

Easton Conservation Commission Permitting Briefing

The PAC is not mentioned in this document or any other Eversource Asset Condition project document for the public, easement-encumbered landowners, towns, municipal groups; the real stakeholders.

Eversource Transmission Line Rebuild Project



O-154 after rebuild



January 3, 2024

X-178, existing



O-154 after rebuild

Agenda

- Introductions
- Project Scope
- Permitting Overview
- Construction and Restoration Phases
- Schedule and Next Steps

Eversource fails to mention that the X-178 is being presented as an Asset Condition project and to explain what that means (if built it will be paid for by the ratepayers.)

Eversource fails to mention that the X-178 is not an Asset Condition project because the replacement of the 336 ASCR and 795 ASCR conductor with 1272 ACSS conductor is not incidental to the project.

“Asset Management refers to projects and activities that ‘encompass the maintenance, repair, and replacement work done on existing transmission facilities” which “may result in an incidental increase in transmission capacity that is not reasonably severable from the asset management project or activity, and . . . is [not] subject to the transmission planning requirements.”

What Do We Need to Do?

Want
Replace the existing transmission line for improved system reliability

- Replace the older, degraded wooden pole structures with new weathering steel structures.

Eversource fails to provide inspection reports on the conductors, fails to mention that the new conductor is larger and heavier and will double and quadruple the capacity of the line.

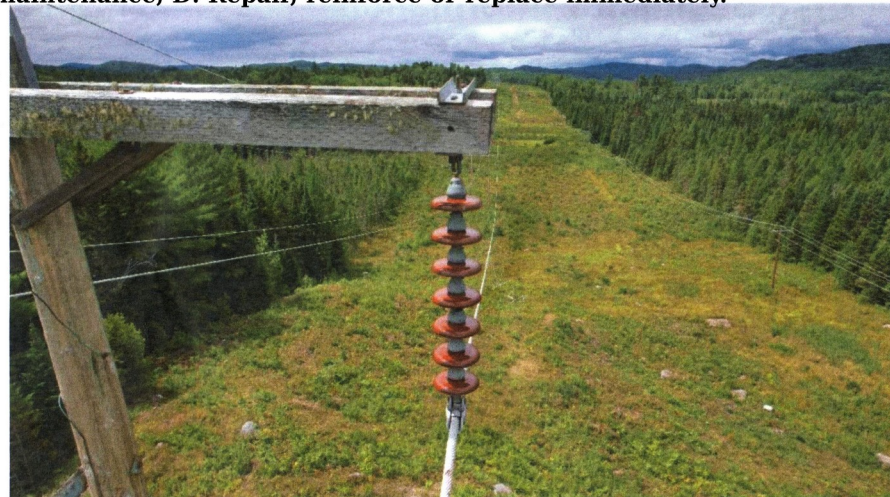
Eversource fails to provide data on the reliability of the existing ground wire compared to OPGW or a cost-benefit calculation for OPGW vs regular ground wire.

Install new transmission wire (conductor) and add new communication wire (OPGW).

The new steel structures will be able to support the weight of the new wires and will better withstand the storms we experience here in New Hampshire.

The line must be built to present-day electrical safety standards and codes, which require more robust structures.

Eversource refuses to provide their structure inspection reports and does not provide EPRI ratings for the structures; how many are A: No Action Required, B: Monitor Degradation, C: Repair or replace under next maintenance, D: Repair, reinforce or replace immediately.



The existing line is built to present day electrical safety standards. Eversource fails to mention that it is their proposed heavier conductor and OPGW that require larger and taller structures. Eversource fails to provide a cost benefit analysis of wood vs. steel or mention that they refuse to use ACCC conductor which is lighter than their proposed ACSS conductor, has less sag, allowing shorter structures, and lower line losses, increasing the efficiency of the grid. Eversource fails to provide data on failures that may have occurred on the X-178. Eversource fails to mention that ISO-NE, the organization that plans and oversees the grid, has not stated that the X-178 needs to be upgraded for system reliability, but that ratepayers will still be paying for it

Easton Scope



A safer, more resilient, more reliable system

No definition of these terms provided. No statistics on how much 'safer', 'more resilient' or 'more reliable' the proposed new line would be. No cost-benefit provided for repair vs. reinforce vs. replace for category D- "Repair, Reinforce, or Replace Immediately" poles.

X178 Segment 2 Information

- 20.8 miles
- 232 Structures (231 will be replaced)
 - 76 structures in Easton
 - Phase 1 – Outside WMNF (25 structures)
 - Phase 2 – Within WMNF (49 structures)

No mention of Eversource's 2018 Asset Condition plan to replace 56 of the 570 structures on the the X-178 at a cost of \$11. m. and explanation of how, five years later, it can claim that building a new line, new roads and new constructions pads at a cost of \$200 m. (-25%+50%) is necessary or prudent.

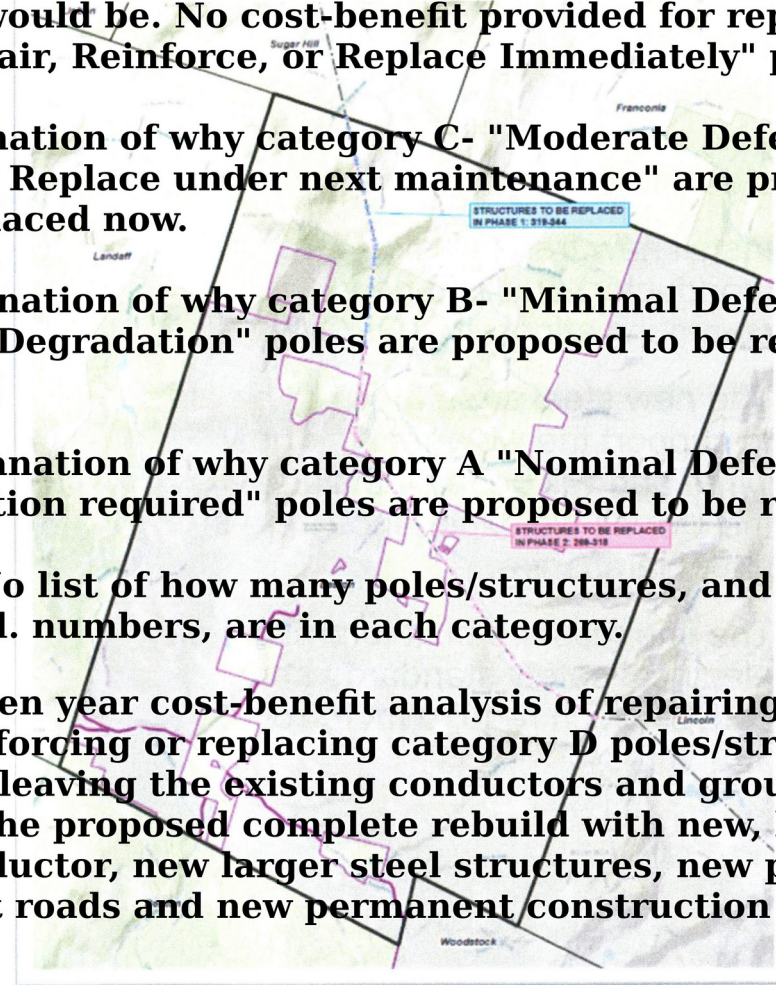
No explanation of why category C- "Moderate Defect- Repair or Replace under next maintenance" are proposed to be replaced now.

No explanation of why category B- "Minimal Defect, Monitor Degradation" poles are proposed to be replaced now.

No explanation of why category A "Nominal Defect- no action required" poles are proposed to be replaced.

No list of how many poles/structures, and their id. numbers, are in each category.

No ten year cost-benefit analysis of repairing, reinforcing or replacing category D poles/structures and leaving the existing conductors and ground wire vs. the proposed complete rebuild with new, larger conductor, new larger steel structures, new permanent roads and new permanent construction pads.



Permitting

its
Based on preliminary assessment, Eversource expects that permit review from the following agencies:

Federal **No explanation of the regulatory power, if any, these agencies have, or how often they deny permits or require plan alterations.**

- United State Army Corps of Engineers
- United States Fish & Wildlife Service
- Federal Aviation Administration
- US Forest Service (NEPA) EA

State **No mention that Eversource is**

- NHDES Wetlands, Shoreland and Alteration of Terrain programs **signing the DES permits as the landowner, cutting the actual land**
- NH Fish & Game Department **owners out of the permitting process and keeping them**
- NH Natural Heritage Bureau
- NH Department of Energy
- NH Department of Natural & Cultural Resources



Local

- Permitting pursuant to local land use ordinances as required.

ignorant of what is planned to be done to their property and ignorant of the waivers Eversource routinely applies for and is given by DES.

No mention that DOE approves all river and public lands crossings and doesn't object when Eversource routinely uses taller structures than necessary.

Project Sequencing and Permitting

- Due to the long timeframe for National Environmental Policy Act (NEPA) permitting in the White Mountain National Forest (WMNF), the X-178-2 project is proposed to be permitted and constructed in two phases in the Town of Easton (subject to change)
 - Phase 1 (Structures 297 – 299; 302 – 304; 319 – 344) will encompass those structure locations that **are not in** or require access through the **WMNF**.
 - Phase 2 (~~Structures 269 – 318~~) will encompass those structure locations that **are in** or require access through the **WMNF**; **structures 269-301 and 305-318**
- Eversource will prepare separate permit applications for both Phase 1 and Phase 2.

Permitting Summary for Easton



X178 LINE REBUILD PERMITTING SUMMARY									
Town	Project Name	Termination Locations	Length of Project in Easton (mi)	# of Structures in Easton	Eversource Permitting Contact	Environmental Vendor	State Environmental Permits	Federal Environmental Permits	Exp. Timeline for AoT/SDF Submittal
Easton	X178-2 Line Rebuild	N Woodstock Substation in N Woodstock to Streeter Pond Switchyard in Sugar Hill	xx	76	Kurt Nelson	GZA	AoT, SDF	NEPA EA, ACOE SGP, EPA CGP	Mar-24/Jan-24
AoT	NHDES Alteration of Terrain for land disturbance Copy of application sent to Town Clerk, Municipality has 14 days from Notice of Acceptance to provide comment to NHDES Easement-encumbered landowners are not notified of this submission.								
SDF	NHDES Wetlands Standard Dredge & Fill for impacts to wetlands and waterways Four copies of application provided to Town Clerk, Optional Pre-application meeting with Conservation Commission, Municipality has 14 days from Notice of Acceptance to provide comment to NHDES Easement-encumbered landowners are not notified of this submission.								
Shoreland PBN	Shoreland Permit by Notification for land disturbance within shoreland areas								
NEPA EA	National Environmental Policy Act Environmental Assessment for work in the White Mountain National Forest Public outreach, comment opportunity as determined appropriate by US Forest Service								
ACOE SGP	Army Corps of Engineers State General Permit for work in wetlands and waterways The ACOE application is the NHDES SDF application								
EPA CGP	Environmental Protection Agency Construction General Permit for land disturbance Notice of Intent submitted to EPA just prior to start of construction Easement-encumbered landowners are not notified of this submission.								

Construction & Restoration Phases



No roads shown, no construction pads shown, no way to compare existing structures heights to new structure heights, dump truck is full of rip rap but no gravel or rip rap is shown on the ground.



B112 Active Civil Construction 2023



E115 Restoration –Construction Complete 2023



O154 Restoration –Construction Complete 2023

Construction pads and roads are invisible. New structure heights are impossible to judge. New growth hides the terrain alterations.



D142 Construction Complete 2022



A111 Construction Complete 2022

Wetland area shown because it has no roads or construction pads Road and hill damage are shown from far, far away.

Eversource fails to mention that 'restoration' of construction pads means "Work pad restoration should include reducing the work pad to a 30 by 60 foot area, and reducing slopes to a maximum of 25% Safety First and Always

'Cable installation will be performed so as to avoid, or limit to the maximum extent possible, traversing wetlands with heavy equipment" Who notices when the maximum avoidance is not done?

Eversource construction close up; another “Asset Condition” project.



Project Schedule

- Phase 1
 - Q4 2023 – Q2 2024: Permitting
 - NHDES Wetlands Preapplication Meeting Q4 2023
 - NHDES Wetlands Permit Application submittal Q1 2024
 - NHDES AoT Permit Application submittal Q1 2024
 - Local Permitting Q1-Q2 2024
 - Q2 2024: Pre-Construction Information Session
 - Q3 2024 – Q4 2026: Construction
 - Restoration will be ongoing during construction for stabilization to the extent it's possible.
- Phase 2
 - Q4 2023 - Q2 2025: Permitting
 - Q3 2025 – Q4 2026: Construction

This schedule is weather dependent and subject to change

On September of 2023, the Massachusetts, Rhode Island, Maine, Connecticut and New Hampshire Consumer Advocates wrote a letter to Eversource and other New England Transmission operators requesting that “all non-emergency and/or elective Asset Condition Projects that have yet to start construction (i.e., concept/proposed/planned projects) are postponed until the Asset Condition Project reform process at the PAC is completed and replaces the current process. Temporarily pausing non-emergency Asset Condition Projects until the aforementioned process reforms are in place will help to ensure that the billions in ratepayer dollars that the NETOs propose to spend are carefully and appropriately evaluated through a uniform, robust, and transparent transmission planning framework.”

Why has Eversource made no response to this request by five consumer advocates who represent electricity consumers in five states, to place the X-178 and other pending “Asset Condition” projects on hold?

“Recently completed (when?) inspections of the X-178 lines graded condition of all structures in accordance with Electric Power Research Institute (EPRI) guidelines:

- A: Nominal Defect – No Action Required
- B: Minimal Defect – Monitor Degradation
- C: Moderate Defect – Repair or Replace under next maintenance
- D: Severe Defect – Repair, Reinforce, or Replace immediately

Many existing wood structures have one or more of the following deficiencies:

- Pole top rot
- Split pole top
- Decay
- Broken or rusting hardware
- Checking

Other structures do not meet current Eversource design standards for structural capacity, uplift and clearance”

How many poles/structures on the X-178 have been replaced since it was installed?

How many of the 570 poles on the 1986 section of the X-178 are in each category; A,B,C and D?

How many poles on the 1948 section of the X-178 are in each category; A,B,C and D?

How long is the maintenance cycle and is the the same as the inspection cycle?

Questions



Has ISO-NE determined that Eversource needs to replace the 336 (529 amps) and 795 (908 amps) conductor with the proposed 1272 conductor, (2,000 amps) which will double and quadruple the carrying capacity of the line?

Where is the documentation of Eversource's claim for increased reliability of the Optical Ground Wire compared to the existing ground wire?

Have the existing conductors or ground wire failed any inspections on the older or newer sections of the line?

ACCC conductor has less sag than Eversource's proposed ACSS cable, is lighter and has less line losses. What amperage ACCC type conductor could the existing structures carry, with the existing ground wire and with the proposed OPGW?

In 2018 Eversource proposed to replace 56 of the 570 structures on the X-178 line at a cost of \$11 million. Which 56 structures were these? What percent were on the 1948 portion of the line?

Are there any category D structures/poles on the X-178? What is the history of pole/structure replacements /failures on the X-178?

A representative at the meeting stated that the line would "still be 115kV." What was that statement intended to imply?

Where is the data on how much power the X-178 line has carried over the past ten years, and from where to where? Where is the map of power flow on the grid?

The existing 1986 conductor weighs: 1,100 lbs/1,000' and can carry 908 amps. Watts = amps x volts

The existing 1948 conductor weighs 463 lbs/1,000' and can carry 529 amps

The proposed conductor weighs 1,432. or 1,633 lbs/1,000' and can carry 2,000 amps

Yellowstone, ACCR conductor weighs: 630 lbs/1,000' and can carry 1280-1350 amps

I request that ISO and the PAC determine that the X-178 is not an Asset Condition project, thus illegitimate and not subject to your review.

If Eversource can re-build almost every line it owns, at the rate-payers' expense, (piece-meal, evading SEC oversight), why not admit that?