

Question on Eversource 10/20/23 presentation to the PAC on the A-152 and M-127 Asset Condition projects, for which Eversource chose not to provide answers though it has them all.

P. 3: The A-152: 1590 ASCR (4.9 miles), 795 ASCR (12 miles)

Does the coating of the OPGW have PFAS?

P. 4: What is the power flow on these lines, to and from Vermont?



P. 5:

Provide records from transmission corporations that use them, showing how EPRI guidelines relate to actual maintenance needs. Are EPRI guidelines produced by the transmission industry?

RE: "C: Moderate Defect – Repair or Replace under next maintenance"

When is the next maintenance (length of cycle)?

With an H-frame structure, does each pole receive a rating?

For the lines presented, how many poles /structures were rated B or C due to hardware that can be replaced, for example, “Damaged insulators and deteriorated steel hardware”?

What is the cost/benefit analysis of waiting until the next maintenance cycle (and getting another 8-10 years use of the 14 moderate defect poles) vs. repair of the 14 moderate defect poles vs. replacement of the 14 moderate defect poles vs. the proposed replacement of 45 structures (31 of which are not in need of replacement and could last another 20 years)?

What are the costs of replacement with wood structures of the same height vs. the proposed new and presumably (though Eversource is silent on this) larger steel structures?

What are the existing and proposed structure heights? (This is an issue of huge importance to those forced to look at these lines, yet is never addressed in the PAC proposals.)

Could the proposed new structures support Eversource’s standard, heavy-weight, low-performance 1272 ACSS conductors?

Does Eversource consider itself responsible for buying poorly performing laminated structures? Has Eversource attempted to get the manufacturer to cover costs of replacing these structures?

Has Eversource covered any of its wood pole tops?

Provide the cost/benefit figures for covering wood pole-tops vs. leaving them uncovered.

Does Eversource consider rate-payers responsible for the costs of remedying pole damage due to pole tops Eversource chose to leave uncovered?

RE: “Additional B grade structures were identified and prioritized for replacement based on Engineering requirements to meet current uplift standards as well as efficiencies in required permitting approvals for replacing Grade C structures, and minimizing environmental impacts”

Are these grade B structures, “Minimal Defect – Monitor Degradation” not currently meeting code requirements? Are the “current uplift standards” Eversource’s or EPRI guidelines?

Should ratepayers be paying for new structures simply for Eversource’s “efficiencies in permitting approvals”?

Provide the numbers showing that constructing thirty-two level 100’ x 100’ crane-pads to replace the 32 structures with minimal defects, trucking in and erecting these structures, and the environmental costs of making them, minimizes environmental impacts.

RE: “Laminated wood structures are susceptible to internal damage and the integrity of structures cannot be measured by conventional visual inspections.”

Confirm that there is only one laminated structure proposed to be replaced on these lines, as seems to be stated on page 3; “Structures targeted for replacement on these lines as part of this project are either natural or laminated wood (one structure)”

What is the life-span of a condition C pole that is repaired?

What methods of inspection show internal damage of laminated structures and does Eversource use these methods?

Provide the 'forensic' inspection reports on the laminated poles that have been cut down and show how these relate to Eversource's inspection reports and gradings of these structures.

P. 6:

How many structures have already been replaced on the A-152 and M-127, and when?

How many structures proposed for replacement have only one pole that is condition B or C?

Were any of the structures replaced in the 2008 reliability project replaced again in 2019 or 2022?

Are any proposed to be replaced in this asset condition project?

Provide the structure numbers of the structures replaced in each project.

A-152: 2008: structures 1-72 replaced, reliability project.

10/2012: Eversource listed the A-152 (rebuild line), project as a reliability project, part of the Western New Hampshire Solution.

10/17/2018: presentation to the PAC to replace 29 structures for \$6.1 m.

10/2019: AC list; under construction, structure replacements project \$6.8 m.

10/20/2021: revised presentation to PAC, replace 72 (the ones replaced in 2008?)/ 242 Laminated Phase II, \$15.264 m.

10/24/2023: RSP list, in-service; \$6.8 m and \$17.5 m. laminated phase II = \$24 m.

12/30/2023; presentation to PAC, structure replacements, \$5.9 m. = proposed \$5.9 m.
(-25/ +50%)

M-127: 12/19/2019: presentation to PAC, replace 139 structures, add OPGW; \$33.43 m.

2020-2022: presentation to PAC, replace 139 structures, add OPGW; \$33.43 m.

10/2020: AC list, proposed, \$33.4 m.

10/24/2023: RSP list, structures and OPGW, in-service, \$29.7 m. = \$29.7 m.

12/20/23: presentation to PAC, replace structures, = \$9.8 . m. proposed
(-25/ +50%)

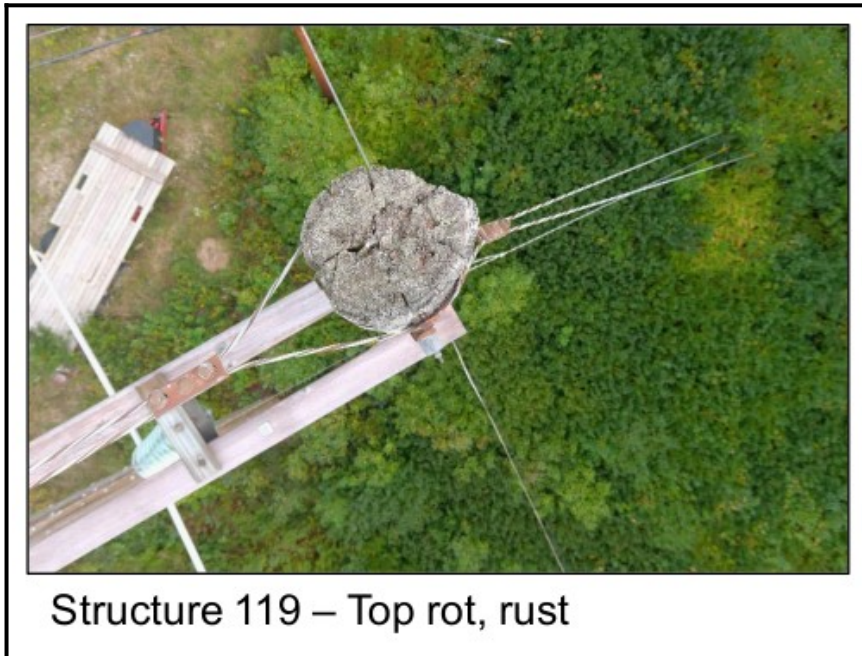
Pgs. 7& 8: All photos need to be dated. The inspection/rating history of the poles shown needs to be provided. How long they have looked like they do in the photo needs to be stated. The photos are meaningless if the rate of degradation is not given and if the degree to which the "defects" shown affect the integrity of the structure is not given.

Pole 119: Was this photograph taken during a repair project? When was it taken?

Was the rusted hardware replaced?

Is the wood on the trailer for repairs? If so, what were these repairs?

Were the crossbars and insulators replaced in 2016-17, as the glass insulators indicate?



If the crossbars and insulators were replaced, and the top rot and rust are presented as threatening system integrity, why were the rusty hardware and pole not replaced at the same time?

If the rust and uncovered-pole-top rot are not threatening system reliability, why is Eversource showing them?

If the pole top had been covered, would it be in better condition?

“Control... Keep wood dry. For practical purposes, and a margin of error, the rule is keep it at below 20% moisture content (dry-wood basis)... but many construction people and even architects do things wrong..”

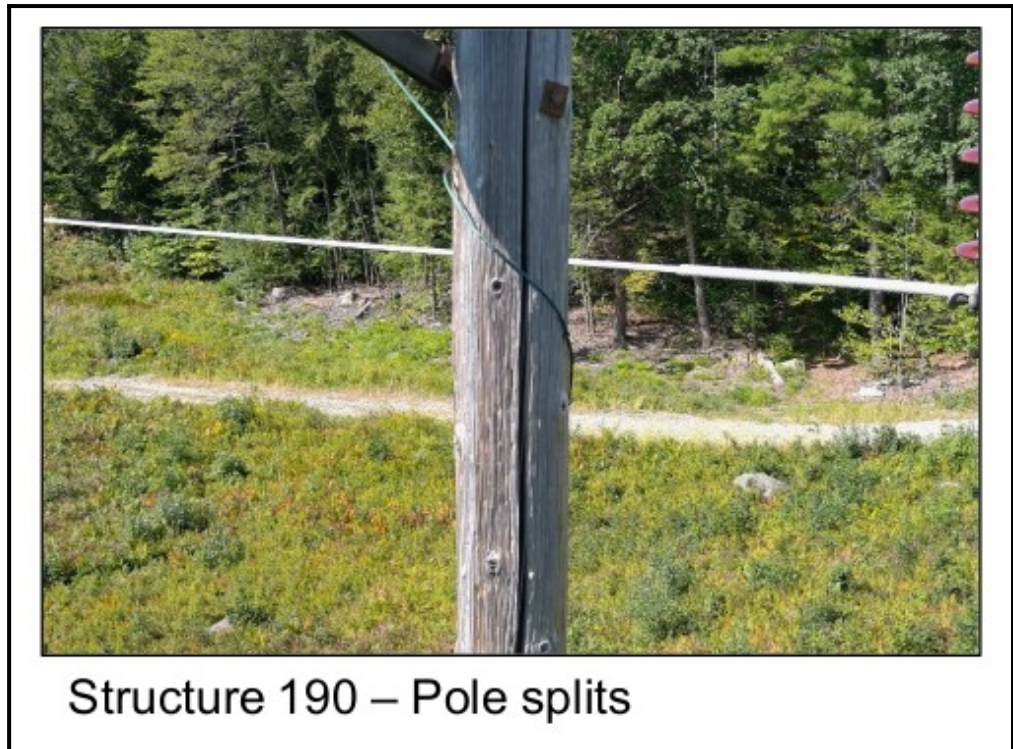
<https://forestpathology.org/general/wood-decay/>

Pole 190: To what degree does its condition impair its function?
Is there more than one pole split?

Does leaving pole tops uncovered increase the number and size of pole splits?

Is there a repair/re-inforcement procedure for pole splits?

What is the cost/benefit of repair vs. replacement?



To what degree does this pole split impair the function of the whole H-frame structure?

Pole 286: When was it last treated?

Is this White Rot (Basidiomycota with some Ascomycota), Brown Rot (Basidiomycota) or Soft Rot (Ascomycota)?

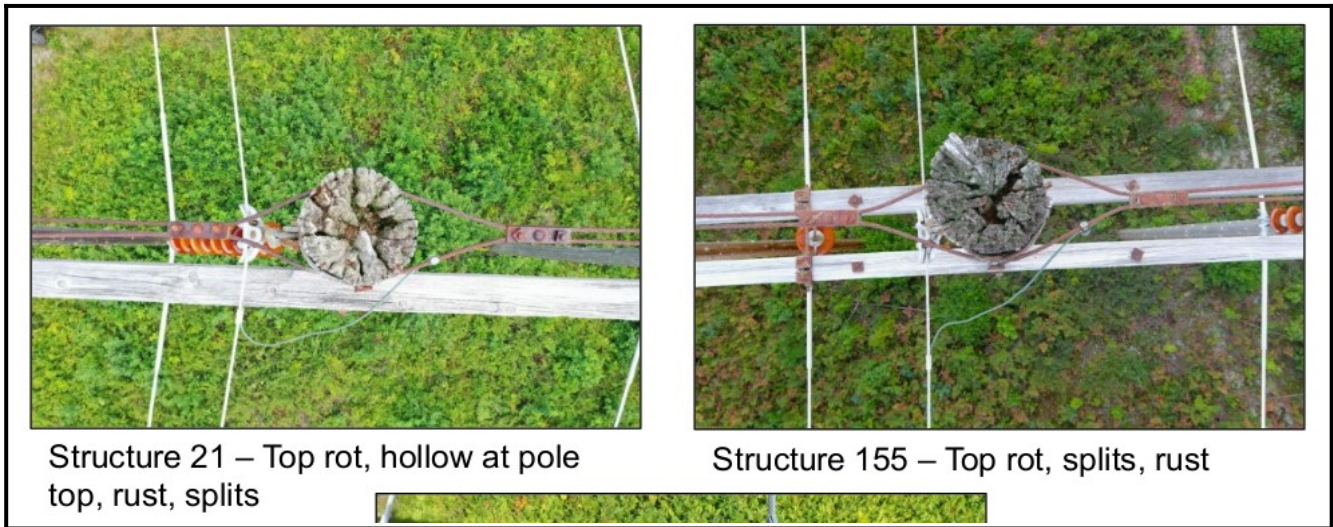
Are lichen present also?

What is the relationship between the micro-organisms causing the decay and the rate of decay?

How much does this rot affect the integrity of the



whole structure? What would this pole top look like if Eversource had covered it or protected it in another way?



To what degree is the rust shown impairing the functioning of the lines? Have these rusted lines replaced? If not, why are they shown as relevant?

P. 9:

Why is the steel structure being replaced?

Why are the wood structures being replaced with steel rather than wood? In minutes for the 12/18/19 meeting of the Lee N.H. Zoning Board of Adjustment, Eversource stated that steel poles last between 50 and 70 years. The wood H-frame structures on the 336 ASCR section of the X-178 line are 75 years old. None appear to have been categorized as Category D; in need of immediate replacement.

RE: “Based on targeted project scope and drivers, no alternatives were considered.”

Eversource addressed only Eversource’s project scope and drivers. The purpose of requiring alternatives is to require Eversource to address stakeholder needs and Eversource’s externalized costs, by presenting alternatives that acknowledge these as relevant.

Obvious alternatives are:

-Repair vs. replacement

-Repair/replacement of only D and C poles (at next maintenance, not years before) with identical wood poles rather than new larger and taller steel H-frame structures

-ACCC conductor (if increased line capacity or reduction in line-losses is deemed necessary by ISO) which has less line losses, is lighter per amp, has less sag and less load on existing structures per amp, thus removes the claimed need to replace structures with taller structures.

- Using regular ground wire which does not violate easements which do not permit fiber-optic and does not monitor acoustics and vibration, which is a violation of the privacy of easement-holders. Eversource provided no data on the increased performance of OPGW over regular ground wire, nor does it address the PFAS problem of OPGW.

P. 10:

Again, the claim that steel lasts longer than wood: In minutes for the 12/18/19 meeting of the Lee N.H. Zoning Board of Adjustment, Eversource stated that steel poles last between 50 and 70 years. The wood H-frame structures on the 336 ASCR section of the X-178 line, for example, are 75 years old. None appear to have been categorized as Category D; in need of immediate replacement.

Why is this presentation scheduled for the very end of the 4th quarter of 2023 when the A-152 has an “In-service date Q2 2024?” and the M-127 has an “In-service date: Q3 2024”?

What would the costs of the alternatives presented above be, compared to:

Line A-152: Total estimated PTF cost: \$5.909M (-25/ +50%)

Line M127: Total estimated PTF cost: \$9.834M (-25/ +50%)

P. 12:

Does anyone in the PAC actually expect Eversource, which is Ever-a-Source-of Sociopathic-Construction, to stop building its so-called Asset Condition projects before it has rebuilt all of its 115kV lines to carry its low-performance 1272 ASCC conductor, replaced every wood structure with a taller steel structure, and followed that with its plans for expansion for which it built/is building all its construction pads and roads?

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