

June 26, 2017

Via Electronic Mail & Hand Delivery

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

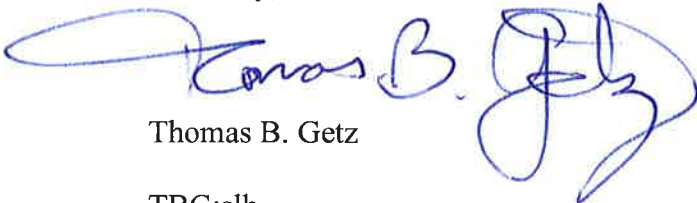
**Re: Site Evaluation Committee Docket No. 2015-06
Joint Application of Northern Pass Transmission LLC and Public Service Company
of New Hampshire d/b/a Eversource Energy (the "Applicants") for a Certificate of
Site and Facility
Objection to Motion to Compel Co-Location Study**

Dear Ms. Monroe:

Enclosed for filing in the above-captioned docket, please find an original and one copy of an
Objection to Motion to Compel Co-Location Study.

Please contact me directly should you have any questions.

Sincerely,



Thomas B. Getz

TBG:slb

cc: SEC Distribution List

Enclosure

**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**

OBJECTION TO MOTION TO COMPEL CO-LOCATION STUDY

Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy (the “Applicants”), by and through their attorneys, McLane Middleton, Professional Association, hereby respond to the motion filed by Kevin Spencer and Mark Lagasse d/b/a Lagaspence Realty, LLC (“Lagaspence”) on June 15, 2017, asking the Site Evaluation Committee (“SEC” or in this case “Subcommittee”) to compel production of a study of potential electrical interactions (“Co-Location Study”) with the Portland Natural Gas Transmission System (“PNGTS”) by a date certain for review by the Subcommittee. As explained below, Lagaspence misapprehends the role of the Co-Location Study and how it will be used by the Applicants to assure public health and safety.

1. As part of its Application filed in this proceeding on October 19, 2015, the Applicants included the pre-filed direct testimony of Derrick Bradstreet, the lead design engineer for the Northern Pass Project. Among other things, Mr. Bradstreet described at p. 8 of his testimony, lines 4 to 14, the design issues associated with building the Project in a transmission corridor that contains an existing gas pipeline.

2. More recently, Mr. Bradstreet pointed out in his April 17, 2017 supplemental testimony that the Applicants had undertaken an assessment of the potential electrical interactions the Project may have with PNGTS. He explained at p. 3, lines 7 to 9, that the Co-

Location Study “will be used to discuss any potential interactions with the pipeline owner.” In addition, he noted: “As is common with a project of this nature, a detailed assessment will be completed during the execution phase where design changes or mitigation requirements will be finalized with the pipeline owner. During this phase, it is not anticipated that the changes or mitigation requirements will affect the Project design.” *Id.* at lines 9 to 12.

3. On May 31, 2017, Attorney Cunningham cross-examined Mr. Bradstreet and Mr. Bowes, Vice President of Transmission Performance for Eversource, on behalf of Lagaspence. He asked them about the electrical interactions between electric transmission lines and natural gas pipelines. Among other things, they explained capacitive coupling, electrostatic coupling and magnetic induction. They also pointed out that the Co-Location Study would be used to work with PNGTS to assure that the Project would not affect the cathodic protection system for the pipeline, which prevents corrosion. See Tr. pp. 22-46 (Day 10, Morning Session)

4. On June 1, 2017, Subcommittee Member Wright questioned Mr. Bradstreet and Mr. Bowes. Mr. Bradstreet noted that the Project had hired Corrpro, a specialist in pipeline corrosion issues, to prepare the Co-Location Study. He further explained that that the Co-Location Study would evaluate the existing PSNH AC line, compare it to the relocated AC line, and evaluate the NPT DC line. Mr. Bradstreet also recounted his experience with other Eversource electric transmission lines located in proximity to pipelines.

5. Lagaspence argues that the Applicants should produce the Co-Location Study “so that it can be presented with sworn testimony of its authors and cross examination in open Committee session if necessary.” The Lagaspence proposal is not necessary for the following reasons.

6. The PNGTS pipeline currently operates alongside PSNH's existing 115 kV electric transmission system and will parallel the new Northern Pass transmission line for a distance of approximately twelve miles. As made clear by Mr. Bradstreet's testimony, the potential interactions between an electric transmission line and a natural gas pipeline are well known and the two can, and do, operate safely together. The purpose of the Co-Location Study is simply to establish the specific parameters that will assure that the Project is constructed and operated safely.

7. It cannot be reasonably maintained that the operation of the Project in parallel with PNGTS will have an unreasonable adverse effect on the public health and safety. The situation is instead more a matter of the Subcommittee exercising its powers and duties under RSA 162-H:4, II and IV. Rather than the Subcommittee reviewing the specific details of the Co-Location Study as part of the adjudicative hearings, the appropriate course is to delegate authority to the Public Utilities Commission ("PUC") to monitor the interaction between NPT and PNGTS concerning co-location and for the PUC to exercise its concurrent authority over pipeline safety.

8. The Applicants expect to submit the Co-Location Study by June 30, 2017, and will work with PNGTS to resolve any potential issues once a Certificate is issued. Inasmuch as Lagaspenca has not established that the Co-Location Study is required for the Subcommittee to make a finding that the Project will not have an unreasonable adverse effect on public health and safety, its motion should be denied.

WHEREFORE, the Applicants respectfully request that the Presiding Officer:

- A. Deny the Motion; and
- B. Grant such further relief as is deemed just and appropriate.

Respectfully submitted,
Northern Pass Transmission LLC and
Public Service Company of New Hampshire d/b/a
Eversource Energy
By Its Attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: June 26, 2017

By: 

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Certificate of Service

I hereby certify that on the 26th of June, 2017, an original and one copy of the foregoing Objection was hand-delivered to the New Hampshire Site Evaluation Committee and an electronic copy was served upon the SEC Distribution List.


Thoma B. Getz