Orr&Reno

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Admitted in NH and MA

May 8, 2018

Via Hand Delivery and Email
Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
c/o New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301-2429

Re: Petition for Declaratory Ruling regarding Upgrade to Seabrook Transmission Substation

Dear Ms. Monroe:

Enclosed, on behalf of New Hampshire Transmission, LLC ("NHT"), are an original and 10 copies of a Petition for Declaratory Ruling and Affidavit regarding an upgrade to the Seabrook Transmission Substation. These are being filed in accordance with Admin. Rule Site 203.01. As noted in the Petition, NHT is requesting that this matter be expedited as much as possible in order to allow for the initiation of construction this summer. NHT is also requesting that this Petition be heard by a three member subcommittee, as authorized by RSA 162-H:4-a, III and Admin. Rule Site 103.03(d). Copies are being provided electronically to you and to the New Hampshire Attorney General's Office.

We have enclosed with this letter and Petition a check in the amount of $3,000 to cover the filing fee as provided in RSA 162-H:8-a, II(d)(2).

If you have any questions, please do not hesitate to contact me. Thank you for your assistance.

Sincerely,

Douglas L. Patch

DLP/eac
Enclosure
cc (via email): Pam Monroe; Christopher Aslin

2098075_1

STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

Docket No. 2018-

RE: PETITION FOR DECLARATORY RULING OF NEW HAMPSHIRE TRANSMISSION, LLC REGARDING TRANSMISSION SUBSTATION UPGRADE

PETITION FOR DECLARATORY RULING

NOW COMES New Hampshire Transmission, LLC ("NHT"), the owner of the transmission substation in Seabrook, New Hampshire ("Seabrook Substation"), by and through its undersigned attorneys, and pursuant to N.H. Admin. Rule Site 203.01, respectfully requests that the New Hampshire Site Evaluation Committee (the "Committee" or "SEC") issue a declaratory ruling on an expedited basis that NHT's proposed upgrade to portions of the Seabrook Substation does not constitute a sizeable addition or change to an existing facility within the meaning of RSA 162-H:5, I. NHT also hereby respectfully requests that this Petition be heard by a three member subcommittee as authorized by RSA 162-H:4-a, III and N.H. Admin. Rule Site 103.03(d).

In support of this pleading, NHT states as follows:

I. Background

A. The Facility

NHT's 345kV Seabrook Substation in Seabrook, New Hampshire is an electric transmission substation which interconnects the 1,318 MW Seabrook Nuclear Generating Station ("Seabrook Generator"), the largest single generating resource in New England, to the New

England electric grid. The Seabrook Substation is also a Pool-Transmission Facility under the Tariff of the Independent System Operator for New England ("ISO-NE"), a part of the New England Bulk Power System, and one of the more critical transmission substations in New England. The Seabrook Substation is an integral part of the North-South Interface and the Northern New England – Scobie plus Line 394 Interface. The Seabrook Substation serves to connect three major 345kV transmission lines: the Seabrook to Ward Hill 394 Line; the Seabrook to Scobie 363 Line; and the Seabrook to Timber Swamp/Newington 369 Line.

B. The Petitioner

NHT is a public utility in the State of New Hampshire for the limited purpose of owning and operating the Seabrook Substation. In 2004 the New Hampshire Public Utilities Commission granted Florida Power and Light Company ("FPL") the authority to operate as a public utility in connection with the Seabrook Substation. *New Hampshire Public Utilities Commission Order No. 24,321*, 89 NH PUC 267 (2004). In 2010 FPL transferred its ownership share in the Seabrook Substation to NHT. *New Hampshire Public Utilities Commission Order No. 25,105,* 95 NH PUC 235 (2010). NHT is an 88.2% owner of the transmission substation. The balance of the Seabrook Substation is owned by Massachusetts Municipal Wholesale Electric Company, Taunton Municipal Lighting Plant, and Hudson Light & Power Department. The construction of the transmission substation and the Seabrook Generator was originally certificated by the SEC in January of 1974 pursuant to the provisions of RSA 162-F (which has been superseded by RSA 162-H). *Order No. 11,267 in D-SF6205*, 63-64 NH PUC 127 (1974).

C. The Need for the Upgrade Project

NHT, in conjunction with ISO-NE, in compliance with standards established by the Federal Energy Regulatory Commission ("FERC"), has concluded that it must complete an upgrade to the Switchyard and transmission lines at the Seabrook Substation to ensure its continuing reliability for the New England grid. NHT and ISO-NE believe that certain overall improvements are needed to the Seabrook Substation, including replacement of existing and aging infrastructure and components, to ensure efficient and reliable operation of the power grid. Because the Seabrook Substation is an integral part of the New England power grid and acts as the interconnection to the electric grid for one of the largest base load electric generating plants in New England, its reliability is critical to meeting the needs of electric customers throughout New England, necessitating the performance of certain reliability improvements.

D. Description of the Upgrade Project

The replacement of existing infrastructure and components at Seabrook Substation that are included in this upgrade are: replacement of four circuit breakers with newer, more compact and efficient breakers; replacement of the existing foundations and buses (support structures) for the three transmission lines (this will involve the construction of new concrete footings); replacement of relay protection systems; and enhancements to the Air Termination Yard (like-for-like replacement of post insulators because of aging). See Attachment 1 (map of substation). None of this work will require the construction of any new buildings, nor will it require the purchase of any additional lands. This upgrade will not result in any change in capacity of the transmission lines or the substation, nor will it result in any change to the existing Seabrook Generator or its capacity. All of the project work will be conducted within the existing footprint, with the exception of work to be performed in a seven (7) foot wide, approximately 600 foot

long strip of land in a previously impacted area that was filled in with gravel as part of the original development of the Seabrook Generator. Some new gravel fill will be placed on top of an area that had already received gravel fill when the Seabrook Generator was first developed. See Attachment 2 (pictures of substation). This strip of land will accommodate the moving of the eastern-most transmission lines and associated structures seven (7) feet to the east of its existing location to create additional workspace suitable for the construction of the transmission line improvements, and so that the improvements can be done safely and at separate intervals for each of the three transmission lines. This will minimize the amount of time that any transmission line is out of service so that the upgrade can meet the schedule approved by ISO-NE.[1] The creation of this workspace will require adding some gravel fill on top of an existing upland gravel fill embankment and the construction of a retention wall.

The project will not require any new laydown yards. The delivery of cement by trucking it from off-site will be necessary for the new footings, but it is anticipated that this will only involve 3-4 deliveries a day over the course of 2-3 days. Excavation equipment and the use of a crane will be necessary for the construction of the retaining wall and concrete and steel support structures. None of the work associated with this upgrade will involve any change in the profile or height of the substation.

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[1] The NHT/Seabrook 345kV Substation "line outages" are considered "complex outages", with a Transmission Outage Application and discussions beginning several months early to coordinate the system for the expected work. Long-Term Transmission Outage requests are processed per ISO New England Operating Procedure No. 3 - Transmission Outage Scheduling (OP-3), following a "Preliminary, Submitted, Study, Negotiate and Interim-approved" process for the time frame beginning 12 months and no later than 21 days prior to the start date of the transmission outage. ISO-NE has requested that all line outage requests, when possible, be submitted 12 months in advance. ISO-NE practices also provide that the first received application is prioritized over a later received one, absent an emergent issue impacting reliability.

These enhancements to the Seabrook Substation will improve the reliability of the interconnections with the 345 kV lines, reduce the risk of unexpected outages of the Seabrook Generator, and provide greater ability to perform maintenance or future upgrades as needed without a generator outage or exposing the lines to a single-contingency condition. The estimated cost of the upgrade is $77 million.

E. Timing of Project Work

The timing of the proposed upgrade work is driven by the need to work within the schedule established with ISO-NE and within certain outage windows established by ISO-NE. It is critical to schedule the preparation and pre-outage work in a manner that helps ensure that work can be done during these outages in the most efficient manner. It is also important to note that Seabrook Substation is not allowed to have more than one of the three 345kV lines out of service at any given time so coordination with other New England utilities is required. Under the schedule NHT has worked out with ISO-NE, certain steps will have to commence by certain dates to stay on schedule. Most critically, the retaining wall construction must begin in early August 2018 in order to meet the NHT/ISO-NE schedule. Engineering work and other foundation work, including the removal of a few existing concrete structures that have been abandoned and currently do not serve a useful purpose, must commence in the summer of 2018. This will allow structural/electrical installation to begin by the next scheduled outage window. The remaining work will be performed during designated outage periods over the next few years, so that the cutover from the old configuration and equipment to the new configuration and equipment will occur within the schedule established by ISO-NE. It is anticipated that the project will be completed in 2022.

F. Other Regulatory Permits and Compliance

NHT has reviewed the applicability of environmental, land use and energy-related approval and permitting requirements associated with the proposed upgrade and discussed these requirements with applicable agency personnel. Although the potential impact of the proposed upgrade is minimal as a result of its limited scope, particularly because the construction is for the most part within the existing substation footprint, the upgrade will require a shoreland protection permit and a minor wetland permit from the New Hampshire Department of Environmental Services ("DES"), both of which are being requested on an expedited basis. No alteration of terrain permit is required because the square footage impacted is below the threshold. The retaining wall will be constructed between the eastern-most existing transmission line and a wetland area in order to allow safe and easy access to accomplish the work on the transmission lines and buses, but it will not infringe on the observed high tide line or wetland area and will not disturb any previously undisturbed area and will not require any tree clearing. The applications for both of these permits, which are required because of resource buffer zones, are being submitted simultaneously with this Petition and expedited treatment is being requested. No local building permits or other permits are required, though in accordance with DES rules the Seabrook Conservation Commission and Town Clerk have been consulted. A copy of a letter of support for the project from the Town of Seabrook Conservation Commission is attached to this Petition. See Attachment 3.

As part of the financing of the upgrade NHT will be applying to the New Hampshire Public Utilities Commission for authority to finance the project.

NHT further emphasizes that the proposed upgrade is intended to comport with all federal, state and local standards and best management practices and NHT has every intention of

remaining in full compliance throughout all phases of the project. There are no dredge and fill impacts to the wetland and waterbodies requiring a filing with the United States Army Corps of Engineers; the Corps' only involvement will be in reviewing the minor wetlands permit. Thus, full SEC review of environmental and reliability factors would be duplicative and would be unnecessary to protect the public interest.

II. The Committee's Authority to issue Declaratory Ruling

The Committee's rules allow any person to submit a petition for declaratory ruling. N.H. Admin. Rule Site 203.01. Under the rules, the Committee has 90 days from the time a petition is submitted to rule on the petition. N.H. Admin. Rule Site 203.02(b).

Under RSA 162-H:5, I, a "sizeable addition" to a facility, like the Seabrook Substation, certificated prior to January 1, 1992 (under the provisions of the former site evaluation law, RSA 162-F, which was repealed in 1991) must also obtain a certificate pursuant to the current law, RSA 162-H, not the law that was in effect when the facility was originally certificated. RSA 162-H:5, II.

Because neither RSA 162-H, nor the Committee's rules, N.H. Admin. Rules Site Chapters 100, 200 and 300, provide any further definition of what constitutes "sizeable" changes or additions, NHT hereby requests a declaratory ruling that the proposed upgrade to the existing Seabrook Substation facilities does not constitute a "sizeable addition or change". See RSA 541-A:1, V ["'declaratory ruling' means an agency ruling as to the specific applicability of any statutory provision or of any rule or order of the agency."]. See also RSA 541-A:16, I(d) [requiring each agency to "[a]dopt rules relating to the filing of petitions for declaratory rulings and their prompt disposition."]

III. Prior Decisions of the Committee on What Constitutes a Sizeable Addition to an Existing Facility

The Committee has approved other similar requests for a determination that a particular addition is not sizeable within the meaning of this statute. In 2008, the Committee issued an order determining that a reliability upgrade at the Seabrook Substation did not constitute a sizeable addition. SEC Docket No. 2008-05, Motion of Florida Power & Light Company for a Declaratory Ruling Regarding the Proposed Reliability Upgrade of the Seabrook Transmission Substation, *Order Granting Motion For Declaratory Ruling Regarding Seabrook Transmission Substation Reliability Upgrade* (December 17, 2008). In that case the improvements involved relocating the reserve auxiliary transformers and the generator step-up transformer connections, installing five new gas insulated substation breakers, and erecting a new substation structure with a higher roofline than the existing structure.

In 2014, the Committee determined that the replacement of a 0.9 mile section of an 8-inch diameter disbanded pipe, realignment of a portion of the replacement pipeline by co-locating it with an existing 30-inch pipeline, and adjusting the pipeline crossing of the Squamscott River by way of horizontal drilling under the riverbed to parallel an existing natural gas pipeline that rested on the bottom of the river, did not constitute a sizeable addition or change to an existing facility. SEC Docket No. 2014-01, Motion of Granite State Gas Transmission Company for Declaratory Ruling on Squamscott Replacement Project, *Order Granting Motion For Declaratory Ruling* (August 20, 2014). In that Order the Committee enumerated five factors that it considers "in determining whether a change or addition to an existing facility is sizeable: (i) the existing size of the energy facility and the size of the proposed change; (ii) whether the proposed change will require the acquisition of new land; (iii) whether the proposed change will create a change in the capacity of the existing facility; (iv) whether the proposed change is

merely a replacement of existing components of the facility as opposed to an expansion or increase in size of those components; and (v) whether the proposed addition or change to a facility will cause disruption in the existing environment." Order at 9-10.

In a 2009 order, the Committee determined that the installation of a $457 million scrubber including a 445 foot tall emissions smoke stack at Merrimack Station, a coal-fired power plant, did not constitute a sizeable addition. SEC Docket No. 2009-01, Motion of Campaign for Ratepayers Rights, et. al., for a Declaratory Ruling Regarding Modifications to Merrimack Station Electric Generating Facility, *Order Denying Motion For Declaratory Ruling* (August 10, 2009).

IV. Analysis

Based on the precedent established through the cases discussed above, as well as the proposed Seabrook Substation upgrade's limited scope, the Committee should determine that the proposed upgrade will not be a sizeable addition or change to an existing facility requiring full review under RSA 162-H.

When the criteria listed in the Granite State Gas Transmission case noted above are applied to the Seabrook Substation upgrade proposed in this case, it is clear that the proposed upgrade does not constitute a sizeable addition or change to an existing facility. Here is how each of the five criteria enumerated in the Granite State Gas Transmission order apply to the proposed Seabrook Substation upgrade:

(i) The proposed upgrade does not increase the size of the existing transmission substation. The only change in the footprint that will result from the upgrade is to move one transmission line and the associated structures seven (7) feet to the east. Because this upgrade will not

increase the height of any existing structures and will not add any new structures, this upgrade will not in any way change the profile of the substation that is visible from any vantage point;

(ii) The proposed upgrade does not require the purchase of any new land, it will be done on the existing land available to the substation;

(iii) The proposed upgrade does not result in any change in the transmission capacity of the transmission substation, which will remain exactly the same as it is before the upgrade, nor does the upgrade result in any change whatsoever to the Seabrook Generator or its capacity;

(iv) The proposed upgrade is merely a replacement of existing components of the transmission substation, those components being breakers, transmission bus structures and foundations, post insulators and relay protection systems, and enhancements to the existing Air Termination Yard. This upgrade will not add new components to the substation; and

(v) The proposed upgrade will not cause disruption to the existing environment. The construction of the retaining wall will be done in an area that has already been filled with soil, thus avoiding the need for an alteration of terrain permit, and this wall will not in any way infringe upon or impact any undisturbed area or marshland and high tide line. All of the other replacements are well within the existing footprint and will not have any impact on the existing environment. The construction itself will be done within previously disturbed areas.

The proposed upgrade meets all five of these criteria. The project is an enhancement and upgrade of an existing substation. The purpose of the project is to enhance the reliability of a substation that is essential for the New England transmission grid and for the interconnection to the Seabrook Generator. The construction involves replacement of equipment and moving of approximately 600 feet of an existing transmission line and associated structures seven (7) feet to the east of where it is currently located. All construction will take place within the substation's

existing footprint, with the exception of the area noted above, and there will be no change to the profile or height of the existing facility. The project will not result in any increase in the voltage or capacity of power being transported through the substation. In addition, the proposed upgrade will not change how the existing land is being used.

One other important thing to note is that given the limited scope of this project, when considering this project in the context of the findings the Committee would be required to make under RSA 162-H:16, IV in the event that there were a full review, it is clear that a full review is unnecessary. This upgrade will not create any adverse impacts on aesthetics, historic sites, air and water quality, the natural environment or public health and safety because it is limited to the replacement of existing components that are already in place. The upgrade will not in any way interfere with the orderly development of the region; the Town of Seabrook has been consulted and the Conservation Commission supports the project as noted above. NHPUC oversight of NHT as a public utility that owns and operates the substation and its review of the financing ensures that NHT has adequate financial, managerial and technical capability. Finally, because this project, through the replacement of existing transmission components, will help to ensure a safe, reliable and fully functioning transmission grid in New Hampshire and New England, this project is clearly in the public interest, as is beginning the upgrade as soon as possible and avoiding a lengthy and unnecessary proceeding.

Given these facts as applied to criteria articulated by the SEC in prior decisions, NHT believes that this proposed upgrade is not a sizeable addition or change that the Legislature intended to be subject to a full review by the Committee. NHT submits, based on the precedents discussed above, and the scope of the proposed upgrade, that it would be entirely consistent with prior decisions of the Committee to determine that the proposed upgrade is not a sizeable

addition or change to an existing facility and therefore it does not require an RSA 162-H certificate.

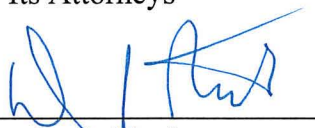
The construction on this upgrade must begin in the summer of 2018 so that crucial cutover work can meet the schedule established with ISO-NE and work within certain outage windows established by ISO-NE.

An affidavit of the President of NHT, Carrie Cullen Hitt, affirming the facts contained in this Petition, is attached as referenced in N.H. Admin. Rule Site 203.01(b)(2). Attachment 4.

V. Conclusion

Wherefore, NHT respectfully requests that a three member subcommittee of the New Hampshire Site Evaluation Committee issue a declaratory ruling, within the 90 days provided for in N.H. Admin. Rule Site 203.02(b), sooner if at all possible, that the proposed upgrade to the transmission substation is not a "sizeable addition[s] or change[s] to an existing facility" within the meaning of RSA 162-H:5, I, and grant such other relief as may be just and reasonable.

Respectfully submitted,
New Hampshire Transmission, LLC
By Its Attorneys



Douglas L. Patch
Orr & Reno, P.A.
45 South Main Street
Concord, N.H. 03302-3550
(603) 223-9161
dpatch@orr-reno.com

Dated: May 8, 2018

Certificate of Service

A copy of this Petition has been sent by email this 8th day of May 2018 to the Site Evaluation Committee and the Office of the Attorney General.

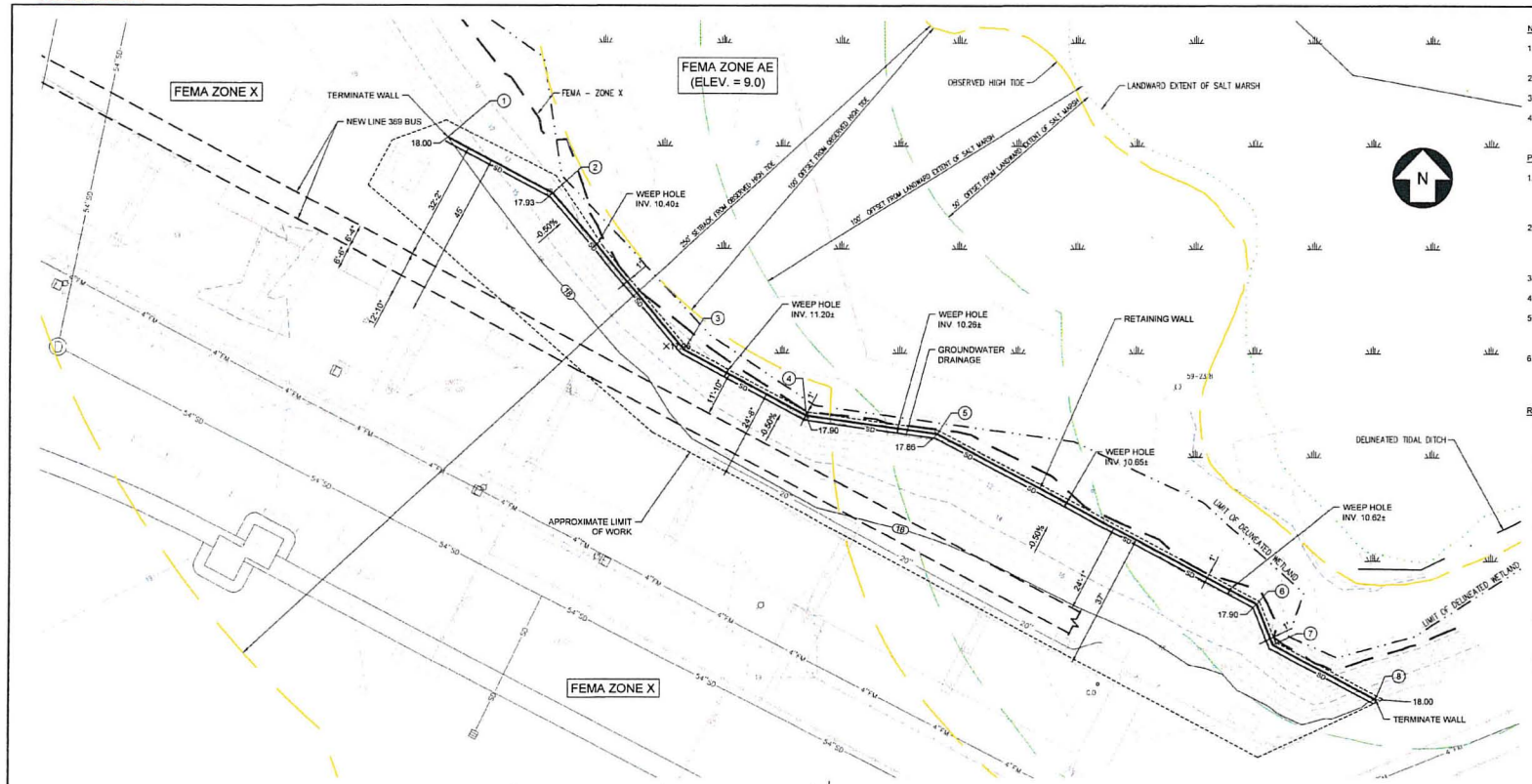
By:_____
Douglas L. Patch

List of Attachments

- Attachment 1: Diagram of Substation
- Attachment 2: Pictures of Substation
- Attachment 3: Seabrook Conservation Commission Letter of Support
- Attachment 4: Affidavit of Carrie Cullen Hitt

2102145_1

Attachment 1



NOTES

1. SURVEY BY CORNERSTONE PROFESSIONAL LAND SURVEYING, INC. BETWEEN FEBRUARY 21, 2018 AND APRIL 12, 2018.
2. WETLAND DELINEATION BY SERGIO BONILLA, CWS #261 ON FEBRUARY 27, 2018.
3. COORDINATE SYSTEM - NAD83 NEW HAMPSHIRE STATE PLANE, US FOOT.
4. VERTICAL DATUM - NGVD 29

PLAN REFERENCES

1. TERMINATION AREA FOUNDATION PLAN AND FOUNDATION DETAILS FOR PUBLIC SERVICE CO. OF NEW HAMPSHIRE SEABROOK STATION BY UNITED ENGINEERS, DRAWING 9763-F-105011 OF UNITS 1 AND 2, REVISED 2-9-79 AND DRAWING 9763-F-105012 OF UNITS 1 AND 2, REVISED 2-9-79.
2. NORTH ACCESS ROAD AREA FOUNDATION PLAN AND FOUNDATION DETAILS FOR PUBLIC SERVICE CO. OF NEW HAMPSHIRE SEABROOK STATION BY UNITED ENGINEERS, DRAWING 9763-F-105008 OF UNITS 1 AND 2, REVISED 4-29-81 AND DRAWING 9763-F-105010 OF UNITS 1 AND 2, REVISED 4-29-81.
3. YARD UNDERGROUND PIPING STORM & SANITARY SYSTEMS, 604051.
4. YARD UNDERGROUND SERVICES & TEMPORARY FACILITIES SHEET 2, 604150.
5. STEEL & FOUNDATION DETAILS ITEM E 345KV DISCONNECT SWITCH STAND SEABROOK TERMINAL YARD. DRAWING R-700-73-3-5 BY UNITED ENGINEERS & CONSTRUCTORS INC. DATED 1-31-79.
6. FLOOD INSURANCE RATE MAP ROCKINGHAM COUNTY, NEW HAMPSHIRE PANEL 0438E, MAP NUMBER 33015C0438E, EFFECTIVE DATE MAY 17, 2005.

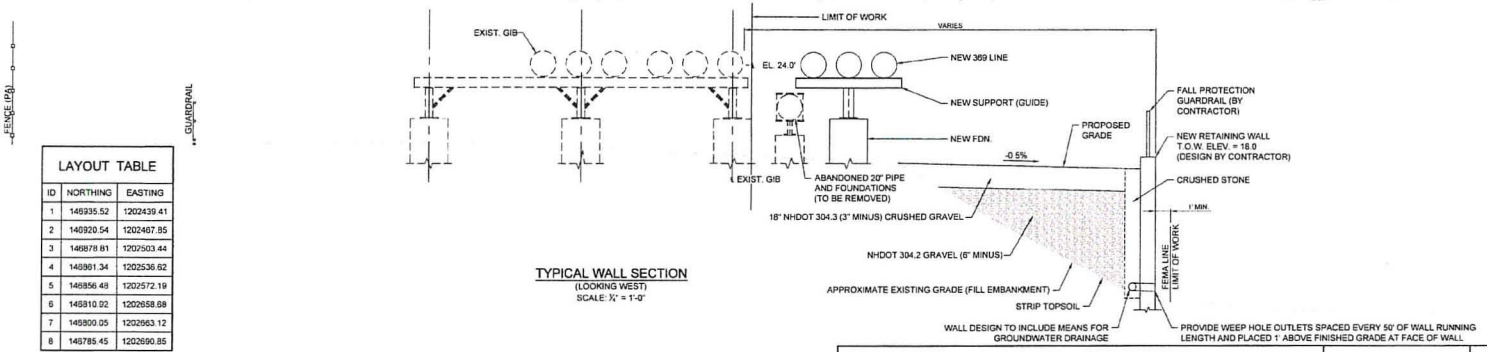
RETAINING WALL NOTES

1. THE CONTRACTOR SHALL PROVIDE THE DESIGN OF THE RETAINING WALL SYSTEM. ALL DESIGN DOCUMENTS SHALL BE SIGNED AND SEALED BY AN ENGINEER LICENSED IN THE STATE OF NEW HAMPSHIRE.
2. THE WALL SHALL BE DESIGNED PER THE NEW HAMPSHIRE STATE BUILDING CODE AND THE PROJECT GEOTECHNICAL REPORT.
3. THE WALL DESIGN SHALL INCORPORATE A GROUNDWATER DRAINAGE SYSTEM AS SHOWN ON THE SITE PLAN AND SECTION VIEW. CONTRACTOR SHALL PROVIDE DETAILS FOR THE DRAINAGE OUTLETS.
4. CONTRACTOR SHALL SUBMIT THE FOLLOWING TO THE OWNER FOR REVIEW AND COMMENT, WITH FINALIZED CALCULATIONS AND DRAWINGS SUBMITTED TO OWNER, PRIOR TO COMMENCEMENT OF WORK, FOR APPROVAL AND INCORPORATION INTO WORK CONTROL PACKAGES:
   a. DESIGN CALCULATIONS
   b. DRAWINGS
   c. CATALOG DATA, AS REQUIRED
5. DESIGN OF THE WALL SYSTEM SHALL INCLUDE THE FOLLOWING LIVE LOADS:
   a. AASHTO H25 TRUCK
   b. CRANE LOAD (SPECIFIED BY OWNER)
6. WORK ON THE WETLAND SIDE OF THE WALL WILL NOT BE PERMITTED.
7. BACKFILL BEHIND THE WALL SHALL BE COMPACTED TO 95% MODIFIED PROCTOR MAXIMUM DRY DENSITY PER THE GEOTECHNICAL REPORT.

LEGEND

- EDGE OF PAVEMENT
- DELINEATED WETLAND BOUNDARY
- DELINEATED WETLAND
- LANDWARD EXTENT OF SALT MARSH
- DELINEATED TIDAL DITCH
- OBSERVED HIGH TIDE
- FEMA ZONE
- CONTOUR
- FENCE (SOCA)
- FENCE (PA)
- FENCE
- ELECTRIC MANHOLE, VAULT
- DRAIN MANHOLE
- CATCH BASIN
- DRAIN LINE
- FORCE MAIN
- POLE - UTILITY, LIGHT
- BUS FOUNDATION
- MISCELLANEOUS FOUNDATION
- VEHICLE OR PEDESTRIAN BARRIER
- GUARDRAIL
- SURVEY CONTROL

ISSUED FOR PERMITTING NOT FOR CONSTRUCTION



TYPICAL WALL SECTION
(LOOKING WEST)
SCALE: ¼" = 1'-0"

LAYOUT TABLE

ID	NORTHING	EASTING
1	146935.52	1202439.41
2	146920.54	1202467.85
3	146878.81	1202503.44
4	146861.34	1202536.62
5	146856.48	1202572.19
6	146810.02	1202658.88
7	146800.05	1202693.12
8	146785.45	1202690.85

ALL RETAINING WALL LAYOUT POINTS TO LOW SIDE WALL FACE

RESOURCE IMPACTS

DISTURBED AREA	SURFACE AREA	VOLUME
FILL WITHIN 100 FEET FROM OBSERVED HIGH TIDE (BUFFER IMPACTS FOR WETLANDS PERMIT)	3,415 SF	503 CY
FILL BETWEEN 100 AND 250 FEET FROM THE OBSERVED HIGH TIDE LINE (SHORELAND) ZONE IMPACTS FOR SHORELAND PERMIT)	2,001 SF	237 CY
TOTAL	5,416 SF	740 CY

WALL LAYOUT REPRESENTS MAXIMUM EXTENT OF DISTURBED AREA

SCALE: ¼" = 1'-0"

REFERENCE ITEMS

REV	DESCRIPTION	DATE	DES	CHK	APP
C	ISSUED FOR PERMITTING	05/01/18	PGT	CHL	CHL
B	ISSUED FOR REVIEW	04/19/18	PGT	CHL	CHL
A	ISSUED FOR DES SITE VISIT	03/22/18	CHL	CHL	CHL

TRC
249 Western Avenue
Augusta, ME 04330

PROJECT NO: 287594

CHRISTOPHER H. LYNG No. 13588 - STATE OF NEW HAMPSHIRE - PROFESSIONAL ENGINEER - LICENSED
5/1/18

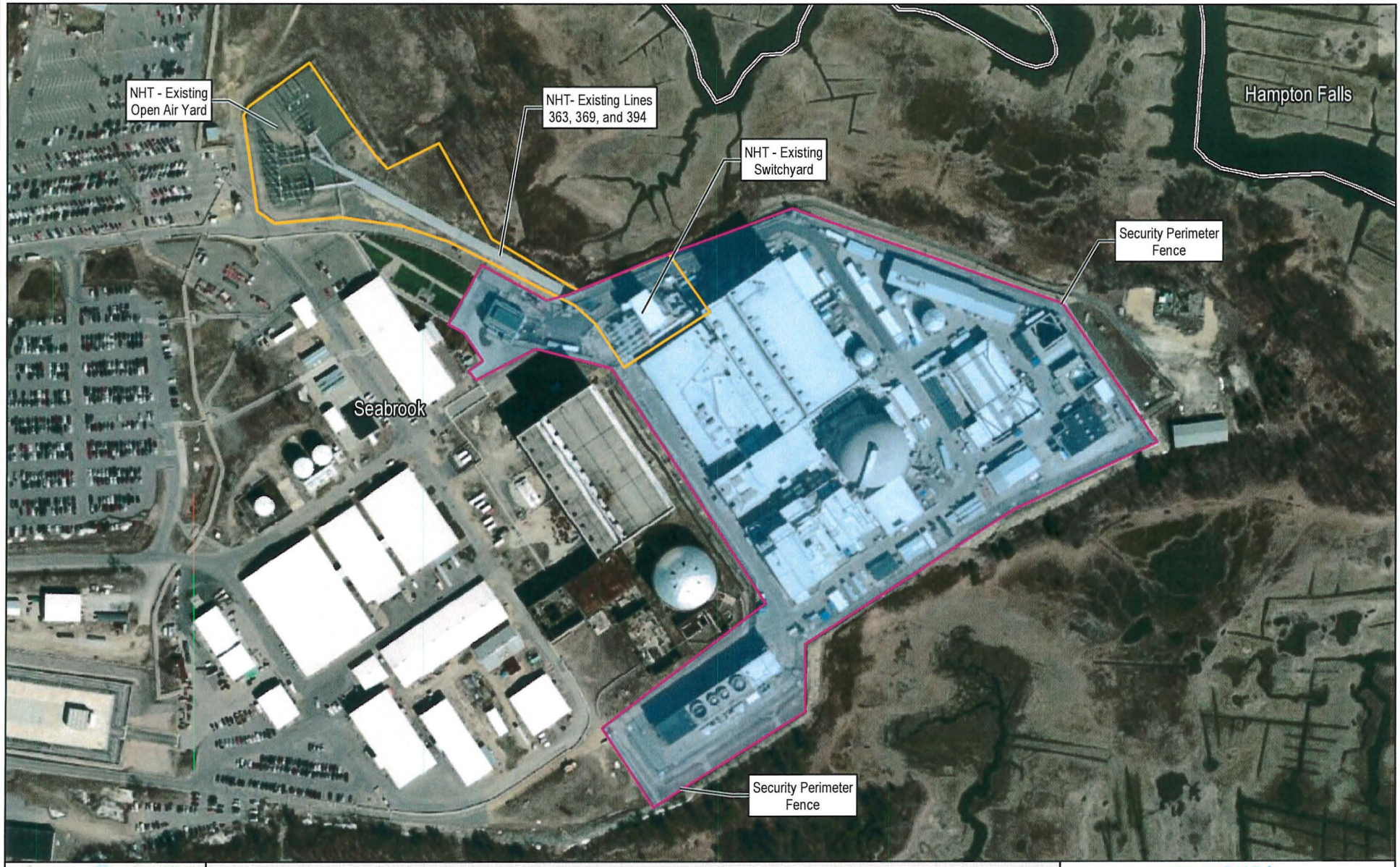
CHL / PGT DESIGNED
DED DRAWN
CHL CHECKED
CHL APPROVED
REVIEW 1
REVIEW 2

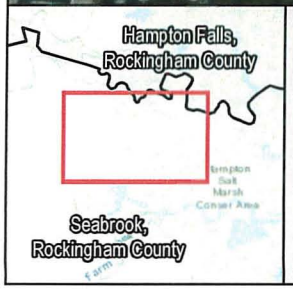
RETAINING WALL
SITE PLAN, SECTION AND NOTES
GSRP HORIZONTAL BUS FOUNDATION REPLACEMENT
NEXTERA SEABROOK STATION
SEABROOK NEW HAMPSHIRE

02/18 DATE
AS NOTED SCALE

TRC 287594-C002 REV. C

Attachment 1





Legend

- Existing Transmission Facilities
- Seabrook Nuclear Energy Generation Facility
- Security Perimeter Fence
- NH Town Boundary

N

0 150 300

Feet

Data Sources: NH Granit, TRC, USGS Base Map Source: Esri, 2018

NEXTera ENERGY RESOURCES

Seabrook Site

Project Area Figure
Seabrook, Rockingham County
New Hampshire

Prepared by TRC Results you can rely on

5/1/2018

S:\1-PROJECTS\NEXTERA\Seabrook\MXD\SEC_Project_Area_8x11P.mxd

Picture of the Substation and Associated Facilities

Photo 1 – Birds-eye view looking north from NHT's existing switchyard along the existing transmission lines 363, 369, and 394. Note the security fence at the bottom of the photograph and the Open Air Terminal located at the top photograph. The three easternmost conductors (Line 369) are planned to be relocated seven feet east.

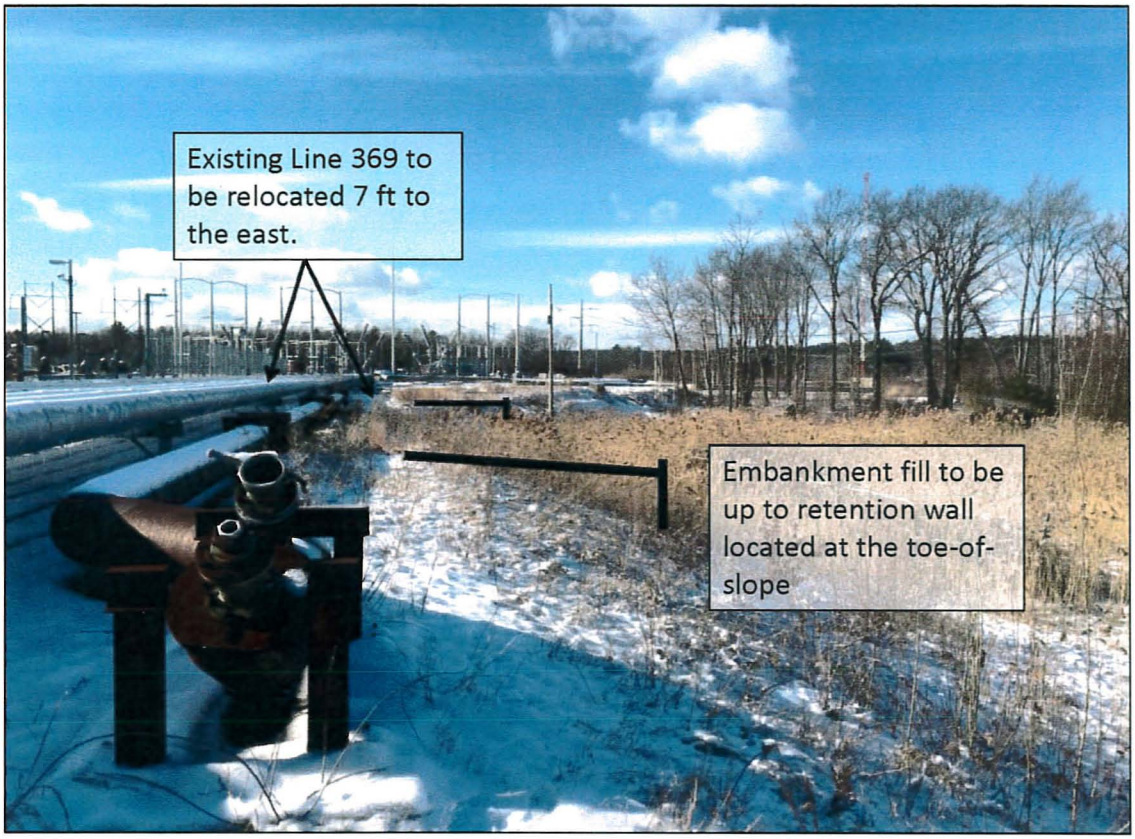
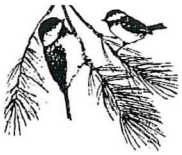
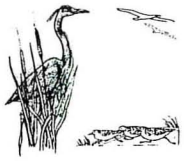


Photo 3 – Looking north along the existing Seabrook transmission lines and the adjacent wetland area. The easternmost line 369 will be relocated seven feet east on the existing filled embankment. A retaining wall is planned to be installed between the new location of line 369 and the wetland area located to the right of the photograph. All work will be limited to upland areas and no direct impacts will occur to the adjacent wetland.



TOWN OF
Seabrook, New Hampshire
Conservation Commission
99 LAFAYETTE RD., P.O. BOX 456 – 03874



April 13, 2018

To Whom it May Concern:

On April 4, 2018 I attended a site walk at Seabrook Station to view the location New Hampshire Transmission will be using for the transmission line upgrade project. The area is previously impacted from the original construction of the Nuclear Power Plant. It is a gravel fill with an unarmored slope of about 9 ft. elevation above the original grade.

During the site walk we discussed the installation of a sheet pile retaining wall with back fill. This will provide sufficient area for the installation of the new transmission lines. Additionally it will be a pro-active action in advance of the potential erosion of the gravel banking during extreme weather events and long term sea level rise.

On April 12, 2018 I received from John Jones of Seabrook Station the written description of the proposed project with the site plan. The site plan concurs with what was discussed during the site walk.

I have discussed this proposed transmission line project with the other members of the Conservation Commission and there is no objection or concerns for the proposed plan of action. One member suggested that the proposed sheet pile wall might be better at deflecting future storm wave spray if the wall had an outward curve attached to the top of the wall.

The Seabrook Conservation Commission is in favor of and supports the proposed replacement of the transmission lines on the previously impacted area. Additionally is in full support of the pro-active installation of the sheet pile wall along the north east gravel berm to prevent future erosion of the gravel banking from the potential extreme weather storms and sea level rise. The existing gravel berm is located within a very short distance from the vulnerable transmission lines leaving the power station.

Very truly yours,

Sue Foote

Susan E. Foote, Chairman
Seabrook Conservation Commission

STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

Docket No. 2018-

RE: PETITION FOR DECLARATORY RULING OF NEW HAMPSHIRE TRANSMISSION, LLC REGARDING TRANSMISSION SUBSTATION UPGRADE

Affidavit of Carrie Cullen Hitt, President of New Hampshire Transmission, LLC

The undersigned hereby states under penalties of perjury as follows:

1. I am the President of New Hampshire Transmission, LLC ("NHT"), a public utility in New Hampshire which owns and operates the transmission substation at Seabrook, New Hampshire ("Seabrook Substation"). A copy of my biography is attached to this Affidavit.

2. As the President of NHT I have overseen the planning for the upgrade to portions of Seabrook Substation that is the subject of the accompanying Petition for Declaratory Ruling. As specified in more detail in the Petition, the Seabrook Substation is an integral part of the transmission grid in New England. NHT and the Independent System Operator for New England believe that the improvements included in this upgrade to the Switchyard and transmission lines at Seabrook Substation, including replacement of existing and aging infrastructure and components, are needed to ensure efficient and reliable operation of the power grid.

3. I have been involved in the preparation of the Petition for Declaratory Ruling and have reviewed it in detail and believe that it accurately describes the upgrade that must be done to portions of the Seabrook Substation, the required schedule for the upgrade, and the relief requested of the Site Evaluation Committee.

4. I have reviewed the decisions of the SEC cited in the Petition and the statute at issue. Based on my review of the statute, the SEC decisions and the criteria that the SEC has used to evaluate whether a particular project is a sizeable addition or change, I believe that it is clear that the upgrade at Seabrook Substation is not a sizeable addition or change within the meaning of the New Hampshire statute.

5. The construction on this upgrade must begin in the summer of 2018 so that crucial cutover from the old configuration and equipment to the new configuration and equipment can meet the schedule established with ISO-NE and work within certain outage windows established by ISO-NE.

6. I respectfully urge the subcommittee of the SEC to act expeditiously on this request.

Carrie Cullen Hitt

Witness

Sworn before me this 7TH day of May, 2018.

Notary Public/Justice of the Peace Robert Messner

My Commission Expires: 4/23/2021
Plymouth County, MA

ROBERT MESSNER
NOTARY PUBLIC
COMMONWEALTH OF MASSACHUSETTS
MY COMMISSION EXPIRES APRIL 23, 2021

Carrie Cullen Hitt

Brief Bio:

Carrie is President of New Hampshire Transmission LLC; a subsidiary of NextEra Energy Transmission and NextEra Energy Inc. (NYSE: NEE). NextEra Energy Transmission is a competitive transmission company with operating utilities in New England and Texas; competitively-awarded projects underway in Ontario, California and New York; and development activities across North America.

At NextEra since 2014, Carrie has also served as a Senior Director on the Distributed Generation and the Regulatory Affairs teams. Prior to joining NextEra Carrie was SVP of State Affairs for the Solar Energy Industries Association and President of the Solar Alliance. Both organizations focused on creation and implementation of sustainable solar policy.

Carrie served in multiple roles in the unregulated division of Constellation Energy, now Exelon. She has also worked at the Harvard Electricity Policy Group, Green Mountain Energy Resources, the Massachusetts Legislature and the Office of Energy and Environment (United Kingdom). Carrie currently serves on the advisory board of the Fraunhofer Institute (Boston), the Board of the New Hampshire Business and Industries Association and the Board of NY-BEST.

Carrie is a graduate of Clark University (BA) and Johns Hopkins School of Advanced International Studies (MA).