

Comment on more mis[sing] -information X-178 DE-24-087 and SEC 2024-02

The profiles which Eversource gave to the SEC after refusing give them to the public for more than a year, show that structure heights could be lowered by at least 10' in almost every location.

This assumes that the conductor is sagged at a the maximum tension. Eversource's max. design tension is 10,000 lbs. The rated standard strength of 1272 ACSS 54/9 is 34,100 lbs. Maximum tension is recommended to be not more than 60% of rated strength, which appears to make the max. tension of the 1272 ACSS 20,460 lbs.

If this is correct, why is Eversource using a max. 10,000 lbs design tension, which would be expected to increase sag and thus structure heights?

The profiles fail to show the level 100' wide construction pads and how these would affect Eversource's "proposed" structure heights.

Eversource only provided profiles for its 1272 ACSS conductor though it has profiles for the existing line and other conductors, because the X-178 project cannot withstand any scrutiny; of conductor, OPGW, structure material, structure heights, roads, construction pads, costs, or the actual condition of the existing structures and their remaining years of service.

Eversource never revealed the numbers of Category C structures for its complete rebuilds listed below. Nor did it provide forensic structure ratings or assessments. These lines indicate that the X-178 has 20-40 years of service left:

B-112: 1956-2024 68 years

O-154: 1946-2024 78 years

D-142: 1948-2023 76 years

W-179: 1948-2024 77 years

E-115: 1953-2023 70 years

A-111: 1953-2023 70 years

Z-180: 1953-2023 70 years

If the PUC had decided to investigate Eversource's "Asset Condition" projects, the SEC and PUC dockets might have been unnecessary. Instead, Easton and Bethlehem are required to spend time and money they can ill-afford in an attempt to protect themselves from the absence of regulatory oversight and no-proof-required permitting of these Eversource projects.

