

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC 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**

**OBJECTIONS TO DATA REQUESTS OF ABUTTERS AND NON-ABUTTERS’
GROUP I NORTH, OF PITTSBURG, CLARKSVILLE, STEWARTSTOWN**

The Abutters and Non-Abutters’ Group I North, of Pittsburg, Clarksville and Stewartstown, object to the Applicant’s Data Requests pursuant to N.H. Admin. Rules, Site 202.12 (i). The Abutters and Non-Abutters’ Group I North also reserves the right to supplement any of the grounds for its objections.

GENERAL OBJECTION

1. The Abutters and Non-Abutters’ Group I North object to the data requests to the extent that they seek to require requests from those specific individuals who submitted pre-filed testimony. N.H. Admin. Rules, Site 202.12 (b) only allow data requests to be served upon a “party.” It is inappropriate to serve data requests to require a particular individual to produce documents.
2. The referenced Abutters and Non-Abutters object to the “Definitions” and “Instructions” to the extent that they exceed the requirements under N.H. Admin. Rules, Site 202.12.
3. The Referenced Abutters and Non-Abutters object to the data requests to the extent that they seek documents that relate to subject matters that will also be addressed in the pre-filed testimony, due on December 30, 2016. There is a separate deadline for data requests relative to the pre-filed testimony due on December 30, 2016. Any documents requested by the Applicant based on the December 30, 2016 submission will be provided in response to such data request as required by applicable law.

DATA REQUESTS

I. Intervenor Bradley Thompson o/b/o Group Pre-Filed Testimony

1. Please refer to the Group testimony at page 4.

Please provide all documents that support your testimony that “the impacts of the Project will be unreasonably adverse as they relate to aesthetics, historic sites, the natural environment and public health and safety.”

Please provide all documents that support your testimony that “light pollution and the ruining of our night sky would have a definite negative impact.”

2. Please refer to the Group testimony at page 5. Please provide all documents that

support the testimony that landowners along Bear Rock Road are burdened with “conservation easements, stipulating that there will be no underground or overhead transmission lines on the property.”

II. Intervenor Bradley Thompson o/b/o Bear Rock Beverages

1. Please refer to the testimony of Bradley J. Thompson, *Bear Rock Springs*, at page 1.

Please provide all documents that support your testimony that construction of the Project will result in “losing” three wells “due to damage caused by the installation of the proposed buried Norther Pass transmission line and the construction of the transition area where the buried cables will go overhead.”

2. Please refer to the testimony of Bradley J. Thompson, *Bear Rock Springs*, at page 2.

Please provide all documents that support your testimony that the Project will cause “contamination of ground water, resulting from a release of a regulated or unregulated substance to the surrounding groundwater. In some instances, materials such as detonators and explosives are not entirely combusted during blasting, resulting in the release of soluble substances into the groundwater.”

3. Please refer to the testimony of Bradley J. Thompson, *Bear Rock Springs*, at page 2.

Please provide all documents that support your testimony that “agitation of the subsurface may cause an increase in turbidity in groundwater and that blasting may cause a shaking

loose of silt, sand, rock particles, and chemical precipitates that line fracture surfaces in the subsurface, resulting in increased turbidity in water derived from a bedrock well.”

III. Intervener Daryl Thompson

1. Please refer to the testimony of Daryl D. Thompson, *The Bear’s Den*, at page 1. Please provide all documents that support your testimony that the Project would “severely impact [y]our home business.”

IV. Intervenor John P. Petrofsky (Wetlands)

1. Please provide all documents that support your testimony that the Project would likely disrupt or destroy your pipe/aqueduct, and the implication that there would be no remedy or recourse.

2. Please provide all documents that support your testimony that your neighbor’s spring would be severely impacted or destroyed by Northern Pass.

3. Please provide all documents that support your testimony that there are serious flaws in the analysis of wetlands.

4. Please provide all documents that support your testimony that the construction of the Northern Pass underground cable within Bear Rock Road will directly impact Bear Rock Bog.

5. Please provide all documents that support your testimony that the construction of the Project’s underground cable will measurably raise stream temperatures and threaten the native brook trout fishery.

V. Intervenor John P. Petrofsky (Historic Resources)

1. Please refer to the testimony of John Petrofsky (historic) at pages 1 – 3. Please provide all documents that support your testimony that the Project will cause damage to the “historic resources” referenced in your testimony.

2. Please refer to the testimony of John P. Petrofsky, at page 2 – 3. Please provide all documents that support your testimony that the Cohos trail “has become an increasingly important part of the identity and tourist economy of the North Country.”

VI. Jon and Lori Levesque

1. Please refer to the testimony of Jon and Lori Levesque at pages 1 – 2. Please provide all documents that support your testimony that the existence of the Project would affect the market value of your two properties.

VI. Sally Zankowski

1. Please provide all documents relating to the significance and integrity of your historic farmhouse and the methodology used to determine the effects of construction/blasting on the granite foundation.

OBJECTION:

The Abutters' and Non-Abutters' Group I North objects to the extent that the requests are unduly burdensome, overly broad, and the much of the responsive information is already contained in the pre-filed testimony of the intervenors.

Respectfully submitted,

Bradley J. Thompson
Spokesperson
Abutters and Non-Abutters' Group I North
Pittsburg, Clarksville, Stewartstown