

August 15, 2016

**By E-Mail & U.S. Mail**

Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429  
pamela.monroe@sec.nh.gov

**Re: Docket No. 2015-06 – Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility**

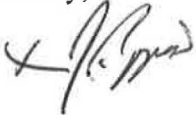
Dear Ms. Monroe:

Enclosed for filing in the above-captioned proceeding is Counsel for the Public's Motion to Compel Further Responses to Expert-Assisted Data Requests and for Other Relief.

Copies of the enclosure have been forwarded via e-mail to all the spokesperson for all parties listed on the attached Distribution List.

Thank you.

Sincerely,



Thomas J. Pappas

TJP/scm - 2495947\_1

Enclosure

cc: Peter C.L. Roth, Esq.  
Elijah J. Emerson, Esq.  
Distribution List via e-mail/U.S. Mail

**STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**No. 20 15-06**

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

**COUNSEL FOR THE PUBLIC’S MOTION TO COMPEL FURTHER RESPONSES TO  
EXPERT-ASSISTED DATA REQUESTS AND FOR OTHER RELIEF**

Counsel for the Public, by his attorneys, the Office of the Attorney General and Primmer Piper Eggleston & Cramer PC, moves (a) pursuant to Site 202.12(k) for an Order compelling a further response to data requests, (b) for an Order requiring the filing of an Amended Application, and (c) moves pursuant to RSA 162-H:7 for an Order modifying and temporarily extending the schedule. In support Counsel for the Public states as follows.

**A. Background.**

1. On October 19, 2015, Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the “Applicants”), submitted a Joint Application for a Certificate of Site and Facility (the “Application”) to the New Hampshire Site Evaluation Committee (the “Committee” or “SEC”) to construct a 192-mile transmission line to run through New Hampshire from the Canadian border in Pittsburg to Deerfield (the “Project”). On November 2, 2015, the Chairman of the Committee appointed a Subcommittee (the “Subcommittee”) to consider the Application. The Subcommittee accepted the Application on December 18, 2015.

2. The Project includes two sections where the transmission line is proposed to be buried: (a) approximately eight (8) miles in Coos County along Route 145 and local roads in Clarksville and Stewartstown; and (b) approximately 52 miles in Grafton County along Route 302, Route 18, Route 116, Route 112 and Route 3, including passing through the center of

Franconia, Sugar Hill, Easton, Woodstock and Plymouth. The underground transmission line will pass, often in close proximity to numerous homes, barns, historic burial grounds, rivers and streams, ponds and wetlands, mature stands of trees, and important scenic areas such as Kinsman Notch and the Beaver Pond scenic picnic area and Appalachian Trail crossing.

3. By Order dated June 15, 2016, the SEC granted, in part, Counsel for the Public's motion to suspend the timeframe, and ordered that the Subcommittee shall issue a Final Order and Decision denying or granting the Application by September 30, 2017.

4. By Order dated June 23, 2016, the SEC established a Procedural Schedule for this proceeding which, among other things, provided that (a) Counsel for the Public and Intervenors shall file pre-filed testimony on or before November 15, 2016, and (b) Technical Sessions with Counsel for the Public's and Intervenors' witnesses shall be conducted between January 16, 2017 and February 15, 2017.

5. On June 28, 2016, Counsel for the Public served upon the Applicants a set of Expert-Assisted Data Requests, which included data requests on the proposed underground proportions of the route. Other parties also have served upon the Applicants data requests addressing the proposed underground portions of the route.

6. On August 5, 2015, the Applicants responded to Counsel for the Public's Expert-Assisted Data Requests.

7. The Applicants' response to Counsel for the Public's Expert-Assisted Data Requests indicated that for the underground portion of the proposed transmission line the Applicants have not determined and thus have not identified the exact alignment of the proposed transmission line. Consequently, the Application is not complete and will not be complete until the Applicants identify the exact alignment of the 60 miles of the underground portion of the transmission line.

**B. Motion to Compel.**

8. Among other things, Counsel for the Public's Expert-Assisted Data Requests sought the following specific information and documents:

- (a) the results of subsurface investigations along the underground portion of the route (Exp. 1 – 29);
- (b) the exact alignment of the underground portion of the route (Exp. 1 – 30);
- (c) the exact location of the 51 segments of the trenchless underground portions of the transmission line that will cross underneath rivers, streams, wetlands, and documents regarding these areas (Exp. 1 – 31 and 1 – 39)
- (d) the foot print and areas of disturbance for each area where trenchless underground drilling will occur ( Exp. 1 – 37);
- (e) the areas and limits of disturbance for the installation of the buried transmission line along the proposed route (Exp. 1 – 51);
- (f) the identity of which side of the road the 60 miles of the underground transmission line, will be placed or if the transmission line will be placed in the roadway itself (Exp. 1 – 52);
- (g) the designation and mapping of underground utilities that exist along the 60 miles of underground transmission line (Exp. 1 – 60);
- (h) the designation and mapping of underground utilities that the Applicants must relocate along the 60 miles of underground transmission line (Exp. 1 – 61);
- (i) the proposed staging areas to locate drilling equipment for the 51 areas of trenchless construction of the underground transmission line (Exp. 1 – 62);

- (j) the proposed elevations of the 51 trenchless crossings for the construction of underground transmission line (Exp. 1 – 63); and
- (k) the size and location of the expected areas where blasting may occur along the 60 miles of underground transmission line (Exp. 1 – 74).

9. In response to these data requests, the Applicants stated that they are conducting geotechnical investigations and utility and ground surveys along the underground route which will help refine the Project's design and determine the transmission line's exact alignment in relation to roads, sidewalks and buildings. The surveys also will determine the locations of existing underground utilities. The Applicants indicated that they expect the data requested by Counsel for the Public for the section of the underground route located in Grafton County to be available by late summer or fall 2016, and that the data for the portion of the underground route located in Coos County will follow. Attached as Exhibit A is a copy of the above data requests and the Applicants' responses.

10. Counsel for the Public appreciates that the size and scope of the Project is unprecedented, and understands that it takes time to conduct tests, analyze results, and determine the exact alignment of the proposed transmission line.

11. Nevertheless, Counsel for the Public (and its experts) as well as the Intervenors and the public at large cannot analyze and assess the proposed transmission line's impact, including its impacts (both permanent and construction related) on (a) homes, commercial buildings, and other structures; (b) town and county emergency services; (c) traffic; (d) local businesses; (e) rivers, streams, and wetlands; and (f) scenic and historical resources, unless and until the Applicants identify (a) the exact location of the underground transmission line (whether on the left side, right side or in the roadway); (b) the existence of underground utilities; (c) the staging areas for the 51 trenchless segments that require underground drilling; (d) the areas of

disturbance; and (e) how the underground transmission line will cross under rivers, streams and wetlands. These considerations are important throughout the 60 miles of the underground transmission line, and they are particularly acute in busy, congested areas such as the center of Franconia, Woodstock and Plymouth, as well as where the proposed transmission line crosses under Route 3 and the Connecticut River in Clarksville and on the single-lane gravel road in Stewartstown. Counsel for the Public also needs additional information on other aspects of construction the proposed transmission line, such as foundation plans and information on rebuilding portions of the Coos Loop.

12. Consequently, Counsel for the Public seeks an Order compelling the Applicants to supplement its response to Counsel for the Public's Expert-Assisted Data Requests.

**C. Amendment to the Application.**

13. Site 301.03(c) requires each application to contain the location of the proposed facility. Site 301.03(g) requires that applications for an electric transmission line shall include the location of the proposed transmission line. For transmission lines that are proposed to be buried along roadways and under rivers and streams, that should logically include whether the transmission line will be off the roadway on the right side or the left side of the roadway or in the roadway itself, as well as the location that the transmission line will cross under rivers, streams and wetlands.

14. Counsel for the Public also seeks an Order requiring Applicants to file an amendment to the Application, including appropriate prefiled testimony, setting forth the exact location of all underground portions of the proposed transmission line, as required under Site 301.03(c) and (g).

**D. Modify the Schedule.**

15. Certain of Counsel for the Public's expert witnesses cannot complete their analysis of the Application until they receive further responses to the data requests and additional pre-filed testimony from the Applicants identifying the exact location of the underground portion of the transmission line. Certain of Counsel for the Public's experts require additional information to complete their work and prepare their own pre-filed testimony.

16. Under the current Procedural Schedule the technical sessions for the Applicants' witnesses are in September 2016, and Counsel for the Public and Intervenors are required to file pre-filed testimony by November 15, 2016. The technical sessions for all of the Applicants' witnesses relating to the above-ground portions of the line can proceed as scheduled.

17. Counsel for the Public and Intervenors also can file pre-filed testimony on numerous topics in accordance with the current Procedural Schedule with respect to the above-ground portions of the line, including (a) Project economics; (b) system stability and reliability; (c) public health and safety; (d) historical resources and cultural; (e) orderly development; (f) local economic benefits; and (g) aesthetics.

18. Without an exact location for the underground transmission line and complete responses to data requests on the underground portion of the transmission line and other construction details, Counsel for the Public cannot effectively conduct technical sessions on all of Applicants' witnesses, and cannot complete their analysis to file pre-filed testimony on these issues.

19. The technical sessions for Applicants' witnesses and the November 15, 2016 deadline by which Counsel for the Public and Intervenors must file pre-filed testimony relating to the underground portions of the line, should be extended until after the Applicants file an amendment to the Application with additional pre-filed testimony and file supplemental

responses to Counsel for the Public's Expert-Assisted Data Requests. Likewise, the deadline by which the Applicants must serve data requests relating to the underground portions of the line on Counsel for the Public's experts should be extended and the deadline for Counsel for the Public's response to these data requests should be extended.

20. Counsel for Public proposes that the current Procedural Order be amended as follows:

- (a) The Applicants are required to file an amendment to the Application, together with corresponding pre-filed testimony, setting forth the exact location of all underground portions of the proposed transmission line;
- (b) The Applicants are required to provide supplemental responses to Counsel for the Public's Expert-Assisted Data Requests Exp. 1 – 28 through Exp. 1 – 74, at the same time that Applicants file an amendment to the Application;
- (c) The Applicants' shall be available for technical sessions relating to the underground portions of the line beginning forty-five (45) days after (a) and (b) above;
- (d) Counsel for the Public shall file pre-filed testimony related to the underground portions of the line within sixty (60) days after technical sessions with the Applicants' witnesses;
- (e) The Applicants shall serve any data requests on Counsel for the Public related to Counsel for the Public's pre-filed testimony relating to underground portions of the line issues within thirty (30) days after Counsel for the Public files pre-filed testimony relating to the underground portions of the line;



- (f) Counsel for the Public shall respond to Applicants' data requests relating to underground portions of the line within thirty (30) days;
- (g) Counsel for the Public's witnesses shall be available for technical sessions relating to underground portions of the line beginning forty-five (45) days after Counsel for the Public responds to data requests; and
- (h) Any Supplemental pre-filed testimony from all parties shall be filed within thirty (30) days of the technical sessions with Counsel for the Public's witnesses relating to underground portions of the line.

21. Under the current Procedural Order, the technical sessions for Counsel for the Public's and Intervenors' witnesses are scheduled for January 16 to February 15, 2017. This motion only affects witnesses relating to the underground portions of the line. If the technical sessions for those witnesses can be held within the existing time frame of January 16, 2017 to February 15, 2017, then no further adjustment of the schedule is required. Otherwise, deadlines in the Procedural Order should be extended as necessary as set forth above.

22. During its site views conducted during winter conditions in March the Subcommittee only toured sections of the transmission line that are proposed to be built aboveground. Before considering the Application, it will be necessary for the Subcommittee to visit the 60 miles of the transmission line that is to be built underground, in order to assess the impacts of the proposed transmission line to these areas of the State. This visit should be conducted in a time of year when these roads are fully accessible by ordinary passenger vehicles.

**The Following Parties Concur in this Motion:**

Municipal Group 1-South	Steven Whitley	<a href="mailto:steven@mitchellmunigroup.com">steven@mitchellmunigroup.com</a>
Municipal Group 2	C. Christine Fillmore	<a href="mailto:cfillmore@townandcitylaw.com">cfillmore@townandcitylaw.com</a>
Municipal Group 3-North	Steven Whitley	<a href="mailto:steven@mitchellmunigroup.com">steven@mitchellmunigroup.com</a>
Grafton County Commissioners	Lara Saffo	<a href="mailto:lsaffo@co.grafton.nh.us">lsaffo@co.grafton.nh.us</a>
Abutting Property Owners (underground portion), Clarksville-Stewartstown	Bradley Thompson	<a href="mailto:bjtdtdt@gmail.com">bjtdtdt@gmail.com</a>
Abutting Property Owners (overhead portion), Dummer, Stark, and Northumberland	Susan Percy	<a href="mailto:Susanenderspercy@gmail.com">Susanenderspercy@gmail.com</a>
Non-Abutting Property Owners (overhead portion), Clarksville and Stewartstown	Alan Robert Baker	<a href="mailto:abobbaker@aol.com">abobbaker@aol.com</a>
Non-Abutting Property Owners (overhead portion), Stark, Lancaster, Whitefield, Dalton, and Bethlehem	Rebecca More	<a href="mailto:rsmore47@gmail.com">rsmore47@gmail.com</a>
Abutting Property Owners (underground portion), Bethlehem to Plymouth	Walter Palmer	<a href="mailto:waltpalmer1@gmail.com">waltpalmer1@gmail.com</a>
Deerfield Abutter Intervenor Group	Jeanne Menard	<a href="mailto:Jeanne@paradeproperties.net">Jeanne@paradeproperties.net</a>
Abutting Property Owners (overhead portion), Ashland, Northfield, Canterbury, Allentown, and Concord	Michelle Kleindienst	<a href="mailto:kleindienstm@gmail.com">kleindienstm@gmail.com</a>
Non-Abutting Property Owners (overhead portion) Ashland to Deerfield	Charlotte Crane	<a href="mailto:ccrane@law.northwestern.edu">ccrane@law.northwestern.edu</a>
Society for the Protection of NH Forests	Amy Manzelli	<a href="mailto:manzelli@nhlandlaw.com">manzelli@nhlandlaw.com</a>
Appalachian Mountain Club, Conservation Law Foundation, Sierra Club Chapter of NH, and Ammonoosuc Conservation Trust	Melissa Birchard	<a href="mailto:mbirchard@clf.org">mbirchard@clf.org</a>
Pemigewasset River Local Advisory Committee	Max Stamp	<a href="mailto:hmstamp@metrocast.net">hmstamp@metrocast.net</a>
NEPGA	Carol Holahan	<a href="mailto:cholahan@nepga.org">cholahan@nepga.org</a>

**The Following Parties Object to this Motion:**

Applicants

The remaining parties have not responded.

WHEREFORE, Counsel for the Public respectfully requests that the SEC:

- A. Order the Applicants to provide supplemental responses to Counsel for the Public's Expert-Assisted Data Requests;
- B. Order the Applicants to amend the Application to identify the exact location of all underground portions of the proposed transmission line;
- C. Establish a deadline by which Counsel for the Public and Intervenor must file pre-filed testimony relating to the underground portions of the line by the equal number of days from August 5, 2016 to the date the Applicants fully supplement their response to Counsel for the Public's Expert-Assisted Data Requests;
- D. Establish a deadline by which Applicants must serve data requests on Counsel for the Public and the deadline by which Counsel for the Public must respond, relating to the underground portions of the line by the equal number of days determined under (C) above;
- E. Extend other portions of the Procedural Schedule as necessary; and
- F. Grant such other and further relief as is just and equitable.

Respectfully submitted,

COUNSEL FOR THE PUBLIC,

By his attorneys,




Dated: August 15, 2016

By: Peter C.L. Roth, Senior Assistant Attorney General  
Environmental Protection Bureau  
33 Capitol Street  
Concord, NH 03301-6397  
(603) 271-3679

PRIMMER PIPER EGGLESTON & CRAMER PC,

Dated: August 15, 2016

By:   
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-and-

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing MOTION TO COMPEL FURTHER RESPONSES TO EXPERT-ASSISTED DATA REQUESTS AND FOR OTHER RELIEF has this day been forwarded via e-mail to persons named on the attached Spokesperson Distribution List of this docket.

Dated: August 15, 2016

By:   
Thomas J. Pappas, Esq. (N.H. Bar No. 4111)

## Exhibit A

**EXP 1-29** Please produce existing reports, documents, drawings or studies that have been done, or are done in the future, that discuss, analyze or relate to any subsurface investigation that identifies underground utilities for the proposed cable route for the underground portion of the Project.

**Response:** The Applicants of the Northern Pass Transmission Project (“Project”) have created preliminary design alignments for the underground route. These can be found in the Project’s SEC Application for a Certificate for Site and Facility: Volume X – Appendix #9 Petition for Aerial Road Crossings, and Underground Installations in State-Maintained Public Highways.

The Project has conducted preliminary geotechnical investigation along the underground route as a part of the underground alignment development. This included borings located one per mile along the southern 52 miles of the underground route in Bethlehem to Bridgewater and a more extensive program in the northern 8 miles in Pittsburg, Clarksville and Stewartstown. These documents are being provided in response to this request.

The Project is currently conducting detailed geotechnical investigations and utility and ground survey which will help refine the overall project design including determining the exact alignment in relation to roads, sidewalks and buildings. Part of this engineering survey will also determine the location of existing underground utilities such as water, sewer, storm, gas, electrical, etc. where applicable. It is expected that this data will be available for the Bethlehem to Bridgewater route by late summer or fall of 2016 and the data for Clarksville and Stewartstown will follow.

Please also refer to the Applicants Response to Municipal Group 1 South Question 9.

**EXP 1-30** Please produce existing reports, documents, drawings or studies that have been done, or are done in the future, that discuss, analyze or relate to drawings or maps showing the routes and subsurface investigative results for the proposed underground portion of the Project.

**Response:** Please see the Applicants' Response to EXP 1-29 above.

**EXP 1-31** Please produce existing reports, documents, drawings or studies that have been done, or are done in the future, that discuss, analyze or relate to trenchless crossings discussed in the Application and supporting pre-filed testimony including limits of disturbance during construction.

**Response:** As is noted in the Applicants' Responses to EXP 1-29 and EXP 1-30, the alignment of the underground route, including the trenchless crossings, is shown in Appendix 9 of the Application. Also, as is noted in the response to EXP 1-30, the alignment is preliminary in nature and the final design will be completed over the next several months.

There are an assumed six horizontal directional drills and two horizontal bores associated with the Route 3 Alignment and Northern Alignment portion of the project and an assumed thirty nine horizontal directional drills and three horizontal bores associated with the Bethlehem to Bridgewater Alignment portion. Overall types of installation, and lengths of installation are preliminary in nature and are dependent upon final design. Please see the summary list of trenchless crossings that has been provided in response to this request.

As is typical for large scale transmission line projects such as this, the Applicants are in the process of determining the final design of each crossing and the type of equipment required for the length of each crossing. This will determine the construction footprint required at each site and where the laydown areas for casing/conduits will be located.



**EXP 1-37** The testimony of Nathan Scott suggests that a trenchless method will require a footprint of 20 feet by 60 feet near entry and exit locations. Trenchless methods include pipe-jacking, microtunneling and horizontal directional drilling (HDD). Please produce existing reports, documents, drawings or studies that have been done, or are done in the future, that discuss, analyze or relate to specifying the expected footprint of HDD work areas and limits of disturbance for the locations where HDD will be used and describe the duration for this limit of disturbance to be utilized for each proposed HDD location.

**Response:** Please refer to the Applicants' Response to EXP 1-31 above. The footprint and type of installation (Jack and Bore, micro tunnel, etc.) for each location will be determined by the selected installer/designer.

As is noted in the Applicants' Response to EXP 1-30 above, the Applicants are in the process of determining the final design of each crossing and the type of equipment required for the length of each crossing. This will determine the construction footprint required at each site and the locations for the laydown areas for casing/conduits.

To clarify the testimony of Nathan Scott, the maximum excavation associated with horizontal bores should be twenty feet wide by twenty feet deep by sixty feet long. Horizontal directional drills may have a larger footprint associated with above grade equipment, but should have a much smaller excavation below grade.

**EXP 1-39** Of the 60.5 miles of planned underground cable for the HVDC project, Applicants have identified 51 segments for trenchless methods. Please provide existing reports, documents, drawings or studies that have been done, or are done in the future, that discuss, analyze or relate to details for each location and a summary of the trenchless method anticipated for each respective location, and produce a copy of all documents that describe, discuss, or analyze these trenchless methods.

**Response:** Please see the Applicants' Response to EXP 1-31 and EXP 1-37 above.

**EXP 1-51** Please provide existing reports, studies, etc., or produce any studies done in the future that discuss, analyze or relate to proposed limits of disturbance along the proposed route.

**Response:** The Project is currently conducting detailed geotechnical investigations and utility and ground survey which will help refine the overall project design including determining the exact alignment in relation to roads, sidewalks and buildings. It is expected that this data will be available by late summer or fall of 2016. The data collected during the geotechnical investigations will be incorporated into the detailed engineering plans. Once the detailed engineering plans are complete, the revised route alignment will detail the proposed limits of disturbance.

**EXP 1-52** Project maps submitted with the Application indicate the route shown is the proposed centerline location of the route. In many areas the route is shown generally in the center of the existing road. Please provide existing reports, studies, etc., or produce any studies done in the future that discuss, analyze or relate to how traffic flow will be maintained in these areas, particularly on roads with less than 24 feet of pavement.

**Response:** In general, the current proposed underground alignments are either on one side of the road or the other to minimize the impact to traffic. It is anticipated that construction activities will be limited to the edge of the ROW, the shoulder of the road or one travel lane. The final route alignment will meet the restrictions imposed by the NH DOT Utility Accommodations Manual and will be coordinated with and approved by the NH DOT during the design process. Please refer to plan drawings and alignments showing proposed trench installation locations within the roadway cross sections contained in Appendix 9 of the Application. Please also see the Applicants' Responses to EXP 1-28, 1-29, 1-31 and 1-32.

Detailed traffic control plans will be created and submitted to NH DOT within the overall traffic management plan and reviewed, revised and approved per the defined NH DOT process. Detailed traffic management and control plans are location specific and will be developed based on construction staging and work area needs determined when construction is imminent. The general traffic control method and process that will be followed is outlined in the Pre-Filed testimony of Lynn Farrington. The described process includes preparation to avoid disruptions to emergency services. Each Town or City will have an opportunity to discuss expected impacts to safety services and mitigation of such impacts during the development of the traffic control plans and traffic management plan. The Project will communicate directly with Hospitals, Fire Departments, Police Departments, schools and universities, and Offices of Emergency Management closer to the commencement of construction.

**EXP 1-60** Please provide existing reports, studies, etc., or produce any studies done in the future that discuss, analyze, or relate to utility designating and mapping for the underground portions of the route that support the proposed alignment, including within the town limits of Pittsburg, Clarksville, Stewartstown, Bethlehem, Sugar Hill, Franconia, Easton, Woodstock, Thornton, Campton, Plymouth and Bridgewater.

**Response:** Please see the Applicants' Response to EXP 1-30 above.

**EXP 1-61** Identify areas along the route where existing underground utility infrastructure exist and is contemplated for relocation to accommodate the proposed Transmission Line, and produce a copy of all existing documents, or documents to be prepared, that describe, discuss, depict or analyze the relocation of said underground utility infrastructure.

**Response:** Please refer to the Applicants' Responses to Grafton County's Data Requests GCC 1-1, 1-5, and 1-12 and Municipal Group 2's Data Request MG2 1-21.

**EXP 1-62** The pre-filed testimony of Jerry Fortier identifies that the depth of jack and bore will be 25 to 30 feet below grade and directional boring sections will be 65 feet below grade at its maximum depth. Please provide existing reports, studies, etc., or produce any studies done in the future that discuss, analyze or relate to size, location and construction staging for each trenchless construction area proposed along the route as they relate to the existing right-of-way and road bed, including the following.

- (a) entrance and receiving pits;
- (b) pipe laydown areas and pullback areas necessary for the pipe;
- (c) location, size and construction staging of transition areas for connecting open trench and trenchless sections;
- (d) location, size and construction staging of splicing pit(s) and operations;
- (e) location and size of underground vaults within the public right-of-way; and whether all proposed concrete encasement materials and manholes/vaults meet or exceed NH Department of Transportation loading limits

**Response:** As an initial matter, the Pre-Filed Testimony of Jerry Fortier has been adopted by Kenneth Bowes, whose Testimony was provided as part of the Applicants' supplemental filing in February of 2016.

(a) – (d): Please see the Applicants' response to EXP 1-31 above regarding trenchless crossings. In general, please also refer to the plan drawings for preliminary design locations of the underground alignment and assumed trenchless crossing locations contained in the Application: Appendix 9 and 10. As previously noted, the alignment is preliminary and will be finalized prior to commencing construction as is typical for transmission line projects of this nature.

(e): The underground design will be finalized over the next several months in accordance with the NH Department of Transportation Utility Accommodation Manual and will include comments received from the DOT during the design review process. The underground installation will be designed to meet HL-93 traffic loading requirements.

**EXP 1-63** Trenchless methods are discussed only generally in terms of what is involved. Each trenchless project site is an elaborate effort requiring detailed analysis. Please provide existing reports, studies, etc., or produce any studies done in the future that discuss, analyze or relate to the detailed evaluations of the trenchless crossings discussed in the Application and supporting prepared testimony.

**Response:** Please see the Applicants' Response to EXP 1-62 above. Detailed evaluations of the trenchless crossing layouts and technology will be performed and detailed plans will be created prior to construction in accordance with the NH Department of Transportation Utility Accommodation Manual and will reflect comments received from the DOT during the design review process.



**EXP 1-74** The Application indicates that blasting may be required for portions of the underground route. Please identify the locations where blasting may occur and:

- (a) Provide information on the size and location of expected blasting areas along the route;
- (b) Provide information on Applicants' coordination with local NH jurisdictions regarding their blasting requirements and work hours for same; and
- (c) Produce a copy of all documents that describe, discuss or analyze blasting for the Project and coordination with local New Hampshire jurisdictions.

**Response:**

(a) The Applicants are currently conducting additional geotechnical investigations and utility and ground surveys to support the design for the underground portion of the project. Part of this engineering survey will also determine the location of existing underground utilities such as water, sewer, storm, gas, electrical, etc. where applicable. During the construction portion of the Project, we will proactively notify abutters of the work, and perform relevant pre and post blast testing. More detailed information regarding blasting is included in the Pre-Filed Testimony of John Kayser (Pages 10 and 11) and in the Application (Pages 68 and 84). Please also see the Applicants' Response to Municipal Group 2's Data Request MG2 1-18 as well as geotechnical reports provided in response to that request.

(b) Any blasting activities will be communicated to the appropriate authorities, municipal leaders and residents. Please refer to the Applicants' Response to subpart (a) and the Applicants' Response to EXP 1-29.

(c) Please refer to the Applicants' Response to subpart (b).

**Northern Pass Transmission LLC and Public Service Company of New Hampshire  
d/b/a Eversource Energy  
Docket No. 2015-06  
Spokesperson Service List  
July 26, 2016**

<b>Intervenors</b>	<b>Spokesperson</b>	<b>e-mail address</b>
Municipal Group 1-North	Steve Ellis	<a href="mailto:sellis46@outlook.com">sellis46@outlook.com</a>
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Municipal Group 2	C. Christine Fillmore	<a href="mailto:cfillmore@townandcitylaw.com">cfillmore@townandcitylaw.com</a>
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Grafton County Commissioners	Lara Saffo	<a href="mailto:lsaffo@co.grafton.nh.us">lsaffo@co.grafton.nh.us</a>
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