

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE SITE EVALUATION COMMITTEE**

DOCKET NO. SEC 2024-02

**PETITION REQUESTING JURISDICTION AND OVERSIGHT OF X-178
TRANSMISSION LINE REPLACEMENT PROJECT**

EVERSOURCE PETITION FOR INTERVENTION

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”), by and through its undersigned attorneys, requests that the Site Evaluation Committee (“SEC” or “Committee”) grant its Petition for Intervention pursuant to Site 202.11 and RSA 541-A:32. As demonstrated below, Eversource’s rights, duties and other substantial interest may be affected by the proceeding.

On May 29, 2024, the Towns of Easton and Bethlehem (“Towns”) filed a letter contending that certain work that Eversource is planning to upgrade the 115 kV transmission line between the Beebe River Substation in Campton, New Hampshire and the Whitefield Substation in Whitefield, New Hampshire (the “X-178 line”), “falls under the ‘sizeable changes and additions’ language of RSA 162-H.” Towns’ Letter at p. 1. Based on the Towns’ belief that Eversource’s work on the X-178 line would be a sizeable change or addition, the Towns take the position that Eversource should be required to file with the SEC an application for a certificate of site and facility.

On July 29, 2024, Chairman Goldner issued an Order and Notice of Public Hearing (“Notice”) that, among other things, set a deadline of September 3, 2024, for the filing of petitions for intervention. The Notice further indicates that the Committee must determine whether the transmission line replacement is a sizeable change or addition, or that it may, alternatively, determine whether to exempt the project from the approval and certificate

requirements of RSA 162-H. The Notice also scheduled a public meeting for September 23, 2024, at which time “the Committee will consider motions to intervene, if any are filed, and in the absence of intervention, may deliberate on the merits of the Petition or may determine that further proceedings are necessary.”

Eversource owns and operates the X-178 transmission line as part of its integrated network of electric transmission and distribution lines in New Hampshire. Consistent with its public utility duty to provide safe and adequate service pursuant to RSA 374:1, for the past year Eversource has been working with communities along the transmission line from Campton to Whitefield and with the Department of Environmental Services, the Fish & Game Department, and the Division of Historical Resources, for the planned replacement of infrastructure in order to increase system reliability, resiliency and safety. Eversource disputes the Towns’ assertion that the work on the X-178 transmission line is a sizeable change or addition to the existing facilities. Moreover, existing state statutes and municipal ordinances provide adequate protection of the objectives of RSA 162-H:1.

Site 202.11 (b) (2) and RSA 541-A:32, I (b) provide that the presiding officer shall grant a petition for intervention if the petition “states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” Based on the facts stated above, namely Eversource’s ownership rights and its public utility duty, as well as “that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention,” Eversource’s petition for intervention should be granted inasmuch as the proceeding requested by the Towns could lead to the imposition of unnecessary regulatory burdens, obligations and costs on Eversource, as well as substantial delays in the upgrade of critical electric infrastructure.

WHEREFORE, the Petitioners respectfully ask that the Chairman or designated presiding officer:

- A. Grant Eversource's Petition for Intervention; and
- B. Grant such additional relief as deemed just and appropriate.

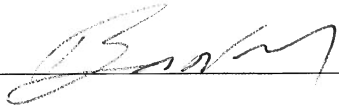
Respectfully Submitted,

Public Service Company of New Hampshire d/b/a
Eversource Energy

By Its Attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION

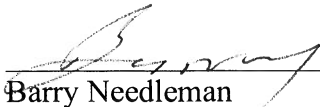
Dated: August 15, 2024

By:  _____

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Certificate of Service

I hereby certify that on August 15, 2024, the foregoing Petition was electronically filed with the New Hampshire Site Evaluation Committee and emailed to the enclosed service list, and that one hard copy was subsequently delivered to the New Hampshire Site Evaluation Committee.

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Barry Needleman