

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE SITE EVALUATION COMMITTEE
DOCKET NO. 2015- 06**

PRE-FILED DIRECT TESTIMONY OF JERRY FORTIER

**IN SUPPORT OF THE
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 TO CONSTRUCT A NEW
HIGH VOLTAGE TRANSMISSION LINE AND RELATED FACILITIES IN
NEW HAMPSHIRE**

October 16, 2015

Qualifications and Purpose of Testimony

Q. Please state your name, title, and business address.

A. My name is Jerry Fortier. I am a Project Director at Eversource Energy (“Eversource”), currently assigned to the Northern Pass Transmission Project (“Northern Pass” or the “Project”) being developed by Northern Pass Transmission LLC, an Eversource company (“NPT” or the “Company”). My business address is 56 Prospect Street, Hartford, Connecticut, 06103.

Q. Briefly summarize your educational background and work experience.

A. I hold an Associate’s degree in Electrical Engineering from the Wentworth Institute of Technology in Boston, Massachusetts, a Bachelor’s of Arts degree in Organizational Management from Ashford University in Clinton, Iowa and a Master’s Certification in Project Management from George Washington University in Washington, D.C. I have directed and managed numerous other transmission line and substation projects for Eversource.

I was previously the project manager of the Greater Springfield Reliability Project (GSRP), the Interstate Reliability Project (Interstate), and the Central Connecticut Reliability Project (CCRP), which are three of the four major projects that are part of the New England East-West Solution. GSRP designed to address specific weaknesses in the transmission system around the Springfield, Massachusetts area and provide businesses and residents in the Greater Springfield area with improved access to competitively priced power. Interstate is designed to address weaknesses in the east/west and west/east transmission of power across Connecticut, Rhode Island, and Massachusetts. In 2013, the long-term reliability of the bulk power system in the Greater Hartford and Central Connecticut area was studied by ISO-New England. This study, called the Greater Hartford / Central Connecticut Study (GHCC), included a more comprehensive geographic area than the original scope of the proposed Central Connecticut Reliability Project to address flow-through and load-supply issues under certain dispatch patterns, contingency conditions, and transfer conditions. Attachment A is my resume, which includes a list of other projects I have managed.

Q. Have you previously testified before the Site Evaluation Committee?

A. No, I have not.

1 the Project will travel overhead in ROWs owned by PSNH between Dummer and Bethlehem
2 over a distance of approximately 40.5 miles (the “Northern Segment”). From Bethlehem, for a
3 distance of approximately 52 miles through the White Mountain region and down to
4 Bridgewater, Northern Pass will be located primarily underground in public roads. Thereafter,
5 the Project will continue overhead in PSNH’s ROWs from Bridgewater to a HVDC/AC
6 converter station to be constructed by NPT in Franklin, New Hampshire. Once converted,
7 Northern Pass will continue as a 345 kV AC line from Franklin along approximately 34 miles of
8 ROWs owned by PSNH to an existing PSNH substation in Deerfield, New Hampshire (together
9 with the Bridgewater to Franklin corridor, the “Southern Segment”). For additional information
10 regarding the land rights associated with the Project, please see section (b)(6) of the Application.
11 The Project map sheets can also be found in Appendix 1.

12 Once the Project is commissioned, and ready for commercial operation, ISO-NE will
13 assume operational control pursuant to the terms of a FERC-approved Transmission Operating
14 Agreement between NPT LLC and ISO-NE. The Project will enable the transmission of 1,090
15 MW of power between Québec and New England. Its objective is to provide clean, renewable,
16 competitively-priced electricity for consumers in New Hampshire and the rest of New England.

17 **Q. What are the key physical features of the Project?**

18 A. The key components of the Project, described below, are the HVDC line, the
19 converter terminal and the 345 kV AC line. Other components of the Project that are required to
20 support the interconnection to the regional transmission system are included in the Project
21 Description, which is located in section (h)(1) of the Application.

22 The heart of the Project is the construction of the +/- 320 kV DC transmission line from
23 the Québec border to Franklin NH. The HVDC line will be approximately 158.3 miles in length
24 with 97.8 miles of overhead construction and approximately 60.5 miles of underground
25 construction.

26 The overhead portions of the HVDC line will consist of a 32 mile section where new
27 rights have been secured to locate the line. Twenty-four miles of the 32 mile section are within a
28 working forest that is already frequently cleared. The remaining 65.8 miles of overhead will be
29 installed in existing PSNH ROW that already has existing transmission and distribution lines.
30 For the area where the HVDC line will be located within an existing ROW, where necessary,

1 portions of the existing transmission and distribution lines will be relocated to allow room for the
2 HVDC line construction.

3 The underground cables will be installed in three sections with a total Project length of
4 60.5 miles. The three areas are 1) a 0.7 mile segment in the towns of Pittsburg and Clarksville in
5 the vicinity of the Route 3 bridge crossing of the Connecticut River, 2) a 7.5 mile segment in the
6 towns of Clarksville and Stewartstown and 3) a 52.3 mile segment starting in the Town of
7 Bethlehem at Route 302 and ending at the intersection of the transmission ROW and Route 3 in
8 Bridgewater. The 52.3 mile segment would be constructed within Routes 302, 18, 116, 112 and
9 3. At the six locations (one at each end of the cable segment) where the overhead line transitions
10 between the overhead line and cable, a transition station will be installed. The transition station
11 will resemble a small substation and will be approximately 75' by 130'. Equipment in the
12 transition station will include a terminal structure, surge arresters, instrument transformers, cable
13 terminators communications equipment and a small control enclosure.

14 The converter station is located in Franklin, New Hampshire. The site was selected for
15 three reasons. First, NPT was able to locate, and purchase from a willing landowner, a
16 previously disturbed parcel that is large enough to accommodate the converter terminal. In
17 addition, the use of this site facilitates the potential use and incorporation of the 345 kV by
18 PSNH into a reliability project should ISO-NE determine that the AC line, together with other
19 system improvements, would provide transmission system reliability benefits in the future.
20 Finally, the site is located close to the existing ROW.

21 The conversion of energy from HVDC to AC will be done at a Converter Terminal that
22 has as its core operation feature a Voltage Source Converter ("VSC"). The converter terminal
23 footprint is approximately 10 acres and will be located within a 118 acre parcel in Franklin, NH.
24 The main components of the VSC include:

- 25 • A DC area where the line enters the terminal. Equipment in this area includes
26 disconnect switches, circuit breakers, capacitors, reactors and instrument transformers.
- 27 • The conversion from HVDC to AC takes place in a valve hall. This is a building
28 that is approximately 235' by 180'. The main electrical component that transforms the energy
29 between AC and DC is the insulated gate bi-polar transistor (IGBT). An IGBT is an electronic
30 device that essentially builds an AC voltage from the HVDC voltage. In addition to the IGBTs,

1 HVDC reactors are located in the valve hall. A control room and unmanned office space will be
2 located adjacent to the valve hall.

3 • The AC portion of the Converter Terminal includes the converter transformers,
4 reactors, filters, capacitors, instrument transformers, disconnect switches and circuit breakers.
5 The entire Converter Terminal will be located within a security fence.

6 **Q. Please describe the steps being taken to allow NPT to utilize the existing**
7 **PSNH transmission corridor.**

8 A. Concurrently with the filing of the Application, NPT will submit to the New
9 Hampshire Public Utilities Commission (“PUC”) a Petition to Commence Business as a Public
10 Utility in the State of New Hampshire. In addition, both PSNH and NPT will seek approval by
11 the PUC of a lease that will allow NPT to use existing PSNH ROW.

12 **Q. Please describe the ROW and any widening that will be required to construct**
13 **the Project.**

14 A. The transmission corridor in the new portion of the North Section where there is
15 no preexisting transmission ROW, will be 120 feet wide. The line was redesigned to reduce the
16 portion of the ROW that will be cleared. As described previously, much of this new corridor is a
17 working forest and subject to routine timber harvesting. The 120 foot width was selected
18 because it will accommodate not only the operation of the transmission line, but also
19 construction, maintenance and repair activities. It is designed to accommodate both steady state
20 and extreme weather conditions, based on both NESC design requirements and good utility
21 practice.

22 As previously described, for the Central and South Sections and a portion of the North
23 Section, Northern Pass intends to use existing transmission ROW under its lease with PSNH.
24 The width of the existing ROW varies from 150 feet to 392.5 feet.

25 **Q. Explain what upgrade work will be done at the Deerfield substation and why.**

26 A. As discussed above, certain upgrades to the AC system are required to support the
27 Project’s interconnection with the regional electric grid. Additional work is necessary at the
28 Deerfield substation in accordance with the requirements identified by the ISO-NE as part of its
29 I.3.9 process.

30 Initially, the ISO-NE I.3.9 studies analyzed the impact of a new 1,200 MW transmission
31 project and identified that the two 345 kV lines between Deerfield and Scobie Pond needed to be

1 thermally uprated to ensure minimum clearance criteria are not violated. This involves
2 replacement of certain structures along the path to allow the line to transmit a greater level of
3 power.

4 Since the initial I.3.9 studies, the Project has altered its projected power flow from 1,200
5 MW to 1,090 MW. The Project is currently undergoing a new I.3.9 study, which is expected to
6 provide substantially similar results.

7 The Northern Pass 345 kV AC line will terminate at the existing Deerfield Substation
8 where the power will then flow to other New Hampshire substations and the New England
9 electrical system. At Deerfield Substation, portions of the substation will be reconfigured to
10 accommodate the Project. The work involves relocating certain 345 kV line terminals and
11 adding 345 kV line positions to the substation. In addition to the line terminal work, an existing
12 345 kV line, the 391 line, that presently goes by the substation will be looped into and out of the
13 Deerfield Substation (two line terminal positions will be added). The 345 kV line work and
14 terminal additions will be constructed within the existing substation fenced area.

15 In a separate new substation area adjacent to the existing substation, a static VAR (volt-
16 ampere reactive) compensator (SVC) and 345 kV capacitor banks will be installed. These
17 devices, which were identified by the ISO-NE during its initial I.3.9 study, provide system
18 voltage support during abnormal system events.

19 For the Deerfield upgrade, the equipment additions will include breakers, the SVC and
20 transformer, capacitor banks, switches and bus, instrument transformers and arresters.

21 **Q. Is work planned for any other substation locations?**

22 A. Yes, a 345 kV capacitor bank addition is planned for an expansion of the Scobie
23 Pond Substation along with the installation of 345 kV breakers in the existing substation bus.

24 **Q. Explain why some existing lines need to be rebuilt and relocated.**

25 A. Relocating some of the existing 115 kV transmission lines and 34.5 kV
26 distribution lines is necessary to make room for the Project facilities. This allows NPT to lower
27 structure heights to reduce potential visual impacts and to satisfy electrical code requirements.
28 NPT has sought to utilize existing transmission ROW to the maximum extent feasible in order to
29 minimize environmental and other impacts of the Project. NPT will bear the costs of all
30 relocations and rebuilding of the PSNH lines.

1 In order to maximize the use of existing ROW and to reduce structure heights to reduce
2 visual impacts in the HVDC portion of the line, NPT will relocate approximately 39.5 miles of
3 existing 115 kV lines and 11.7 miles of 34.5 kV lines. For the 345 kV AC portion of the Project,
4 approximately 22.8 miles of existing 115 kV lines and 6.5 miles of 34.5 kV lines must be
5 relocated.

6 In addition, to address specific visual impact concerns expressed by officials and
7 residents in Concord, NPT agreed to modify its design to reduce structure heights for the 345 kV
8 AC line in some areas. Specifically, six additional miles of 115 kV line will be relocated to
9 allow use of H-frame structures. The H-frame has a standard design height of 80 feet, which is
10 the lowest height of the AC structure design alternatives.

11 Underground Construction

12 **Q. What technology is associated with constructing an underground**
13 **transmission line of this magnitude?**

14 A. Underground cables will be installed using a combination of construction
15 techniques that include direct burial of the cable in trenches, installation of the cable in conduit
16 or in a duct bank constructed in trenches or through the use of trenchless technology. The
17 trenchless technology will include jack and bore and directional boring. The depth of the direct
18 buried cable will be approximately four feet below grade; the depth of the conduit or duct bank
19 will vary based upon its configuration and will have at least 30 inches of cover over the duct
20 bank; the depth of the jack and bore will be approximately 25 to 30 feet below grade; and the
21 depth of the directional boring sections will be approximately 65 feet below grade at its
22 maximum depth. The exact depth of the trenchless conduit installation, duct bank or direct
23 buried cable may be adjusted based upon the final civil design. After the cable sections are
24 installed, multiple segments of the line will be joined together in splice pits at locations along the
25 route.

26 Project Construction

27 **Q. Describe the process for selecting contractors that will be involved in the**
28 **construction of the Project and what their respective roles will be.**

29 A. The construction of the Project will be managed and constructed by several
30 specialty contractors. The contractors that will be chosen will have years of experience in
31 managing and constructing high voltage transmission lines and substation facilities throughout

1 the United States and here in New England. For the Project, NPT will choose contractors with
2 the experience and capabilities necessary for the size of this Project and the types of work that
3 they will perform. The major categories of work necessary to complete the Project include
4 engineering and design services, project management and control services, construction
5 management, converter terminal and underground cable supply, and transmission line and
6 substation construction services.

7 Each contractor chosen to work on this Project will be evaluated and selected based upon
8 experience and previous performance on projects of similar size and scope in their respective
9 fields and will include the review of each contractors safety and environmental record for
10 comparison with industry standards. The procurement process will be managed by NPT's
11 procurement group and will include standard utility practices including shortlisting qualified
12 bidders, web-based bidding process, detailed bid evaluations based on technical and commercial
13 criteria and contract negotiation and award.

14 **Q. Describe the qualifications and role of the Owner's Engineer that will be**
15 **involved in this Project.**

16 A. It is expected that NPT will hire an Owner's Engineer or equivalent to assist it
17 with the management of the construction process. The preferred Owner's Engineer will be a
18 full-service engineering, architecture, construction, environmental and consulting solutions firm
19 and will have a multi-disciplined staff of resources including engineers, architects, construction
20 professionals, planners, estimators, economists, technicians and scientists, representing virtually
21 all design disciplines. The Owner's Engineer will also be NPT's representative for engineering
22 and design services, project management and controls services, and construction management
23 and will be responsible for monitoring, coordinating and reporting to the Project. Reports will
24 include the quality and compliance of the work that the construction contractors and vendors
25 perform on this Project. The Owner's Engineer will provide services including design,
26 permitting, construction management, schedule, cost, construction coordination, materials
27 management, safety oversight, environmental compliance oversight, communications, and
28 project closeout.

1 **Q. Describe the qualifications and role of the overhead line Construction**
2 **Contractor that will be involved in this Project.**

3 A. The construction contractor chosen will demonstrate the ability to manage a
4 project of this size and will have had recent successful experience in the construction of high
5 voltage switching stations and substations, underground or overhead transmission lines and
6 HVDC converter terminals as appropriate. The contractor will have a demonstrated ability to
7 construct the work within the allotted time frames and have the ability to supply adequate labor.
8 The preferred contractor for this Project will have the resources available to deliver the technical
9 skill and physical capacity to respond safely, quickly and cost effectively and have an established
10 track record of success with the ability to draw on field employees that are members of the
11 International Brotherhood of Electrical Workers (“IBEW”) and work closely with the National
12 Electrical Contractors Association (“NECA”). This strong IBEW/NECA connection ensures
13 trained, highly productive and safety-oriented personnel.

14 **Q. Describe the qualifications and role of the Converter Terminal and**
15 **Underground Cable supply vendor that will be involved in this Project.**

16 A. The converter terminal, SVC and underground cable systems that are being
17 proposed for this Project are unique in design and can only be manufactured by specialty
18 companies. Worldwide, there are only a handful of vendors that can provide such equipment.
19 Northern Pass has issued a request for proposal (“RFP”) for the supply of the converter terminal,
20 SVC and cable system. This RFP is underway and thus a final supplier has not yet been selected.
21 Each of the companies participating in this RFP has vast experience in the manufacturing and
22 installation of converter terminal and cable systems worldwide and in North America. It is
23 expected that the vendor of choice will be selected in the near future and will immediately be
24 integrated in the existing design teams of the converter terminal and cable systems. This contract
25 will be for the supply and installation oversight of the converter, SVC and cable equipment.

26 **Q. Describe how the companies described above will work together.**

27 A. The construction of Northern Pass will be a collaborative effort of NPT, the
28 construction contractor and the Owner’s Engineer. Each brings its unique skill sets to the table
29 to create a strong and dynamic team. The converter terminal and underground cable supply
30 vendor will provide equipment and construction services specific to the converter and
31 underground cable.

1 NPT, as owner, will be responsible for all major management decisions. The Owner's
2 Engineer and the construction contractor senior project managers will report directly to the lead
3 Northern Pass Transmission Project Director. This reporting will include updates on cost,
4 schedule, risk, compliance, issues and other matters as it relates to the construction process.
5 Regular meetings (weekly and monthly) will be held to provide project updates.

6 Attachment B details the Construction Management Reporting Matrix and shows
7 conceptually how the companies will integrate the distinct design and construction efforts.

8 Both the Owner's Engineer and the construction contractor will have direct lines of
9 communication at all significant levels of operation (safety, community relations, environmental
10 compliance, outage coordination, materials management, project controls and construction
11 coordination). This direct communication allows for fast information exchange and processing
12 and ensures that daily decisions are made in a timely manner. The Owner's Engineer will
13 provide the coordination and reporting that ensures that the Project is meeting all standard and
14 compliance requirements.

15 **Q. Please provide a general description of a Project Labor Agreement ("PLA").**

16 A. A PLA is a set of terms and provisions agreed to between a construction project
17 owner and a union regarding how work will be performed on a project. The owner includes PLA
18 specifications in its bid requirements when it solicits contractors for its project. A contractor
19 who accepts a contract award accepts the provisions of the PLA, and will apply the terms and
20 provisions of the agreement with union and nonunion personnel who are hired to work on the
21 contracted job.

22 **Q. Describe how Northern Pass Transmission expects to use a PLA?**

23 A. Northern Pass is firmly committed to hiring local, New Hampshire workers first,
24 and to developing strong working relationships with both large and small contractors who are
25 either union or non-union. In addition, Northern Pass will be seeking contractors who have a
26 track record of working safely and in an environmentally sensitive manner, and who are focused
27 on competitive pricing and on-time service.

28 The PLA used for the Project was uniquely structured to promote local jobs to New
29 Hampshire workers. That is the top priority. There are provisions to bring in non-union
30 companies both where there are specialized skills or equipment not provided by tradesmen, and

1 where there are simply not enough skilled craftsmen available to staff a job. Non-union
2 companies can become signatories to the PLA.

3 The PLA specifically identifies non-union job opportunities that are not subject to the
4 agreement, including logging, landscaping, land clearing, maintenance and warranty work on
5 equipment, training, testing, and equipment installation.

6 Numerous “service vendors” providing such as trash haulers, security, fuel delivery, and
7 janitorial services, are also included in these non-union opportunities. Non-union job
8 opportunities also include a number of “non-manual job categories” needed for project support.
9 These include inspectors, timekeepers, clerical and administrative workers, guards, emergency
10 medical technicians, quality assurance/quality control staff, and engineering, real estate, survey,
11 technical, and supervisory personnel.

12 The major engineering, construction, and equipment suppliers will generally hire trade
13 personnel and/or subcontractors directly. The PLA requires that contractors hire NH labor
14 and/or NH subcontractors first to ensure that local suppliers and businesses will be utilized.

15 The contractors who will be bidding on the Project’s major contracts will need to propose
16 specific, aggressive, and innovative staffing/hiring plans as part of their efforts to provide a
17 winning bid.

18 As the Project construction start date draws closer, NPT will hold job fairs where Project
19 contractors will meet with those interested in working on the Project. In addition, the IBEW, one
20 of the major unions that will be working on the job, will be soliciting workers for its training and
21 apprentice programs to ensure an adequate supply of labor for the Project in key skills areas.

22 **Q. Please describe how NPT intends to address any violations of either state or**
23 **federal requirements that were pre-existing on the land prior to the start of construction.**

24 A. Any potential violations (e.g. environmental issues) will be identified and
25 reported to the appropriate reporting agency. Wherever possible, these issues will be resolved
26 prior to when construction activities commence. Additionally, notification protocols will be
27 created to assess any potential violations that could be identified once construction activities
28 commence.

Project Operations

1
2 **Q. After the Project is constructed, how will the Project operate?**

3 A. Following completion of the Project construction phase, ISO-NE will assume
4 operational control over the transmission facility pursuant to the terms of a FERC-approved
5 Transmission Operating Agreement (“TOA”) between NPT and ISO-NE.

6 Section 6.1(a) of the Transmission Service Agreement (“TSA”) contemplates that the
7 management committee comprised of Hydro Renewable Energy and NPT personnel will review
8 the terms and conditions of the TOA to facilitate alignment of all interested parties. Under the
9 TOA, NPT expects that ISO-NE will assume operational authority over the Project and all
10 transactions over the line will be scheduled in accordance with the applicable New England
11 market rules. ISO-NE will also have final approval authority over planned line outages.
12 Therefore, Northern Pass effectively will operate in the same manner as all other facilities within
13 the integrated ISO-NE system.

14 Section 6.2 of the TSA requires NPT to maintain the Project in accordance with good
15 utility practice and in compliance with all applicable regulatory requirements, including
16 applicable North American Electric Reliability Corporation (“NERC”) and Northeast Power
17 Coordinating Counsel (“NPCC”) reliability standards, and to comply with all applicable
18 operating instructions and manufacturers' warranties.

19 **Q. Please describe the maintenance and inspection activities associated with**
20 **Project operations.**

21 A. For the Project route where there are already transmission lines, many of the
22 maintenance and inspection activities will be performed for the Project as the crews traverse the
23 ROW. In these locations, NPT will pay its allocated share of the costs associated with such
24 maintenance and inspection activities.

25 Where the Project is not located with existing transmission lines, maintenance and
26 inspection activities will be paid for by NPT, and performed consistent with the Eversource
27 Energy maintenance policies and procedures which are documented in the Eversource Energy
28 Transmission Maintenance Program Manual (“TMPM”). The TMPM is based upon the
29 following key attributes:

- 30
- Best practices for preventive maintenance;

- 1 • Assuring compliance with regulatory and power coordination authority standards and
2 guidelines;
- 3 • Establishing maintenance practices that are practical and cost effective;
- 4 • Establishing maintenance practices that monitor equipment operating conditions and
5 provide trend data; and
- 6 • Written descriptions of the maintenance program.

7 During operation, NPT and its contractors will follow all Eversource Energy company
8 policies and procedures, including a well-established set of transmission procedures mandated
9 for all Eversource Energy employees and contractors. Those policies and procedures include all
10 OSHA regulations, all State and federal regulations and other guidance documents. In
11 accordance with maintenance procedures, Eversource Energy inspects high voltage transmission
12 lines (including Northern Pass) on the following basis:

- 13 • Aerial patrol of the line each year for inspection of structures and conductors;
- 14 • Foot patrol of the line each year to visually inspect the facilities;
- 15 • Thermographic inspection of the line two times per year;
- 16 • Patrol of lines after every interruption if the specific cause cannot be identified;
- 17 • Aerial patrol of lines each year for vegetation management inspection; and
- 18 • Three year vegetation maintenance within cleared areas, ten year side trimming
19 and tree removal as required.

20 With regard to the stationary buildings, including maintenance for transition stations,
21 converter terminal, underground sections, and the substations, NPT will undertake the following:

- 22 • Monitoring, testing and maintaining, civil, electrical, protection and
23 communication equipment including visual inspection, sampling, trending, testing, maintenance
24 and time based equipment replacement; and
- 25 • Monitoring on-line key electrical devices to determine equipment status, load
26 levels, and temperature and to identify any abnormal conditions
- 27 • Spare parts will also always be kept on site.

28 In addition to the TPM, the Protection System Maintenance Program (“PSMP”)
29 provides the basis for performing maintenance on Protection System components across the
30 three-state Eversource Energy system. The PSMP provides the basis to verify regulatory

1 compliance for protective systems. The requirements of the Federal Energy Regulatory
2 Commission (“FERC”), NERC, NPCC and ISO-NE form the basis for the PSMP.

3 **Q. Please describe the vegetation maintenance work that will be required once**
4 **the Project is in operation.**

5 A. PSNH will be responsible for vegetation maintenance work and a cost sharing
6 agreement will be developed in connection with this work. Maintenance activities in the ROW,
7 depending on the natural features and accessibility of the ROW, can be carried out on foot, or by
8 line truck, track mounted vehicle, all-terrain vehicle or snowmobile. Any of these activities can
9 have an impact on the environment if not performed in a sensitive manner. All vegetation
10 management and line maintenance activities associated with the Project’s new lines will be
11 performed in accordance with the New Hampshire Division of Forest and Lands Best
12 Management Practice for Utility Maintenance. The Best Management Practice publication
13 provides guidance for identifying appropriate means and methods for vegetation management
14 and maintenance in or within the vicinity of jurisdictional wetlands. The company will provide a
15 field manual summarizing the Best Management Practice to all contractors performing
16 maintenance work in the ROW.

17 **Q. Please describe the security measures associated with Project operations.**

18 A. NPT also will implement security measures consistent with industry practices and
19 Eversource Energy policies, including the use of security cameras at stations. With regard to the
20 stationary buildings, transition stations, converter terminal, underground sections, and the
21 substations, NPT will maintain the facilities in accordance with the TMPM, the PSMP and
22 manufacturer recommendations. Maintenance activities for those facilities will include:

- 23 • Monitoring, testing and maintaining civil, electrical, protection and
24 communication equipment including visual inspection, sampling, trending, testing, maintenance
25 and time based equipment replacement;
- 26 • Monitoring on-line key electrical devices to determine equipment status, load
27 levels, and temperature and to identify any abnormal conditions; and
- 28 • Maintaining an adequate supply of spare parts on site.

1 **Q. Please describe how NPT will manage Project operations.**

2 A. NPT will rely on Eversource Energy’s transmission maintenance and work
3 management department to support the operating and maintenance requirements of the new
4 facilities associated with the Project. NPT will pay for the cost of these services. To the extent
5 appropriate or required (including for emergency repair efforts resulting from storms or system
6 events), Eversource Energy supplements its transmission maintenance and work management
7 department with contractors having crews with the necessary skills and experience. The
8 collective staff available to NPT will ensure that all maintenance and operational activities are
9 performed in accordance the TPM and PSMP.

10 **Q. Describe all measures that will be employed to ensure the Project operates**
11 **safely.**

12 A. During Project operations, NPT and its contractors will follow all Eversource
13 Energy policies and procedures, including a well-established set of transmission procedures
14 which contractors are required to follow. These policies and procedures necessarily include all
15 Occupational Safety and Health Administration (“OSHA”) regulations, all State and federal
16 regulations and other guidance documents. NPT will also adhere to the National Fire Protection
17 Association (“NFPA”) 850 Recommended Practices for Electric Generating Plants and High
18 Voltage Direct Current Converter Stations.

19 **Q. Describe what measures will be taken to ensure the security of the Project**
20 **once constructed.**

21 A. The Project will meet all requirements identified by the Federal Energy
22 Regulatory Commission in CIP-014-1, the security Reliability Standards for critical Bulk Power
23 System facilities. Features of the Eversource Energy security plan include the following:

- 24 • Inspection of the converter station, transition stations and substations in
25 accordance with the Eversource maintenance procedures
- 26 • Inspection of transmission lines (foot patrols and aerial inspections) in accordance
27 with Eversource maintenance procedures
- 28 • Security gates at converter station, transition stations and substations
- 29 • Transmission line ROW gates to restrict access to the ROW at certain locations.
- 30 Perimeter fencing at all station facilities

