

May 21, 2023

I petition the PUC to intervene in docket DE-20-161.

My rights, duties, privileges and other substantial interests may be affected by the proceeding because I own property encumbered by an Eversource ROW in which is sited a 115 kV transmission line.

I possess knowledge of Eversource's 115kV system on the ground, gained during eight years as an intervenor during Northern Pass. Important aspects of Eversource's physical structures and ROWs appear to be unknown to the PUC, and it would be in the interests of justice, and this docket, for the PUC and the public to be informed and able to demand the appropriate information from Eversource.

Eversource's LCIRP for 2020 failed to include:

I. A forecast of future demand for the utility's service area.

II. An assessment of demand-side energy management programs, including conservation, efficiency, and load management programs. [the word 'conservation' does not appear in this LCIRP]

III. An assessment of supply options including owned capacity, market procurements, renewable energy, and distributed energy resources.

IV. An assessment of distribution and transmission requirements, including an assessment of the benefits and costs of "smart grid" technologies, and the institution or extension of electric utility programs designed to ensure a more reliable and resilient grid to prevent or minimize power outages, including but not limited to, infrastructure automation and technologies.

V. An assessment of plan integration and impact on state compliance with the Clean Air Act of 1990, as amended, and other environmental laws that may impact a utility's assets or customers.

VI. An assessment of the plan's long- and short-term environmental, economic, and energy price and supply impact on the state. [no mention of the effect of Eversource's grid on global warming]

VII. An assessment of plan integration and consistency with the state energy strategy under RSA 4-E:1.

Eversource's Plan states:

"Existing Asset Considerations: If assets are part of the proposed capital projects that through their age or asset health index pose a reliability risk, a traditional system upgrade is to be prioritized.

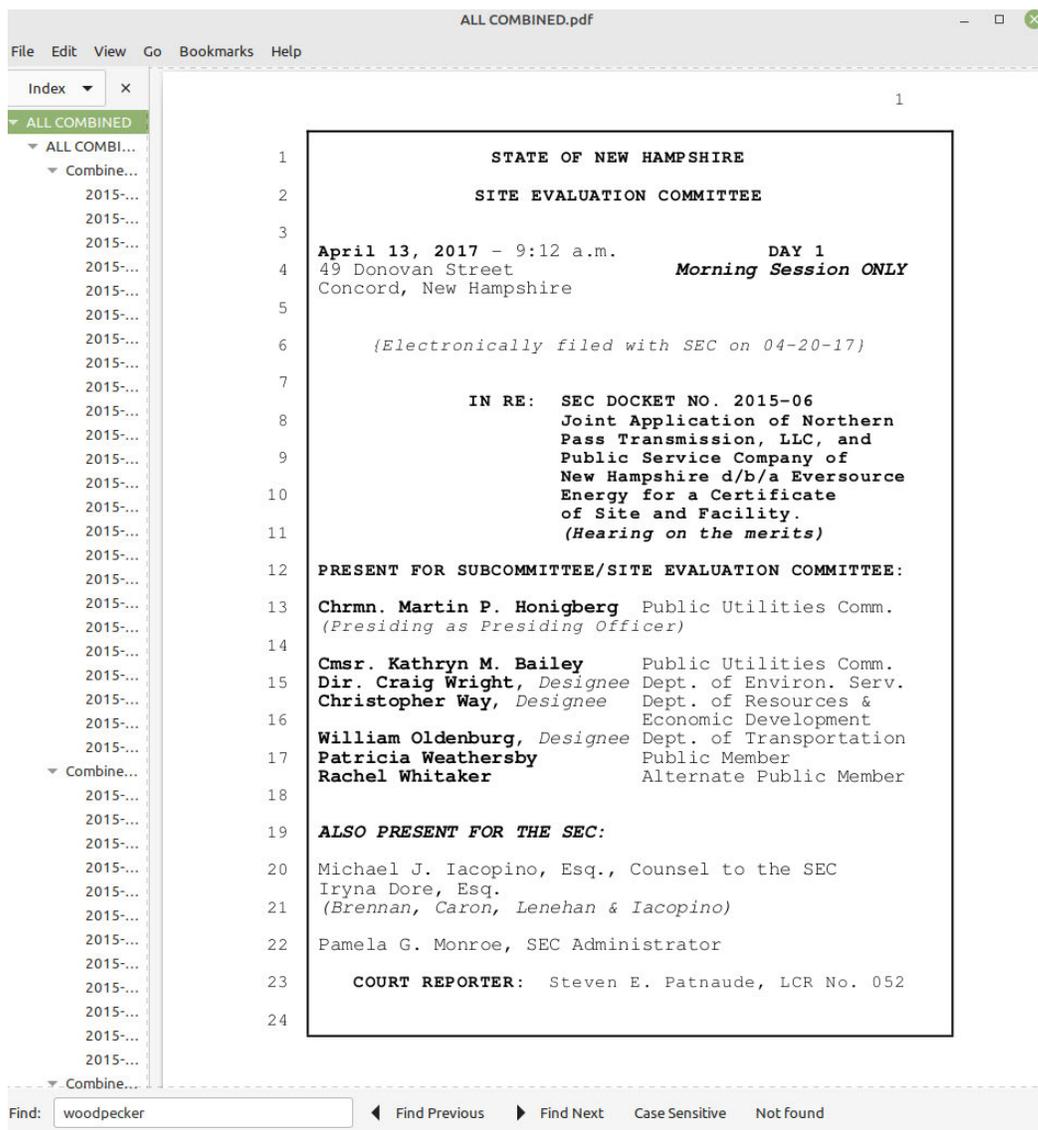
• System Obsolescence: For aging and/or obsolete systems traditional system upgrades should be prioritized."

Eversource's 2020 LCIRP failed to justify its prioritization (in practice, exclusive use) of traditional system upgrades. Eversource failed to distinguish between upgrades that are replacements of failing elements and "upgrades" that are completely new transmission lines.

Eversource’s LCIRP (p. 29): “When a system reliability need is identified from a Needs Assessment, ISO-NE begins a process to address the need...ISO-NE maintains a similar list (the Asset Condition List) reflecting projects developed by the TOs to address asset condition issues identified by the TOs on their existing transmission facilities.”

Eversource’s LCIRP (p. 32): “... the fundamental purpose and design of the Company’s distribution planning and investment plan is to establish the foundation for enhanced reliability, resilience, operational efficiency and the incorporation of grid-modernization investments, which is a necessary precursor to grid modernization. This was acknowledged in Commission Order No. 25,877 (April 1, 2016) in Docket No. IR 15-296, where the Commission stated that it expects the benefits of grid modernization to include the improving the reliability, resiliency, and operational efficiency of the grid; reducing generation, transmission, and distribution costs...”

Eversource’s 2020 LCIRP failed to limit Eversource’s use of the Asset Condition category to appropriate and cost-effective projects.



During the Northern Pass SEC hearings, Eversource made no mention of pole degradation, despite it's plan to replace the existing 115kV structures in addition to adding the HVDC line to the ROW.

Eversource's 2017 bulk river crossing applications for its 115kV lines made no mention of pole degradation.

https://www.puc.nh.gov/regulatory/Docketbk/2017/17-195/INITIAL%20FILING%20-%20PETITION/17-195_2017-12-14_EVERSOURCE_ATT_PETITION_WATER_CROSSING.PDF

Yet between 2018 and 2023 Eversource used the Asset Condition category to engage in extensive, expensive replacement of its 115kV and 345kV transmission lines. It thus avoided any assessment of the necessity for structure replacement, let alone structure, OPGW and conductor replacement which increased the transmission capacity of its 115kV lines (existing 336 and 795 kcmil rebuilt to 1272 kcmil: 529 and 907 amps to 1,187 amps.)

It damaged the environment of the state through construction and materials costs, CO2 production, air pollution, aesthetic degradation and damage to the ROWs, for new lines without proven necessity.

Eversource's LCIRP promotes Asset Condition projects that have increased, and will continue to increase, transmission costs for ratepayers.

Eversource's Asset Condition projects and claimed costs can be found here:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwiqmuXY_oj_AhXVIIkEHVGuBMIQFnoECBQQAQ&url=https%3A%2F%2Fwww.iso-ne.com%2Fstatic-assets%2Fdocuments%2F2023%2F03%2Ffinal_asset_condition_list_march_2023.xlsx&usg=AOvVaw33bdGnZC4WYw7NBBWpgOtN

Pending proposed so-called Asset Condition projects: U-199, Q-195, B-112 & X-178 115 kV lines replacements) add at least another \$267 m. (-25%+50%)

https://www.iso-ne.com/static-assets/documents/2023/05/a03_2023_05_18_pac_northern_nh_rebuilds.pdf

Synapse Energy Systems states: "New England has a growing gap between the amounts invested in reliability projects and asset condition projects. Asset condition spending now constitutes the majority of new regional transmission investments and is projected to continue increasing. Ratepayers ultimately bear the costs for asset condition projects; but unlike other investments that have cost reviews built into approval processes, there is little to no meaningful check on the prudence of asset condition spending. Projects under \$5 million are specifically exempted from review by the tariff and therefore are never presented to the PAC. Projects exceeding \$5 million are presented to the PAC, whereby the cost "review" process occurs through NETOs presenting their proposed projects and spending....

Synapse is concerned that the lack of regulatory oversight may be creating a perverse incentive for NETOs to pursue asset condition spending disproportionately, unnecessarily, and/or exorbitantly. We understand there are few strings attached to the approval and rate-basing of asset condition projects, and NETOs earn a guaranteed rate of return on these investments. The ostensible lack of cost review

and containment measures also raises questions over whether NETOs are prudently incurring these investments. While ISO New England has a “gold-plating” review process for asset condition projects, ISO New England is not a regulator and has no express directive to oversee NETOs’ spending. Regardless, a gold-plating review is not the same as a cost-prudency review since it is a distinct and much lower standard relative to an assessment of whether a cost is reasonable.”

Eversource’s 2020 LCIRP has enabled Eversource to “pursue asset condition disproportionately, unnecessarily and/or exorbitantly.”

Eversource’s 2020 LCIRP failed to address conservation, the least expensive method of lowering electric cost and consumption.

Eversource’s 2020 LCIRP failed to address simultaneous HVAC/HVDC transmission.

Kris Pastoriza



P. S. This petition to intervene is not in the usual format. It is in the format of a dedicated person who has spent many hours in research and writing.

Added to this is my understanding that almost all attempts to communicate with New Hampshire agencies to bring about environmental and/or social justice, or to simply require that they adhere to their own RSAs, will be ignored (sovereign immunity.)

I request that the PUC encourage, rather than discourage, in every way possible, public participation in its dockets.

Below: Eversource O-154 115kV line, “Asset Condition” complete rebuild with structures 15’+ taller, before and after:





“10. It was not anticipated that abutters on either side of the public waters or State owned lands that are the subject of this petition would be affected by the proposed scope of this project... is an existing line and the project will be accomplished within existing ROW easements.”