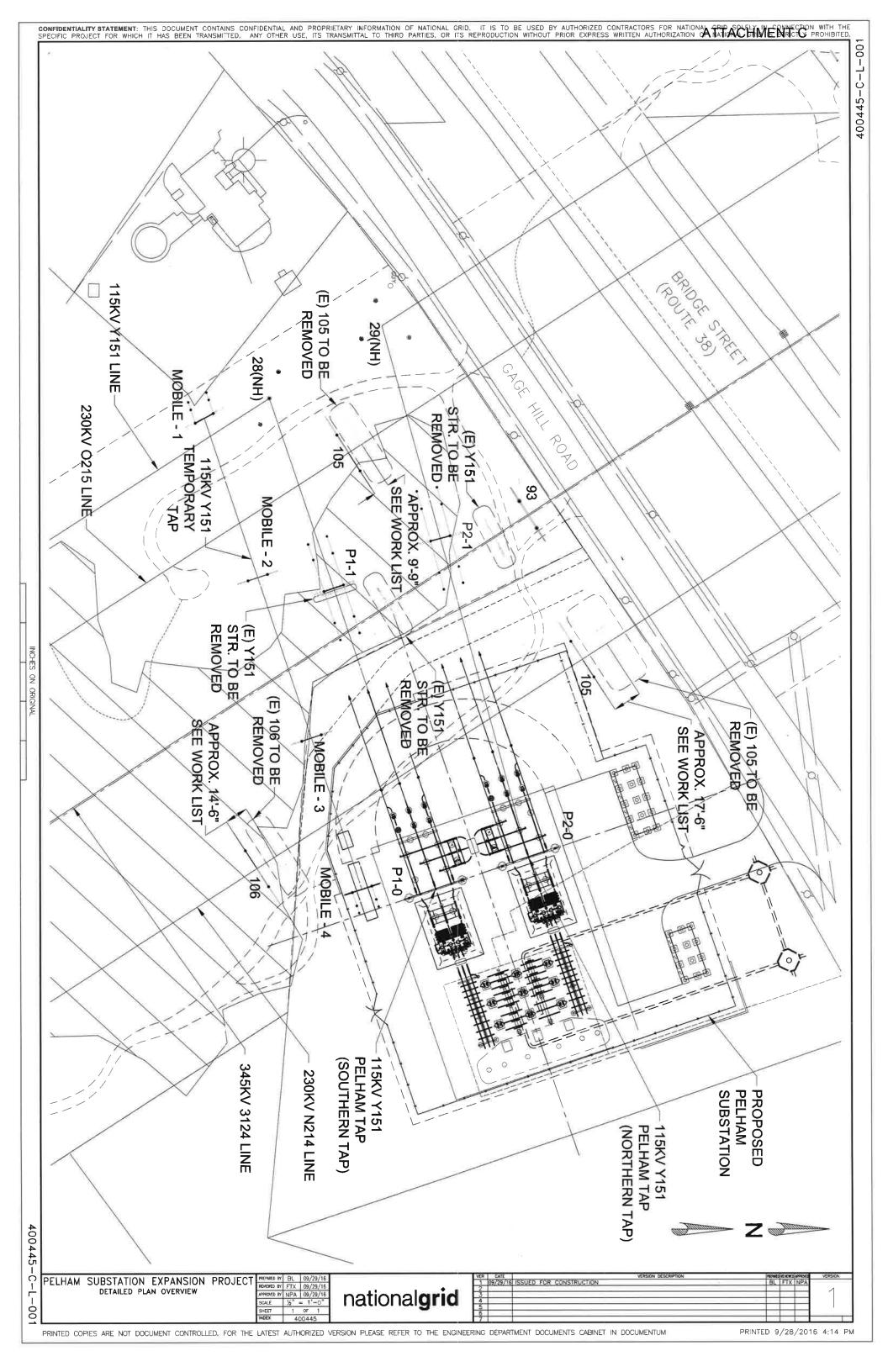




3 CLAMP, CGS UNIT FOR 795 ACSR/ACSS DRAKE 9306305

national**grid**







TOWN OF PELHAM

Planning Department

6 Village Green Pelham, NH 03076

Tel: (603) 635-7811 Fax: (603) 635-6954

Email: planning@pelhamweb.com

Notice of Planning Board Decision

Decision Date: September 19, 2016

Case# PL2016-00017

Property Location: 196 Main Street

Owners:

New England Power Company, 900 Elm Street, Manchester, NH 03101

Location:

196 Main Street, Map 22, Lots 8-21

Purpose of Meeting: Site plan to upgrade existing Pelham #14 substation.

After duly-noticed public hearing(s) the Planning Board voted to **APPROVE** the above mentioned plan entitled Site Plan Map 22 Lot 8-21 prepared for National Grid, 40 Sylvan Road Waltham, MA 02451.

If you have any questions, please feel free to call.

Sincerely

Jeff Gowan Planning Director

JG:std

cc: SGC Engineering, LLC

Susan Snide, Assessing Assistant

File



TOWN OF PELHAM

Planning Department

6 Village Green Pelham, NH 03076

Tel: (603) 635-7811 Fax: (603) 635-6954 Email: planning@pelhamweb.com

NOTICE OF DECISION ZONING BOARD OF ADJUSTMENT

Case #ZO2016-00021

You are hereby notified that the request of NEW ENGLAND POWER COMPANY d/b/a National Grid - 196 Main Street - Map 22 Lot 8-21 for a Variance concerning Articles III & VII, Section 307-8 (C) & 307-41 to permit the construction of a retaining wall in the Wetland Conservation District.

en approved.
(

- 1.) Variance to expand non-conforming use
- 2.) Variance to build retaining wall within the WCD
- _ Has been denied.
- __ Withdrew without prejudice.

SIGNED: David Housesey &

David Hennessey

Chair

DATE: September 12, 2016

DH/std

cc:

Tax Assessor

BOA File

