

October 16, 2024

VIA EMAIL

To: New England States Committee on Electricity (NESCOE)
Attn: Sheila Keane, Director of Analysis

Consumer Advocates of New England (CANE)

Claire Coleman

Consumer Counsel, State of Connecticut

William Harwood

Public Advocate, Maine

Elizabeth Anderson

Chief, Energy and Ratepayer Advocacy Division, MA Office of Attorney General

Don Kreis

Consumer Advocate, New Hampshire

Linda George

Administrator, Rhode Island Division of Public Utilities & Carriers

CC: ISO New England
Planning Advisory Committee

Re: New Hampshire Line X-178 Rebuild

Thank you for your recent communications about our proposed X-178 Line Rebuild project, which will address serious asset condition issues with the existing line and improve reliability and resiliency of Eversource's transmission system in New Hampshire. We take very seriously the concerns expressed in your August 1 and August 16 letters. In response to your comments, we have performed further analysis of project alternatives other than a complete rebuild of the line and the updated analysis continues to show that a full rebuild of the line is necessary and the most cost-effective solution for customers. At the same time, more recent inspections of the wood transmission structures supporting the line have uncovered additional asset condition concerns. Please refer to the attached presentation for additional information and analysis that we intend to discuss at the October 23 Planning Advisory Committee (PAC) meeting. As always, PAC meetings are open to all, including representatives of the New England states, NESCOE staff, consumer advocates, regional stakeholders, and members of the public.

As with our prior presentations to the PAC on February 28, 2024, and June 20, 2024, we continue to evaluate the long-term cost-effectiveness of a full line rebuild compared to pared-back alternatives, while balancing the potential impacts to local communities and the environment. The X-178 line runs 49 miles through remote and challenging terrain and is Eversource's only transmission line crossing the White Mountains, including 12 miles of the line located within the White Mountain National Forest. It includes nearly 600 structures, the majority of which are natural wood. With an average age of 45 years, some of these structures have fallen victim to woodpecker damage, pole top rot, cracked arms, split pole top and decay. Although the upfront costs of a full line rebuild are higher than a piecemeal approach, a full line rebuild is more cost-effective over time. It also comprehensively addresses the structural condition issues, provides a fiber communication path to other transmission lines and substations located in New Hampshire's North Country, and is more sensitive to the environment, local communities, and landowners, by eliminating the need for repeated re-entry into rights-of-way in the coming decades.

Thank you again for your feedback, and we hope that the presentation at the October 23 PAC meeting helps address your concerns. We remain fully committed to continuing our engagement on the X-178 project and the asset condition project process improvements more broadly.

Sincerely,

David J. Burnham
Director, Transmission Policy