kris pastoriza comment on Eversource's "proposed" finish-up-rebuild of its S-136 transmission line at an estimated cost to rate-payers of \$140 m.

"The existing utility poles are wooden poles that are old, worn, and have extensive damage by various wildlife, including clawing from bears. The project is needed to maintain safety and reliability of the transmission line.

Eversource, permit holder for utility lines across the WMNF, has identified 214 existing structures that need to be replaced within the existing right of way (ROW) of the S-136 transmission line in Whitefield, Jefferson, Randolph, and Gorham NH.

[Eversource needs to explain what it did to the S-136 in its 2010-2012 "Upgrade of the 27 mile overhead 115kV S136 line from Berlin, NH to Whitefield, NH"

Eversource needs to provide pole inspection reports and a list of how many structures on the line are in each of the four categories of structure integrity (A,B,C and D) as it has for the X-178 "proposed" complete rebuild and provide the recommendations for each category, as it has for the U-199 "proposed" complete rebuild:

"2022 inspections of this line graded condition of structures in accordance with Electric Power Research Institute (EPRI) guidelines: –A: Nominal Defect, B: Minimal Defect, C: Moderate Defect, D: Severe Defect" (X-178)

"Recently completed inspections of these lines graded condition of all structures in accordance with Electric Power Research Institute (EPRI) guidelines:

- -A: Nominal Defect No Action Required
- -B: Minimal Defect Monitor Degradation
- -C: Moderate Defect Repair or Replace under next maintenance
- -D: Severe Defect Repair, Reinforce, or Replace immediately" (U-199)

Eversource needs to provide evidence that bear scratching has affected the strength of the structures and if so, explain why it did not install protective covers.

This project has not been determined by ISO-NE as necessary for system reliability and no structure inspection reports have been provided by Eversource. Eversource needs to provide documentation supporting its statement that "The project is needed to maintain safety and reliability of the transmission line."]

The proposed structure replacement work will involve replacing wooden H-frame structures with new, steel H-frame structures along 7.4 miles of the ROW. All work will follow the Best

Management Practices Manual for Utility Maintenance in and Adjacent to Wetlands and Waterbodies in NH.

The Forest Service needs to required Eversource to pay for independent contractors to inspect the "proposed" construction during the construction process to ensure compliance with "Best" Management Practices.

The proposed project will use existing access routes within the S-136 transmission line ROW wherever possible. Portions of the ROW occur within the WMNF lands and there are also some areas where access to the ROW may need to cross WMNF lands. Most existing access routes are comprised of dirt or grassy areas, or previously used access routes, and are proposed to be improved as part of the project to allow for construction vehicle access.

Eversource needs to provide maps and photographic documentation of the existing condition of ts claimed "previously used access routes" and specs showing its "proposed" "road" "improvements;" the construction of permanent, 9" deep, 16-20' wide heavy equipment roads with rip-rap and gravel. Where necessary these roads are bermed with boulders excavated during construction as well as glacial erratics. These roads are major and permanent alterations of the terrain and fauna and have not been shown to be necessary for maintenance of the line, which was constructed and has been maintained without them.

No vegetation clearing is anticipated. Minor trimming of tree branches may be needed along the ROW for equipment access. The width of the ROW will not change, no new off-ROW access roads will be constructed (upgrades to existing may be needed), and no new additional transmission lines will be built. Where access and work pads are proposed within wetlands, Eversource will use temporary timber matting to cross wetlands. Individual timber mats are about four feet by sixteen feet and will be placed in adjoining segments to span wetlands. Upon completion of work, temporary timber matting will be removed, and wetlands will be restored by seeding and adding mulch if needed. In uplands, Eversource is proposing grading and construction of about sixteen foot wide gravel access roads and 100 by 100 square foot gravel work pads at most structure locations. Upon completion of work, Eversource is proposing to leave access roads in place in order to access structures in the event of an emergency, and will reduce work gravel pads to an approximate sixty by thirty foot area in order for bucket trucks to access structures in emergencies or when structure maintenance is needed.

Eversource fails to state that construction pads are not always reduced in size and when they are this means pushing some topsoil over the gravel and rip-rap surface, not true restoration of the former grade or subsurface soils.

Eversource needs to provide justification for the expense, fragmentation and massive terrain degradation that would be caused by its construction of permanent roads and construction pads for future access to a completely new line that should not require more than very occasional structure replacements in the next 50 years, especially considering that maintenance has been done over the past 50 years without problems.

Eversource needs to provide documentation of why access for bucket trucks is needed when these have not been necessary for maintenance on the majority of the line in the past. Are the metal structures un-climbable, and if so, why are they being used when this so seriously limits ease of repair?

Eversource needs to provide topographic maps with 2' lidar contours showing its "proposed" post-construction permanent altered terrain, as shown below:



https://nhconservation.org/lib/exe/fetch.php?media=x178:es-x178-6-3-planset-stamped.pdf

Structure heights will increase on average ten to fifteen feet which is required to meet current National Electric Safety Code standards.

Eversource fails to mention that structure height increases are only required to meet current NESC standards because it "proposes" to replace the existing 795 ASCR 908 amp conductors

with larger, heavier, high-sag 1272 ACSS 2,200 amp conductors that require taller structures to maintain the clearance to ground required by Code.

Eversource needs to provide profile drawings of the line showing that this clearance to ground is the minimum necessary, since it regularly exceeds necessary clearances by tens of feet.

Eversource fails to state that the OPGW, which is not permitted in the terms of the easement, requires greater clearance to the conductors than the existing ground wire, and it has claimed that this is where the height increases will occur, though this would only account for around 5' of added height. Below: "Portion of structure that will increase in height"



The proposed project will not add any new lines within the ROW and Eversource is not proposing to expand the width of the ROW.

Vehicles and equipment that will need to access the transmission line corridor include mobile cranes to set poles, flatbed trucks to deliver materials, and other mobile equipment such as drill rigs, frontend loaders, and excavators.

Eversource fails to state that the project could be built without mobile cranes or built with tracked mobile cranes that do not require heavy-equipments roads. It fails to provide

documentation showing that PSNH's former lower-impact construction methods, that did not include permanent roads and construction pads, can not be used.

The project proposes to use portions of two existing roads outside of the ROW for access.

Eversource fails to provide maps showing the locations of these roads

Grading and the addition of gravel may be necessary to make the off-ROW access roads passable by construction equipment.

Eversource fails to provide documentation showing a necessity for building new heavyequipment roads ("grading and addition of gravel") on WMNF property.

No tree clearing will be required during any phase of construction, and all work will occur within the existing, cleared transmission line ROW and access roads.

Construction proposed to begin winter 2023, pending issuance of necessary permits and approvals, through spring 2025. Work is expected to take place throughout the year to allow for time to replace the structures and replace the overhead wires.

Eversource fails to state that by "wires" it means three conductors and two OPGWs with a combined weight of 5,989 lbs. per 1,000'.

Eversource fails to mention that it refuses to assess low-sag, low line loss ACCC type conductor for this project as recommended by the Department of Energy and required by FERC Order 1920.

Eversource fails to note that no state or federal agency has assessed this project for need or prudence.

kris pastoriza

krispastoriza@gmail.com

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