

August 22, 2023

To the PAC and ISO-NE,

in a recent filing with the NH PUC (DE-23-056) the New Hampshire Department of Energy disingenuously described Asset Condition projects as reviewed and approved by ISO-NE, implying that this approval is for fulfilling identified reliability needs.

“Further, Asset Condition projects are approved by the Independent System Operator-New England (ISO-NE), which oversees the regional transmission planning process for New England states and assesses whether transmission facilities are able to meet reliability needs for the region... As referenced in the filings, ISO-NE approves or denies applications for Asset Condition projects after review by the Planning Advisory Committee (PAC) of ISO-NE.

https://www.puc.nh.gov/regulatory/Docketbk/2023/23-056/BRIEFS/23-056_2023-08-07_NHDOE_BRIEF-JURISDICTION.PDF

Eversource also mis-characterized the review process of ISO-NE and the PAC:

“...transmission resource planning, construction, installation, replacement, and maintenance are subject to review and approval through processes developed by or in coordination with ISO New England Inc. (“ISO-NE”)...In general, for Asset Condition transmission projects located on regional Pool Transmission Facilities (“PTF”) with an estimated cost of \$5 million or more, the relevant PTO makes an informational presentation regarding the project to the regional Planning Advisory Committee (“PAC”),⁵...Asset Condition transmission projects are reviewed and approved through a process implemented by the New England Participating Transmission Owners (“PTOs”), including Eversource, with involvement of ISO-NE and New England Power Pool (“NEPOOL”) committees and review by ISO-NE and stakeholders. “

5- The PAC process is open to the public and represents a forum in which states and other interested stakeholders may ask questions and provide input.”

https://www.puc.nh.gov/regulatory/Docketbk/2023/23-056/BRIEFS/23-056_2023-08-04_EVERSOURCE_BRIEF-JURISDICTION.PDF

These briefs also implied that the PAC reviews these Asset Condition projects. The “high level” (as described by Eversource) view of these projects presented to the PAC is insufficient for meaningful review and the lack of comments or questions on the projects by the PAC members has enabled Eversource’s Asset Condition transmission line projects to escape scrutiny.

The public, towns, Conservation Commissions and ROW landowners subject to these rebuilds are not considered stakeholders and are not informed by Eversource about the existence of the PAC, let alone the PAC meetings at which Asset Condition projects are presented.

The March 16, 2023 PAC minutes list only two superficial questions about the Eversource presentation of its “proposed” Asset Condition removal and replacement of the F-139 115kV line with larger and taller towers, a conductor increase from 336 ASCR to 1272 ACSS, the installation of OPGW) optical ground wire (fiber-optic is not permitted in the terms of many of the ROW easements), construction of 100’ x 100’ constructions pads, and permanent and extensive road building, at an estimated cost of \$58. m. paid by rate-payers.

From the Eversource F-139 line presentation:

“F-139 line

- Replace remaining 144 wood structures with 142 steel H-frame structures
- Reconductor 14.45 mi of 795 ASCR with 1272 ACSS
- Install 29.4 miles of OPGW (2 x 14.7 mi)
- Install ADSS into Farmwood and Webster substations to tie in OPGW
- Total Estimated PTF Cost: \$58.0M (-25 / +50%)
- Project in-service date: Q1 2025”

The PAC minutes on this presentation:

“Item 4.0 – NH Line Asset Condition Projects

Mr. Chris Soderman (Eversource Energy) presented New Hampshire asset condition projects on lines F-139, M-183, and H-123. In response to Stakeholder questions, Eversource Energy responded with the following:

- “ADSS” stands for All-Dielectric Self-Supporting fiber-optic cable.
- The three New Hampshire asset condition projects were grouped together because the projects’ comparable timeframes to one another.”

In 2015 Eversource made no mention of pole condition issues on the X-178 (and other 115kV lines it has replaced on its 150 miles of north to south lines) though the following testimony in support of Northern Pass’s proposed replacement of these HVAC lines would have been the perfect place to offer up this information;

“For the section from Whitefield to the location in Bethlehem where the NPT Line transitions to underground, the NPT Line will utilize a transmission corridor occupied by an existing 115 kV transmission line, the X178 line. The X178 line was constructed as a supply to the various mills located in northern New Hampshire and to connect with the hydro generation near the Moore dam facilities. PSNH acquired the rights for this ROW during the late 1940’s and built the X178 line in that corridor in approximately 1948.

Since 1948, PSNH has not installed any additional transmission lines in this ROW. The lines have changed very little since the initial installation, with the exception of a segment of the X178 line that was rebuilt in 1986 with a larger conductor in order to facilitate the interconnection of the Hydro Québec DC line, Phase 1... The load in this area has not required the upgrade of the remaining [336] sections of the X178. (my emphasis)

https://nhconservation.org/lib/exe/fetch.php?media=15-464_2015-10-19_eversource_ptestimony_r_andrew.pdf

The proposed X-178 rebuild is not an Asset Condition Project

The PAC needs to understand and acknowledge that the X-178 is not an Asset Condition project. The asset is in fine shape, as shown by the poles pole inspections, treatments and Eversource documents. If there were poles in Category D, immediate replacement necessary, they would have been replaced by now. Conductor and cross-arm replacements on some structures in 2017 suggest that an earlier plan by Eversource was to engage in more cost-effective (for rate-payers), less obviously unnecessary ‘maintenance’.

Summary



- B112
 - Replace 254 wood structures with new steel structures
 - Reconductor 22.9 mi of 336 ACSR with 1272 ACSS
 - Install 45.8 mi of OPGW (2 x 22.9 mi)
 - Estimated PTF Cost: **\$105.43M** (-25% / +50%) Projected In-service Date: **Q4 2024**
- Q195
 - Replace 224 wood with 223 new steel structures
 - Reconductor 17.5 mi of 336/477/795 ACSR with 1272 ACSS
 - Install 35 mi of OPGW (2 x 17.5 mi)
 - Estimated PTF Cost: **\$100.00M** (-25% / +50%) Projected In-service Date: **Q4 2026**
- U199
 - Replace 104 wood and 1 steel structures with new steel structures
 - Reconductor 9.75 mi of 795 ACSR with 1272 ACSS
 - Install 19.5 mi of OPGW (2 x 9.75 mi)
 - Estimated PTF Cost: **\$51.18M** (-25% / +50%) Projected In-service Date: **Q2 2026**

An Eversource presentation to the PAC in 2018 proposed the replacement of 56 out of the 570 structures on the X-178. Given that part of the X-178 was built in 1948, one would expect that most of the proposed replacements were on that section of the line. That indicates that the section of the line that was upgraded in 1986 with 5' taller, larger diameter wood poles and 795 ASCR conductor, is sound. Of the E-115 it was said that only three structures on the completely removed and rebuilt line were in need of replacement.

The estimated cost of the 2018 replacement of 56 of the 570 structures on the 50 mile X-178 line was estimated to be \$11. million. The estimated cost of the proposed 2023 complete rebuild is \$51. million. This figure is also far out-of-line with Eversource's May 2023 estimates for identical rebuilds on the U-199 and Q-195 lines (above.)

The X-178 line goes through White Mountain National Forest (solicitation of public input), the unique and fragile high-altitude Bog Pond and bog, over Old Kinsman Notch and the Appalachian Trail, through another wetland where Eversource was unwilling to even remove poles dumped in the 1986 upgrade because of the environmental damage that would cause. It then goes down the Reel Brook drainage near the Reel Brook Trail (listed, as is the AT, on the National Register of Historic Places), through steep and wet terrain, and crosses over that trail.

\$200. million would be a more realistic (-25%-+50%) estimate of X-178 rebuild costs.

As a stakeholder in the Eversource proposed X-178 line rebuild, I have many questions about this project, questions which have not been answered by Eversource which has responded, after long delays, with the minimum of information. **When Eversource is required to produce real pole inspection reports for the X-178 (these are not critical infrastructure information), the project will have to be radically altered, if not withdrawn.**

I list my (culled) questions here, now, so Eversource has time to produce the answers and the PAC understands the questions that must be asked and answered.

7) New and old pole numbers and proposed and existing heights for the whole X-178 line. (July 19, 2023. These were in binders at the August 1, 2023 public meeting but are no longer available to the public.)

8) Pole inspection reports/ proof of need to replace structures. (July 19, 2023)

9) Proof of need to construct a whole new larger line. (July 19, 2023)

10) Proof of E\$ legal right to use fiber optic; legal precedent in this state, for example, not just 'we believe...' (July 19, 2023)

1) The information shown below, for the X-178 line: (requested July 24, 2023)

O154 115kV LINE STATE LAND AND PUBLIC WATERBODY CROSSING STRUCTURE TABLE

EXHIBIT 7

Eversource O154 Line Rebuild - DOE State Land and Waterbody Crossing Details								
Existing Structure #	New Structure #	Structure Type	Height Change (feet)	Span (Pole to Pole)	Span Distance (feet)	Minimum NESC Table 232-1 Clearance (ft.)	ES Vertical Design Clearance (ft.)	Complies with NESC Table 232-1 (Y/N)
268	37	56.5' steel 2 pole, T, CLH1	15	37-38	642.6	18.6	28.8	Y
267	38	65.5' steel 2 pole, T, CLH1	10					
250	55	56.7' steel 2 pole, T, CLH1	15	55-56	460.7	20.1	28	Y
249	56	61.0' steel 2 pole, TG, CLH1	20					
248	57	61.0' steel 2 pole, T, CLH1	20	56-57	498	20.1	29.4	Y
247	58	65.5' steel 3 pole, P, CLH1	20	57-58	433.1	20.1	32.0	Y
246	59	61.0' steel 2 pole, T, CLH1	10	58-59	767	20.1	32.1	Y
232	73	52.0' steel 3 pole, ADS, CLH3	5	73-74	429.8	20.1	27.4	Y
231	74	52.0' steel 2 pole, T, CLH1	10					
230	75	61.0 steel 2 pole, T, CLH1	15	74-75	445.5	20.1	28.0	Y
229	76	70.0' steel 2 pole, T, CLH1	20	75-76	507.5	20.1	33.8	Y
228	77	61.0' steel 2 pole, T, CLH1	20	76-77	635.8	20.1	30.1	Y
227	78	61.0' steel 2 pole, T, CLH1	20	77-78	488.4	20.1	29.4	Y
226	79	64.8' steel 3 pole, BP, CLH1	25	78-79	455.6	20.1	26.8	Y
225	80	56.5' steel 2 pole, T, CLH1	15	79-80	294.4	20.1	38.2	Y
224	81	52.0' steel 2 pole, T, CLH1	10	80-81	465.7	20.1	32.2	Y
223	82	52.0' steel 2 pole, T, CLH1	10	81-82	363.4	20.1	26.5	Y
222	83	52.0' steel 2 pole, T, CLH1	10	82-83	423.1	20.1	29.6	Y

4) Altitude of each existing and proposed structure. (July 24, 2023)

(Where E\$ builds work pads that are above the grades of the old structures, then the proposed new structures are higher without being any longer than the ‘proposed structure height.’)

11) Helicopter survey imagery of the X-178 line. (July 19, 2023)

13) Figures for the amount of gravel proposed to be trucked into each property with an easement, and spread around, need to be provided, along with plans showing proposed final grades. (July 19, 2023)

15) Disclosure of Eversource's plan to leave the terrain that would be altered to provide the 100' x 100' flat work-pads, to leave the topsoil removed, and to leave the roads and gravel where they are proposed to be bulldozed into the terrain, to all those encumbered by its easements, and the public.
(July 19, 2023)

16) The 57 poles proposed to be replaced in 2018.

- 17) Explanation of the Asset Condition category for transmission line projects to the public; that there has been no 3rd party determination of need, structural or reliability, for the rebuild as proposed. (July 19, 2023)
- 18) ISO (Independent System Operators) study showing that Eversource's proposed increase in conductor sizes, from the current 336.4 and 795 to the proposed 1272, is necessary for system reliability (June 2023)
- 20) Construction plans including alteration of terrain, wetlands, stream crossing, road building, road restoration, specifications for proposed steel H-frame structures including diameter and weight, proposed location of timber matting, and a list off all heavy-equipment proposed to be used. (June 2023)
- 21) List of public land and water crossings that require an application for permission to the NH Department of Energy (before 2021 the PUC granted these permits.) (June 2023)
- 22) Special Use Permit application submitted to the White Mountain National Forest.(June 2023)
- 23) Pole inspection reports and any other inspection reports, showing proof of claimed damage, degree of damage, which poles are damaged, and the standards used to determine the need for replacement. (June 2023)
- 24) Map of National Register of Historic Places resources affected by the proposed rebuild. (June 2023)
- 25) The carbon footprint of proposed rebuild with steel structures at 65' and wood structures at 65', (with the proposed 1272 conductor) and steel structures at the current structure heights (40'- 60') and replacement with wood of the current heights, with 795 conductor. (June 2023)
- 27) Lifecycle costs of wood vs. steel structures. (June 2023)
- 28) The Code book and page where the requirement for the distance between the OPGW (Optical Ground Wire) and conductor is stated. (June 2023)
- 29) The Code book and page where the requirements for the distance between the proposed conductor and the ground is stated. (June 2023)
- 30) A visual impact map of the proposed larger and taller structures. (June 2023)
- 31) Documentation of how Eversource would comply with Endangered Species Act restrictions for the Northern Long-Eared bat. (June 2023)
- 32) Northern Long-Eared bat survey results. (June 2023)

34) A map of areas proposed to be used for helicopter access. (June 2023)

35) Location of poles proposed to be replaced by helicopter due to sensitive environmental conditions, such as the Bog Pond area. (June 2023)

For question #22: Pole Inspections as described by Eversource:

- Foot Patrol –
 - Line crews walk/drive line to observe general condition of structures (ground level up) and general condition of ROW (access, vegetation, encroachments)
- Structure Ground Line –
 - Specialized crews excavate at each structure (~18”) to determine subsurface integrity of pole and apply treatment as necessary
- High Resolution Aerial –
 - Entire system flown, and with detail hover review at most structures, accompanied by high-resolution photos
- Thermography -
 - Infra-red camera (typically on helicopter) observes line for hot-spots
- Comprehensive Drone - Started in 2017
 - Combines foot and High Res Aerial. Plan to inspect whole system in 3 years
- Items Reviewed - Wood Structures
 - Significant Woodpecker Damage
 - Severe Checking/Splits/Cracking
 - Insect Damage
 - Structure with Rot or Decay
 - Severe Fracturing, Buckling, Leaning
 - Compression Breaks
 - Fire Damage
 - Damage / Vandalism
 - Hardware / Insulator damage

38) Documentation of the source and toxicity of proposed road building materials and transmission structures and OPGW (Optical Ground Wire; PFAS) (June 2023)

40) Transportation routes and number and type of vehicles that will be on each road at each hour of the days of the proposed construction and ‘restoration.’(June 2023)

41) Locations of lay-down areas for structures and other materials. Roads E\$ is planning to use for access to the easement. (June 2023)

42) A description of how Eversource would comply with local noise regulations more restrictive than Eversource’s proposed 7:00 am to 7:00 pm six days a week no-decibel-limit plan. (June 2023)

39) Noise-map for construction. An example is shown below:

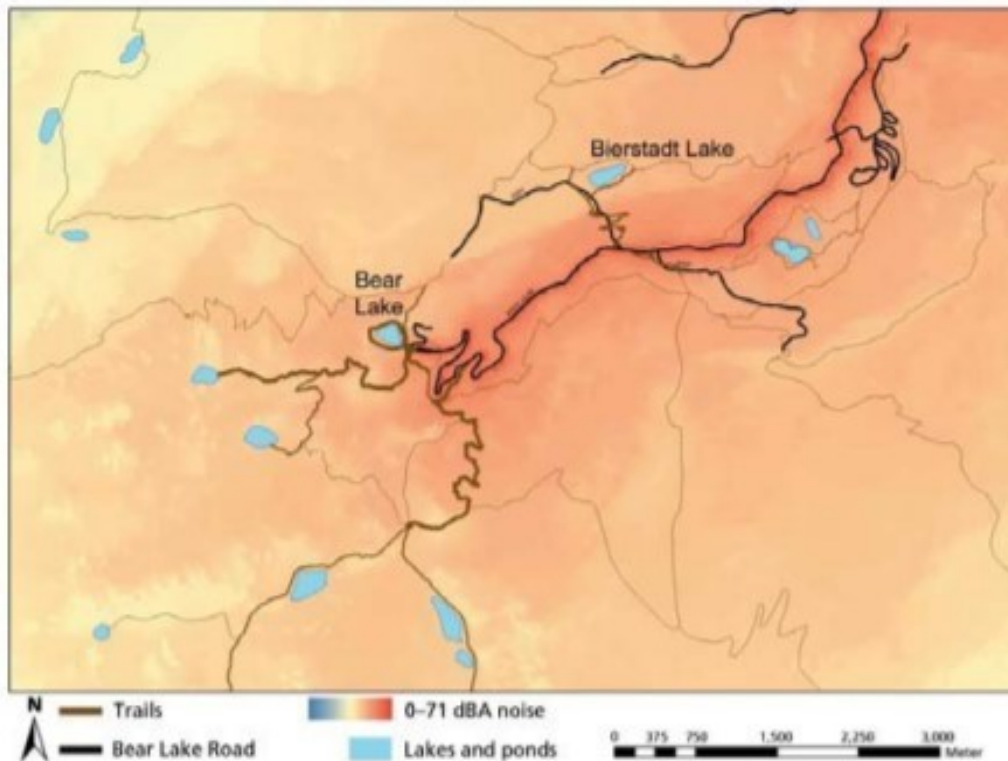


Figure 2. Noise map of baseline traffic volumes on Bear Lake Road and relative intensity of hiking use on adjacent trail network.

45) Would the proposed rebuilt lines and ROWs be valued at more than the existing ones? Eversource values its 6 miles (163 acres) of transmission ROW in Easton at \$11,300. and its lines and structures at about \$200,000. (June 2023)

46) I see nothing in the ISO interconnection request queue for the X-178 line. Please add Eversource's request to ISO to my list of requests for information (June 2023)

(Eversource Response: No interconnection agreement with ISO-New England is associated with this project.)

47) The carbon footprint of proposed rebuild with steel structures at 65' and wood structures at 65', (with the proposed 1272 conductor) and steel structures at the current structure heights (40'-60') and replacement with wood of the current heights, with 795 conductor. (May 24, 2023)

49) Life-cycle costs of wood vs. steel structures. (May 24, 2023)

50) Time frame of proposed restoration. (May 1, 2023)

(Eversource Response: Site Restoration will be ongoing through construction for stabilization and upon construction completion.)

60) Carbon footprint of proposed upgrade (X-178 line portion.) (May 1, 2023)

(Eversource Response: While Eversource maintains a company-wide greenhouse gas (GHG) inventory, we typically do not conduct GHG emission calculations at the individual project level related to the construction period due to the relatively short duration of the work. As for the constructed project, we do believe the proactive maintenance and investments in infrastructure upgrades is a core responsibility of Eversource to our customers to ensure we can reliably deliver critical services, help mitigate outages, and respond to the additional electrification trends in our region.)

62) Documentation that Eversource has been allowed to be out of compliance with the electrical codes it now states it must upgrade the structures to be in compliance with. (May 1, 2023)

(Eversource Response: Eversource is not out of compliance with electrical codes. The current distance between the conductor and static wire at the top of the pole, does not meet updated industry standards for lightning protection on our system. Industry and company standards have changed, driven by increased emphasis on system reliability from the public and regulators.)

63) Construction plans including alteration of terrain, road building plans, road restoration plans, and weight of proposed conductor. (April 28, 2023)

64) List of all vehicles/heavy equipment proposed to be used. (April 28, 2023)

(Eversource Response: Several types of vehicles and equipment are used during construction and restoration. Specific vehicles have not been identified at this time but are part of the planning process for construction that will be further developed at a later date.)

64) Time frame of proposed upgrade. (April 28, 2023)

(Eversource Response: The current schedule is as follows

- Project Information Sessions: 3rd Quarter 2023
- Permitting: Beginning 2nd Quarter 2023
- Construction: 2nd Quarter 2024 through 4th Quarter 2026 (duration includes all three segments))

67) Documentation that Eversource has been allowed to be out of compliance with the electrical codes it now states it must upgrade the structures to be in compliance with. (April 28, 2023)

68) Would the whole ROW width be cleared (225', of which 150' is cleared now,) (April 28, 2023)

(Eversource Response: Clearing to the edge of the easement boundary is unknown at this time, but may be needed in select locations on the line to safely access each structure.)

70) Would any road-building be done (AOT, imported fill, grading) and how would these roads be 'removed', (April 28, 2023)

(Eversource Response: Yes, access roads will be built to provide construction vehicles the ability to safely access each structure. Therefore, we build or enhance access roads using gravel or timber mats within the power line corridor which need to be stable enough for heavy construction equipment. Generally, gravel access roads remain in place for future maintenance unless required to be removed by permitting or other considerations, which is less disruptive to the environment than removing and rebuilding as future maintenance needs arise.)

71) In what areas would helicopters be used for access, (April 28, 2023)

(Eversource Response: It is unknown if there is a need for helicopter-assisted access at this time.)

74) How would Eversource comply with local noise regulations, (April 28, 2023)

(Eversource Response: Eversource will reference and comply with all local noise ordinances.)

75) How would Eversource comply with Endangered Species Act restrictions for the Northern Long-Eared bat, (April 28, 2023)

(Eversource Response: Eversource will coordinate with the US Fish and Wildlife Service and NH Fish and Game relative to the Northern Long-Eared bat.)

76) If hay/straw is used to cover denuded areas, what certification will be provided that this came from a field that was never spread with sludge, (April 28, 2023)

(Eversource Response: Eversource and its contractors source hay free of weeds.)

This is not an answer.

78) Please provide NLEB survey results (April 28, 2023)

81) Please provide a wetlands delineation map. (April 28, 2023)

(Eversource Response: Mapping for the project is not yet available, but will be in the coming months. Once the draft mapping is available, we will post it to our website

www.eversource.com/X178-Line-.)

Mapping posted August 1st, 20230

82) Book and page where the requirement for the distance between the OPGW and conductor is stated. (April 28, 2023)

83) A visual impact map showing where any poles will be visible from anywhere on my property. For example, some of the poles in the Reel Brook area of WMNF are visible from here, as well as poles at the height of land above Ruskin Road. (April 28, 2023)

(Eversource Response: Visual simulations are not anticipated to be developed

Book and page where the requirements for the distance between the conductor and the ground is stated. (April 28, 2023)

(Eversource Response: The distance between the conductor and static wire at the top of the pole, does not meet updated industry standards for lightning protection on our system. The existing X178 Line is over 50 years old, and industry and company standards have changed, driven by increased system reliability.)

This is not an answer.

85) A map with the structures currently on my property and new structure locations as well as the existing and proposed structure heights. (April 28, 2023)

(Map provided with incorrect pole numbers)

86) Proposed

Conductor size and amps (given)

Diameter of poles (given)

Number of insulators (number of insulator strings provided, not number of insulators on each string.

Proof of damage (six photos of damaged poles provided)

Proof of easement language allowing fiber optic on your property and use for electric service only. (We believe, answer given) (April 28, 2023)

87) Is the line usable for “HVAC/HVDC simultaneous transmission” (April 28, 2023)

(Eversource Response: The existing line is High Voltage Alternating Current (HVAC) and will be the same when rebuilt.)

This is not an answer.

July 31, 2023 Eversource responses to questions:

What is the lowest pole heights that could be used? For example, closer spacing of the poles would lower height, which would certainly be something Eversource would consider for White Mountain National Forest.

Eversource Response: We attempted to minimize structure height increases wherever possible while ensuring current electrical standards and safety clearances are met and balancing other important considerations, such as environmental impacts. The average pole height increase for the X178 line is 12 feet.

This is not an answer.

What is the maximum conductor size the proposed poles at their proposed heights can carry?

Eversource Response: The line has been designed to support 1272 ACSS conductor.

This is not an answer.

I need product descriptions/spec sheets for the proposed new HVAC conductor and the towers.

Please provide the source for the steel towers, conductor and OPGW (China?)

Sources and source locations of conductor, OPGW and structure components

I also need a product sheet for OPGW. Does it include any PFAs?

Eversource Response:

This is a list of our current manufacturers. Information on specifications can be found on their websites. Material has not been ordered so we don't know which specific manufacturer will be used:

Sabre (Pole manufacturer): <https://www.sabreindustries>.

Southwire (Conductor manufacturer): <https://www.southwire.com/>

Prysmian (Conductor manufacturer): <https://na.prysmiangroup.com/>

AFL (OPGW manufacturer): <https://www.aflglobal.com/en>

INCAB (OPGW manufacturer): <https://incabamerica.com/>

This is not an answer.

Please provide NLEB survey results

Eversource Response: Eversource will assess the project impacts with respect to NLEB in accordance with US Fish & Wildlife/NHF&G requirements. The need for field surveys is currently to be determined. Location data of rare species is typically treated as confidential.

Would boulders/glacial erratics be moved?

Eversource Response: In addition to access roads, level work pads will be built to provide construction vehicles the ability to safely access each structure. As we build or enhance access roads and work pads, it may be necessary in some areas to move material including rocks to make the areas stable enough for heavy construction equipment.

New questions:

“Matt Arsenault and Elise Ward made a presentation to the CC on the proposed project, which deals with the replacement of 65 existing wooden pole structures with significantly larger weathered-steel structures. This is an extension of previously approved improvements of transmission facilities through the City of Concord and the Towns of Pembroke and Bow.

Roads through these easements will require significant improvement, including the permanent placement of gravel along the roadbed.

Additionally, 100'x100' gravel work pads will be constructed at each pole location. After completion of the project 60'x30' pads will be left at each of these sites.”

https://www.pembroke-nh.com/sites/g/files/vyhlf4861/f/minutes/cc_mins_21323.pdf”

Is this an accurate description of how Eversource will treat the ROW here?

Will large glacial erratics be pulverized into pieces and bulldozed out of the way of construction, as has been done on Eversource ROWs in the southern part of the state?

Would Eversource accept an offer of \$100,000. for the ROW in Easton it values at \$11,300.?

Why hasn't Eversource proposed ACCC conductor on any Asset Condition project; lighter weight, lower sag?



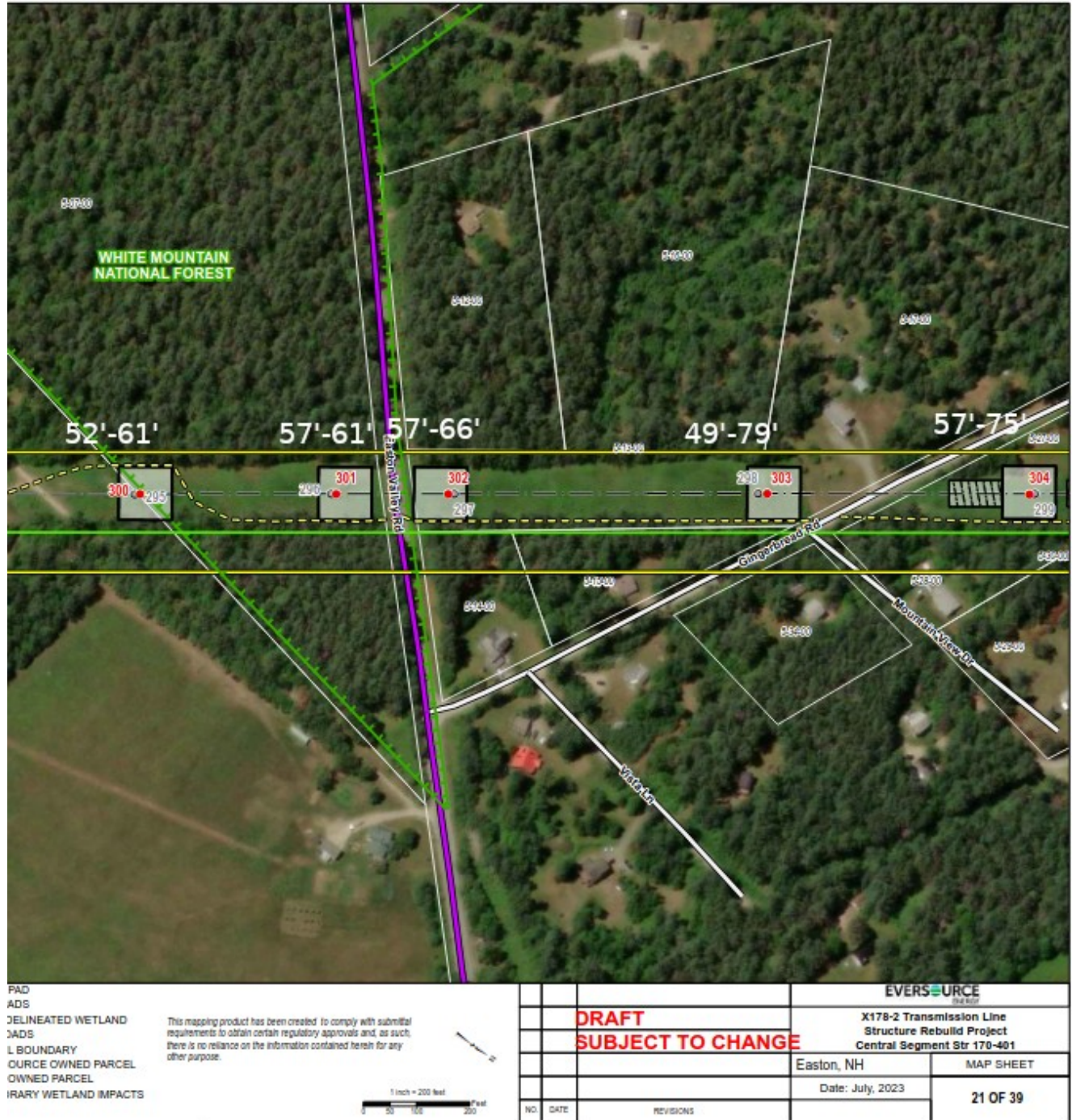
O-154 line before so-called Asset Condition replacement



O-154 line after “upgrade”, with “enhanced” roads.



Proposed pole heights over Gingerbread Road in Easton, (white road) vastly exceeding clearance required by Code. The pole height information is not available to the public, except those pages I photographed at the August 1st Sugar Hill “information” meeting:



(Proposed new structure heights were added to the project map.)

Below: driveway of house between the proposed to be 30' higher and proposed to be 20' higher structures:



Below: Replacing this 49' wood structure with a 79' steel structure means a more than 50% increase in height. Eversource has provided no documentation that this is necessary for clearance or line safety.



Structure across the road, 57' high, proposed to be replaced with a 75' steel structure.



Proposed pull pad location is on this side of the pole. 100' x 50'.



Pull pad and construction pads



Above, helicopter on the X-178 yesterday.

Bog Pond and Bog, White Mountain National Fores

Clearly transmission line siting standards in 1948 were low and this was felt to be a better location than the Coppermine Trail route, where tourists might see it.



“It seems that the previous location, which contemplated a power line running from Berlin to Gorham, thence through Shelburne on National Forest land, then crossing the Wild River valley to the head of Basin Brook to Chatham, and down the east boundary of the State to Conway, had not proved satisfactory from a power distribution viewpoint. Considerable study had been

made and it seemed that the most economical location for the north and south transmission line would be from Whitefield to Lincoln via Franconia. The Public Service Company was aware that proposing a power line in the immediate vicinity of Franconia Notch would bring up many objections. Their proposed location was from Whitefield to the Village of Franconia, thence up the valley toward Easton to the mouth of Coppermine Brook. From that point it was proposed that the power line would head directly up the Coppermine Brook drainage, crossing the height of land in a sag between the Cannon Balls and Profile Mountain. [Cannon Mt] The proposed line would cross the state Reservation close to Lonesome lake and at one other point before it reached Lincoln. Generally speaking, it would be out of sight of the Franconia Notch road until it crossed at Lincoln. It would not be out of sight of the observation point at the end of the aerial Tramway but probably would be in full view from that point. Mr. Graham questioned them as to their reason for not attempting to cross the main range via Reel Brook, Bog Pond and Harvard Brook. This location, it would seem, would be less rugged and more accessible than the proposed location. At the same time it would not be visible from any point in Franconia Notch or from the Aerial Tramway. Mr. Mosscrop stated that sometime ago the Public Service Company had scouted a location in that very path. The consensus of the engineers had been that construction would be excessively expensive due to the rugged nature of the country. It was assumed that this new location could be constructed more easily.”

https://nhconservation.org/lib/exe/fetch.php?media=1945_fs_suggests_bog_pond.pdf

The PAC has enabled Eversource’s misuse of the Asset Condition category

The PAC has enabled Eversource’s construction of many lines of wholly unproven need.

Eversource has very few HVAC lines that have not been Asset Condition projects.

At least seventy 115kV or 345kV Eversource lines have been subject to at least one Asset Condition project, often two or three.

<https://nhconservation.org/doku.php?id=lines>

Eversource owns 83 lines in New Hampshire, and some of them are quite short.

If one were to calculate Eversource miles of lines/ROWs subject to Asset Condition projects, vs. miles without, the ration would be greater than 7 to 8.

Pepper Brook area in Easton, another inexplicable road-crossing-with-huge-pole-height increases-proposed. Where is the profile drawing of this crossing, showing the span length, sag and clearance?



kris pastoriza

easton nh

august 23, 2023