

Public Service of New Hampshire d/b/a Eversource Energy
Docket No. DE 21-020

Date Request Received: 05/13/2021

Date of Response: 05/28/2021

Request No. TS 1-001

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Request from: New Hampshire Public Utilities Commission Staff

Witness: Lee G. Lajoie

Request:

Reference Joint Petitioners' Response Staff 1-011.

- a. Please reconcile the statement that the sale of the CCI assets "will result in significant reliability and operational benefits," with the fact that the Company is unable to quantify the reliability benefits.
- b. Please reconcile the statement that "Eversource's proactive identification and replacement of poles not meeting minimum strength requirements greatly reduces the probability that a pole will fail in service as the result of adverse weather conditions or the installation of additional equipment by Eversource or third parties with significant reliability or operational benefit," if failing in service occurs as opposed to a pole failure?

Response:

- a. The statement is based on the fact that delays by ConsolidatedI in replacing poles to allow Eversource to complete projects intended to improve reliability will be eliminated, thereby allowing these projects to be placed in service earlier. The sooner a reliability project is completed, the sooner its intended purpose of improving reliability takes effect. Since the Company cannot predict when a particular event may occur which the improvement has now mitigated nor how long the delay in pole setting by ConsolidatedI might be, the Company cannot quantify the reliability benefit.
- b. Eversource follows good utility practice with its pole inspection program including inspection and replacement of poles. The Company is on a 10-year program for inspecting poles. Replacing a pole which has failed in service can preempt pole failure, thereby enhancing public safety by keeping overhead lines and equipment in place, enhance reliability by preventing a potential outage, and decrease the need for an emergency replacement which is generally more expensive than planned work performed during normal business hours.