

## **SEC Docket 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**

#### **Pre-filed Testimony of Jo Anne Bradbury, Deerfield Abutter**

##### **Background of Jo Anne Bradbury**

My name is Jo Anne Bradbury, and I own property and live in Deerfield, NH. I grew up in the South, but it has been my lifelong dream to live in rural New England. When I was looking for land back in the early 1980s I discovered Deerfield, an enchanting rural town, and decided to settle here. Deerfield is where I want to spend my golden years. I love to roam the hiking trails both on my own land and all around the entire state.

I have worked to create my special place here for over thirty years. By 1992 I had saved enough to build a home, a New England salt box set back off the beaten path. I worked hard at improving my land and home slowly over that thirty years, one step at a time, as resources allowed. I have worked extensively with a local professional forester with the following objectives:

- Manage towards a healthy, resilient, diverse, and structurally complex forest.
- Maintain “deep forest” wildlife habitat that is managed to emulate the local prevalent pattern of light natural disturbance. Manage for wildlife species of concern where appropriate.
- Maintain (and not expand) the current trail system for low-impact, non-motorized recreational uses.
- Preserve the many historic structures on the property, including stone walls, cellar holes, stone wells, stone fords, and the cemetery.
- Establish functional and lasting forest management practices.
- Maintain “no-harvest” reserve areas in sensitive, difficult-access areas.
- Manage the property’s resources in accord with the goals of the Deerfield Open Space Plan, the NH Wildlife Action Plan, and practices in the most recent edition of *Good Forestry in the Granite State* (December 2010, Karen P. Bennett, Editor, published by UNH Cooperative Extension).

The proposed Northern Pass towers and high voltage electric transmission lines (“HVET lines”), if built, will cross over my land. If the Project is approved, I will see and hear these 140 foot monstrosities every day for the rest of my days, unless I accept an enormous loss and sell out. At my age, it is not possible that I would be able to re-create what I have built here in Deerfield. I no longer have the time to do it all again.

As an environmentalist, my dream was to build off grid. So I built my active and passive solar house with timbers harvested from my land. In recent years I upgraded the solar system to plan for climate change, and the value of my home reflects this increased value.

Although I plan to retire here, my home is expected to be a key element in my financial security. Northern Pass will destroy the economic value of my home. The appeal of an off grid home is limited to a particular type of buyer - an environmentally conscious person willing to be disciplined about their living habits. Massive industrial towers and HVET lines will drive off potential buyers and drive down the resale value of my home. This financial devaluation of my home and land, along with other homes and land, will interfere with the orderly development of the Town of Deerfield.

The Applicant has brought in “experts” to tell you that these towers and lines will have no adverse effect on the property values and aesthetics of this beautiful state and this beautiful town. We all know what these towers will look like and what they will sound like because not only have we seen similar structures along the New Jersey turnpike, our common sense also informs us. The towers are massive, the electric lines create an incessant hum that grows even louder in hot, humid weather and the corona effect will create flashing lights. These towers will devastate large portions of the State of New Hampshire. Wetlands will be permanently destroyed by construction equipment. The massive expanded sub-station in Deerfield will severely compromise the value of the homes near it, devaluing more homes in Deerfield.

The Northern Pass Project is against the public interest for both the Town of Deerfield and the State of New Hampshire. (Site 301.16) For all of the reasons set forth herein, every element identified in Site 301.16 will be compromised by the construction of the Northern Pass Project. The Town of Deerfield and many other towns along the 192 route of the Project have voted to reject the Northern Pass Project as currently proposed. The overwhelming public outcry, both through written comments and at the many public hearings, shows clear, convincing and consistent opposition to the construction of this Project.

### **Thurston Pond Road: A Short History of a Small Road**

Deerfield was incorporated in 1766. Thurston Pond Road in Deerfield was laid out in 1772 as the “Deerfield-Allenstown/Pembroke Highway”. At various points, this road has also been known as the “Cross Road”, “The Allenstown Road”, and the “Ridge Road”. Such names convey a busy history, and certainly a well-traveled past.

Cotton Haynes, one of Deerfield’s first settlers and a school teacher in 1766-67, appears to have first settled the property. A crude foundation is located just west of the Bradbury/Greig homestead driveway. Now a small mound with remnant bricks, this may have been the location of the Haynes’ family dwelling.

Thereafter, Haynes cleared portions of the 30-acre “Merrill Lot” across Thurston Pond Road and, in 1776, constructed a sawmill just south of Thurston Pond, which was

converted to a shingle mill and a grist mill in later incarnations. Though the mill building disappeared long ago, foundation stones are still visible along the stream banks near the Hartnett/Stuart residence. Another trace—a grist stone—was discovered by Kate Hartnett adjacent to the mill site.

In 1779, Haynes moved to Rumney, NH, selling 55 acres to Robert Merrill, which began nearly a century and a half tenure for the Merrill family on the land. The Merrill family continued to clear and pasture the land, as present day stonewalls and wire fencing attest, and built a large house in the late 18<sup>th</sup> century on the southeast corner of the 30-acre lot. Stella Merrill, a local teacher, was the last of the Merrills to inhabit the homestead. She sold her interest in the land to Woolette Lumber, retaining a life estate in the house. The house was taken down in the 1920's; the large L-shaped cellar hole and well remain to the present day. There are also some minor foundations and a well on the 12-acre property to the east.

Other settlers in this area include the French, Philbrick and Rollins families. Another large home, which became the Rollins homestead, was constructed farther east on Ridge Road. This home was known to have been well constructed, with a beautiful interior finish, which was sold when the home was torn down.

A Deerfield map of 1857 shows D. Merrill in the Merrill homestead, and S. French in the Rollins homestead. The 1857 map also shows a shingle mill below Thurston Pond. A Deerfield map of 1892 shows both the Merrill home and the Rollins home. A small cemetery on the Bradbury/Greig homestead includes headstones for the Philbrick, Rollins and French families.

### **Impact of Northern Pass on Thurston Pond Road**

For the reasons set forth herein, I urge the SEC to find that the proposed Project will have unreasonable adverse effects in many areas, including aesthetics, historic sites, the natural environment and public health and safety (301.14).

In order to reach the historic Thurston Pond dam, mill site and cemetery via roads that are currently maintained, it is necessary to travel approximately one mile on the gravel Thurston Pond Road, which traverses south off Mt. Delight Road. If constructed, the proposed Northern Pass towers will cross Thurston Pond Road, the 30 acre Merrill Lot and the 12 acre lot just east of the Merrill Lot, both parcels now part of the Bradbury/Greig homestead. Standing on the Thurston Pond dam, the existing towers are barely visible, with the tops ending just slightly above the tree line. The existing towers are less than ½ mile away from Thurston Pond dam, and the many visitors to the dam and mill site are not overwhelmed or troubled by the tiny portion of existing towers peeking just above tree line. Some visitors do not even notice the existing towers when standing on Thurston Pond dam until they are pointed out to them. Doubling the height of the towers, as proposed by the Applicant, will cause irreparable damage to the view from this historic and beautiful site, and the SEC rules require the SEC to consider the effectiveness of the measures proposed by the Applicant to avoid, minimize or mitigate

unreasonable adverse effects on historic sites and archeological resources (Site 301.14(b)). If the Northern Pass towers are built, it will be impossible to salvage the view from the Thurston Pond dam and its surroundings.

In addition to the protections afforded to historic sites, SEC rules require the SEC to determine whether a proposed energy facility will have an unreasonable adverse effect on aesthetics (Site 301.14(a)). In making this determination, the rules require the SEC to consider the existing character of the area of potential visual impact, the significance of affected scenic resources and their distance from the proposed facility, the scope and scale of the change in the landscape visible from affected scenic resources, the extent to which the proposed facility would be a dominant and prominent feature within a natural or cultural landscape of high scenic quality or as viewed from scenic resources of high value or sensitivity, among other things. It is a fact that the Thurston Pond dam, mill site and cemetery are within a natural and cultural landscape of high scenic quality. This beautiful area is a window into the incredible history of the people of the State of New Hampshire. Creative, dedicated and hard working people like Cotton Haynes and the French, Philbrick, Rollins and Merrill families settled this area and spent their entire lives working hard to improve the land and provide for their families. Local residents and visitors alike cherish both the walk in to the dam and the incredible view from the colonial era bridge at the outflow of Thurston Pond. If built, the proposed Northern Pass towers will destroy this experience.

The many visitors to Thurston Pond usually reach the cemetery, dam and mill site by biking, riding horses, walking or driving in from Mt. Delight Road. If the Northern Pass project is approved, traveling this route will require both tourists and local citizens to pass under HVET lines. HVET lines are known to cause hair to stand on end, loud humming and popping sounds and electrical arcing. The vast majority of people avoid being in close proximity to HVET lines. Studies have shown that some migratory animals will not pass under or near HVET lines. The magnetic fields and extremely low frequency fields created by HVET lines may affect implanted medical devices, such as cardiac pacemakers. The local contractor that currently maintains Thurston Pond Road has a pacemaker, and it is doubtful that he would be able to continue this work if the Project is approved. It is generally accepted that additional studies are needed in respect of the effects of living under or near HVET lines. The people of the State of New Hampshire have been extremely clear in expressing their wish not to become unwilling participants in a study of the effects of living under or near HVET lines.

As noted, access to the proposed route in the ROW occurs via Thurston Pond Road. I pay for the maintenance of this gravel road and its small bridge.<sup>1</sup> I purchase stone dust, fill and gravel and hire a contractor to rake and machine the road. I had the bridge and road restored and rebuilt after they suffered storm damage and maintain them for normal wear and tear.

The construction of this project will involve significant traffic with multi-ton vehicles

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<sup>1</sup> The financial burden of the road and bridge maintenance is shared with my neighbor.

over a prolonged time frame. This use will greatly affect access to my home and will also greatly affect the costs associated with the upkeep and maintenance of the bridge and road. Typically two to four persons travel the road daily in sedans. The dramatic rise in trucks and construction vehicles will damage, the gravel road, the bridge and the stone walls adjacent to the ROW, resulting in financial loss.

The Project also poses an unreasonable adverse effect on my safety and the safety of my neighbors. Thurston Pond Road is the access road for 911 services to both 30 and 40 Thurston Pond Road. The construction phase will block this critical access. Furthermore a collapse of the towers and lines would result in prolonged loss of emergency services to our homes, a nightmare scenario.

The grantors of the ROW on Thurston Pond Road transferred to PSNH in the 1950s in no way contemplated a Project of this magnitude, using massive towers and HVET lines to carry power from a foreign country to distant states other than the State of New Hampshire. This Project -- installation of 140 foot towers on a 150 foot right of way -- will overburden the existing easement. My usage, and my heirs' usage, of our homestead will be forever altered, compromised and irreparably harmed. It destroys my vision for the environmentally responsible use of my land and home. This limits and burdens my choice of opening my land and home to new possibilities, whether it is a nature reserve or photography center or spa or yoga retreat ... or even the development of environmentally-friendly condominiums. It is my land! It harms my economic investment in this undertaking. Industrial-sized towers will forever mar this land and overburden the 150 foot easement.

### **High Quality Vernal Pool in the ROW East of Thurston Pond Road**

Construction of the Northern Pass will have an unreasonable adverse effect on the natural environment, including wildlife species, rare plants, rare natural communities and other exemplary natural communities in Deerfield and throughout the State, all issues that must be considered by the SEC in deciding whether to grant approval (Site 301.14(e)).

One of the top three highest quality vernal pools along the entire 192 mile route is located on the Bradbury/Greig property just east of Thurston Pond Road, and its quality is documented in the Normandeau report. It will be directly impacted, and likely destroyed, by Northern Pass construction and ongoing operations and maintenance.

The State Wildlife Action Plan Habitat Stewardship Series on Vernal Pools (the "Wildlife Action Plan") recognizes the unique and critical role of vernal pools as breeding habitat for amphibian species of conservation concern in New Hampshire and the threat posed by human development, such as this proposed Project. The Wildlife Action Plan notes that "development, road-building and re-grading of land can fill and destroy vernal pools, causing immediate loss of habitat and (for some species) permanent loss of populations."

As to Blanding's Turtles, the Wildlife Action Plan emphasizes that they "require large and diverse habitats and must travel long distances to satisfy their habitat needs and find

nesting sites. They use vernal pools as “stepping stones” between larger wetlands, foraging for amphibian eggs and tadpoles. Areas with many vernal pools are critical, especially those in southeastern New Hampshire, to the survival of Blanding’s turtles, and the loss of any vernal pool in these areas is detrimental. Leave undisturbed travel corridors between vernal pools and other wetlands for dispersing turtles.”

According to the Wildlife Action Plan, when conducting any work near vernal pools it is important to avoid creating ruts and skid roads that collect or change the flow of water. Through runoff, these disturbances can influence the timing of wet/dry periods in a vernal pool, altering the species that can breed there. To avoid changing the pool’s ability to hold water, it is important not to run heavy machinery through vernal pool basins (wet or dry). The Wildlife Action Plan also stresses the importance of avoiding clearcuts in or around vernal pools. Removing the shade of the tree canopy can heat up the air, soil and water in the pool, change the period of time that water remains in the pool and influence which species can survive there.

Vernal pools provide critical fish-free habitat for amphibian and reptile breeding. The Applicants have proposed placing mats over the entire vernal pool east of Thurston Pond Road for the purpose of building a crane pad (See DFVP 1). Frogs, turtles, toads, salamanders, red efts and snakes are routinely observed in and near this vernal pool and along the ROW in this area throughout the summer months.

Smooth Green Snakes and Black Racer Snakes are species of “Conservation Concern” in the State of New Hampshire. A Smooth Green Snake was found along Thurston Pond Road in the ROW in June 2016, and Black Racer Snakes have been documented in the vicinity of the ROW in Deerfield.

The world’s amphibian populations have experienced a precipitous drop over the last several decades, and habitat destruction is known to be a major cause of this mass extinction. Placing mats over the vernal pool east of Thurston Pond Road will likely destroy this critical habitat and will result in the loss of many amphibians and reptiles. Disturbing the vernal pool and the surrounding area with mats and heavy equipment will alter the pool’s ability to hold water, thereby destroying its efficacy as important wildlife habitat.

The Applicant asserts that the people of the State of New Hampshire should trust them, and that they will be very careful in constructing and maintaining the Northern Pass towers. However, the Deerfield Conservation Commission, the Lamprey Rivers Advisory Committee and many others have provided compelling documentation of continued degradation and destruction during past and ongoing PSNH/Eversource operations.

Permission to engage in the unprecedented destruction of wetlands and vernal pools, including the vernal pool just east of Thurston Pond Road, should be denied.

### **Blanding’s Turtles**

Blanding's turtles, which are known to hibernate in vernal pools, have been observed in this area of Deerfield. Blanding's turtles are classified as an endangered species and are legally protected in New Hampshire. The following activities are illegal in New Hampshire: possessing, selling, importing, harming, harassing, injuring and killing any Blanding's turtle. The following habitats have been identified for Blanding's turtles: wetland habitats with permanent shallow water and emergent vegetation such as marshes, swamps, bogs, and ponds. Blanding's turtles use vernal pools extensively in spring and while traveling through the landscape. Slow rivers and streams may be used as mechanisms for dispersal between wetlands. They make extensive use of terrestrial habitats for nesting and travel among wetlands.

Nesting sites include disturbed soils, pastures, powerline corridors, roadsides, and yards. Blanding's turtles hibernate in shrub swamps, ponds, and vernal pools. Conservation threats include loss and/or alteration of wetland and terrestrial habitats and fragmentation and loss of nesting habitat.

The New Hampshire Fish and Game Non Game Program has been tracking Blanding's turtles over the past few years, and has documented their presence within "excursion distance" for nesting of the ROW. Nests, hatchlings, and adults all live and travel in and through the ROW.

It will not be possible to avoid harming, harassing, injuring and killing Blanding's turtles if the Northern Pass Project is approved.

### **Other Wildlife Concerns**

Significant swaths of Deerfield are among the 2015 Highest Ranked Wildlife Habitat by Ecological Condition in the 2015 NH Wildlife Action Plan. Despite this, the proposed route of Northern Pass cuts directly through sensitive ecological areas. If the project is approved, it will cause enormous damage to wildlife habitat, resulting in significant loss of wildlife.

Many studies document bird and bat injury and mortality from collisions with power lines. Several bat species are making a comeback from near extinction from White Nose Syndrome. There have been many documented bat sightings in western Deerfield, with a hibernaculum likely in the vicinity. Raising the lines and changing configuration increases the likelihood of more collisions.

### **Other Wetland and Water Issues**

The Applicants have failed to provide an accurate assessment of the potential wetland degradation along the proposed 192 mile route of the Project. Along Thurston Pond Road, wetlands immediately adjacent to the ROW have not been considered. The mapping and conclusions provided by the Applicants are woefully inadequate, failing to

provide in both Deerfield and throughout the state a true picture of the potential damage to wetlands.

Wetlands are the sponges that soak up and store rain water and snow melt, so streams and rivers keep flowing. More activity in the ROW means more damage to any water system in or crossing the corridor. All of NH wildlife species need access to clean water to survive. Wetlands are the filters that help keep water clean.

I am a homeowner with a private well threatened by the blasting and construction required to build the Northern Pass Project. Loss of clean drinking water will further serve to destroy the value of my home, causing financial loss. Under Site 301.14(d) the SEC must consider unreasonable adverse effects on water quality. Construction of this Project will pose unreasonable risk to myself and others in our town who are all on private wells, as there is no public water supply in Deerfield. As we have seen with PFOA contamination in Southern New Hampshire, contamination of private wells leads to significant long term consequences for homeowners and their families.

### **Impact of Northern Pass on the Town of Deerfield**

The **cultural landscape and economic foundation** of Deerfield is its scenic and rural appeal. Without a single stoplight, its winding scenic roads and hilltop overlooks offer tourists and visitors a respite from the urban setting. Deerfield's cultural landscape and tourism, which Applicant's experts failed to examine, reflect its agricultural history and scenic draw. The SEC must consider the impact of Northern Pass on the orderly development of Deerfield and the surrounding region, a predominantly rural landscape. (Site 301.09)

White steeples set against blue skies are the quintessential portrait of New England towns. Two beautiful steeples adorn historic Deerfield center. If the Project is approved, 140 towers and HVET lines will frame our steeples, forever robbing our citizens and tourists alike of the New England experience. Voters stepping out of Deerfield's polling place, the historic Town Hall, will be faced with industrial sized towers. Tourists and New Hampshire citizens enjoying concerts at the Deerfield Gazebo will be unable to ignore the towers.

The Deerfield Fair, celebrating 140 years, is billed as New England's Oldest "Family Fair". This agricultural celebration at the end of September draws roughly 100,000 visitors annually – and, as Applicants' experts noted, it will be in the shadow of the transmission towers, visible from the grounds at every angle. Moreover, visitors coming from the east, west or north will cross under the towers and lines.

This year, in a few short hours, over 500 persons at the Fair signed a Petition opposing this Project. Many long time fairgoers come to this Fair because it is a respite from urban development and is a return to vintage New England – it is the identity of Deerfield and its rural landscape.



But the Fairgrounds are not used for a single four-day period - all year long, the Deerfield Fairgrounds hosts similar events. Like the Fair, these are rural-based celebrations: Bo-Gee Dog Agility Trials; NEAR-Fest; Fireworks Show; NH Horse & Trail Horse Show; NH Sheep & Wool Festival; Granite State Disc Dogs; NH Quarter Horse Association Show; Happy Trails for Forgotten Tails; 5K to benefit Forgotten Tails Animal Rescue; Rockingham Country 4-H Horse Show; Granite State Disc Dogs; NH Arabian Summer Jubilee Show; Poultry Show; Catamount 5K Race; Halloween Trunk and Treat and the Christmas Stroll.

Deerfield also celebrated its 250<sup>th</sup> Anniversary in 2016, using the Fairgrounds for Military Re-enactors' Encampments, Local Artists Exhibits, Photo Exhibit of 19th Century Murals and Wall Stenciling, Craft Vendors, Children's Games, Music, Dancing, Parade and Fireworks.

Deerfield captures its beauty through its art – it is blessed with extraordinary artists. The Deerfield Arts Tour highlights these artists' studios at the peak of foliage season – it is an economic driver for them. Almost one-half of the studios are within a short distance of the proposed Project, but all will be impacted by the view of the towers in the heart of Deerfield since the proposed towers will hover over the main access routes of Routes 43 and 107.

All of the above activities are but a piece of the fabric of life offered to visitors and residents of Deerfield. The rural and rugged beauty invites them outdoors to use hiking trails, parks and streams. Two State parks, Bear Brook and Pawtuckaway, sandwich Deerfield and are significant economic drivers for our area. Northern Pass will be visible from summits and trails alike. Deerfield offers its own beautiful trails and town forests to residents and visitors alike, and many of these (eg, Dowst-Cate, Arthur Chase, Great Brook to name a few), will be impacted by the proposed Northern Pass route. Generations of visitors and residents have enjoyed the natural beauty of this Town and this landscape – for the sake of our children their descendants, preserve the physical and cultural landscapes that serve as the economic foundation of our Town and our State.

### **Public Health and Safety**

As described herein, Northern Pass will have an unreasonable adverse effect on the public health and safety of the Town of Deerfield, and the SEC must consider these effects (Site 301.14(f)).

The Town's emergency response system is designed for a rural residential town, not the industrial vision of Northern Pass. Deerfield is 52 square miles with 80 miles of roads, the largest town in Rockingham County. It has 4300 residents in 1670 households. For emergency response, Deerfield presently has a Volunteer Rescue Squad of 9 (excluding Fire Department); a Volunteer Fire Department of approximately 18 (plus trainees); a paid Police Department of 7 (FT) plus 4 part time officers. These first responders service our territory 24/7/365.

In addition, we have Mutual Aid for emergency services, but the nearest towns are 20 minutes away and the cities are 30 minutes away on rural roads. The nearest hospitals in Concord Manchester and Exeter are 30 minutes from Deerfield. The State Hazardous Materials Response and SWAT teams are 30 minutes away.

Northern Pass will increase the burden on our emergency volunteers who will now respond to car accidents and house fires as well as substation or tower accidents or incidents. Responders must be prepared for these industrial additions to our Town – they need appropriate training for handling two substations (or one massive one), and the additional hazardous exposures it brings. This will increase time commitments when volunteers are already scarce. Moreover, the Project will burden our existing equipment and most likely warrant additional purchases of equipment given the substation expansion.

Northern Pass will also impact response time, especially in the construction phase. If lines or towers block Routes 43 and 107 and/or Church Street, the length of time for first responders to reach outlying houses such as mine will increase significantly. Delayed access is a critical factor for homes, given the geographic size of Deerfield.

This Project poses a significant safety issue in that the HVET lines in Deerfield Center are located just a few short yards from a 20 unit senior housing project (Sherburne Woods, 1 Upham Drive). The impact of electromagnetic fields on implanted medical devices risks injury and/or death to our Town residents housed in close proximity to the lines. Applicants have not offered any solution to this problem.

Deerfield's Hazard Mitigation Committee has evaluated what hazards are likely to happen here and how much damage they will likely cause. First on the list of most damaging hazards: WEATHER! The Town has had ice, heavy snow, rain, flooding, tornados and other wind events -- all in the past 10 years. FEMA data and a recent UNH weather study confirm that the Northeast has experienced a 71% increase in heavy precipitation events, the largest increase in the nation. As water and air temperatures rise in the coming years, these events will increase in frequency and intensity.

Damage to the proposed Northern Pass powerlines and massive towers from severe weather such as ice and high winds would be significant, as seen in Canada in the 90s and in Australia just this summer. Towers toppled and lines buckled and fell to the ground. The impact of collapse would be catastrophic -- our Town would be split in half. Town services would be cut off from residents and residents cut off from shelters. Moreover, the towers will fall on our local powerlines, creating a nightmare scenario of prolonged electrical outages. For an isolated town with no grocery store, one gas station and purely volunteer fire and rescue services, the impacts of collapse would be life-threatening and devastating. SEC rules mandate that the risk of tower collapse be considered (Site 301.14(f)(4)).

Other potential hazards posed by the Project include terrorism and cybersecurity attacks. Federal and State Homeland Security have recognized that energy infrastructure

(powerlines and substations) is susceptible. The remote rural location makes Deerfield vulnerable to these risks.

As a resident and taxpayer who relies on these services to keep myself and my neighbors safe, I urge the SEC to recognize that the Project has an unreasonable adverse effect on the public health and safety of the residents of Deerfield.

In summary, if this project goes forward, the Applicant will create a path of damage and destruction the entire length of this beautiful state from Canada to Deerfield and onward to southern New England. There can be no doubt that property values, aesthetics, health and welfare, wetlands and wildlife all will be irreparably harmed. If the proposed towers go up, it will not be possible to set things right again.

Jo Anne Bradbury reserves the right to file supplemental testimony in accordance with any extensions or modifications of the schedule set by the SEC.

For all of the foregoing reasons, Jo Anne Bradbury urges the SEC to deny the Application for the Northern Pass Project.

Respectfully submitted by Jo Anne Bradbury  
14 November 2016

cc: SEC Distribution list