EVERSOURCE ENERGY

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August 13, 2025

Matthew Fossum
21 South Fruit Street, Suite 18
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Dear Mr. Fossum,

Please find Eversource's response to the questions from the New Hampshire Office of Consumer Advocate regarding the New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391 presentation Eversource made to the ISO-NE Planning Advisory Committee (PAC) on June 16, 2025.

If you have any follow up questions, please feel free to reach out.

Sincerely,

David Burnham

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Eversource Energy
New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391
Data Request: NH OCA
Question: 1
Date Received: June 19, 2025

Request From: New Hampshire Office of the Consumer Advocate

Question: As requested by the NH OCA during the June 16, 2025 PAC meeting, the NH OCA requests that Eversource provide the total costs and total scope (number of structures, conductor replaced, etc.) of the 12 projects within the right-of-way housing the 373, 385, and 391 lines described on slide 2 of Eversource's presentation. For purposes of this question, the NH OCA requests that Eversource provide:

a. The costs, in nominal dollars, of all projects in total, and broken down by each line.
b. To the extent the costs in subpart a. do not include the costs of the projects described in the June 16, 2025 PAC presentation, a summary of total costs, and costs by line, including those costs.
c. A description of any further structure replacements that are contemplated for the lines, a timeline for that work, and any estimated costs.

Response:

Table 1, below, summarizes the 12 asset condition projects performed on Lines 373, 385, and 391 referenced on slide 2 in the June 16, 2025 New Hampshire Asset Condition Structure Replacements – Line 373, 385, 391 presentation.

Table 1

Transmission Line	Projects Performed	Total Cost of All Projects ($M)[1]	Number of Structures Replaced	Other Scope
373	4	$37.695	131	18.5 miles of OPGW installed
385	3	$22.156	91	N/A
391	5	$58.590	233	N/A
Total	12	$118.441	455	

[1] Based on costs shown on June 2025 ISO-NE Asset Condition List, where applicable. Please note that some projects are not listed on the Asset Condition List because they had total estimated costs of less than $5 million.

The three incremental projects included in the June 16, 2025 PAC presentation are the last anticipated asset condition projects on these lines for the foreseeable future. The projects are replacing the last remaining wood structures on these circuits and upon completion, Lines 373, 385, and 391 will be comprised entirely of steel structures. Table 2, below, provides additional information on these projects.

Table 2

Transmission Line	Project to be Performed	Estimated Cost ($M)	Number of Structures to be Replaced	Other Scope
373	1	$9.253	27	N/A
385	1	$16.456	54	N/A
391	1	$25.822	89	N/A
Total	3	$51.531	170	

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Eversource Energy
New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391
Data Request: NH OCA
Question: 2
Date Received: June 19, 2025

Request From: New Hampshire Office of the Consumer Advocate

Question: Given that Eversource has performed at least 12 projects in the right-of-way housing these lines since 2018, please respond to the following:

a. Slide 21 references cost efficiencies from a single mobilization for the projects proposed in the June 16 presentation. What have been the mobilization and de-mobilization costs of the projects already performed and what costs could have been avoided or mitigated by limiting the number of mobilizations?

b. Slide 21 references the desire to avoid future disturbances in the right-of-way. Given the number of projects performed in this right-of-way since 2018 and the substantial disturbances of the right-of-way from them, please explain why avoiding disturbances is relevant to determining the reasonableness of the June 16 projects.

Response:

a. As described in our response to NH OCA Question 1, between 2018-2024, Eversource has performed 12 structure replacement projects on Lines 373, 385, and 391. Eversource cannot provide precise costs for access and mobilization because of cost classifications and differences in contracting methods across these projects. However, Eversource estimates that the combined access and mobilization costs comprise approximately 10 – 20% of the total project cost. Estimating the amount by which costs could have been reduced by performing all structure replacements through a single project is not feasible and would be complicated by the significant increase in utility construction costs over the 2018 – 2024 time period.

b. Replacing all remaining wood structures at this time would eliminate the need to re-enter the ROW and preform additional wood structure replacements in the near future. Eversource believes it is appropriate to avoid additional disturbances to the ROW when future needs can be reasonably foreseen. In this case, the number of structure replacements required on this ROW since 2018 provides a strong indication that additional wood structure replacements will be required in the near future if all remaining wood structures are not replaced as part of the proposed projects.

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Eversource Energy
New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391
Data Request: NH OCA
Question: 3
Date Received: June 19, 2025

Request From: New Hampshire Office of the Consumer Advocate

Question: During the June 16 PAC meeting, Eversource noted that the twin bundled 850.8 ACSR 45/7 (Buzzard) conductor on all three lines is standard, but uncommon. Has Eversource considered replacing this uncommon conductor on one or more of the subject lines as part of any of the 12 or more projects since 2018. If so, please explain any analysis done. If not, please explain why not.

Response:

Eversource has not considered replacing the 850.8 ACSR 45/7 (Buzzard) conductor as part of any of the prior structure replacement projects because Eversource has not identified any asset condition issues with the conductor. Manufacturers continue to offer this conductor type and associated hardware, and as a result Eversource is able to maintain an adequate inventory of spare parts.

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Eversource Energy
New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391
Data Request: NH OCA
Question: 4
Date Received: June 19, 2025

Request From: New Hampshire Office of the Consumer Advocate

Question: On Slide 23 Eversource states that construction is planned to begin in Q1 2026, but could be deferred depending on the proposals responding to the LTTP RFP. Those responses are due at the end of September 2025 (with the award(s), if any, coming well after Q1 2026). Please explain how, and what, Eversource would decide to defer in response to the LTTP RFP, and when it would expect to make any decisions whether to defer some or all of the projects.

Response:

Following the receipt of all bids under evaluation within the ISO-NE Longer-Term Transmission Planning (LTTP) RFP, Eversource anticipates ISO-NE will publish a summary of the proposed solutions under evaluation. Eversource will review this information for any potential impacts proposed to the Line 373, 385, 391 corridor. If any proposal under review by ISO-NE would require an alteration to the Eversource asset condition structure replacement projects presented on June 16, 2025 to PAC, Eversource would delay the start of construction of the currently-planned projects to a later date.

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Eversource Energy
New Hampshire Asset Condition Structure Replacements – Lines 373, 385, 391
Data Request: NH OCA
Question: 5
Date Received: June 19, 2025

Request From: New Hampshire Office of the Consumer Advocate

Question: Slide 23 states "Eversource has confirmed that new structures planned for installation as part of these projects can support future reconductoring with bundled 1590 ACSS 54/19 Falcon conductor."

a. Can all of the structures replaced as part of the 12 or more projects since 2018 support new conductor, or would reconductoring require replacing some of the recently installed structures?

b. Would installing 1590 ACSS 54/19 Falcon conductor address the overload conditions noted in the 2050 study as referenced on Slide 16? If so, (and assuming the LTTP process does not impact these lines) when would Eversource anticipate needing to install such conductor to address overload conditions? If not, please describe what would be required, including whether additional structure replacements would be required.

c. If the date for any predicted overload is more than three years out, (and assuming the LTTP process does not impact these lines) please explain whether Eversource would treat any reconductoring or related work as reliability projects subject to competitive bidding under the OATT. If not, please explain why not.

Response:

a) Eversource has not performed a comprehensive evaluation of all the recently installed structures on these transmission lines to determine their capability to support reconductoring with 1590 ACSS 54/19 Falcon and maintain required clearances while allowing operation of the line up to the maximum conductor rating. Based on a high-level preliminary analysis, we anticipate that a limited number of structure replacements or modifications may be required. However, we expect that most existing structures would not require replacement.

b) Eversource has not performed a comprehensive evaluation of all the recently installed structures on these transmission lines to determine their capability to support reconductoring with 1590 ACSS 54/19 Falcon and maintain required clearances while allowing operation of the line up to the maximum conductor rating. Based on a high-level preliminary analysis, we anticipate that a limited number of structure replacements or modifications may be required. However, we expect that most existing structures would not require replacement.

c) Installing 1590 ACSS 54/19 Falcon conductor would address the conductor overloads identified in the 2050 Transmission Study. Outside of the LTTP process, Eversource does not have any current plans to replace the conductor. With respect to the LTTP process, Eversource would replace the conductor if necessary to support a Longer-Term Transmission Solution selected by ISO-NE.

d) If an overload on these lines is identified outside of the LTTP process, Eversource would follow the applicable process under the ISO-NE Open Access Transmission Tariff (OATT) to address the overload. For example, if an overload is identified through a reliability Needs Assessment performed by ISO-NE under Section 4.1 of Attachment K to the OATT, Eversource would participate in the development of solutions (including potential reconductoring) through either the Solutions Study Process described in Section 4.2 of Attachment K or the Competitive Solution Process describe in Section 4.3 of Attachment K, as applicable.