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November 16, 2016

Via Electronic Mail

Barry Needleman
McLane Middleton
11 South Main Street, Suite 500
Concord, NH 03301

**Re: New Hampshire Site Evaluation Committee – Docket No. 2015-04 –
Application of Public Service Company of New Hampshire d/b/a Eversource
Energy for a Certificate of Site and Facility for the Construction of a New
115kV Transmission Line from Madbury Substation to Portsmouth
Substation – First Set of Data Requests from Durham/UNH**

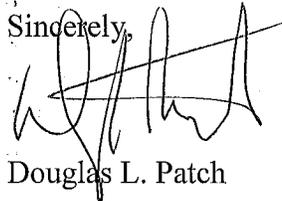
Dear Attorney Needleman:

Attached please find the Town of Durham and the University of New Hampshire's first set of data requests to Public Service Company of New Hampshire d/b/a Eversource Energy in the above-captioned docket. We have provided the requests in both Word and pdf formats.

Please provide written responses in accordance with the procedural schedule for the docket.

Please contact me if you have any questions about the attached data requests. Thank you.

Sincerely,



Douglas L. Patch

DLP/eac

Enclosure

cc: Discovery Service List (*electronic mail only*) SEC Docket No. 2015-04

1629273_1

THE STATE OF NEW HAMPSHIRE

BEFORE THE

SITE EVALUATION COMMITTEE

Docket No. 2015-04

**Re: Application of Public Service Company of New Hampshire d/b/a Eversource Energy
for a Certificate of Site and Facility**

**The Town of Durham and the University of New Hampshire's
Data Requests to the Applicant**

NOW COME the Town of Durham ("Durham") and the University of New Hampshire ("UNH"), joint intervenors in the above-captioned matter, by and through their attorneys, and respectfully submit the following data requests to the Applicant, Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH").

Instructions

1. These data requests seek answers in writing as of the date propounded (i.e. October 21, 2016) but shall be deemed to be continuing so that any additional information relating in any way to these data requests that you acquire or becomes known to you up to and including the time of hearing shall be provided in writing promptly after such information is acquired or becomes known.

2. In answering these data requests, you are requested to divulge all information and documents (if requested) in PSNH's possession, control or available to it, including information and documents (if requested) in the possession or control of PSNH's agents, representatives, or any other persons acting on its behalf, and not merely such information as is known by the person(s) answering these data requests based on their personal knowledge.

3. For purposes of these data requests, the term "document" refers to any writing of every kind, including but not limited to: letters, facsimiles, minutes and records of meetings, memoranda, reports, notes, work papers, plans, maps, recordings transcripts, records of telephone or other communications, vouchers and other accounting records, lists, computer files, engineering studies, rate studies and economic studies in the possession, custody or control of PSNH or its agents, representatives, or any other persons acting on its behalf.

4. For purposes of these data requests, the term "Project" refers to the proposed Seacoast Transmission Reliability project that is the subject of this proceeding before the New Hampshire Site Evaluation Committee.

5. If you feel that any data request is ambiguous, please notify counsel for Durham and UNH so that the request may be clarified prior to the submission of a written response.

6. Please organize the responses to each data request so that it is clear which specific information and/or documents are being furnished in response to each data request. In addition, describe with specificity precisely which portion or portions of a document are responsive to a particular data request. If a document is responsive to more than one data request, it is not necessary to supply duplicate copies. Instead, simply state that the document has already been provided, state which data request the document has already been provided under and state specifically which portion or portions of the document are responsive to each portion of each of the data requests to which the document applies.

7. If there is an objection to any data request, please state the basis of the objection. If the objection is based on privilege, identify the privilege and the facts on which the privilege is based. If a claim of privilege is asserted with respect to a document, provide the date, title or number of the document, the identity of the person who prepared or signed it, the identity of the person to whom it was directed, a general description of the subject matter, the identity of the person holding it and the location of its custody. If any document requested has been destroyed, lost or is otherwise unavailable, please list and identify the document, describe the document with as much detail as possible, and state the circumstances of its loss, destruction or unavailability.

8. Please begin each response to a data request on a separate page and use the format requested by the Site Evaluation Committee.

9. For each response, please identify the person who provided the response and who will be responsible for cross-examination concerning each request. Also, for each response, identify each individual who supplied any information in response to the questions.

10. Please provide responses to these data requests by the date provided in the procedural schedule in this docket.

DATA REQUESTS

1. What, if any, impacts will the jet plow and hand jetting techniques and the removal of existing cable have on Little Bay? To the extent that there are any impacts please provide a complete list of those impacts. In your response to this request please take into account the potential for pollutants presently buried in the soils that could be released into the water column as a result of the proposed jet plow technique. Please take into account the impact on marine life. Please also take into account the concrete blankets, the size of those blankets, the depth of fine grained sediment on top of the blankets, and the impact of any other equipment that would be necessary to complete the underwater crossing. In your response please discuss whether there will be any permanent benthic impacts.
2. Have PSNH or any of its agents or representatives had any discussions, correspondence, meetings or other contact with any state or federal environmental officials or employees with regard to the jet plow and hand jetting techniques? What concerns have been raised by these state or federal officials or employees? How has PSNH addressed any concerns raised? Please provide a complete list of the contacts.

3. Does PSNH or do any of its agents, consultants or representatives working on this Project have any information regarding what contaminants might be dispersed when the sediments in Little Bay are plowed up or stirred up by hand jetting and removal of the old cables? If so, please provide.
4. Was any chemical analysis done on vibra core samples taken in Little Bay or Great Bay? If so please provide. If not, please explain why it was not done.
5. Did PSNH or any of its agents, consultants or representatives working on this Project analyze data that is available on levels of toxic contaminants, heavy metals, PCBs, PAHs, pesticides, or any other similar contaminants in the sediments of Little Bay or Great Bay? If so, please provide. If not, please explain why not.
6. Does the plan for this Project include a vegetation control plan for the shorelines on either side of Little Bay? If so, please explain what the plan is. If not, please explain why not.
7. Has PSNH considered ways in which it might mitigate the impact on Little Bay that will take place during and after construction of the Project? Please provide a complete list of all forms of mitigation it has considered, as well as those forms of mitigation that it plans to implement if the Project is approved by the NH Site Evaluation Committee.
8. When it was developing this Project did PNSH take into account the possibility of directional boring under Little Bay? If it did not, please explain why not. If it did, please explain why it rejected this option.
9. What, if any, negative impacts on views and the quality of life will the transmission line and corridor as proposed have on abutters to the transmission corridor in the Town of Durham? Please provide a complete list of those impacts.
10. What, if any, negative property tax impact will the monopoles associated with the Project have on all abutters in the Town of Durham? Please provide a complete list of those impacts.
11. What if any conditions would need to exist for there to be a negative impact from this Project on a property? Are there any properties impacted by the Project that fit these criteria? If so, please identify those properties.
12. How much would it cost to put the entire transmission line underground in the Town of Durham?
13. What, if any, environmental impact would there be to putting the entire transmission line underground in the Town of Durham?
14. How much would it cost to put the portion of the transmission line as proposed to run between Route 4 and A-lot on the UNH campus underground?

15. What, if any, environmental impact would there be to placing the portion of the transmission line as proposed to run between Route 4 and A-lot on the UNH campus underground?
16. How much would it cost to put the portion of the transmission line as proposed to run between Durham Point Road (a scenic road) and the Little Bay underground?
17. What, if any, environmental impact would there be to putting the portion of the transmission line as proposed to run between Durham Point Road (a scenic road) and the Little Bay underground?
18. Can PSNH definitively conclude there will be no negative environmental impact to the Great Bay Estuary as a result of the proposed Project, when the sediments in Little Bay are plowed up or stirred up by hand jetting and removal of the old cables? If not, please provide a list of the negative environmental impacts.
19. Please provide a complete list of the outreach efforts that PSNH has undertaken during the course of this Project to residents of Durham.
20. Please describe in detail the need for this Project and whether it could have been addressed through alternative proposals to include alternative routes, alternative technologies, and non-transmission alternatives. In responding to this question please take into account all available and possible non-transmission solutions.
21. Please describe in detail the amount of widening of the existing corridor that will be necessary in the Town of Durham to accommodate the Project.
22. Please describe in detail the amount of clearing of the existing corridor that will be necessary in the Town of Durham to accommodate the Project.
23. What impact will the widening described #21 and the clearing described in #22 have on abutters?
24. If the Site Evaluation Committee approves this Project, what is PSNH's understanding of who will oversee the construction work to ensure that it is being done in accordance with all laws, rules, regulations, and conditions that may be imposed by the SEC?
25. Is PSNH willing to provide financial guarantees that would fully fund restoration efforts in the event that the Project causes environmental damage of any kind?
26. Please provide detailed simulated views showing the Project's impact to every property that abuts the ROW corridor in Durham.
27. Will any properties of historic value whatsoever along the proposed route be damaged or affected in any way by the Project? Please provide a comprehensive listing of historic

values along the proposed project corridor in Durham as well as any other associated documents that explain the response to this request.

28. When the Preservation Company prepared its report for this Project did it only review and address the Durham Point Historic District? If not, what other areas did it review and address? If so, why was this the only area reviewed and addressed?
29. Did the report prepared by the Preservation Company rely primarily on material that can be accessed on line? If not, what other material did it rely on? In preparing the report did the Preservation Company review history before 1850? If not, why not, if so, please explain what information it reviewed?
30. What is PSNH's understanding of what sites the New Hampshire Division of Historic Resources (NHDHR) identified in Durham related to this Project? What is PSNH's understanding of what distance from the right-of-way the NHDHR and Victoria Bunker used in doing the analysis?
31. Are wooden poles a viable alternative for use in this Project? What would the impact be from a cost, reliability, safety and environmental perspective of using wooden rather than steel monopoles for the Project?
32. With regard to "hand jetting" and "jet plowing" at the shoreline, what equipment would be used, how much time is projected for the hand jetting process and jet plowing process and what is the impact of this process to the sediments?
33. Please provide a map of the Project that includes all of the roads that will be directly or indirectly impacted by the Project and that shows where the proposed transmission lines intersect and follow those roads.
34. Please provide a complete description of all sediment samples and data available from local, state, federal and any other sources for Little Bay. Please describe in detail the sediment samples and data that your consultants have reviewed in connection with this Project.
35. Does available information related to sediment samples for Little Bay include information on sediment contamination to the depth that will be disturbed by the planned removal of the old cable and the jet plow and hand jetting techniques to be used on this Project? If not, how does the Applicant intend to obtain such information?
36. Please provide a copy of the Applicant's sampling and water quality monitoring plans and a list of all of the constituents which the Applicant or their representatives will be analyzing.
37. Reference the New Hampshire/Vermont Transmission Solutions Study Report, ISO-NE (April 2012) (Application at E-3), was this the basis for the determination that additional transmission capacity is needed to support reliable delivery of electric power to meet the

region's current demand and future demand, and the determination that this Project is the best solution to address this transmission capacity need? Please explain in detail the derivation of the demand figures, which are the basis for the conclusion that this Project is needed to address this transmission capacity need. Please also explain whether that study has been updated based on more current demand and projected demand figures, which reflect the increased impact of energy efficiency and demand side programs, as well as reductions in projected demand for electricity, as compared with the information on which that study was based.

38. When the Project was proposed to the ISO, what was the specific rate of projected economic growth in the state and the region, as well as the specific rate of growth in electrical consumption for the state and the region? Have those figures been updated to reflect changing trends, and if so, please provide those figures?
39. Is the regional grid including the Durham area unreliable today, and if so, please describe that situation as well as its causes? Will the primary beneficiaries of the new line be local as suggested, among our neighboring towns, or over a much larger region? If the benefit is to a larger region, what are the geographical boundaries of that region?
40. Was the Seacoast Reliability Project proposed by Eversource and approved by ISO selected as part of a competitive process, and if not, why should the SEC allow Eversource to proceed without considering whether there are other viable and potentially lower cost or lower risk solutions to capacity or reliability issues facing our regional grid?
41. How does this Project fit into the New Hampshire Public Utility Commission's grid modernization planning process?
42. Is the need for transmission capacity in this region currently the same as it was in 2012, or earlier depending on the year from which the demand figures were derived that were the basis of the study referenced in #37?
43. Are there other less impactful projects that could be undertaken to address the same transmission capacity need?
44. Is this Project in any way connected with, related to or impacted by the Northern Pass Project? Will the Project be constructed or operated any differently depending on whether or not the Northern Pass Project is approved and constructed?
45. Can PSNH definitively conclude there will be no public health risks or negative public health impacts to abutters to the Project? If not, please provide a description of the risks and negative impacts and a list of the specific properties that would be impacted by them.
46. Given that protected wetlands, historic stone walls, and other local resources traverse and sometimes block passage through the easements, how will construction equipment used within the easement reach and operate upon the work site without causing

damage? Please list the type of construction equipment that will be utilized within the right-of-way as part of the Project.

47. Can Eversource provide detailed mapping showing the amount of widening of the existing corridor that will be necessary in the Town of Durham to accommodate the Project, and within the easement can Eversource mark the boundaries for proposed cuttings on the actual vegetation in the corridor so that residents can view the extent of the proposed cutting in the field?

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