EVERSOURCE ENERGY

February 26, 2024

To: Kris Pastoriza

From: David Burnham
Director, Transmission Policy
Eversource Energy

Subject: Response to Comments Submitted to ISO-NE and PAC regarding Eversource Asset Condition Project Presentations

Please see below for responses to several comments and questions which you submitted regarding our asset condition projects via the stakeholder process administered by the ISO New England (ISO-NE) through the Planning Advisory Committee (PAC).[1] In this response, I address the role of the PAC in reviewing proposed asset projects. Additionally, I provide some responses to several of the questions raised in your comments, especially those that pertain to Eversource's transmission line conductor and shield wire selection process, and our rationale for line structure replacements.

Role of the Planning Advisory Committee

The PAC plays an important role in the regional system planning process and gives stakeholders an opportunity to discuss many issues pertaining to long-term planning of the New England transmission system. The responsibilities of the PAC are defined in Section 2.2 of Attachment K to the Open Access Transmission Tariff (OATT) and comply with the requirements of Order No. 890 from the Federal Energy Regulatory Commission (FERC). The PAC serves as the primary committee through which ISO-NE and/or the New England Transmission Owners review and discuss a variety of topics related to transmission planning, including but not limited to (1) the development of the Regional System Plan (RSP), (2) assumptions for studies, (3) the results of Needs Assessments, Solutions Studies, and competitive solutions developed pursuant to Section 4.3 of Attachment K to the OATT, (4) potential market responses to the needs identified by ISO New England in a Needs Assessment of the RSP, (5) Cluster Enabling Transmission Upgrades Regional Planning Studies, and (6) Longer-Term Transmission Studies.[2]

FERC Order No. 890 and Section 2 of Attachment K of the OATT provide the framework for the role of the PAC in the regional system planning process and give stakeholders further information as to the extent of their roles and responsibilities. Providing an opportunity for stakeholders and market participants to discuss issues pertaining to asset condition projects is an essential function of the PAC, but it is not intended to serve as a forum for discussion on project-specific ancillary issues such as permitting and

[1] While we are responding primarily to your January 21, 2024 comments on the Hurd State Park project presentation, some of this information also addresses questions you have raised in other comments.
[2] https://www.iso-ne.com/participate/rules-procedures/tariff/oatt Attachment K, Section 2.2

siting.[3] Many of the questions and concerns raised in your comments are related to the potential visual, community, and environmental impacts of our transmission projects – these issues are best addressed in the project siting and permitting processes. In addition to presenting projects to the PAC, Eversource prepares and submits project-specific applications for federal, state, and local agency approvals, including applicable siting reviews and permitting. These processes also include coordination with affected stakeholders. Further, in order to solicit local stakeholder and community feedback and address concerns, Eversource implements a variety of outreach programs during each phase of a project. As you are aware, these public engagement efforts may include, but are not limited to, mailings, door-to-door outreach, open house events, and one-on-one meetings with affected property owners.

Transmission Line Equipment Selection

Whenever possible, Eversource takes a holistic approach to transmission line asset condition projects. Comprehensively addressing multiple needs as part of a single project minimizes repeated visits to the same locations, limits the number of disruptions to the environment and abutters and results in long-term cost efficiencies.

Even seemingly simple project design decisions, such as conductor selection, are affected by numerous factors, including the condition of the existing conductor, material cost, tensile strength, electrical characteristics, product availability, capacity, clearance requirements and availability/cost of replacement parts and equipment. Eversource typically uses widely available standard conductor sizes and technologies in order to take advantage of supply chain efficiencies, simplify designs, and lower the long-term costs of spare parts and equipment. While Eversource continually evaluates new conductor technologies, traditional technologies such as steel-supported aluminum conductors (i.e., Aluminum Conductor, Steel-Supported or ACSS) offer superior performance and lower costs for the vast majority of applications.

Some of your questions are related to transmission line structure design considerations, and more specifically, why new transmission line structures are sometimes taller than the structures they replace. Transmission line asset condition projects often require Eversource to bring transmission lines into compliance with current design standards and criteria. An existing line may meet design standards applicable when the line was initially installed, but current standards are typically much more stringent. For example, conductor blowout criteria were added to the National Electric Safety Code (NESC) guidelines in the mid-1970s, after many of Eversource's existing transmission lines were already constructed.

You have also asked questions about Eversource's use of Optical Ground Wire (OPGW) as a replacement for existing shield wire. OPGW improves system reliability by providing a private, controlled, and secure

[3] Within Order No. 890, FERC stated, "We also clarify that the coordination requirements imposed in this Final Rule are intended to address transmission planning issues, and are not intended to provide a forum for ancillary issues, such as specific siting concerns, which are better addressed elsewhere." See https://www.ferc.gov/sites/default/files/2020-06/OrderNo.890.pdf at P 453.

high-speed data transfer and communications path that is essential for a variety of uses, including system protection. Because OPGW has different characteristics than older shield wires, sometimes older structures may need to be replaced to facilitate OPGW installation while complying with current criteria.

Conclusion

Eversource appreciates the opportunity to respond to your questions raised through the PAC process, in addition to those you have already raised to us directly concerning transmission line rebuilds in your area. Additional information about major Eversource transmission projects is available on our website.[4] Individual project pages provide the contact information for our Project Services team, who are available to answer more detailed questions about specific projects. We also look forward to further discussions with the PAC regarding the planning processes for asset condition projects in New England.

[4] https://www.eversource.com/content/residential/about/transmission-distribution/projects