April 7, 2016

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10 Concord, NH 03301-2429


RE: Jo Anne Bradbury’s Responses to the following pleadings:

1) Jo Anne Bradbury Supports the Society for the Protection of New Hampshire Forest’s proposed procedural schedule filed March 21 and April 5, 2016;

2) Jo Anne Bradbury Objects to Joint Applicants’ Request for Partial Waivers under the Newly Adopted SEC Rules & Joins in the Objection of Public Counsel to Said Request.

3) Jo Anne Bradbury Objects to Applicant’s Unassented-To Motion for Protective Order and Confidential Treatment;

Dear Ms. Monroe:

I. Jo Anne Bradbury asks the SEC to adopt the Procedural Schedule proposed by the Society for the Protection of New Hampshire Forests (March 21 & April 5, 2016).

The Project is unprecedented in scope and complexity and the short and long-term impacts on the State of New Hampshire and its citizens deserve a considered, thorough review by the SEC. The Project will affect every facet of the land’s natural state along the 192 mile corridor, including, wetlands, forests, wildlife, vegetation, shorelines and water quality. The historic, aesthetic, and economic implications for the residents, municipalities, and State warrant due consideration.

Understandably the Project has resulted in a significant number of intervenors, including Jo Anne Bradbury, with varied interests. All parties, including these intervenors, are entitled to due process and fairness. The adoption of new SEC rules after the Application was submitted resulted in additional Applicant information being filed. The amount of data, testimony and process to handle the breadth of this proceeding cannot be fairly conducted in 365 days and such a calendar would compromise the public interest and notions of justice and due process. The Proposed Schedule of the Society for the Protection of New Hampshire Forest sets forth a balanced timeline to accomplish the tasks at hand for a group of this size and a Project of this complexity.

II. Jo Anne Bradbury Objects to and Asks the SEC to Deny Joint Applicants' Request for Partial Waivers under the Newly Adopted SEC Rules & Joins in the Objection of Public Counsel to Said Request.
Jo Anne Bradbury owns two parcels of land that will be crossed by the proposed high voltage powerlines with 140 foot towers in Deerfield. The intrusion of this Project on her property and all of the others along the 192 mile corridor warrants full disclosure of the requisite information. Otherwise the full extent of impact cannot be determined.

The newly imposed rules call for identification of additional improvements, property lines, water and historic resources. It is the role of the SEC to decide whether the Project have unreasonable adverse effects -- for the SEC to do its job, the Applicants should provide the information.

The Legislature crafted its mandates to ensure that the information needed to assess the full impact of a project was made available in the Application. Granting the requested waivers would undermine this intent and would not serve the public interest.

Additionally, Jo Anne Bradbury refers to and incorporates by reference the positions set forth in the Objection by Counsel for the Public to Applicants' Request for Partial Waivers Under the Newly Adopted SEC Rules filed March 7, 2016 and OBJECTION OF THE SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS TO APPLICANTS' REQUEST FOR PARTIAL WAIVERS UNDER THE NEWLY ADOPTED SEC RULES filed March 11, 2016.

III. Jo Anne Bradbury Objects to and Asks the SEC to Deny Applicant’s Unassented-To Motion for Protective Order and Confidential Treatment

As part of the process, the SEC must determine whether the Project will interfere with the orderly development of the region and whether it will serve the public interest. To present their testimony, all parties to this action are entitled to evaluate the accuracy and completeness of the Applicants’ assertions and positions. Accordingly Jo Anne Bradbury asks the SEC to deny the Motion for Protective Order and Confidential Treatment.

Respectfully Submitted,

Jo Anne Bradbury

I hereby certify that on this day, April 7, 2016, a copy of the foregoing Response of Jo Anne Bradbury was sent by electronic mail to persons named on the Service List of this docket. Multiple emails required due to size of Service List.