

Comment on New Hampshire SEC 2024-02 and PUC DE-24-087

I submit my spoken comment from the SEC hearing of March 4, 2025, because the SEC's subsequent questions on Eversource's planned conductor capacity increase and Commissioner Cass's comment on DES oversight of the project, indicate that I was not heard:

We shouldn't have to be here.

We are here because since 2018 Eversource has been rebuilding its grid in New Hampshire under the category of "asset condition" projects, without any federal or state scrutiny for need, planning or costs.

We are here because none of the Consumer Advocates of New England took any effective action against the Asset Condition problem.

We are here because ISO-New England, a private corporation allowed by FERC to run the New England grid, has violated FERC's rules and allowed Eversource to classify the X-178 as an "asset condition" project paid for by ratepayers, rather than an Elective Upgrade paid for by Eversource.

Because the X-178 rebuild has not been shown to be necessary for safety or reliability and would more than double the capacity of the line, from 908 to 2,200 amps, it is excluded from FERC's definition of an asset condition project.

We are here because on January 5, 2024, the New Hampshire PUC denied my petition of June 2023 requesting it to investigate Eversource's 70+ "asset condition" projects in New Hampshire, including the X-178, for need, planning and costs.

The PUC, which included two members of the present SEC, denied my petition despite NH RSA 374:2 which states; "All charges made or demanded by any public utility for any service rendered by it ... shall be just and reasonable ... Every charge that is unjust or unreasonable... is prohibited."

We are here because the New Hampshire Department of Energy licensed all Eversource's proposed X-178 crossings of public lands and waters without the required proof of public need or Eversource ownership rights.

We are here because DES violated its own rules and accepted Eversource's Alteration of Terrain and Wetlands Permit Applications for the X-178 without landowners' signatures or even landowner notification that these permit applications had been submitted.

We are here because the New Hampshire AG gave its blessing to DES's violation.

We are here because of Regulatory Capture, also called Agency Capture "a form of corruption of authority that occurs when a... regulator is co-opted to serve the commercial... interests of a minor constituency such as... industry""