

**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**Docket No. 2015-06**

**Joint Application of Northern Pass Transmission, LLC & Public Service Company  
of New Hampshire d/b/a/ Eversource Energy for a Certificate of Site and Facility**

**PETITION FOR INTERVENTION BY JO ANNE BRADBURY**

Petitioner, Jo Anne Bradbury, respectfully petitions the New Hampshire Site Evaluation Committee (“the SEC”) to grant her leave to intervene in these proceedings. In support of her Petition, Jo Anne Bradbury states:

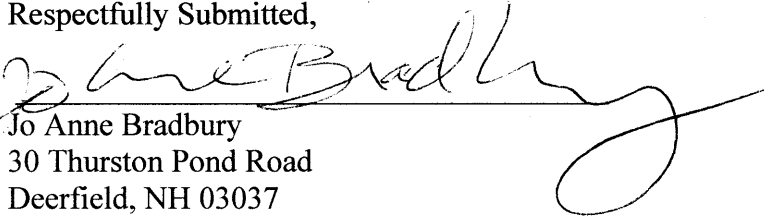
1. Jo Anne Bradbury resides at 30 Thurston Pond Road, Deerfield, New Hampshire, 03037, and owns four abutting parcels of land in Deerfield, New Hampshire, consisting of approximately 133 acres of land (including wetland) together with a residence and related outbuilding. Jo Anne Bradbury purchased this property to build her home and improve the property for recreation use and her ultimate retirement home. Jo Anne Bradbury’s home and property are accessible solely via Thurston Pond Road, a road that she maintains along with her neighbors. It is also a main source of recreation and enjoyment.
2. The Applicant Northern Pass Transmission LLC (“Northern Pass”) seeks permission to site a new high voltage transmission line facility running approximately 190 miles from Pittsburgh to Deerfield, New Hampshire.
3. The Northern Pass proposed transmission line facility, if permitted and built, would run overhead through the Town of Deerfield for approximately 7.5 miles. In 2016, the Town of Deerfield is celebrating its 250<sup>th</sup> Anniversary.
4. The new transmission line would be built on an existing 150 foot wide right of way held by the Applicant Public Service of New Hampshire, dba Eversource (“PSNH”) and placed on transmission towers two or more times higher than presently exist. The new transmission line structures would be up to 130 feet high.
5. The PSNH right of way that Northern Pass states it intends to use to site its transmission line and to conduct its other activities runs directly through two parcels of Jo Anne Bradbury’s property in Deerfield and crosses Thurston Pond Road.
6. Jo Anne Bradbury’s rights, duties, privileges, immunities and other substantial interests will be affected by this proceeding in numerous ways, including but not limited to, the following:

- a. Significant loss of value of her entire property;
- b. Violation of and expansion of the terms and conditions of the easement held by PSNH beyond that which was originally intended by the parties to the point of the proposed use becoming unreasonable;
- c. Infliction of damage to the forest and designated tree farm on and near Jo Anne Bradbury's property.
- d. Infliction of potential health and safety hazards and fears imposed upon her and other users of her property.
- e. Loss of enjoyment and scenic, historic and cultural value of her property.
- f. Infliction of damage to the wetlands and wildlife on and near Jo Anne Bradbury's property, including without limitation the endangered Blanding's turtles.
- g. Infliction of damage and temporary loss of use and enjoyment of Jo Anne Bradbury's property due to the noise and movement of construction vehicles and equipment;
- h. Infliction of damage and temporary loss of use and enjoyment of Jo Anne Bradbury's property due to the noise and movement of construction vehicles and equipment passing via Thurston Pond Road, including without limitation, damage to a bridge maintained privately by Jo Anne Bradbury and her neighbors.
- i. Loss of esthetic, historic and scenic values of the greater Deerfield local and regional environment that forms the highly valuable scenic, historic and cultural backdrop for her property.

7. Jo Anne Bradbury reserves all rights, powers and privileges in respect of this matter. Nothing in this petition is intended to operate as a waiver of any right, power or privilege of Jo Anne Bradbury. A failure or delay in exercising any right, power or privilege in respect of this matter shall not be presumed to operate as a waiver, and a single or partial exercise of any right, power or privilege shall not be presumed to preclude any subsequent or further exercise, of that right, power or privilege or the exercise of any other right, power or privilege.

8. Allowing this intervention will not impair the orderly and prompt conduct of the proceedings, and would help to serve the interests of justice. Jo Anne Bradbury respectfully requests that the SEC grant her Petition for intervention and granting such other and further relief as it deems appropriate.

Respectfully Submitted,



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Date: February 2, 2016

cc: SEC email distribution list