

Public Service of New Hampshire d/b/a Eversource Energy
Docket No. DE 21-020

Date Request Received: 04/12/2021

Date of Response: 04/28/2021

Request No. STAFF 1-011

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Request from: New Hampshire Public Utilities Commission Staff

Witness: Lee G. Lajoie

Request:

Reference Lajoie Testimony, Bates 20, stating that the transfer “will result in significant reliability and operational benefits,” relating to the “reduc[tion] in probability that a pole will fail in service as the result of adverse weather conditions or the installation of additional equipment by Eversource or third parties.”

- a. Please provide the number of transferred poles set in Consolidated’s maintenance areas as compared to Eversource’s maintenance areas.
- b. Please indicate how the “the installation of additional equipment by Eversource or third parties” would lead to pole failure.
- c. Please indicate, and separate by respective maintenance or set area, the annual number of pole failures occurring in the transferred poles over the last ten years as a result of adverse weather conditions or installation of additional equipment by Eversource or third parties. If any of those failures was the result of tree contact, please indicate the number of such failures that resulted from tree contact.
- d. Please indicate, and separate by respective maintenance or set area, the annual number of pole failures occurring in Eversource maintained poles over the last ten years as a result of adverse weather conditions or installation of additional equipment by Eversource or third parties. If any of those failures was the result of tree contact, please indicate the number of such failures that resulted from tree contact.
- e. Please quantify the reliability and operational benefits in (\$/dCMI avoided) expected to accrue to Eversource ratepayers as a result of the reduction in probability that a pole will fail in service.

Response:

The data request is misleading in that the testimony describes three separate scenarios demonstrating reliability and operational benefits. These benefits are not limited to the "reduc{tion} in probability that a pole will fail in service as the result of adverse weather conditions or the installation of additional equipment by Eversource or third parties."

- (a) There are approximately 124,816 transferred poles in the Consolidated maintenance area and approximately 218,282 transferred poles in the Eversource maintenance area. Consolidated Communications has no single list which identifies poles in the manner requested by Staff. Consolidated Communications is attempting to provide data responsive to this data request and will produce data as soon as possible.
- (b) The question is misleading in stating that “the installation of additional equipment by Eversource or third parties” would lead to "pole failure." The Company's original statement was made in

accordance with the premise of the NESC, which requires poles to have a designated minimum strength to support attached electrical equipment. If the pole strength has decreased due to decay and additional load is placed on the structure, the pole would be considered to have "failed in service" as opposed to causing "pole failure."

- (c) Data to answer this question is not available for Eversource. Consolidated Communications and its predecessor entities have set the 34,515 poles between 2010 and 2021 related to storms or adverse weather events as shown Attachment Staff 1-011.
- (d) Data to answer this question is not available. Consolidated Communications does not maintain such data in the format requested by Staff. Please refer to the response to Staff 1-011(c) above.
- (e) Data to answer this question is not available.