From: Gretchen Draper [mailto:bgd@metrocast.net]
Sent: Monday, November 21, 2016 12:51 PM
To: Monroe, Pamela
Subject: PRLAC Corrected Pre-filed Testing of Max Stamp

Pamela G. Monroe
Administrator
Site Evaluation Committee
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Dear Ms. Monroe,

PRLAC submits a corrected Pre-filed Direct Testimony for Max Stamp. The original document contained errors/ misprint at the bottom of page 1 (lines 24-27).

Thank you. If you have any further questions, please contact me.

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for PRLAC
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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

PRE-FILED DIRECT TESTIMONY OF MAX STAMP, INTERVENOR
Chair Pemigewasset River Local Advisory Committee

November 15, 2016

Name and address: Max Stamp, 2110 Summer St, Bristol , New Hampshire 03222

Name of Organization: Pemigewasset River Local Advisory Committee (PRLAC)

Current position: Chair of PRLAC

Background: Variety of executive positions in large corporation – 40 year career

Experience relevant to this testimony: Riparian land owner; PRLAC volunteer 17 years; seminars; workshops

Q: Who is PRLAC?

A: The Pemigewasset River Local Advisory Committee's duties include the requirement to consider and comment on any federal, state, or local governmental plan to approve, license, fund or construct facilities that would alter the resource values and character for which the river is designated. The Pemigewasset River was "designated" in 1991. PRLAC's focus is on the implications of proposed development activity on water quality, water quantity, and aesthetic impact on the river. PRLAC asserts that the river and supporting wetlands will be negatively affected by the Project. PRLAC has a substantial interest in ensuring that the river, its tributaries, streams, brooks, and wetlands will not be negatively impacted by the Project. PRLAC is guided by a Management Plan (2013). We serve the towns of Thornton, Campton, Plymouth, Holderness, Ashland, Bridgewater, New Hampton, and Bristol, and have members from these towns. Pemigewasset River headwaters are in Franconia Notch. The river travels ~ 70 miles to its confluence with the Winnipesaukee River in Franklin where it becomes the Merrimack River. The Pemi River watershed is 1000 sq. miles.

Q: Why am I submitting this testimony?

A: PRLAC feels the Northern Pass Transmission Project, as presented, will have unacceptable adverse consequences in the entire Pemi Watershed, particularly wetlands and its feeder streams. Our issues and concerns are based in field experiences over more than a decade. We perceive the greatest threat to the river to be stormwater runoff. The substantial loss of trees and natural vegetated areas within the Right-of-Way (ROW), combined with altered and damaged sloped surfaces compacted by heavy machinery activity will accelerate erosion. These issues will occur despite NPT's intended adherence to Best Management Practices. This leaves us with the following questions:

Q1. Is the added electric power capacity offered by The Northern Pass Transmission Project actually needed in NH?

a. Electrical load forecast for NH is "static" (flat) per NPT expert Robert Andrew, Technical Session 9/6/16.
b. NPT is an "elective" project, which means it is not driven by transmission reliability/stability issues.
c. The ISO-NE load summary for 2019/20 Indicates peak load for New England is projected to be 29,861MW and is covered by "Installed Capacity Requirement" of 35,126MW. Only Southeast New England (MA) is considered electric "capacity constrained". We believe the ICR summary excludes NPT. (see below)
d. After reviews of the above - The most frequently asked question I receive is "why are we (NH) doing this?"

FERC accepted the ICR Values in an Order dated January 8, 2016 (Docket No. ER16-307-000).[9]

Table 1 shows the ICR Values for the 2019/20 CCP. The monthly values for the HQICCs are provided in Table 2.

Table 1: Summary of 2019/20 ICR Values (MW)[10]

	New England	Southeast New England
Peak Load (50/50)	29,861	12,282
Existing Capacity Resources	33,484	11,194
Installed Capacity Requirement	35,126	
NET ICR (ICR Minus 975 MW HQICCs)	34,151	
1-in-5 LOLE Demand Curve capacity value	33,076	
1-in-87 LOLE Demand Curve capacity value	37,053	
Local Sourcing Requirement		10,028

Table 2: Monthly HQICCs for the 2019/20 CCP (MW)

2019/20 CCP Month	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
HQICC Values	975	975	975	975	975	975	975	975	975	975	975	975

[9] The FERC Order accepting the ICR Values for FCA10 is available at: http://www.iso-ne.com/static-assets/documents/2016/01/er16-307-000_1-8-16_order_accept_2019-2020_icr_and_related_values.pdf.

[10] After reflecting a reduction in capacity requirements relating to the 975 MW of HQICCs that are allocated to the Interconnection Rights Holders (IHR), the net amount of capacity to be procured within the Forward Capacity Auction to meet the ICR is the Net ICR value of 34,151 MW.

Q2. Does Industrial hydro power such as Hydro Quebec – all things considered - fully qualify as "green" energy?

a. Hydro Quebec very much needs to be exposed to "environmental full-cost accounting". The project's positive impact on Carbon Emissions has been well publicized. What is not well publicized is offsetting ecosystem damage. 1) miles of healthy forests are now inundated by dam reservoirs and no longer absorbing significant amounts of carbon, 2) damage to aquatic life (particularly salmon fisheries migration) from dramatic up/down changes in river water levels and 3) increased methane associated with decaying underwater forests and soil.

b. NOAA's Atlantic Salmon Priority Action Plan 2016-20 – designed to stabilize/prevent extinction of the distinct Maine Salmon population is at risk. Success is directly linked to enforcement of the Plan's management of salmon stocks in Quebec's rivers. SOURCES: EarthJustice; (ecowatch.com/hydropower-methane-climatechange-2024731803.html) plus others. Are federal/state tax dollars being used in salmon rescue effort?

c. Issues like this are escalating around the planet as large corporations drive controversial energy projects under the guise of clean energy. This is happening over the objection of majority populations.

d. Some say it's too late – the damage is done? That won't be true until threatened fisheries are driven to extinction.

Conclusion – industrial hydro is not clean energy and is not classified as renewable energy by the State of New Hampshire because of the environmental damage created during its production.

Q3. Is the DeWan regional aesthetics study as comprehensive and objective as it purports to be?

a. Towers to be constructed over 132 miles will number ~ 2000, predominately lattice structures. A several mile sample indicates there will be a tower every 320' and ~ 75% of the towers will be over 80' in height -typically double the height of existing ROW towers. The new above ground transmission lines will be positioned alongside the existing much lower structures.

b. The new "high rise" structures will carry two 6" diameter heavy black cables. Picture stringing 2 X 6 lumber between towers for the entire above-ground route.

c. Because of 6" cable "sag" issues – tower "cross-arms" had to be raised 5' closer to the very top of the new higher towers increasing both tower and line visibility. This was deemed not to have any adverse visible affect?

d. At river crossovers and other highly visible areas – adding abutting towers 2 X the height of the existing towers was determined not to have any adverse visual effect?

e. DeWan's view aesthetics system is apparently adapted from other numeric land rating system(s). The concerns expressed is that this is a one-size-fits-all assessment used in areas not really compatible with NH's unique year-around rural landscape and scenic outdoor recreation and tourist attractions.

f. Few if any "intercept" studies were conducted with locals as the assessment team (basically 2 people) moved from area to area, so no unique local "history/color" was noted in this process. Guide books are no substitute.

g. None, repeat none, of the above specific issues were sufficient to be considered an "unreasonable adverse impact" on the view. That opinion prevails over the 132 mile above ground landscape. The average person is baffled by DeWan's conclusions.

h. Changing "rural character" is not a visual impact criteria? A shortcoming of the SEC process is that no actual experience input from regional realtors/developers regarding values – both esoteric and real – were considered.

i. The average person cannot picture the ultimate visual impact with tools provided today. Balloon studies should be conducted to fill the visual gap. It should be possible to work around electric line interference issues.

Q4. How do we realistically assess potential impact Northern Pass Project will have on water quality of rivers and streams, short and long term, over the entire 192 mile route?

a. Scale of project? Probably the most massive earth moving, resource damaging project in NH since I-93 construction.

b. There are 313 perennial streams, 350 intermittent streams, 438 ephemeral streams and two ponds within the proposed project limits, which include the proposed and existing transmission ROW, nine site developments and off-ROW access roads. Major rivers are effected, particularly the Pemi River which the NPT project tracks. (source: Stormwater Pollution Prevention Plan by NPT).

c. It's hard to imagine the heavy equipment fleet (bulldozers, excavators, cranes, concrete trucks, oversize tractor trailers delivering structures over 132 mile above-ground ROW, bucket trucks, tree shears, chippers, and more) that will be churning within the vulnerable ROW and access roads to the ROW. Potential damage is incalculable.

d. Substantial tree cutting is required to widen existing ROW. Tree/vegetation cutting is of very significant concern. To facilitate ecosystem management, PRLAC proposes that "base case aerial photos" be taken today in all ROW wetland areas (including upland attached wetlands). These photos will provide visual evidence of construction damage in need of remedial action post construction. Maps are not a realistic substitute.

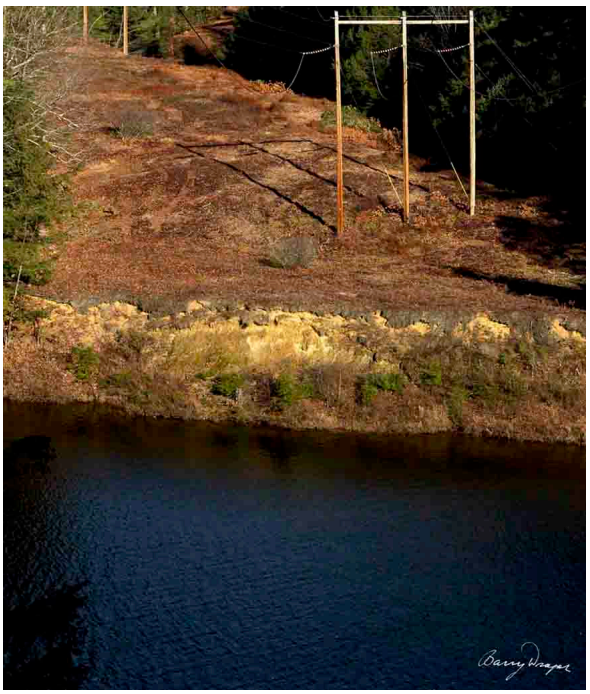
e. Wetlands damage is conceded – some damage is temporary; some will not fully recover and be downgraded.

f. Lattice structures dominate tower installations. Each requires a 40 sq ft level (excavated) area plus drilling 4 footings (~4' diameter) requiring concrete to an appropriate depth

g. The plan calls for temporary construction mats or log riprap to cross streams and invade wetlands. Heavy track vehicles will be prevalent. Protection is promised through the use of BMPs, silt fences, etc.

h. Stormwater runoff management is the name of the game. NPT MUST AGREE THAT ROW STORMWATER RUNOFF POST-CONSTRUCTION WILL NOT EXCEED PRE-CONSTRUCTION RUNOFF EXPERIENCE.

Q5. Aren't these the same ROW environmental safeguards that have been in place at Public Service of NH for a decade or more?



A private riparian landowner would not be allowed to violate river buffer areas as shown above. Why should a utility?

Both the SEC and NHDES should specify that ROW mowing is not allowed within 100' of the river/tributary and that vegetation with the right root structure should be specified. An appropriate height for such vegetation would be 6-8'.

b. PRLAC Motion to Compel question (PRLAC 1-26) "Please provide the guidelines and personnel that will be responsible for annual inspection and assessment of ROW degradation post-construction". NPT Response: "NPT will utilize qualified line workers for the annual visual inspections of transmission lines and associated ROW's as is the case for inspections of all other Eversource lines today." "Qualified arborists will make periodic inspections to assess the vegetation growth and overall condition of the ROW's. Annual aerial inspections of the ROW's and associated transmission lines will be conducted by supervision to review vegetation management, transmissions line integrity and safety issues from encroachments within the ROW".

i. PRLAC requested copies of PSNH Annual Inspection Reports for 2015, 2016. None were provided. Do they exist?
ii. The BMP's emphasized by NPT are **recommendations** - not absolute requirements.
iii. Eversource's stated concerns about conditions in their ROW's obviously is not getting results. (See PIX)
iv. So, will Humpty-Dumpty ever be put back together again post construction? PRLAC is very skeptical.

b. PRLAC does bi-weekly water testing on the Pemi R and some tributaries (9 stations) from April to Sept. We see first-hand notable increases in soil erosion in many river areas. Erosion starts in "violated areas" and doesn't stop unless corrective action is taken. Scars deepen after every significant rain. The sediment moves quickly to moving water. The problem is exacerbated by Climate Change and the way precipitation is delivered now in the northeast. There has been a 76% increase in 2" or more rain events over the last 50 years. We see evidence of this throughout the watershed, particularly in slope situations that have suffered surface damage.

c. It is most doubtful that standard "Best Management Practices" solutions will correct such conditions.

Q6. What are PRLAC's concerns regarding the "independent " environmental monitoring plan before, during, after completion of the NPT Project?

a. It is the applicants plan to have 6-8 construction crews active simultaneously during the project. Given the activity level NPT proposes, sufficient monitoring staffing is critical. Appropriate credentials is equally critical.. We would request that members of this group (a) be selected/endorsed by NHDES and (b) report directly to the NPT Project Leader. This would send an important signal to construction contractors that NPT is serious about its environmental protection commitments.

b. It is also imperative that NHDES hire and put into the field 2 or more properly credentialed people and have them on the ground throughout the project – paid for by NPT. This will be the true independent source of monitoring needed for this project. NHDES is simply not staffed to assume the critical active protection role called for in a project of this scale. This would provide some assurance that resource protection is high on the project list.

Q7. What additional concerns would PRLAC like to keep "open" as future agenda items?

1. All data and complete calculations of NPT's stated $80M annual lower costs to NH customers.

2. All applicant responses to NH DES requests-for information, to be delivered at future dates.

Q8. What were the guidelines used by PRLAC in assembling its testimony?

1. PRLAC was primarily governed by criteria outlined in Site 301.74. Focus was on:

a. AESTHETICS

b. WATER QUALITY

c. NATURAL ENVIRONMENT

PRLAC requests the opportunity to provide testimony to the Applicant's Response to the Department of Environmental Services. PRLAC functions under the authority of NH DES and has legitimate interests in what the Applicant has to say. Pre-filed testimony will be filed on or before December 30, 2016.

Respectfully submitted,
Max Stamp, Chair and Intervenor
Pemigewasset River Local Advisory Committee