

Comment on SEC 2024-02 and DE-24-087

Eversource destroys 252 “structurally and functionally operable” structures in “Asset Condition” rebuilds.

Rock-Solid Replacements: Harlan Electric Co. [replaces](#) transmission structures in New Hampshire

By [Susan Bloom](#) | Mar 15, 2024

“In early 2022, Eversource issued an RFP to the several live line contractors in New Hampshire, of which we’re one. And in May 2022, we were successfully awarded the contract to provide electrical line construction services for a complex series of transmission structure replacements, including extensive energized work in the state...

“The job involved replacing 252 largely H-Frame, two-pole structures ranging from 50–80 feet in height across four different 115-kV circuits in the same corridor,” Lenahan said. Originally built in 2011, the laminated wood structures had deteriorated from the inside...

while the [laminated](#) wood poles remained structurally and functionally operable, they didn’t offer the same durability and the utility prioritized that they be repaired [replaced]...

The majority of the structures gained between 5–15 feet in height and now range from 60–95 feet, which allows additional clearance for natural vegetation to grow from an environmental perspective and which will also help hide the poles aesthetically,” he said.

“From a performance standpoint, Eversource can upgrade the poles to an even higher-capacity conductor if they want, as the structures were built to accommodate that option in the future,” Lenahan said.”

In its 2021 Laminated Phase II [presentation](#) to the PAC Eversource stated “Recent structure replacements have revealed additional concerns about the integrity of laminated wood structures installed between 2000 and 2014”

Eversource has not provided any evidence that it contacted the [manufacturer](#) of the laminated structures to request compensation for this claimed lack of integrity.

Eversource has spent \$450 m. on “Asset Condition” replacements of laminated structures that were installed in Reliability projects between 2001 and 2014.

Were all these laminated wood structures “structurally and functionally operable”?

Were the vast majority of the wood structures Eversource has replaced in “Asset Condition” projects “structurally and functionally operable” ?

The X-178 is the only asset condition project for which Eversource has provided (unverified) structure condition [ratings](#).

What is the [value](#) of the remaining years of service Eversource destroyed when it prematurely replaced its transmission lines in its “Asset Condition” projects in New Hampshire?

Below: R-187 stub and structure section awaiting disposal (2023)

