

The State of New Hampshire

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

For a Certificate of Site and Facility to Construct a New Voltage Transmission Line and Related Facilities in New Hampshire

Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC Objection to Applicants' Motion for Clarification and/or Rehearing Order on Motion to Compel Production of Co-Location Study

Status of Case

Applicants propose to co-locate the +/- 320 HVDC kV Northern Pass project and the relocation of the existing 115 kV HVAC line with a 24 inch high pressure gas pipeline¹ owned by Portland Natural Gas Transmission System in a 12 mile stretch of 150 foot right of way in Dummer, Stark and Northumberland.

The co-location poses safety risks to people and is a threat to the structural integrity of the steel pipeline.

The pipeline lies behind the Percy Lodge and Campground owned by interveners Kevin Spencer and Mark Lagasse.

On June 30, 2017, because of these concerns, pursuant to Order of the Chair, Site Evaluation Committee, Applicants produced a document dated June 29, 2017, entitled Burns and McDonnell-Northern Pass HVCD project Preliminary Interference Assessment (Assessment). (App 63351).

Objection to Motion for Clarification

Intervenors Kevin Spencer and Mark Lagasse dba Lagaspence Realty, LLC, object to Applicants' Motion for Clarification and/or Rehearing Order on Motion to Compel Production of Co-Location Study for the reasons set forth herein.

RSA 162-H:16, IV(c) Requires That the Site Evaluation Committee (SEC) Make a Finding Based Upon Evidence Produced by Applicants That the Project Not Have an Unreasonable

¹ Intervenors believe the pipe line operates at 1400 pounds per square in (psi) bringing its operation within the ambit of Puc 506.02.

Adverse Effect on the Public Health and Safety Before Issuance of a Certificate of Site and Facility²

The Assessment is a superficial outline of worker and general public safety issues and threats to the structural integrity of the pipe line posed by co-located high voltage electric lines.

The Assessment does not address **any** of the actual facts in the 12 miles of proposed co-location, including geological characteristics, topography, hydro-geology, crossing implications and pipeline appurtenances.

The Assessment hypothetically identifies the safety and pipeline structural integrity concerns posed by the co-location for different scenarios for alternating current and direct current without any factual examination of the threats identified.

The Assessment does not provide a basis for the SEC to find that the project will not have an unreasonable effect on the public health and safety as required by RSA 162-H:16, IV(c).

The **Assessment expressly states that a more detailed analysis will be required** and is described by its author as a “high-level preliminary assessment”. (Assessment, page 5). The Assessment author’s disclaimer discusses both high voltage alternating current (HVAC) (relocated and upgraded 115 kV line and high voltage direct current (HVDC) (Northern Pass project).

High Voltage Alternating Current

For example, the Assessment, at the page 5 discussion of HVAC steady state and faults expressly disclaims that its authors did not consider the existing HVAC mitigation grounding system. At page 7 of the Assessment, the author explains that while likely that a mitigation system may be in place, appurtenances and mitigation details from the initial pipeline construction should be “reviewed and evaluated during a detailed interference analysis”. And emphasizing, the Assessment author writes: “...Please note that these high-level findings are based on assumed coating quality and soil resistivity values, which play a significant role in determining coating stress voltages. It is strongly recommended that field measurements followed by a detailed AC interference study be conducted to better evaluate the associated risks.”

High Voltage Direct Current

The Assessment discusses both HVDC interference-faults and HVDC interference-steady state. The Assessment at page 8 points out that HVDC faults may transmit thousands of amperes of time fluctuating current. The Assessment notes that the high amplitude fluctuating current can cause significant inductive coupling and may inject significant current into the earth as the fault current flows back to the source vial shield wire and the earth. The Assessment contains the express

² Applicants have the burden of proof on each element of the findings required by the SEC. Site 202.19. Applicants’ Motion for Clarification asks the SEC to waive their burden of proof.

disclaimer that the “high-level findings” must be resolved by “field measurements followed by a detailed HVDC interference study to better evaluate the associated risks”.

The Assessment author, at page 9, in his discussion of HVDC -steady state operation, recommends further investigation and evaluation of HVDC stray current interference from the HVDC transmission line during its symmetrical monopole operation on the pipeline through field measurements and detailed HVDC interference analysis.

The Assessment Identifies What the Co-location Dangers Are and What Investigation Must Be Done without Any Analysis of Those Dangers

The Assessment Cannot Be Used by the SEC to Support the Mandatory RSA 162-H:16, IV(c) Finding That the Project Not Have an Unreasonable Adverse Effect on the Public Health and Safety

The Assessment falls far short of the representations made by Applicants’ witness Bradstreet’s testimony about the scope of the co-location study during questioning by SEC member Craig Wright. (Transcript, day 11, afternoon, pages 188-193). While useful to identify the dangers of co-location and what must be done to properly assess the co-location dangers, the Assessment is ineffective as evidence that would permit the SEC to make the required findings regarding the health and safety of the project.

Wherefore

Interveners respectfully request that the Motion for Clarification be denied.

August 8, 2017

Respectfully submitted,

/s/ Arthur B. Cunningham

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Certificate

I certify that this document was served in accordance with the New Hampshire Site Evaluation Committee Rules.

August 8, 2017

/s/Arthur B. Cunningham

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