



From: [Kris pastoriza](#)
To: [Mauck, Ridgely](#); [Nelson, Kurt I](#); [Lindsey.White@gza.com](#); [Easton SelectBoard](#); [Linda Hansen](#); [pacmatters@iso-ne.com](#); [John Plummer](#); [Sugar Hill Selectmen](#)
Subject: ROW Concern 2024-04-16 DES permits
Date: Tuesday, April 16, 2024 9:04:51 AM
Attachments: [thus earning no return.pdf](#)
[Eversource does not own the land 4-24.pdf](#)

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Aging equipment: “utility-speak for equipment that is fully depreciated, and thus earning no return.”

 **Paul Alvarez**
President, Wired Group
2mo

Those of you who have worked with us know our opposition to using subjective assessments of asset condition to justify replacement of "aging" equipment (utility-speak for equipment that is fully depreciated, and thus earning no return), even though that equipment has passed its most recent, objective, functional or diagnostic tests. In this article, Maine is complaining that this is happening at ISO New England for transmission, but it is exactly what we are also seeing in distribution. While Maine asks what alternatives are available, our analyses of specific utility programs that replace "aging" equipment based on subjective assessments of condition NEVER deliver reliability improvements of sufficient value to justify the incremental costs of the practice. Further, no utility of which we are aware has validated that their subjective assessments of asset condition are more accurate than objective tests at predicting equipment failures in service. Thus, the best alternative is to simply rely on objective equipment test results! Please see the article here:
<https://lnkd.in/gcMR5Fps>



Eversource, others may be capitalizing on lax reviews for some transmission projects: Maine officials
utilitydive.com

https://www.linkedin.com/posts/paul-alvarez-9b38452_eversource-others-may-be-capitalizing-on-activity-7159246567961423872-GV_7

kris pastoriza April 16, 2024

April 16, 2024

To GZA and Eversource,
as a landowner encumbered by the Eversource X-178 easement, I require a copy of the AoT application for the section of the project which Eversource proposes to build on my property.

Eversource owns a transmission easement which allows it limited activity. It does not own the land over which the easement runs, and its rights within the easement are limited. For example, fiber optic and roads are not permitted in the terms of the easement.

NHDES-W-01-003

12. REQUIRED SIGNATURES

AF By initialing here, I acknowledge that I am required by Env-Wq 1503.20(e) to submit a copy of all approved documents to the department in PDF format on a CD within one week after permit approval.

By signing below, I certify that:

- The information contained in or otherwise submitted with this application is true, complete, and not misleading to the best of my knowledge and belief;
- I understand that the submission of false, incomplete, or misleading information constitutes grounds for the department to deny the application, revoke any permit that is granted based on the information, and/or refer the matter to the board of professional engineers established by RSA 310-A:3 if I am a professional engineer; and
- I understand that I am subject to the penalties specified in New Hampshire law for falsification in official matters, currently RSA 641.

APPLICANT

APPLICANT'S AGENT:

Signature: Katherine Wilkins Date: 5/10/2023

Name (print or type): Katherine Wilkins Title: Project Manager

PROPERTY OWNER

PROPERTY OWNER'S AGENT:

Signature: Ashley Friend Date: 5/11/2023

Name (print or type): Ashley Friend Title: Licensing and Permitting Specialist

I understand that Eversource's position on its so-called Asset Condition complete line rebuilds is "It can, so it will." It is extremely unfortunate that Eversource, unregulated and amoral, has a monopoly on transmission in this state.

Landowners are required to be informed of what DES is permitting on their property and to sign or refuse to sign the DES permits.

The AoT states: "This project is necessary to maintain the safety and reliability of the electrical infrastructure.....The structures must be replaced due to environmental damage over time."

This statement is false.

Eversource claims that 41 poles out of 580 on the X-178 line are in need of replacement within the next maintenance cycle. It refuses to provide the length of the maintenance cycle. It refuses to provide the location of the 41 poles. For all we know none of them are on the 1985 section of the X-178. Nor do we know if their condition is as Eversource describes.

I do not provide the required owner's signature for any Eversource easement AoT.

kris pastoriza

INV OF PRIVACY

easton

NHDES-W-01-003

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JF By initialing here, I acknowledge that I am required by Env-Wq 1503.20(e) to submit a copy of all approved documents to the department in PDF format on a CD within one week after permit approval.

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APPLICANT

APPLICANT'S AGENT:

Signature: Jeremy Fennell

Date: 2/8/22

Name (print or type): Jeremy Fennell

Title: Licensing and Permitting Specialist

PROPERTY OWNER

PROPERTY OWNER'S AGENT:

Signature: _____

Date: _____

Name (print or type): _____

Title: _____

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APPLICANT

APPLICANT'S AGENT:

Signature: 

Date: 3/17/2022

Name (print or type): Conor Madison

Title: Project Manager

PROPERTY OWNER

PROPERTY OWNER'S AGENT:

Signature: 

Date: 3/17/2022

Name (print or type): Kurt Nelson

Title: Permitting Specialist

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- I understand that I am subject to the penalties specified in New Hampshire law for falsification in official matters, currently RSA 641.

APPLICANT

APPLICANT'S AGENT:

Signature: 

Date: 11/28/2022

Name (print or type): Ashley Friend

Title: Licensing and Permitting Specialist

PROPERTY OWNER

PROPERTY OWNER'S AGENT:

Signature: _____

Date: _____

Name (print or type): _____

Title: _____

Redaction Log

Total Number of Redactions in Document: 1

Redaction Reasons by Page

Page	Reason	Description	Occurrences
4	INV OF PRIVACY	NH RSA 91-A:5 IV Confidential information which would constitute an invasion of privacy if disclosed	1

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
INV OF PRIVACY	NH RSA 91-A:5 IV Confidential information which would constitute an invasion of privacy if disclosed	4(1)