

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-087

Date Request Received: December 06, 2024
Data Request No. PUC 1-001

Date of Response: December 16, 2024
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Request from: New Hampshire Public Utilities Commission

Witness: Harris, Samuel D

Request:

Please cite the authority or authorities that permit Eversource to proceed with its X178 and U199 transmission line upgrade projects and provide a copy of any specific authorization(s) granted.

Response:

ISO New England (“ISO-NE”) reviews and/or approvals

Eversource is required to seek certain ISO New England (“ISO-NE”) reviews and/or approvals for the replacement of the transmission facilities. Asset condition transmission projects are initially reviewed through a process that involves the ISO-NE Planning Advisory Committee (“PAC”). The PAC does not vote to approve a project, but attendees are provided opportunities to participate with questions, comments, and concerns.

ISO-NE also performs a technical review and approval to confirm that the proposed transmission projects will not have an adverse impact on the regional transmission system. This involves the submission of a Proposed Plan Application (“PPA”) and associated studies by Eversource, review of the PPA and associated studies by the NEPOOL Reliability Committee, and finally approval of the PPA by ISO-NE.

Finally, ISO-NE will also review Eversource’s Transmission Cost Allocation (“TCA”) application for each project. The TCAs seek ISO-NE’s confirmation that the costs of the projects are eligible for inclusion in regional transmission rates. This involves the submission of a TCA to ISO-NE, review of the TCA by the NEPOOL Reliability Committee, and finally approval of the TCA by ISO-NE.

X-178

- The project was presented to the ISO-NE PAC on February 28, 2024, as the “New Hampshire Line X-178 Rebuild” project, with materials posted here: https://www.iso-ne.com/static-assets/documents/100008/a05_2024_02_28_pac_line_x178_rebuild_presentation.pdf.
- In response to stakeholder questions, the Company provided additional information in a memo: (<https://www.iso-ne.com/static->

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[assets/documents/100012/eversource_x178_stakeholder_feedback_memo.pdf](#)), and discussed the project at the June 20, 2023, PAC meeting with an accompanying presentation: https://www.iso-ne.com/static-assets/documents/100012/a04_line_x178_follow_up_presentation.pdf.

- Furthermore, an additional presentation to PAC occurred on October 23, 2024: https://www.iso-ne.com/static-assets/documents/100016/a07_pac_line_x178_rebuild_followup.pdf
- In October 2024, the project was added to the Asset Condition List for public disclosure tracking purposes as ACL 444.
- The project TCA application is pending and will be submitted to ISO-NE prior to the start of construction. Proposed Plan Applications (PPA) are also required for the project and are pending at this time.

U-199

- The project was presented to the ISO-NE PAC on May 18, 2023, and included in the “Northern New Hampshire Rebuilds 115 kV Lines B112, Q195, U199” projects,” with materials posted here: https://www.iso-ne.com/static-assets/documents/2023/05/a03_2023_05_18_pac_northern_nh_rebuilds.pdf.
- In June 2023, the project was added to the Asset Condition List for public disclosure tracking purposes as ACL 388.
- The Proposed Plan Application was submitted to ISO-NE on January 30, 2024, reviewed by the Reliability Committee on February 14, 2024, and ISO-NE issued an approval on February 14, 2024.
 - PPA Approval: https://www.iso-ne.com/static-assets/documents/100008/u199_line_rebuild_i_3_9_letter_es_24_t02.pdf
- The project TCA application was submitted to ISO-NE on October 25, 2024. Reliability Committee review is pending at this time.

No other or further process or approval is required for such projects under the ISO-NE committee or governance process, except as described above.

Federal, state, and local and land use licensing and permitting requirements

In addition, the X-178 and U-199 projects are subject to significant federal, state, and local and land use licensing and permitting requirements.

X-178

Eversource has planned the X-178 project in three segments to support scheduled outages, reduce risk of customer outages, and enable a contracting strategy that manages resources efficiently. The three segments include: (1) Beebe River Substation to North Woodstock Substation, 14.1 miles, in the towns of Campton, Thornton, and Woodstock; (2) North Woodstock Substation to the Streeter Pond Tap, 20.8 miles, in the towns of Woodstock, Lincoln, Easton, and Sugar Hill;

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and (3) the Streeter Pond Tap to Whitefield Substation, 14.1 miles, in the towns of Sugar Hill, Bethlehem, Dalton, and Whitefield.

The X-178-1, X-178-2, and X-178-3 segments were permitted individually, and the X-178-2 segment was further segmented from a permitting standpoint into two phases. The X-178-2, Phase 1, included sections of the project that did not fall within or require crossing through the White Mountain National Forest (“WMNF”), while X-178-2, Phase 2, included areas within or required crossing through the WMNF. The reason for phasing the X178-2 segment was predicated on maintaining construction continuity, in view of the anticipated long-lead permitting timeframes associated with the National Environmental Policy Act (“NEPA”), administered through the U.S. Forest Service (“USFS”) as the lead agency.

U-199

The U-199 project is also subject to a number of significant federal, state, and local land use licensing and permitting. Where the U-199 and X-178 right of ways overlap geographically at the Streeter Pond Tap off of Streeter Pond Road in Sugar Hill, the U-199 Project area was captured under the permitting for X-178-3 to avoid duplication.

As of the date of this response, there are only two out of 23 necessary local, state and federal permits for the U-199 project that are currently pending: (1) the Department of Natural & Cultural Resources Special Use Permit to access select structures along the Ammonoosuc Rail Trail, which is actively being discussed with DNCR (Eversource will not utilize the trail to access these select structures until the permit is received); and (2) the Town of Bethlehem zoning height restriction exemption that is the subject of this docket (Eversource is not working in Bethlehem until the height waiver issue is resolved).

The list and status of permits and approvals required for the X-178 and U-199 projects are summarized in Attachments 1-001(a) and 1-001(b), respectively, and the permits and approvals obtained to date are also provided as attachments to this response, see Attachment 1-001(c) through Attachment 1-001(f).