

May 3, 2024

Hi Jasmin,

the Eversource SUP for the Horner Brook section of the X-178 line states:

This permit covers 11 acres and is described as shown on the location map attached to and made a part of this permit, and is issued for the purpose of:

Relocation of 115 kv and 69 kv power transmission lines, # X-178, # 67 and # 691, E of R175 and proposed I-93 (since completed) corridor; permit area consists of 3 segments all 100 feet in width running N to S between Horner Brook and Russell Pond Brook. Use area crosses portions of T50e, T57i and T914 all in Woodstock, NH.

Eversource's proposed complete rebuild of the X-178 is not “for the purpose of relocation of the X-178 ”(for the accommodation of I-93.)

Please provide the Forest Service's written statement confirming if its apparent position that Eversource's complete line rebuild in the area covered by this SUP is the “Relocation of 115kV transmission line X-178” as described in this SUP.

The SUP also states:

K. Powerline Change Application (X48). The holder agrees that no substantial change or alteration shall be made in the design, location, construction, voltage, or capacity of this line until application for such change shall have been submitted to and approved by the authorized officer.

The proposed new line has substantial changes in:

#1. Design material (wood to steel),

#2. Design height (taller structures; up to 85')

#3. Construction; a permanent 16' road and 100' x 100' graded and graveled construction areas (habitat fragmentation),

#4. Capacity: The power carrying capacity of the line is proposed to change substantially; from 908 amps to 2,200 amps,

#5. Capacity: Eversource plans to replace the existing (2) static/ground lines with OPGW (Optical Ground Wire) which transmits intelligence and is thus a substantial change in capacity

since intelligence has not been transmitted on this line since it was built in 1948, is not electricity, and is not permitted in the original easements.

Please provide Eversource's Powerline Change Application or the Forest Service's written decision on why it considers a Powerline Change Application unnecessary.

Section III-A of the Special Use Permit states:

C. Maintenance. The holder shall maintain the improvements and permit area to standards of repair, orderliness, neatness, sanitation, and safety acceptable to the authorized officer and consistent with other provisions of this authorization. If requested, the holder shall comply with inspection requirements deemed appropriate by the authorized officer.

Please provide the Forest Service's written confirmation that it does not hold Eversource responsible for failures of maintenance, for example failure to install pole top covers or bear-guards (if the bear scratching actually affects the pole integrity; where is the proof of this?) that have increased the rate of pole degradation on the X-178.

Please provide the Forest Service's written confirmation that it does not hold Eversource responsible for contamination resulting from Pentachlorophenol, creosote, and PFAS in the herbicides applied to the easement.

Please provide the Forest Service's written confirmation that it will hold Eversource liable for PFA contamination from the covering of the proposed Optical Ground Wire.

The Horner Brook section of the X-178 Small Projects Day application states:

**10. Purpose and Need**—Describe relationship between the current and desired future condition. Why is the project needed?

Eversource X178-1 Transmission Line is a current permitted special use on the White Mountain National Forest (permits WTM0759 and WTM0771). Recent pole inspection found the wooden pole structures to be in poor condition given their age, damage from wildlife, insects, and rot. The project is needed to maintain public safety and reliability of the transmission line.

Please provide the "recent pole inspection" reports showing the poles/structures to be in "poor condition", as well as the Forest Service's and Eversource's definitions of "poor condition."

Has Eversource's one month delay in its permitting, proposed construction and presentation to the Project Advisory Committee of ISO-NE of a revised X-178 plan, delayed the assessment of the Horner Brook "Small Project"?

Thanks,

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