



THOMAS B. GETZ
Direct Dial: 603.230.4403
Email: thomas.getz@mclane.com
Admitted in NH
11 South Main Street, Suite 500
Concord, NH 03301
T 603.226.0400
F 603.230.4448

September 30, 2019

NHPUC 30SEP'19PM4:15

Ms. Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: Docket No. DE 16-441
Public Service Company of New Hampshire d/b/a Eversource Energy
Notice of Construction of F107 Electric Transmission Line under Little Bay**

Dear Ms. Howland:

On March 10, 2017, the New Hampshire Public Utilities Commission (PUC or Commission) issued Order No. 25,988, in the above-captioned proceeding, granting Eversource Energy the license to, among other things, construct, install, operate, and maintain a 115-kV electric transmission line underwater in Little Bay between Durham and Newington, New Hampshire. PUC Safety Division Staff recommended, on February 1, 2017, that the Commission grant the license for a submarine crossing below the floor of Little Bay “within existing PSNH 100-foot ROW on permanent onshore easements in Durham NH, and Newington, NH, and within the charted underwater cable corridor across Little Bay.” Staff Recommendation, p. 15. This Notice explains the necessity for Eversource Energy to slightly alter the submarine cable alignment to avoid newly formed and identified obstructions caused by tidal currents, as more fully described below.

The Certificate for Site and Facility issued by the New Hampshire Site Evaluation Committee (SEC or Committee) on January 31, 2019, required Eversource Energy to conduct a trial run of the jet plow technology that will be used to bury the submarine cable in the bed of Little Bay in order to ensure that the impact on water quality is minimized. That test was conducted on September 9, 2019, and a report was filed with the SEC and the Department of Environmental Services (DES) on September 17, 2019, which concluded that the model predictions provided during the SEC proceeding were conservative and that the jet plow technology will not compromise the water quality of Little Bay. Installation of the submarine cable may not begin until authorization is received from DES, which is expected by October 4, 2019.

In addition, a pre-construction bathymetric survey was conducted on August 28, 2019, which showed that new sedimentary structures caused by tidal currents, known as sand waves, had developed in a portion of the intended route for the submarine crossing. To prevent damage to

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the jet plow and the cable, and to assure full burial depth and security for the cable, Eversource Energy intends to shift the cable slightly to the south as shown in Attachment A, which will require less than 20 feet of additional cable for each of the three segments of the cable to be buried in the channel.

Eversource Energy advised DES and the U.S. Army Corps of Engineers (Army Corps) of the sand wave development. The Army Corps determined that the slight alteration in the route is allowed under its Permit and no modification is necessary. For DES wetland purposes, and SEC purposes, Eversource Energy will propose a minor modification of the cable alignment that is expected to be approved by October 9, which will result in a minor delay in the construction schedule but not materially affect Eversource Energy's ability to complete construction in a timely manner, as described below.

Due to certain work restrictions applicable to the construction of the Project, Eversource Energy must complete construction of the Little Bay crossing this fall. The intended schedule, which must now slip by several days, involved cable installation of segment #1 between October 4 and 9, segment #2 between October 13 and 19, and segment #3 between October 23 and 30, and concrete mattress installation between November 14 and 19. A significant delay in the construction schedule, however, could cause installation of this reliability project to be deferred until fall 2020.

The New Hampshire Fish and Game Department and DES require the construction in Little Bay to be completed between August and December to avoid potential impacts to sturgeons and bald eagles. In addition, in below-freezing temperatures, the transmission cable is less pliable during jet plow operations. Specifically, in temperatures below 14 degrees Fahrenheit, small cracks and micro-fractures could result from the bending required as the cable is unspooled and fed to the jet plow, which would be difficult to detect during deployment and could shorten the life of the cable by allowing seawater to seep in and ultimately cause an electrical failure. Underwater cables are expected to have a lifespan of decades but cracks that form during installation can result in premature replacement of the failed cable. Furthermore, the potential for icing of the cable-lay barge and associated equipment due to freezing air temperatures represents an increased risk to the safety of the cable installation crew and complicates the installation process, requiring frequent deicing of the barge and equipment and causing delays due to the increased time required for startup of the deck and equipment.

Finally, the construction slated to begin on October 10, 2019, will, by necessity, deviate in a very minor way from the straight line depicted in Exhibit 8 to Eversource Energy's April 12, 2016 Petition in the above-captioned proceeding, but will remain within the underwater cable corridor charted by the National Oceanic and Atmospheric Administration (NOAA), which formed the basis for the recommendation by Safety Division Staff to grant the submarine crossing license. Moreover, the minor deviation, a shift of 100 feet or less over 1/3 of the length of the cable, will have minimal, if any, impact on the Safety Division Staff's original recommendation because it will not affect the public rights in Little Bay and will conform to the National Electric Safety Code. Consequently, no amendment to Order No. 25,988 is necessary.

Ms. Debra A. Howland, Executive Director

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An original and six copies of this Notice will be hand delivered to the Commission. Electronic copies have been filed with the Commission, the Consumer Advocate and the service list.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas B. Getz", with a large, stylized flourish at the end.

Thomas B. Getz

TBG:slb