



## Responses to Stakeholder Comments on Draft RSP Project List and Asset Condition List March 2024 Update

### Comments from Kris Pastoriza<sup>1</sup>

#### Comment 1

I request that Eversource clarify whether OPGW (Optical Ground Wire) has been placed on lines 391, 373, U-181, S-153, A-126, R-193 and E-194.

In Eversource’s 5/18/2023 presentation to the PAC, the “Asset Condition” projects on these lines are described as structure replacements only, without the installation of OPGW:

Project Scope – Structure Replacements						EVERSOURCE ENERGY
Line	kV	Length (miles)	Replacement Structures	Total Structures	Estimated Cost (-25% / +50%)	In-Service Date
391	345	37.30	39	335	\$12.37M	Q4 2023
373	345	18.50	34	178	\$10.28M	Q4 2023
R193	115	14.79	30	177	\$7.70M	Q4 2023
S153	115	4.62	16	51	\$5.00M	Q4 2023
A126	115	15.28	35	182	\$8.37M	Q4 2023
E194	115	5.50	21	70	\$8.67M	Q4 2023
U181	115	5.50	24	67	\$8.51M	Q4 2023
D121	115	11.31	18	154	\$5.00M	Q4 2023
<b>Totals</b>		<b>112.80</b>	<b>217</b>	<b>1,214</b>	<b>\$65.90M</b>	<b>-</b>

10

On the next page of the presentation the 307, B-143 and J-112 “Asset Condition” projects are described as including the installation of OPGW:

<sup>1</sup> Submitted by Kris Pastoriza via email on March 21, 2024.

## Project Scope – OPGW and Structure Replacements



Line	kV	Length (miles)	Replacement Structures	Total Structures	OPGW Replacement Length (miles)	Estimated Cost (-25% / +50%)	In-Service Date
307	345	19.24	15	146	19.24	\$9.42M	Q4 2023
B143	115	11.10	46*	154	22.20	\$17.28M	Q1 2024
J114	115	3.80	32	49	7.60	\$9.71M	Q4 2023
<b>Totals</b>		<b>34.14</b>	<b>93</b>	<b>349</b>	<b>49.04</b>	<b>\$36.41M</b>	<b>-</b>

\*Project also includes the removal of one structure

### ADSS Scope

- Spans of ADSS will be utilized to tie OPGW into substations

### Alumoweld Shield Wire Replacement Scope

- Line 307: Replace one of two shield wires with 96F OPGW (the second shield wire is currently 64F OPGW)
- Line B143: Replace two static wires with two 11.1-mile segments of 144F OPGW and 48F OPGW
- Line J114: Replace two 3.8-mile segments of shield wire with 144F OPGW and 48F OPGW

11

Safety First and Always

For the record, this presentation states: “Other supporting structures on these lines were inspected and do not require any further work.”

In the 3/20/2024 Asset Condition list, ten months later, all the lines listed in the above presentation as not including the installation of OPGW, are listed as in-service or under-construction, with OPGW.

NH Wood Structure Replacements and OPGW Installation - S153 Line		Proposed	In-service
NH Wood Structure Replacements and OPGW Installation - E194 Line		Under Construction	In-service
NH Wood Structure Replacements and OPGW Installation - U181 Line		Under Construction	In-service
NH Wood Structure Replacements and OPGW Installation - 391 Line		Proposed	Under Construction
NH Wood Structure Replacements and OPGW Installation - 373 Line		Proposed	Under Construction
NH Wood Structure Replacements and OPGW Installation - R193 Line		Proposed	Under Construction
NH Wood Structure Replacements and OPGW Installation - A126 Line		Proposed	Under Construction
NH Wood Structure Replacements and OPGW Installation - D121 Line		Proposed	Under Construction

The D-121 is listed as under-construction for OPGW, even though this was proposed in 2021 with an installation date of Q4 2022, received TCA approval (structures and shield wire, \$13.105 m.) on 12/23/2022,

NH	D121*	115 kV	33	154	\$13.4 M	Q4 2022
CT	1751†	115 kV	82	159	\$28.8 M	Q4 2022
<b>Totals:</b>			<b>208</b>	<b>608</b>	<b>\$65.0 M</b>	-

\* Scope Includes Installation of Replacement Shield Wire

† Replaces ACL-226 (43 structures, \$10.75 M, projected in-service date December 2023)

and is listed as in-service in the 10/2022 Asset Condition list.

115 kV Structure and Shield Wire Replacements - Line D121	Under Construction	In-Service
---	--------------------	------------

The 10/24/2023 RSP list shows the 391, 373, R-193, S-153 and A-126 as proposed for OPGW.

I am unable to find a presentation to the PAC for the OPGW.

12/2023		NH Wood Structure Replacements and OPGW Installation - 391 Line		Proposed	Proposed
12/2023		NH Wood Structure Replacements and OPGW Installation - 373 Line		Proposed	Proposed
12/2023		NH Wood Structure Replacements and OPGW Installation - R193 Line		Proposed	Proposed
12/2023		NH Wood Structure Replacements and OPGW Installation - S153 Line		Proposed	Proposed
12/2023		NH Wood Structure Replacements and OPGW Installation - A126 Line		Proposed	Proposed
12/2023		NH Wood Structure Replacements and OPGW Installation - D121 Line		Proposed	Proposed

[https://nhconservation.org/doku.php?id=asset\\_condition\\_lists](https://nhconservation.org/doku.php?id=asset_condition_lists)

Eversource needs to provide histories for each line it presents to the PAC for an “Asset Condition” project. These histories would show all reliability and asset condition projects on the lines and whether any “Asset Condition” project replaced infrastructure that had been upgraded in a reliability project. They would also show canceled projects and whether structure replacements were later followed by the replacement of ground wire with OPGW and the replacement of existing conductor with the larger and heavier 1272 ACSS conductor.

The “Asset Condition” lists are extremely repetitive and make tracking the projects on the lines time consuming.

**ISO Response to Comment 1**

The ISO reached out to Eversource to request clarification on whether OPGW (Optical Ground Wire) installation was a part of the eight Asset Condition projects (ACL Project IDs 389-396) that were identified in the comment. Eversource confirmed that these asset

condition projects do not include OPGW installation, and that the entries that described OPGW installation for these eight Asset Condition projects were erroneous. The descriptions for these projects have been corrected in the final March 2024 presentation and the Asset Condition list that are published on the [Regional System Plan and Related Analyses website](#).