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“Regional Committee Cites Concerns About Proposed Eversource Line Rebuild Following Community Petition, NHSEC Public Hearing Scheduled For Sept. 23

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As communities in northern Grafton County voice concerns about taller towers and environmental impacts from Eversource Energy's proposed X-178 transmission line replacement, the New England States Committee on Electricity has weighed in with consumer-related concerns.

NESCOE questioned the need for the project and the use of ratepayer dollars and suggested that a continued lack of information from Eversource could result in an action filed with the Federal Energy Regulatory Commission (FERC).

At the same time, a public hearing was recently scheduled for Sept. 23 before the New Hampshire Site Evaluation Committee, following a petition by the towns of Easton and Bethlehem, which are asking the NHSEC to oversee the full rebuild project because of impacts.

Residents and town officials in both communities, and in towns beyond, have expressed concerns about taller towers affecting views and aesthetics, impacts to wetlands, streams, vernal pools and the environment from new access roads and construction, and information they say Eversource omitted at previous public meetings about the project.

Eversource is proposing a 115-kilovolt line replacement, a segment of which runs nearly 50 miles from Whitefield to Camp- ton, including 12 miles through the White Mountain National Forest. The line has a total of 594 structures, 570 of which are wood and are proposed for replacement.

It's part of an estimated \$400 million line rebuild through several counties.

Eversource representatives have said replacing towers and lines is needed because of aging infrastructure, including wooden poles, some of which are decades old and have deteriorated and incurred woodpecker damage. The proposed replacement is new steel poles that would be an average of 12 feet higher and top out at about 67 feet. On Aug. 1, the nonprofit NESCOE weighed in with a letter to Eversource. Eversource first proposed a full rebuild of its line on Feb. 28, after which NESCOE and other stakeholders submitted feedback to Eversource.

In their letter, NESCOE representatives raised "concerns about the lack of compelling evidence to support the scope of the project and asked Eversource to provide additional information, including a targeted solution alternative."

Eversource responded on June 20 with a written memo and subsequent presentation.

"In sum, NESCOE objects to Eversource's announcement that it will proceed with the project as originally proposed," said NESCOE representatives. "Eversource's plan, despite broad state and stakeholder discomfort and outstanding requests for information, illustrates how the lack of sufficient federal oversight on the asset condition project pathway governing billions of dollars of spending per year is not adequately protecting New England consumers."

Eversource, they said, did not directly respond to NESCOE's requests and refused to provide a targeted minimum solution, stating that such an approach was "inefficient from a... cost perspective

They said that Eversource also did not address NESCOE's request to provide information on the major cost drivers.

"Eversource's disregard of requests for information that states believe would help assess proposals was troubling," said NESCOE representatives. "Information should not cause fear, particularly when Eversource is free to caveat it however Eversource deems appropriate. Eversource's persistence in claiming this project is cost-effective without providing the necessary cost details to allow stakeholders to ascertain the reasonableness of this statement underscores the continued need for a comprehensive Asset Condition Needs and Solution Guidance document, as NESCOE has emphasized in several prior communications to the New England Transmission Owners."

The additional information that Eversource provided does little to address NESCOE's concerns about the project, they said.

"For example, Eversource's breakdown of structure ratings by segments shows that the company is fully rebuilding a segment in which only 2% of structures show asset condition concerns under Eversource's grading system," said the NESCOE representatives. "Moreover, during the presentation another transmission owner opined that a more staggered or targeted replacement approach might be appropriate based on the information provided."

"Similarly, information from other transmission owners about asset deterioration in general indicates that the useful life of structures is approximately 60 years, while Eversource expresses concerns with not replacing 40-year-old structures here," they said. "While each transmission owner applies its judgment in relation to its assets, Eversource did not provide a reasoned explanation for its judgment falling outside the norms in this case."

That Eversource has met the minimal obligations of the current asset condition process provides a stark example of how inadequate the existing process is from a consumer protection standpoint, said NESCOE representatives.

Based on the information that Eversource has shared to date, NESCOE is not persuaded that this investment is a reasonable use of consumer dollars," they said. "We strongly encourage

Eversource to respond to outstanding information requests, and to the broad and serious expressions of concern raised by states, consumer advocates, and stakeholders about the project as proposed."

Absent information showing that the use of consumer dollars is well-supported and reasonable, NESCOE is prepared to use its full resources to explore all available options to dispute the reasonableness of the investments, including, but not limited to, action at FERC, they said.

On Friday, The Caledonian-Record reached out to Eversource for comment about NESCOE's concerns and asking if the company intends to provide the requested information as well as all cost analyses and any alternatives studied.

"Asset condition projects or line rebuilds such as this are critical to enhancing reliability for customers as we make the transmission system more resilient to the increasingly extreme weather we're experiencing in New England and addressing aging infrastructure that in many cases was originally built over 50 years ago," Eversource spokesperson Kaitlyn Woods said in a statement. Eversource continues to comply with established processes for review, consideration, and oversight of these projects and has engaged in extensive community outreach efforts, including with local municipalities, she said.

"We recognize certain stakeholders take issue with the existing external review and oversight processes for these types of projects and we have been engaged in the conversations to consider potential adjustments to those processes," said Woods. "Making our transmission infrastructure more resilient is critical to ensuring safe, reliable service to our customers, and we will be providing a response to NESCOE."

The NHSEC public hearing is scheduled for 1 p.m. Sept. 23 at the offices of the New Hampshire Public Utilities Commission in Concord.

It follows the petition that the Easton and Bethlehem Select Boards submitted in May.

Other towns crossed by the X-178 line include Dalton, Lincoln, Sugar Hill, Whitefield, and Woodstock."