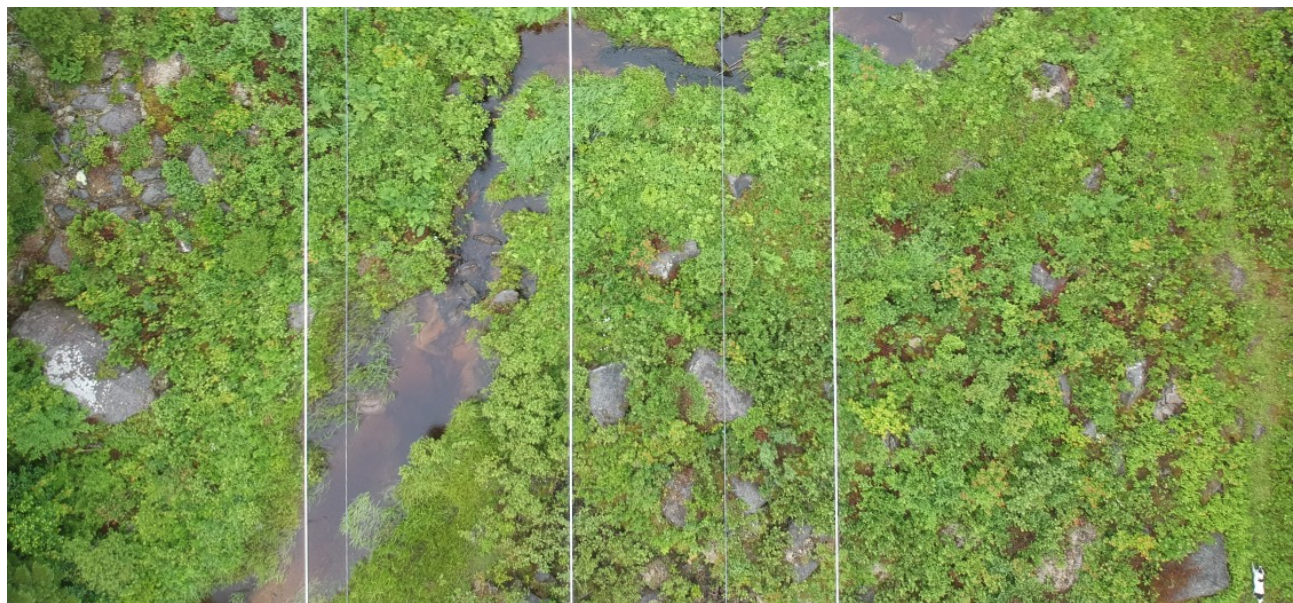


Stakeholder comment to the PAC re Asset Condition projects presentation

The “high-level view” fails to see the people on whose land these projects are built, and the land itself.
X-178 line July 2023



Stark O-154 line before “Asset Condition” rebuild:



Stark O-154 line August 2023 after “Asset Condition” rebuild; 336 conductor replaced with 1272 conductor, new wider and taller steel structures, Optical Ground Wire (OPGW), 100’ x 100’ construction ‘pads’, new roads left in place and massive importation of gravel.

The ‘left’ side of the easement is occupied by the Portland Natural Gas Transmission line thus not subject to the extensive alteration of the terrain to which the ‘right’ side has been permanently subjected.



The Eversource information handouts and public meetings for Asset Condition projects are fraudulent in their claims that they are for reliability, and provide almost no details about the project.

‘Stakeholders’ in these project includes ROW landowners, towns, the public and ratepayers.

These stakeholders need to be given a full disclosure of the complete lack of oversight of the Asset Condition projects; that there has been no 3rd party determination of need, structural or reliability, for the rebuild as proposed.

PAC presentations need to occur months before public “outreach” by transmission corporations, and ROW landowners and the public need to be notified of these presentations.

PAC members need to attend Eversource Asset Condition project public information meetings.

PAC meetings need to occur again after “outreach” for each project, when the public has full disclosure of the project plans, and the public needs to be notified of these meetings.

Current Asset Condition projects need to be placed on hold until real oversight and full disclosure of project plans is required. Allowing Eversource to continue to exploit and damage ROWs and ratepayers until it gets the last of it’s lines rebuilt with expanded capacity and permanent roads through unaltered terrain, is unacceptable.

Asking transmission corporations to act in ways that will reduce their profits is disingenuous. Publicly held corporations are required by their legal structure to maximize profits and serve their shareholders, not the public. They are amoral thus essentially sociopathic in their “behavior.”

Why is an eighth-grade level presentation by Eversource, with the same damaged pole photos, same text, same vague phrases, submitted over and over, with a complete lack of pole inspection reports, considered adequate or acceptable? What other entity allows an asset to be declared totaled without requiring proof?

Project information requirements:

Explanation for why Eversource consistently exceeds required conductor clearances.

Height and altitude of each existing and proposed structure.

Explanation for the claimed necessity of increased tower heights when the clearance of the proposed conductors are generally more than required by Code.

Proof of need to construct a whole new larger (in size, AOT “footprint”, costs, externalized costs, social costs, environmental damage and carrying capacity) line.

Pole and conductor inspection reports and any other inspection reports, showing proof of claimed damage, degree of damage, which poles are damaged, and the standards used to determine the need for replacement.

Lifecycle costs of wood vs. steel structures.

Carbon footprint of wood vs. steel structures.

Documentation of the source and toxicity of proposed road building materials and transmission structures and Optical Ground Wire. Material Safety Data Sheets for all products proposed to be used in construction.

A map of areas proposed to be used for helicopter pads laydown areas and ROW access.

Location of poles proposed to be replaced by helicopter due to sensitive environmental conditions.

Transportation routes and number and type of vehicles that will be on each road at each hour of the days of the proposed pre-construction, construction and 'restoration'

Locations of lay-down areas for structures and other materials. Roads transmission corporations plan to use for access to the easement.

A description of how transmission corporations would comply with local noise regulations more restrictive than for example, Eversource's proposed 7:00 am to 7:00 pm six days a week no-decibel-limit plan.

Detailed description of BMP's, not just "we'll use BMPs."

Constructions plans (with 2' lidar-derived contour lines) that are not crude, computer-generated, standardized Eversource 1272 industrial rebuild plans, the same for every line regardless of the nature of the terrain, aesthetics, environmental impacts, need, cost, quality.

Post-Constructions documentation with 2' lidar contour lines showing terrain, terrain alterations, topsoil removal and restoration, etc.,

The X-178 line was constructed in 1948-9 and a portion "upgraded" in 1986. Glacial erratics are on a large portion of it. The construction methods of 70 and 40 years ago were sophisticated and careful enough to avoid road building as proposed, construction pads as proposed and massive alteration of terrain as proposed, despite heavier structures. Eversource needs to explain why it is unwilling to use quality construction methods suited to the terrain (inasmuch as any transmission line can be suited to any terrain.)

The carbon footprint of a proposed rebuild with steel structures at 65' and wood structures at 65', (with the proposed 1272 conductor), steel structures at the current structure heights (40'-60') and replacement with wood of the current heights, with 636 ACCC conductor

The carbon footprint of replacing, with wood, only those structures on the X-178 line identified in 2018 as needing replacement.

List, photographs and dimensions of all vehicles/heavy equipment proposed to be used.

If hay/straw is used to cover denuded areas, certification will be provided that this came from a field that was never spread with sludge or sprayed with herbicides/pesticides.

Visual Impact maps (leaf-off) for proposed project.

Will proposed conductors be used for simultaneous HVAC/HVDC transmission?

The maximum conductor (ASCR, ACSS and ACCC or equivalent (I. e. C7)) size the existing poles, and the proposed poles at their proposed heights, can carry.

Comparison of life-cycle costs (including environmental and social) of ASCR, ASCC and **ACCC** conductor replacements (if necessary), and regular ground wire replacement with OPGW, including the larger steel replacement structures claimed as necessary to hold the heavier OPGW and 1272 conduit and the associated construction and disposal costs.

Why is no one asking these questions at the PAC meetings?

In a 2018 presentation to the PAC Eversource proposed the replacement of 55 (out of 570) poles on the X-178 line with an estimate of around \$11 million dollars for costs.

This line was built in 1948-9 and part of it was “upgraded” in 1986. One would assume that most, if not all, of the poles Eversource claimed needed replacement were on the 1948-9 section.

Eversource withdrew this proposal and is now proposing a full rebuild of the whole line with 1272 ASCC, replacing the 336 and 795 conductor at an estimated money cost of \$50. million and no mention of the externalized costs of environmental and social damages.

Whatever happened in between 2018 and now, was not to the poles.

How can the PAC comment on Asset Condition projects when there is no proof that they are Asset Condition projects?

The “High-Level View” (as described by Eversource) of the presentations of so-called “Asset Condition” projects are completely inadequate for any action by the PAC other than a request for more information.

Do members of the PAC buy a car or house given only a “high-level view”, one from across the street perhaps? Is a “high-level view” of a child’s school adequate? No.

How can the PAC then, let pass, without substantive questions, the Asset Condition presentations as now given, and with only those changes suggested by Eversource?

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