

**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**

**PREFILED DIRECT TESTIMONY OF PETER SCOTT ON  
BEHALF OF SABBOW AND CO., INC.**

**(FILED BY CITY OF CONCORD)**

**November 15, 2016**

1    **Background and Qualifications – Peter Scott**

2           **Q.     Please state your name and business address.**

3           A.     My name is Peter Scott. My work address is 77 Regional Drive, Concord, New  
4   Hampshire.

5           **Q.     Please describe your employment?**

6           A.     I am General Counsel of Sabbow and Co., Inc. (“Sabbow”).

7           **Q.     Please describe Sabbow’s business and its use of the property.**

8           A.     Sabbow manufactures precast concrete products at its principal place of business  
9   at 77 Regional Drive, Concord, New Hampshire. We have conducted business at this location  
10  for over 25 years. Sabbow (under the tradename Phoenix Precast Products) manufactures and  
11  sells, among other things, concrete septic tanks, chambers, manholes and specialty box products.  
12  These items service the residential, commercial, and governmental markets in New Hampshire  
13  and adjacent states.

14          **Q.     What is your professional background and experience?**

15          A.     I have been a member of the New Hampshire Bar since 1978, and have been  
16  employed at Sabbow for about ten years. Previous to my work at Sabbow, I worked among  
17  other things as a private attorney in several New Hampshire law firms and as an Assistant  
18  Attorney General with the New Hampshire Office of Attorney General.

19    **Purpose of Testimony**

20          **Q.     What is the purpose of this prefiled direct testimony?**

21          A.     The purpose of my testimony is to discuss the concerns of Sabbow relative to the  
22  temporary and permanent impacts of the proposed Northern Pass Project.

1 **Review of Construction and Project Plans**

2 **Q. Have you reviewed plans of the proposed Northern Pass Project?**

3 A. Yes. I reviewed Sheet 612 of the New Hampshire Wetlands & US Army Corps of  
4 Engineers Section 404/10 Permit Application Plans. I also reviewed Sheet 163 of the Project  
5 Maps (February 2016 Supplement). A copy of those maps is attached as Exhibits A and B.

6 **Q. Did you review those plans with anybody at Sabbow?**

7 A. Yes. I reviewed these plans with Ray Billings, the Facilities Manager at Sabbow,  
8 and Ray Popsie, the Logistics Manager at Sabbow.

9 **Q. In reviewing the plans, did you identify any information relative to the**  
10 **Sabbow property that appeared to be inaccurate?**

11 A. Yes. We compared the cross sections in Sheet 163 to existing conditions on our  
12 property, and they do not match. Moreover, we suspect that there are additional errors in the  
13 plans concerning what will be constructed in the future.

14 The section at the “corner” where the lines turn (S1-09) indicates that the existing 115 kV  
15 pole (that will not be moved) is a single pole. It is not; it has three poles. The plan also suggests  
16 that the other existing 115 kV pole has only two poles. It does not; it also has three poles. All  
17 this suggests that the relocated 115 kV pole (P145-81) will ALSO have THREE poles, rather  
18 than the single pole as shown on the plans. We suspect that a single pole would not be able to  
19 take the forces inherent in the change in direction.

20 The section nearest Regional Drive (S1-10) on the Sabbow property indicates that the  
21 distribution line will be moved 15 feet. The section at the corner (S1-09), however, does NOT  
22 indicate that the distribution structure will be moved at all. Sheet 612 shows the relocated  
23 distribution line, which suggests that the line and structures will be moved, but Sheet 612 does

1 not show the existing line and structures. The relocated line suggests the existing distribution  
2 poles will be removed, but the plans do not say that.

3 Sheet 162 does not show the existing distribution line that runs along the northerly side of  
4 Regional Drive, adjacent to the Sabbow property. This line will limit where 3132-152, P145-80,  
5 and 318-135 may be located. This becomes important when considering impacts.

6 These inaccuracies and possible mistakes in the plans create additional uncertainty for  
7 Sabbow in its planning for the future.

### 8 **Temporary Impacts of Construction**

9 **Q. What concerns does Sabbow have regarding the temporary impacts that will**  
10 **occur to your business during construction.**

11 A. We are concerned about interruptions of our business during construction. Based  
12 on the location of the construction pads and access roads, it will completely interrupt our current  
13 traffic flow and require us to relocate a significant amount of product, for which we do not have  
14 enough space.

15 We deliver concrete products by tractor trailer combinations, occasionally using a second  
16 tag-along trailer. Delivery loads can be 99,000 pounds. The trucks are loaded by forklift  
17 generally, and are difficult to maneuver in the yard once loaded. The current setup allows us to  
18 drive in a circular route, so the trucks do not ever need to backup. The plans indicate that our  
19 current paths will be complete cut off during construction.

20 In addition, the plans would require us to remove a significant number of large concrete  
21 pieces that are stored on the site. Space is already at a premium, so further relocation may not be  
22 feasible and would cause extra expense.

1 Finally, the plans suggest that the construction zones will utilize a significant portion of  
2 our parking area. During the summer months when production and sales are at their peak,  
3 parking is already tight.

4 **Permanent Impacts of Proposed Northern Pass Project**

5 **Q. What concerns does Sabbow have regarding the permanent impacts of the**  
6 **proposed Northern Pass Project?**

7 A. Poles Along Regional Drive. The construction of pole 3132-52 will necessitate  
8 the permanent relocation of a large amount of product. It appears that the two relocated poles,  
9 P145-80 and 318-135, could permanently take a significant portion of our parking.

10 Poles at the Corner. In reviewing the plans, we measured the distances, and the existing  
11 guy wires, and it was clear that the guy wires for EACH pole at the corner would reach the  
12 nearest pole in the adjacent line, all the way across from the relocated distribution line to the  
13 fence. In other words, 318-134 will be relocated to a position within our current pathway. The  
14 guy wires from 318-134 will reach the nearest portion of P145-81, the guy wires from P145-81  
15 will reach the nearest portion of 3132-151, and the guy wires from 3132-151 will reach the  
16 nearest portion of the existing 115 kV structure, and the guy wires from that existing structure  
17 reach nearly to our fence on Industrial Park Drive.

18 This means that one of the paths from northerly portion of our property to the southern  
19 portion will be completely removed and the other will be relocated and restricted. This will  
20 result in the complete removal of the circular path which our trucks use. Moreover, given the  
21 inaccuracies in the plans, it may well be that our property will be cut in half, permanently  
22 separating our manufacturing plant from much of our storage, our office, our warehouse, our  
23 maintenance building, and our parking lot.

1           Remaining Pole. When P145-82 is relocated, it will cut off two access paths currently  
2   used. This will require the rebuilding of those roadbeds.

3           Finally, there is a long stretch between the newly created 3132-151 (at the corner) and the  
4   next structure to the northwest (not on Sabbow property). The plans show that both of the  
5   existing lines have an intermediate structure between the corner the poles to the northwest. We  
6   are concerned that lines may sag and interfere with normal operations.

7           We believe that the addition of a fourth transmission line of such magnitude creates a  
8   burden on the easement that was not anticipated at the time of the original creation, and in any  
9   case, presents such a burden on our property as to constitute a taking in its own right. We will be  
10   looking for a remedy for this taking.

11          Finally, we note that the entity creating the additional burden is not identical to the entity  
12   owning the easement.

13          **Q.     Does this end your testimony?**

14          A.     Yes.

# EXHIBIT A

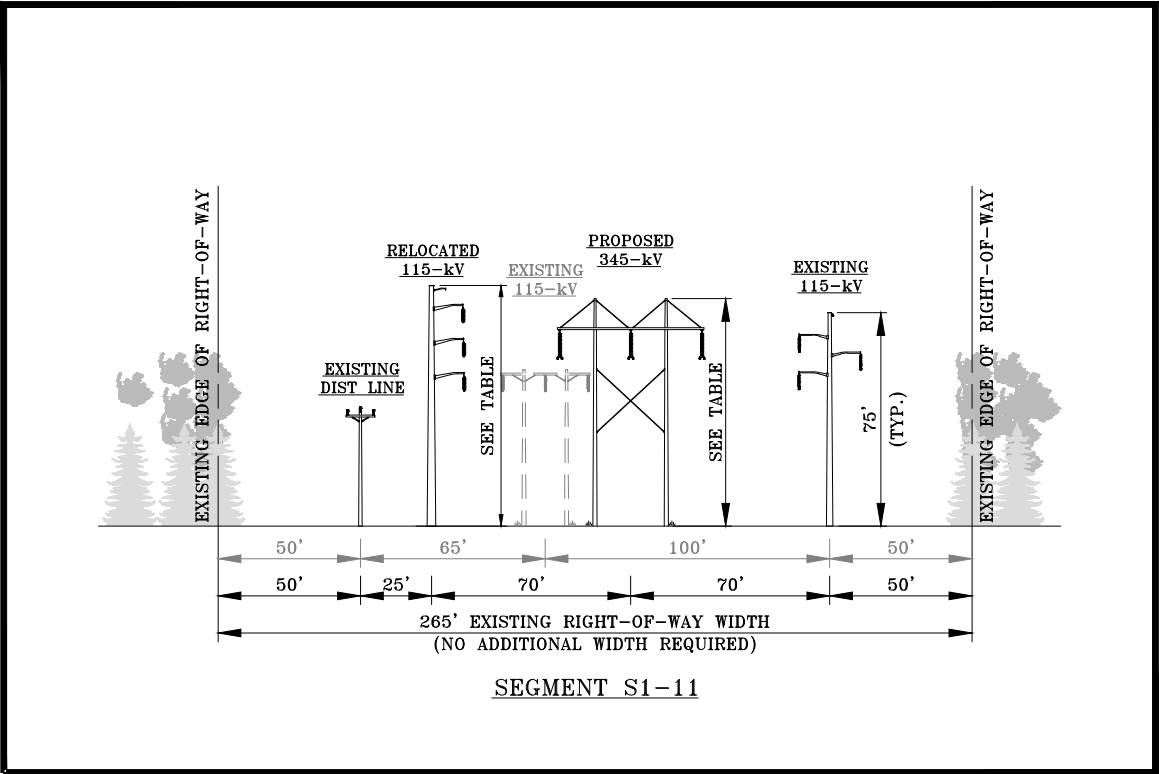
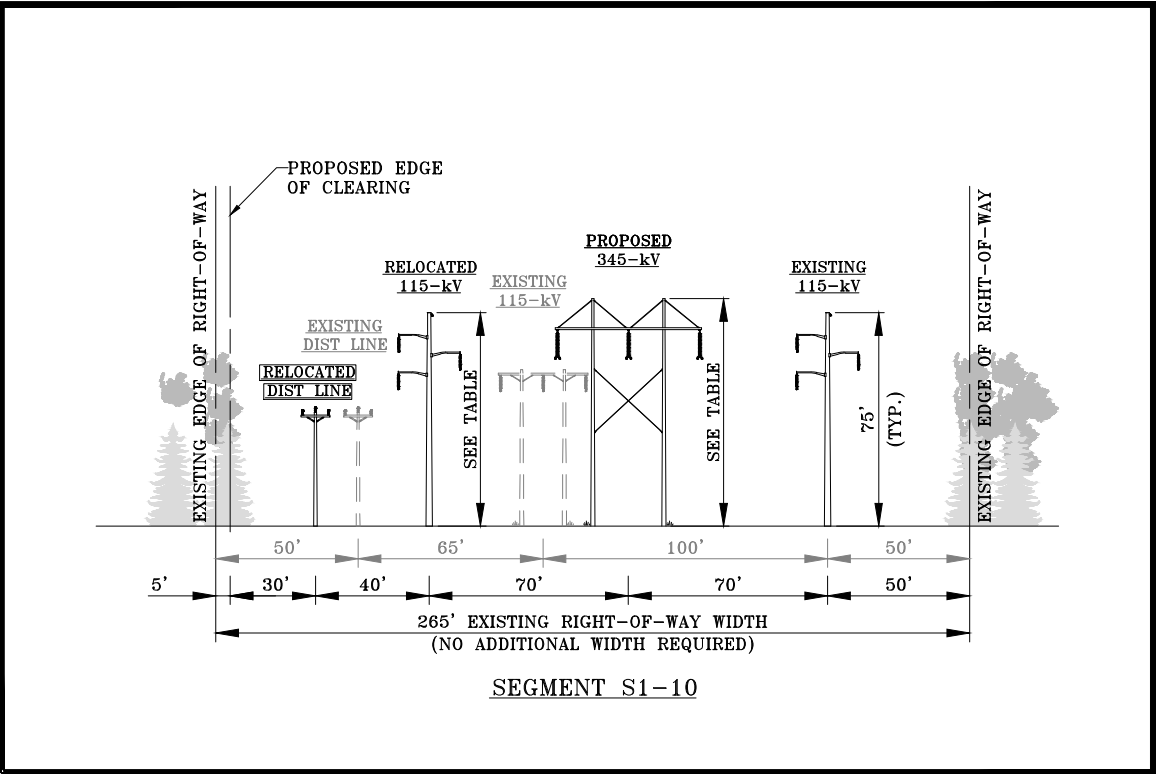
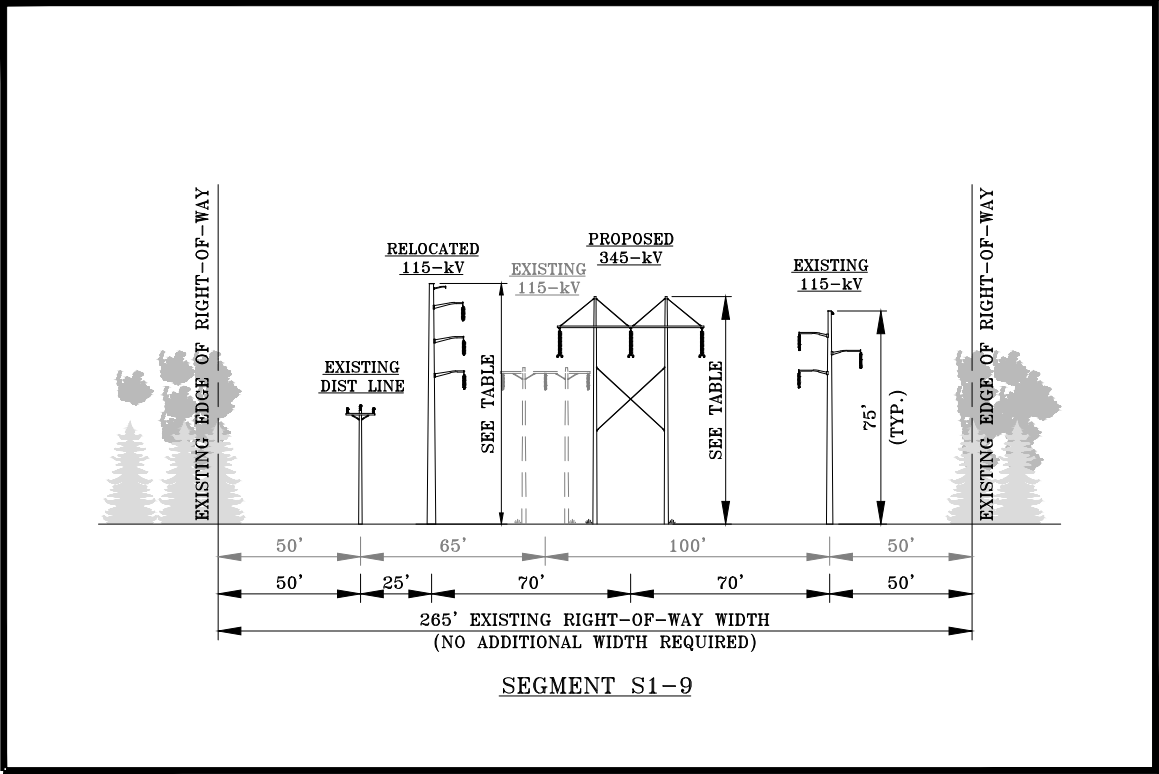
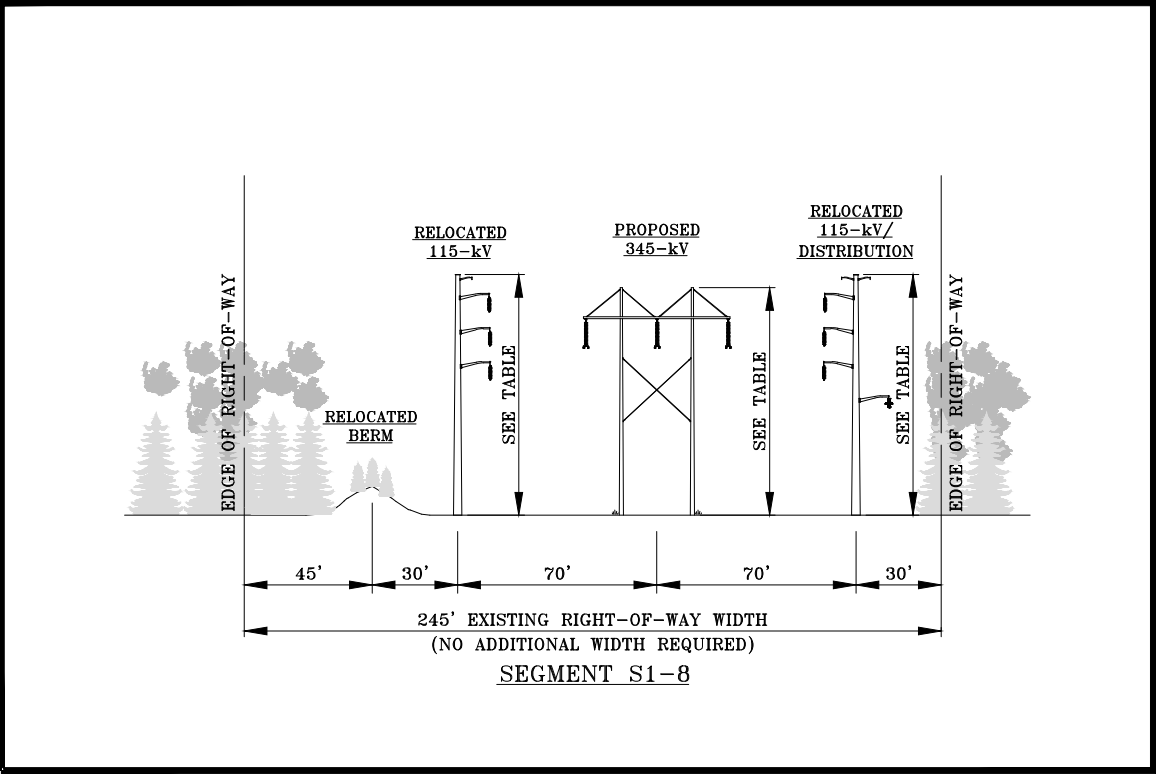






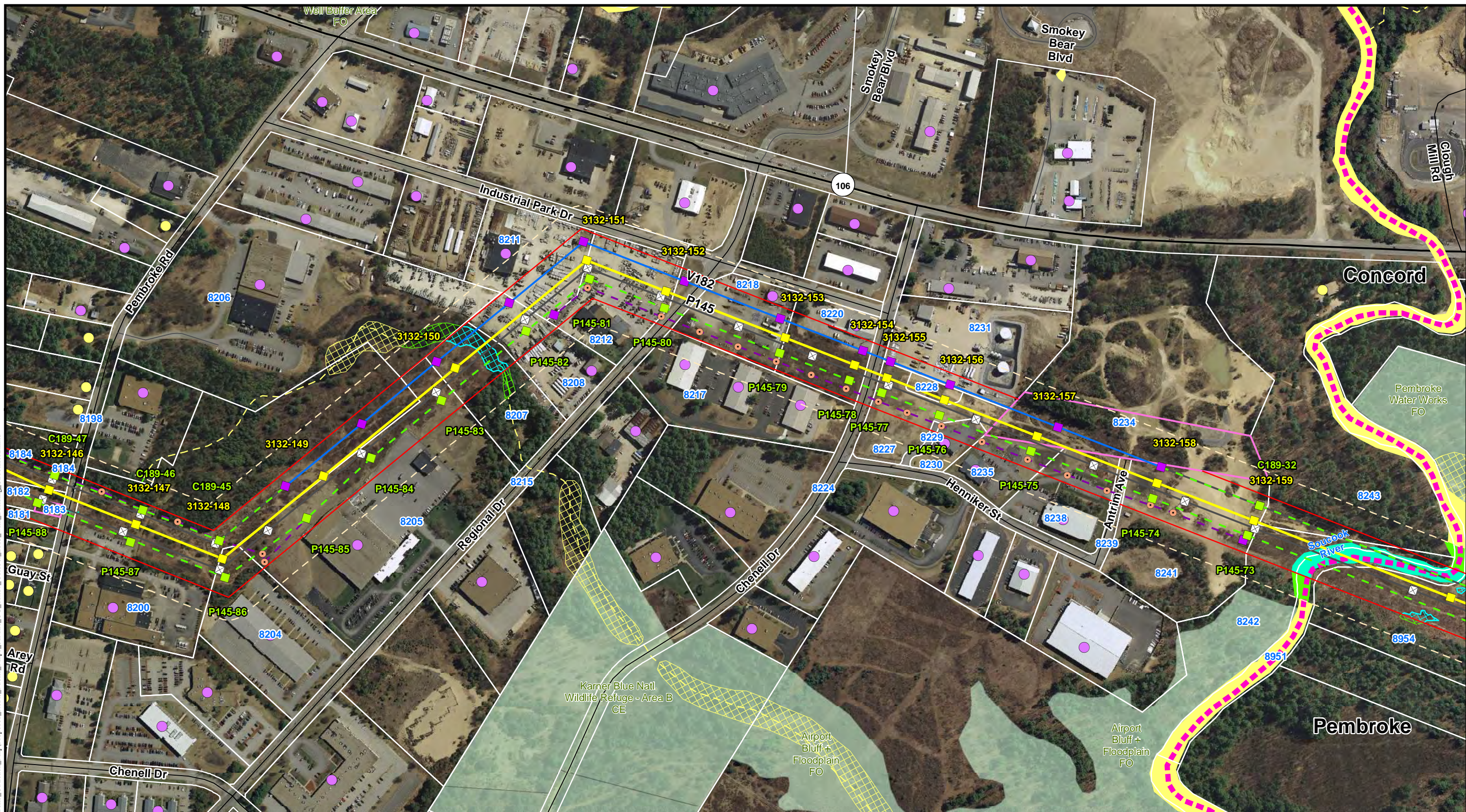
# EXHIBIT B

Structure Number	Structure Height	Cross Section
3132-146	85	S1-8
3132-147	85	S1-8
3132-148	90	S1-9
3132-149	95	S1-9
3132-150	95	S1-9
3132-151	100	S1-9
3132-152	110	S1-10
3132-153	100	S1-10
3132-154	85	S1-10
3132-155	85	S1-10
3132-156	95	S1-10
3132-157	90	S1-10
3132-158	80	S1-10
3132-159	75	S1-11
C189-32	75	S1-11
C189-45	100	S1-8
C189-46	105	S1-8
C189-47	110	S1-8
P145-73	90	S1-11
P145-74	100	S1-10
P145-75	97	S1-10
P145-76	92.5	S1-10
P145-77	92.5	S1-10
P145-78	92.5	S1-10
P145-79	92.5	S1-10
P145-80	97	S1-10
P145-81	95	S1-9
P145-82	88	S1-9
P145-83	92.5	S1-9
P145-84	92.5	S1-9
P145-85	97	S1-9
P145-86	100	S1-8
P145-87	101.5	S1-8





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0 150 300 Feet

<ul style="list-style-type: none"><li>HVDC Line</li><li>HVDC UG - Trenched</li><li>HVDC UG - Trenchless</li><li>345-kV Line</li><li>Existing 345-kV Line</li><li>Existing 115-kV Line</li><li>Existing Distribution Line</li><li>Relocated 115-kV Line</li><li>Relocated 345-kV Line</li></ul>	<ul style="list-style-type: none"><li>Relocated Distribution Line</li><li>ROW Boundary</li><li>Edge of Corridor</li><li>Existing Structure</li><li>Existing Structure - Removed</li><li>Proposed HVDC Structure</li><li>Proposed 345-kV Structure</li><li>Relocated Structure</li><li>Distribution Pole</li></ul>	<ul style="list-style-type: none"><li>Replacement Structures</li><li>Town Boundary</li><li>Property Owner Identification</li><li>Eversource Owned Parcels</li><li>Residential Building</li><li>Commercial Building</li><li>Other Building</li><li>Field Delineated Wetlands</li><li>Photo-Estimated Wetlands</li></ul>	<ul style="list-style-type: none"><li>Approximate Wetlands</li><li>Field Delineated Waterbody</li><li>Photo-Estimated Waterbody</li><li>Approximate Waterbody</li><li>Field Delineated Stream</li><li>Photo-Estimated Stream</li><li>Approximate Stream</li><li>Extent of Estimated Features</li></ul>	<ul style="list-style-type: none"><li>Conservation Easement, State/Federal Parks and Public Lands</li></ul>
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The Northern Pass  
Transmission Line Project  
Proposed Route  
Concord, Pembroke  
Project Maps  
February 2016 Supplement  
**PRELIMINARY ENGINEERING**