

TOWN OF BETHLEHEM



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NH Site Evaluation Committee,

Pamela Monroe, Administrator

Docket 2015-06

Response of the Town of Bethlehem, NH Selectboard to the request for Waivers by Northern Pass, LLC.

Northern Pass, LLC in Waiver request Section IV 301.08(c)(2) is requesting A waiver for the requirement of removal of infrastructure in the event of decommissioning. Much of their argument seems to be directed at the transmission lines and does not address the Transition Station proposed on property in Bethlehem. We believe the SEC Rule applies to ALL infrastructure.

Northern Pass asserts two principle reasons for this waiver: 1. That the work to remove underground structures will pose more environmental disturbance/harm than simple abandonment and 2. That transmission lines are "never" decommissioned.

Neither reason offers distinctions between transmission lines and the Transition Station. As to the first reason. It may be reasonable that a secure clean underground tunnel & cable in a remote road less area may pose little harm & cause significant disturbance to remove. But they are requesting a blanket waiver of this requirement which doesn't address the Transition Station which may contain transformers or other equipment containing hazardous compounds. The Station is adjacent to a major highway, removal will not disturb natural or sensitive areas. It is also unfair to the neighborhood and will adversely affect property values if Northern Pass is allowed to abandoned a 75x130x85' ugly rusting industrial structure.

Secondly they claim transmission structures are never decommissioned. We know this to be false. In the past few years National Grid(the prior owner of Comerford Generating Station) decommissioned a large AC/DC conversion structure in Monroe that was no longer needed. The large lines still pass through the Comerford property they just stopped using this very large facility.

If N Pass is so certain this Transition Station will never be decommissioned then they should have no problem with this section of the Regulations.

It is the position of the Selectboard of the Town of Bethlehem, that this Request for Waiver from compliance with regulations for Decommissioning be DENIED.

Samuel Blanchard
SECRETARY
Mark J. [unclear]
SECRETARY