

**COMMENTS OF NORTHERN PASS TRANSMISSION LLC
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
TRANSMISSION LINE SAFETY ISSUES**

The Draft Environmental Impact Statement (“DEIS”) could be read to suggest that there are significant safety issues associated with normal operation of a high voltage transmission line such as the one Northern Pass Transmission LLC (“Northern Pass” or the “Project”) intends to construct. In particular, the DEIS seems to suggest that normal operations pose a risk of shocks and of arc flashes. DEIS at 3-24. If that is the intended message, Northern Pass disagrees. As described below, Northern Pass requests that the Final EIS be clarified on a few key issues related to transmission line safety.

The DEIS seems to acknowledge, although not as clearly as seems warranted, that the safety risks it identifies can be avoided or minimized by compliance with standards set by the National Electrical Safety Code (“NESC”). Northern Pass agrees with this point, and indeed believes such safety measures are routinely employed in the industry. Northern Pass recommends that the Final EIS acknowledge this point clearly.

More specifically, the Final EIS should acknowledge that the shock risks to which the analysis refers are nuisance shocks, not shocks of a type that pose a threat to life or limb. The Final EIS should also recognize that proper grounding of transmission structures prevents even these nuisance-type shocks in almost all cases. Northern Pass transmission structures will all be grounded, and thus they will not present any significant risk of a nuisance shock. Specifically, the Project will be designed in accordance with Rule 234g of the 2012 NESC, which establishes limits for electro static discharge to prevent the risk of nuisance shock.

Likewise, arc flashes are not normally associated with a high voltage transmission line, as the DEIS might be read to imply. An arc flash might occur if there were both heavy ionization and a heavy concentration of particulate matter in the air beneath a high voltage transmission line. Conditions such as those would be associated with an event like a forest fire, a structure fire or a gasoline tank fire. Even in such cases, EPRI has noted: “A tall fire column is necessary to produce hot ionized gases sufficiently close to the conductors to cause flash overs.” EPRI Transmission Line Reference Book, 345 kV and Above, Section 8.14 at 384 (2nd ed. 1982).

The DEIS also seems to suggest that the proximity of a person to an energized line can cause an arc flash and result in serious burns to an individual. Someone walking in a ROW does not create a risk of an arc flash. This Project is designed so that someone can walk under the transmission lines without a concern for safety. A person would have to climb a transmission structure and come within close proximity to an energized conductor to create the risk of an ach

flash. Here, the transmission structures will be designed to deter unauthorized climbing, and the safety hazard associated with climbing the structures will be clearly posted.

In short, there is nothing normal about the risks the DEIS describes, and they do not constitute significant safety risks that would be associated with the operation of Northern Pass.