

March 20, 2024

To the PAC and ISO-NE,

I request that the PAC request that Eversource clarify whether the 43 Category C structures it claims are on the X-178 line are structures or poles.

The photographs show poles.



Structure 212 – Pole Top Rot & Rusted Hardware



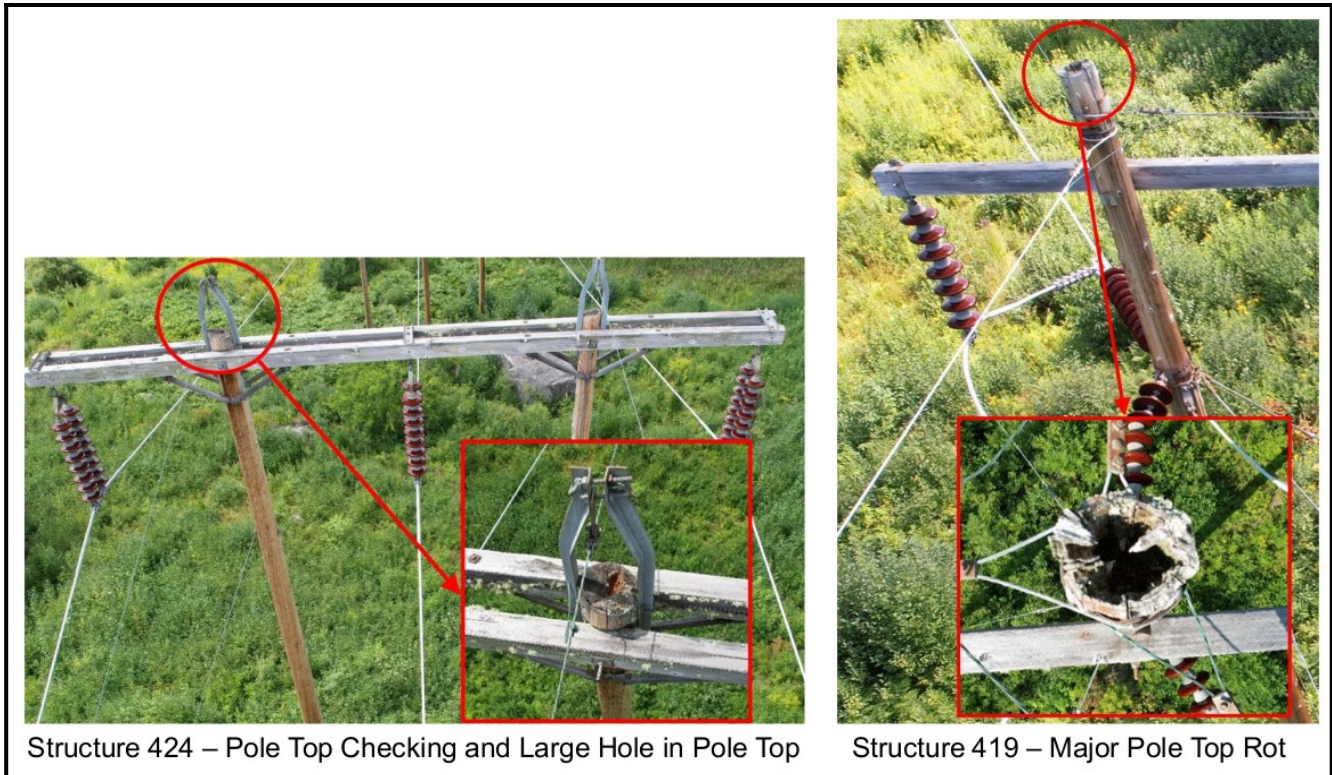
Structure 356 – Split Pole Top



Structure 8 – Severe Structure Splitting



Structure 25 – Pole Top Rot and Splitting at Hardware Attachment Point



If only one pole in a structure needs replacement or reinforcement, and there are 37 three pole tangent structures and 546 two poles H-frame structures on the X-178, that makes 43 poles out of 1203 poles, that are in need of repair or replacement within the next maintenance period. That lowers the 7% figure to 3.6% of the poles on the X-178 line needing repair or replacement within the next maintenance cycle.

Assuming that some of the 56 poles/structures proposed by Eversource for replacement in 2018 have not been replaced or repaired, that indicates that Eversource’s maintenance cycle for transmission is the same as its maintenance cycle for distribution – ten years. Eversource records state that the X-178 line was last inspected in 2023.

Eversource did not provide the number of poles in Category C, in its presentation to the PAC on the U-199 and Q-195 complete rebuilds with OPGW and the 975 ASCR conductor (908 amps) replaced with 1272 ACSS conductor (2,200 amps), but stated only that on these lines and the B-112 “Inspection results showed all wood structures are rated B or C.” That means all structures except for one could be Category B.

Eversource needs to provide this information well in advance of the proposed May 2024 PAC presentation.

Eversource needs to provide the condition ratings for all the poles on the U-199, Q-195 and X-178. When the S-136 rebuild is presented, that document also needs to provide all the information that has been requested for the X-178.

Eversource needs to provide, well in advance of the proposed May PAC presentation, the locations of the 296 structures on the X-178 that would not be overloaded by the replacement the existing ground wire with OPGW -- and of course, the locations of the 43 Category C poles on the X-178.

Eversource needs to state, well in advance of the proposed May PAC presentation. whether the OPGW coating contains PFAS.