

The PUC must examine projects for necessity, cost/least cost, how they are booked for inclusion in the rate base, eg, as capital costs to be depreciated; as operation and maintenance, renewable energy goals and environmental consequences. Costs include externalized costs. This assessment needs to be done for Eversource's Asset Condition projects as a whole and considering that Eversource has almost completed constructing a completely new 115V line of increased power carrying capacity running from Comerford (and north-northeast) to Massachusetts: the PUC needs to look at Eversource Asset Condition project connections to the proposed National Grid Hydro-Quebec project:

‘Eversource also has use rights to the transmission capacity of the Phase I/II HVDC Transmission Facilities, a transmission interconnection that connects the Hydro-Québec TransÉnergie control area to the New England control area. Transmission service is available to eligible customers over these transmission facilities under separate Open Access Transmission Tariffs, as noted below.’

<https://www.eversource.com/content/residential/about/doing-business-with-us/transmission-interconnections/transmission-rules-rates-tariffs/open-access-transmission>

PUC order 25910 produced for DE-15-460 is invalid in any crossing where it applying it alters the wording of the ROW easement deeds for the transmission line. Most of the early easements were given or taken to meet the reasonable needs of service to the public.

The PUC thus failed to assess whether the Asset Condition lines were necessary for meeting the reasonable needs of service to the public.

Most of the ROW deeds do not permit fiber optic, thus the OPGW (Optical Ground Wire) is not permitted by the terms of most of the easements (including those on the X-178 line.)

That OPGW may increase reliability is irrelevant. If Eversource wants to use OPGW it is free to negotiate with landowners for this right. Again, the PUC/DOE cannot permit the violation of ROW easement deeds. (The OPGW is heavier than the existing ground wire (which appears to be working just fine) and this provides Eversource with a reason to claim a need to install larger structures. Eversource has failed to provide data on the reliability of the OPGW compared to the ground wire it replaced in the line rebuilds.)

PUC has never defined ‘the reasonable need of service to the public’ which has thus far meant ‘the unlimited desire of the public.’ The word ‘desire’ does not appear in the ROW deeds or the PUC/DOE crossing documents.

Eversource failed to incorporate potential use of simultaneous HVAC/HVDC transmission, which would considerably increase line capacity, in any of its documents.

Eversource failed to consider replacing only unsafe poles with poles of the same height while leaving the conductor the same size and not replacing the ground wire, as an option for any of its asset condition projects. And again, no cost-benefit or credible reliability-need data for any Asset Condition

project was submitted by Eversource or required by the PUC/DOE. Eversource has been given carte blanche in submission to its political power.

Eversource must provide pole inspections, reports on cross-bar and insulator replacements on all lines (2016-2017) and all wetlands damage reports/compensation payments.

The PUC needs to hire an independent contractor to provide pole inspection reports. This is an area where Eversource benefits from inaccurate data, unlike the river crossing engineering specs, which the PUC has reviewed independently (except for the need for the proposed pole height for meeting the reasonable needs of service to the public.)

The PUC needs to conduct a survey of ROW landowners on the lines to ascertain their understanding of why the lines were rebuilt or replaced with new lines, because this bears on the lack of complaints to the PUC by ROW landowners. Since Northern Pass was denied a permit by the SEC, it is likely that landowners assumed the Asset Condition projects must have been approved by some agency as necessary for system reliability, thus said nothing. Many probably also had no clue about who to contact about the new and rebuilt lines.

Since externalized costs are real, the PUC needs to hire a Counsel for the Public, since the public, not just the rate-payers, are paying for Eversource's Asset Condition (and other utility) projects.

Documents are here: https://nhconservation.org/doku.php?id=eversource_asset_condition

kris pastoriza

krispastoriza@gmail.com

June 14, 2023