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April 8, 2021

BY EMAIL AND USPS

Ms. Dianne Martin
Chairwoman
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Public Service Company of New Hampshire d/b/a Eversource Energy
Notice of Transmission Line Maintenance on the A111 Line (Franklin to New Hampton)

Dear Ms. Martin:

Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") routinely monitors the physical integrity of its transmission facilities and undertakes appropriate maintenance activities to ensure the reliable and safe delivery of electricity. Maintenance activities include, but are not limited to, selective replacement of structures due to asset condition, the need to strengthen/reinforce structural support for conductor or static wire replacements and to ensure appropriate electrical clearances from energized conductors are maintained. The purpose of this letter is to apprise the Site Evaluation Committee ("Committee") of scheduled maintenance on Eversource's A111 electric transmission line, a 115-kilovolt (kV) line from Franklin to New Hampton, a section of right-of-way ("ROW") that was also once considered for the Northern Pass Transmission project. The A111 line went into operation in 1951 and is now over 70 years old[1].

The A111 line extends 10.6 miles through the municipalities of Franklin, Hill, and New Hampton and consists of 118 wood H-frame structures located within a 225-foot wide ROW. Many of the existing structures are showing signs of physical degradation (excessive cracking, splitting, top rot, insect and woodpecker damage) as well as structure loading capacity deficiencies. Please see Attachment A for representative photographs displaying samples of some of the structures and the associated physical degradations. In addition, the existing communication between substations relies on slower communication wire, which is less reliable and less secure than the optical ground wire ("OPGW"), being installed throughout the Eversource transmission system.

[1] Depreciable life is 40 years.

An entire rebuild of the existing line within the existing corridor is required to maintain reliability of service.[2] The specific work involves replacement of all but three[3] of the existing structures, line reconductoring, and replacement of the existing static wire with the current industry standard of OPGW. In addition, the rebuild will require the addition of a new monopole structure at Webster Substation (the "Project" constitutes all work described). As the existing line must remain in service, the rebuild will occur adjacent to the existing line within the established ROW. Subsequent to the installation of the rebuild, the existing conductor, static wire and structures will be removed. Eversource has an outage scheduled for September, with preliminary construction activities commencing August 1 in support of this needed maintenance project.

Each replacement structure will be positioned within the ROW near the corresponding existing structure, though some minor structure shifts will occur, primarily to remove structures from wetland resource areas. Maps depicting the location of the existing and replacement structures are provided in Attachment B. Many of the replacement structures are required to be taller than the existing structures in order to meet current safety and reliability clearance requirements and also to address uplift[4] considerations specific to the surrounding terrain. The A111 Line traverses through mountainous/hilly terrain and several of the height increases are a result of slope impacts, ground clearance requirements and road crossings.

This notice is provided to the SEC in an abundance of caution, in consideration of RSA 162-H:5, which would otherwise require Eversource to seek SEC approval if it were to undertake a sizeable change or addition to the A111 Line. In Docket No. 2014-01 the SEC defined sizeable as "having considerable size" which it interpreted to mean "large in amount, extent or degree" or "worthy of consideration." Order Granting Motion for Declaratory Ruling, p. 9 (August 20, 2014), quoting earlier Order in Docket 2012-02 recognizing said definition. In Docket No. 2009-01 the SEC further observed that "[a]ddition means "the act or process of adding; something added, especially a room or annex to a building…[and] the word 'sizeable' is defined as 'having a considerable size' . . . 'Considerable' means: 'large in amount, extent or degree'." Order Denying Motion for Declaratory Ruling, p. 8 (August 10, 2009).

Eversource believes that the proposed maintenance line rebuild work does not constitute a sizeable change or addition under RSA 162-H:5, for the following reasons:

- Essential System Reliability Maintenance: The proposed work on the A111 Line is part of an ongoing Eversource maintenance program which evaluates the integrity of its utility lines and structures and implements repair, upgrade or replacement in order to

[2] The project was presented to ISO New England at the December 2020 ISO Planning Advisory Committee (PAC) meeting where it was also approved by ISO at the same meeting.
[3] These three structures were replaced previously in 2020 due to conditions found during routine inspection which necessitated immediate replacement prior to the 2020-2021 winter season.
[4] Uplift is a transmission and distribution line engineering and construction term used to describe a condition where wire on a structure pulls up on the hardware instead of hanging down vertically. For certain structure types this is detrimental as the structure and hardware is being pulled up resulting in forces that the structures were not designed to withstand, which could lead to breaking or uprooting of the structure. This can happen in locations where there is quick change in elevation of the ground or change in structure height of adjacent structures. Raising the structure helps alleviate the increased tension on the conductor and eliminates any uplift concerns.

ensure the safe and reliable transmission of power to its customers. The installation of OPGW will provide near instantaneous communication between the substation equipment to protect the operability of the system in case of a fault or other problem.

- The proposed rebuild is primarily limited to a one for one replacement of the existing line components for purposes of maintaining reliability. The work entails replacement of the existing line components and not an "expansion in size" of the existing line. The addition of the new terminal structure (monopole) just outside Webster Substation will alleviate line tension into the substation as a result of the rebuild.

- No additional land or property rights are required for the line rebuild. Work activities would take place in areas within Eversource's existing right-of-way ("ROW"), utilizing existing access roads to the extent possible. Existing access roads in upland areas may be improved, hardened and widened at turning areas to facilitate the safe passage of construction vehicles. Eversource can access each of the structure replacement locations utilizing its existing rights but hopes to reduce impacts to the ROW by seeking alternate off-ROW access points, with willing property owners. These proposed access points are depicted on Attachment B.

- Operating capacity will be unchanged. The line will continue to operate at 115 kV. The current functionality of the line will not change with the new conductor and Eversource is not expanding the number of customers served by the line.

- The Project will cause only temporary disruption to the existing environment. Impacts to the environment are primarily the result of ground disturbance associated with the improvement of upland access roads and temporary matting used in wetland areas to facilitate safe travel of mobile equipment along Eversource's ROW and creation of level work areas associated with the structure replacements and OPGW pulling locations. The structure replacement work will follow the New Hampshire Department of Natural and Cultural Resources Best Management Practices Manual – Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire dated March 2019 ("NH BMP Manual"), which is the standard to mitigate environmental impacts. Temporary impacts to wetland areas may be further reduced with securing off-ROW access points from willing property owners.

  No vernal pools will be impacted by the proposed work. Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum amount of time before they are covered, seeded, or otherwise stabilized to prevent erosion. In addition, anti-tracking mats would be installed at construction entrances onto public roads to prevent tracking of soil onto local roads. Upon completion of the Project, all disturbed/exposed areas will be stabilized and revegetated, as needed. After the establishment of permanent ground cover, Eversource's contractor would remove the temporary erosion and sedimentation controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

- The Project will not impact state-listed species. Some work areas are proposed within terrestrial habitats that may support rare species. Eversource is coordinating with the NH Department of Fish and Game and Natural Heritage Bureau ("DFG/NHB") to implement appropriate protective measures necessary to avoid impacts to state-listed rare species. With these protective measures, no adverse impacts to state-listed rare species are anticipated.

- In general, the Project will not require any tree clearing within the existing ROW. Eversource may need to undertake tree trimming and/or vegetation removal/mowing within the work areas for conductor clearance and/or to improve access to portions of the work areas. Some limited tree removal may also be required at the edge of the ROW, or for off-ROW access with property owner approval.

- The Project is not expected to impact cultural resources. The entire corridor was previously surveyed for archaeological resources and no significant sites requiring protective/avoidance measures were identified within the ROW. Impact assessments to above-ground historic properties are also being performed for the Project as part of the Section 106 review and no adverse effects to significant resources have been identified to date. Eversource has initiated consultation with the NH Division of Historical Resources ("DHR") for the Project and will continue to work with the agency to identify and mitigate any impacts to historic properties.

- The Project will not result in impacts to scenic or recreational resources and will not alter the visual characteristics of the existing transmission ROW. The project does not cross any state or federally designated scenic byways. The ROW does cross the Franklin Falls Reservoir and the Pemigewasset River in Hill/North Hampton, the William H. Thomas State Forest in Hill and is located within 0.2 miles of the Webster Lake Wildlife Management Area. There is a wide variety of public uses in the project area, including hiking, bird watching, fishing, boating, swimming, picnicking, camping, sightseeing, snowmobiling, cross-country skiing, ice fishing, ice skating, mountain biking, and cycling. Temporary signage and/or spotters will be utilized for trails that cross the ROW to alert users of the maintenance activity. The dark color of the weathering steel H-frame structures will ensure the contrast in color and form from the existing wooden H-frame structures is minimal. The existing forest cover, particularly during leaf-on conditions, combined with the rolling topography in this expansive and varied landscape, suggests the new structures will not significantly alter the landscape as compared to the existing line.

  Structure height increases average 14.4 feet. All structure height changes have been carefully reviewed by engineering, through both desktop and field review. Adjustments to reduce structure heights have been made wherever possible based on road crossing clearances, standard structure geometry, uplift issues, steep slopes, and changes in topography. Information as to structure height changes is provided below:

  Franklin:
  -53 structures are located in Franklin.

-49 structures (92%) will increase by less than 20 feet in height.
- Of the structures increasing by more than 20 feet, only four are located within 500 feet of a residence.

Hill:
- 28 structures are located in Hill.
-24 structures (85%) will increase by less than 20 feet in height.
-Of the structures increasing by more than 20 feet, none are located within 500 feet of a residence.

New Hampton:
-38 structures are located in New Hampton.
-32 of those structures (84%) will increase by less than 20 feet in height.
-Of the structures increasing by more than 20 feet, none are located within 500 feet of a residence.

At the crossing of the Pemigewasset River between Hill and New Hampton height increases of approximately 25.4 and 37 feet are required for two structures, respectively, near the crossing to meet Army Corp of Engineers (ACOE) clearance requirements to the impoundment of the Franklin Falls Dam. This crossing had not previously been licensed through the ACOE due to the line construction occurring before the impoundment construction. An additional structure in Hill (existing Structure 55, new structure number 57) will be raised approximately 42 feet to mitigate uplift on a steep slope. At both of these locations the visual impacts of the height increase have been mitigated by the placement of the structures in locations which are screened by vegetation and to avoid the need for additional structures and guying, due to the terrain.

Increases in structure height are driven by clearance requirements and visual effects attributable to the replacement structures will be mitigated by the similar H-frame design and appearance of the rebuilt line, as opposed to utilizing a monopole design, and which will also serve to maintain a lower profile against the adjacent tree line.

- The Project will not impact air quality. The rebuild work will use appropriate dust suppression, as needed (water truck), to address any fugitive dust caused by the passage of construction vehicles along access roads.

- The Project will enhance public health and safety, as the rebuild work will reduce the reliability risk associated with the current, aged, transmission line.

Project Permitting:

Permitting associated with this maintenance project is progressing. Many of the SEC's constituent agencies are already assessing the project, with local, state and federal entitlements necessary. Eversource will continue to work with relevant authorities to obtain any necessary permits and approvals.

	Permit Granting Authority	Permit Trigger/Threshold	Status
Municipal Permits			
City of Franklin	Zoning Board of Adjustments (ZBA)	Variance for pole heights above 50 feet Special Exception for impacts to wetlands	Submittal Pending
Town of Hill	Zoning Board of Adjustments (ZBA)	Steep Slope Ordinance (potentially required)	Applicability Assessment Pending
State Permits			
	NH Dept of Environmental Services	Alteration of Terrain Permit (AoT) - for land disturbance in uplands for work pads and access routes	Submittal Pending
	NH Dept of Environmental Services	Dredge & Fill Wetlands Permit (includes NH DHR requests for Project Review) - for temporary impacts associated with matting for work pads and access routes	Submittal Pending
	NH Dept of Environmental Services	Shoreland Permit by Notification – for work within 250' of Public Waters (Pemigewasset River)	Submittal Pending
	NH Fish & Game/Natural Heritage Bureau	Review Pursuant to Wetlands and AoT Permitting – for assessment, avoidance, and minimization of impacts to rare, threatened and endangered species	Submittal Pending
	NH DOT	Driveway Permits - new or improved access off state roads	Submittal Pending
	NH Dept of Historical Resources	Request for Project Review	Submittal Pending
	NH Public Utilities Commission	License for crossing public waters and land	Submittal Pending
Federal Permits			
	US Army Corps of Engineers	Army Corps Section 404 CWA Special Use Permit	Submittal Pending
	Environmental Protection Agency	NPDES Construction General Permit/SWPPP	Submittal Pending
	Federal Aviation Authority	FAA Obstruction Evaluation / Airport Airspace Analysis	Submittal Pending

Project Outreach

Municipal officials were first briefed by Eversource of this maintenance project in December 2020. A Project Introduction Letter was then sent to each municipality along with all property owners that abut the transmission corridor. In March 2021, a detailed presentation was provided to the New Hampton Town Administrator, and a joint presentation was made to Town of Hill and City of Franklin officials. Two Town of Hill Select Board members, along with the Franklin Planning Director and the Franklin City Manager, also attended the latter session. A copy of the presentation was emailed to municipal officials for informational and sharing purposes. The feedback at each presentation focused on access points, detail on structure heights, transparency with respect to updating the municipality and abutters regarding project activities and local permitting. No significant concerns were raised.

Eversource will continue outreach with municipal and elected officials, permitting authorities,

abutters and landowners, as well as other interested stakeholders, prior to, during, and after construction is complete. Consistent with its established practice, Eversource will also provide advance notice of construction activities to municipal officials and abutting property owners.

Conclusion

This Project is essential to preserve the integrity of the A111 line and the broader transmission system. Aging infrastructure is less resilient and could fail if stressed which could result in safety issues or electric outages, and less reliable communication wire between substations could make it more difficult to identify abnormalities and isolate failures, which could also lead to outages.

The rebuild of the line will not require the acquisition of new land and encompasses modest changes in the course of replacing the existing transmission facility that will have limited effects on aesthetics, will not impact archaeological resources, is not expected to adversely affect significant above-ground historic resources, and will only temporary disrupt the natural environment. Accordingly, this maintenance Project does not constitute a sizeable change or addition.

Electricity providers are listed as an essential business per Exhibit A to Emergency Order #17 issued by Governor Christopher Sununu on March 26, 2020.[5] The safety of our employees, our customers, and the public is our top priority during the ongoing COVID-19 public health crisis. Our commitment to safety first and always is continuous. Rest assured, as Eversource undertakes this Project and all its vital work activities, Eversource will adhere to its strict Safety Guidelines that outline the mandatory proactive measures required of our workforce to protect the health and safety of the general public, our contractor partners, our employees and their families. These measures are consistent with, and build upon, the Center of Disease Control and World Health Organization directives to prevent the spread of COVID-19.

Should the SEC have any additional questions about the Project, your further inquiry within 60 days is greatly appreciated.

Very truly yours,

Erik Newman
Senior Counsel
EVERSOURCE
780 No. Commercial St | PO Box 330 | Manchester, NH 03105-03301
603.634.2459 (office) 603.724.0284 (cell)

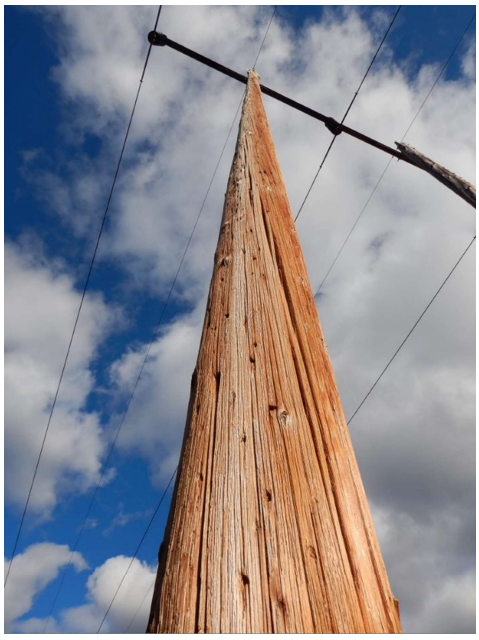
Cc: Michael J. Iacopino, Counsel for the SEC (by email only miacopino@brennanlenehan.com)
Jody Carmody (by email only Jody.M.Carmody@puc.nh.gov)

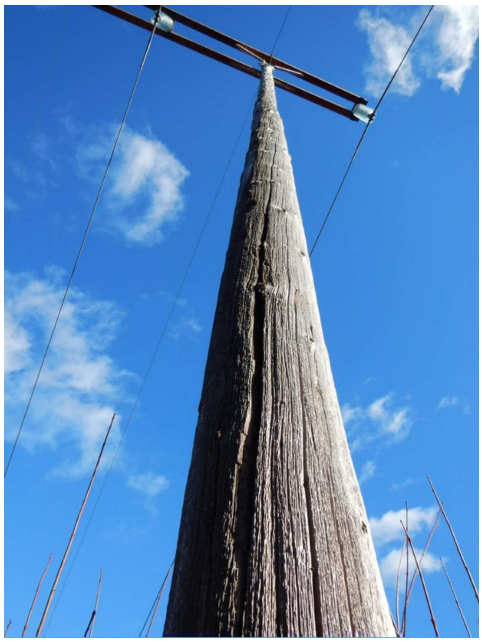
[5] For details on the Governor's order, refer to the following link: https://businesshelp.nheconomy.com/hc/en-us

ATTACHMENT A

Attachment A

Line A111 – Existing Condition Photographs





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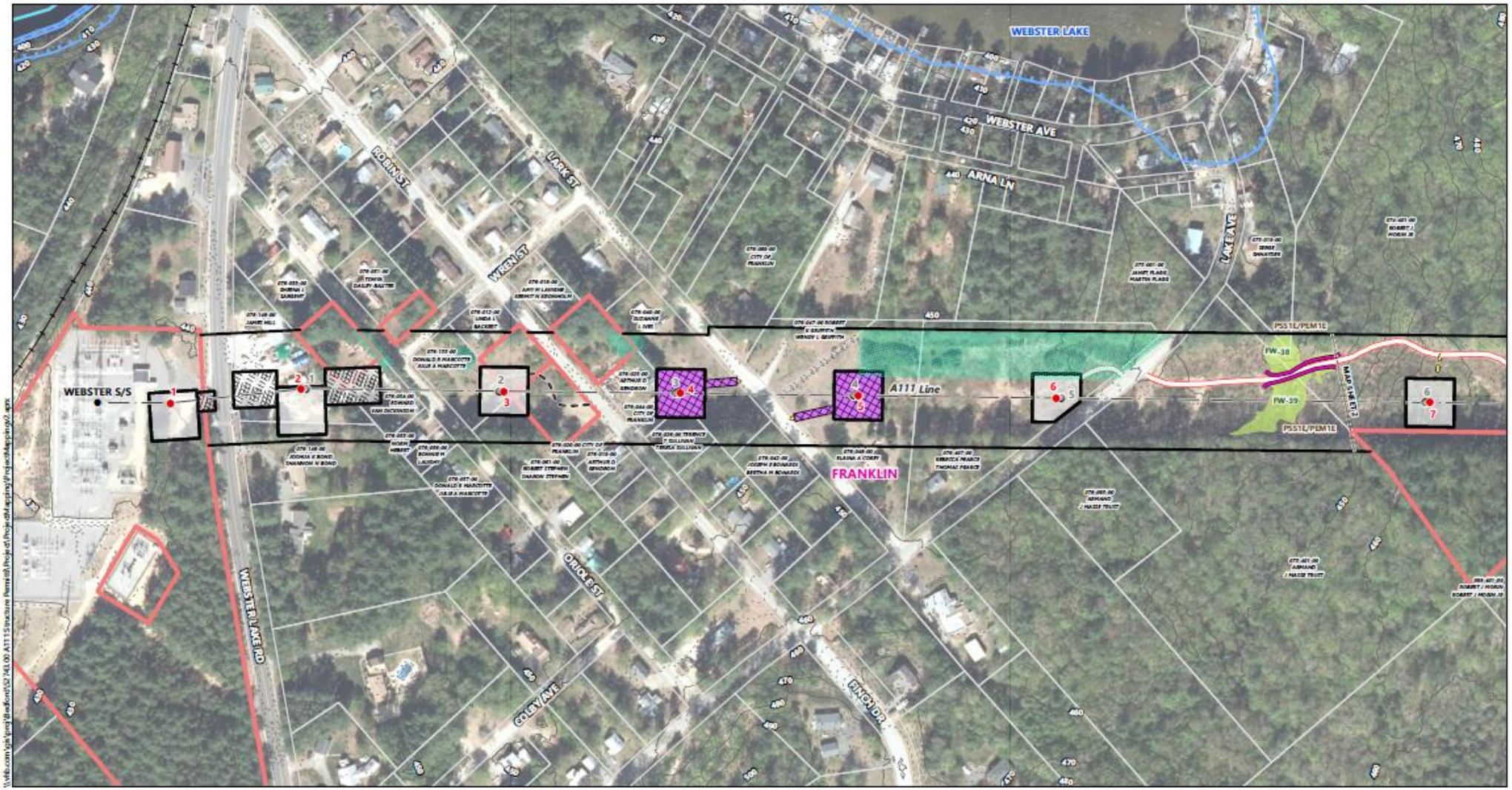
ATTACHMENT B

EVERSOURCE ENERGY

vhb March 22, 2021 | **FIGURE 1**



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A111 Structure Replacements

Franklin - New Hampton, NH

Preliminary Project Plans

Source: VHB, GZA, Eversource, GRANIT

EVERSOURCE ENERGY

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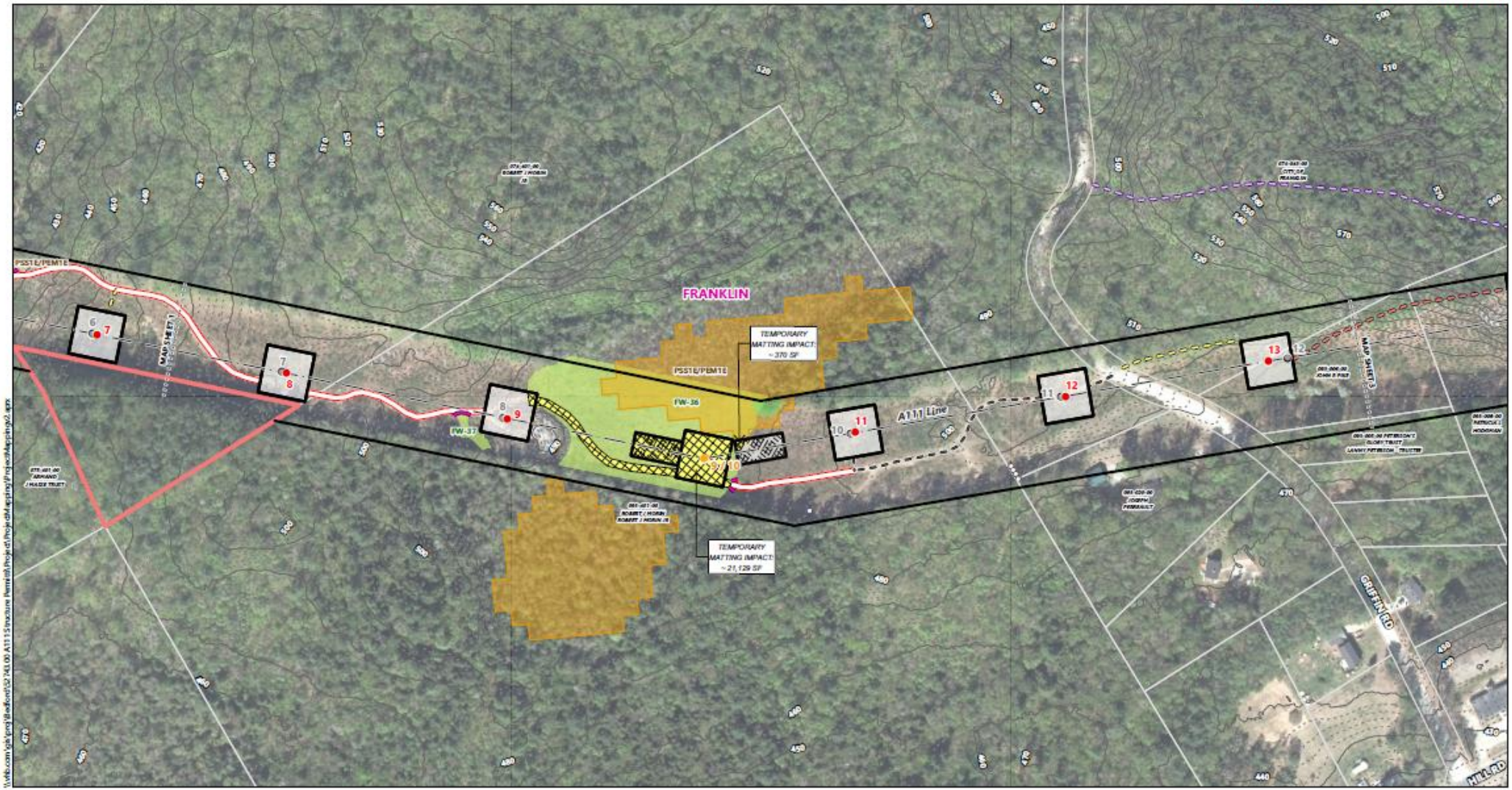

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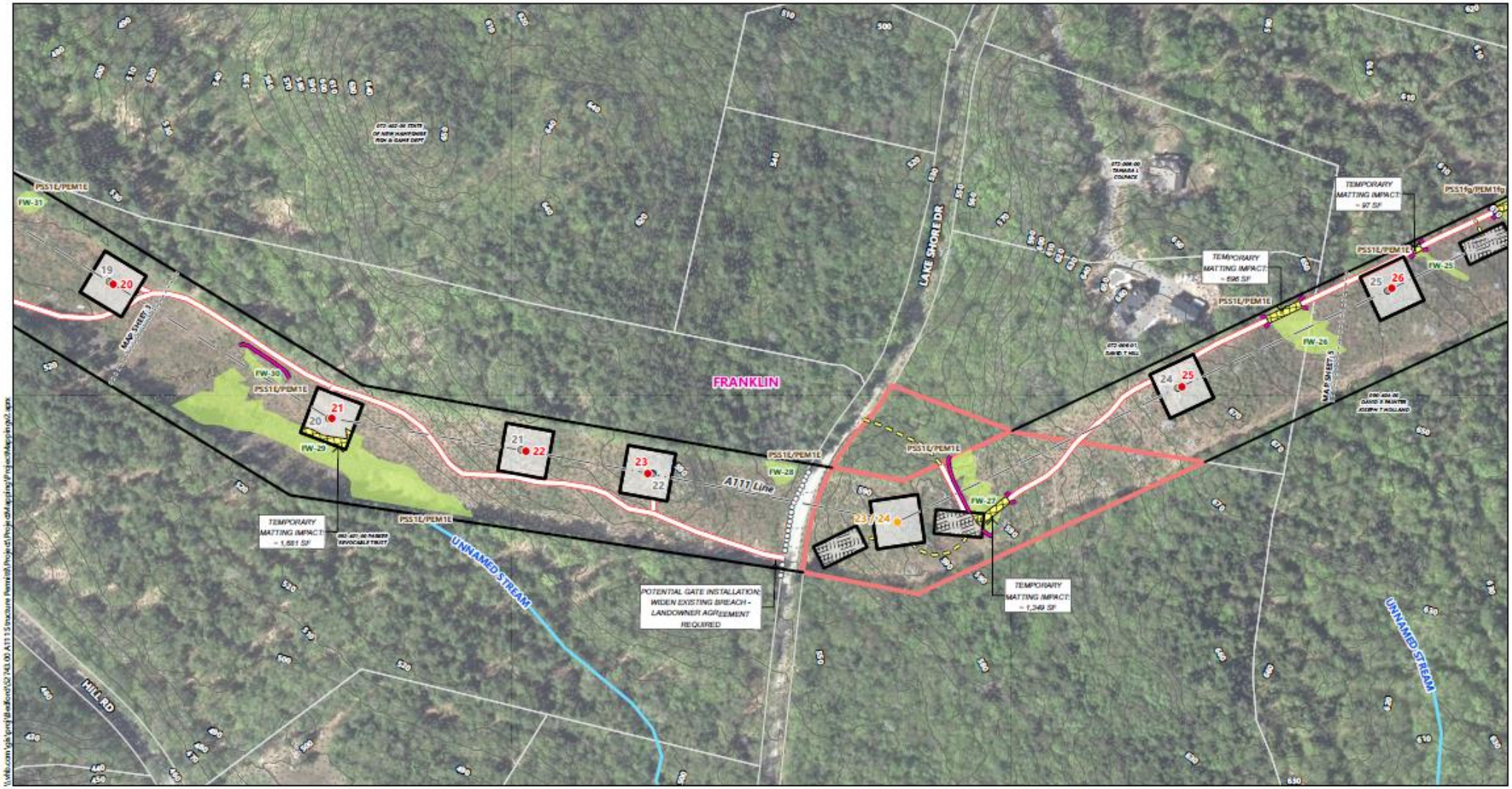

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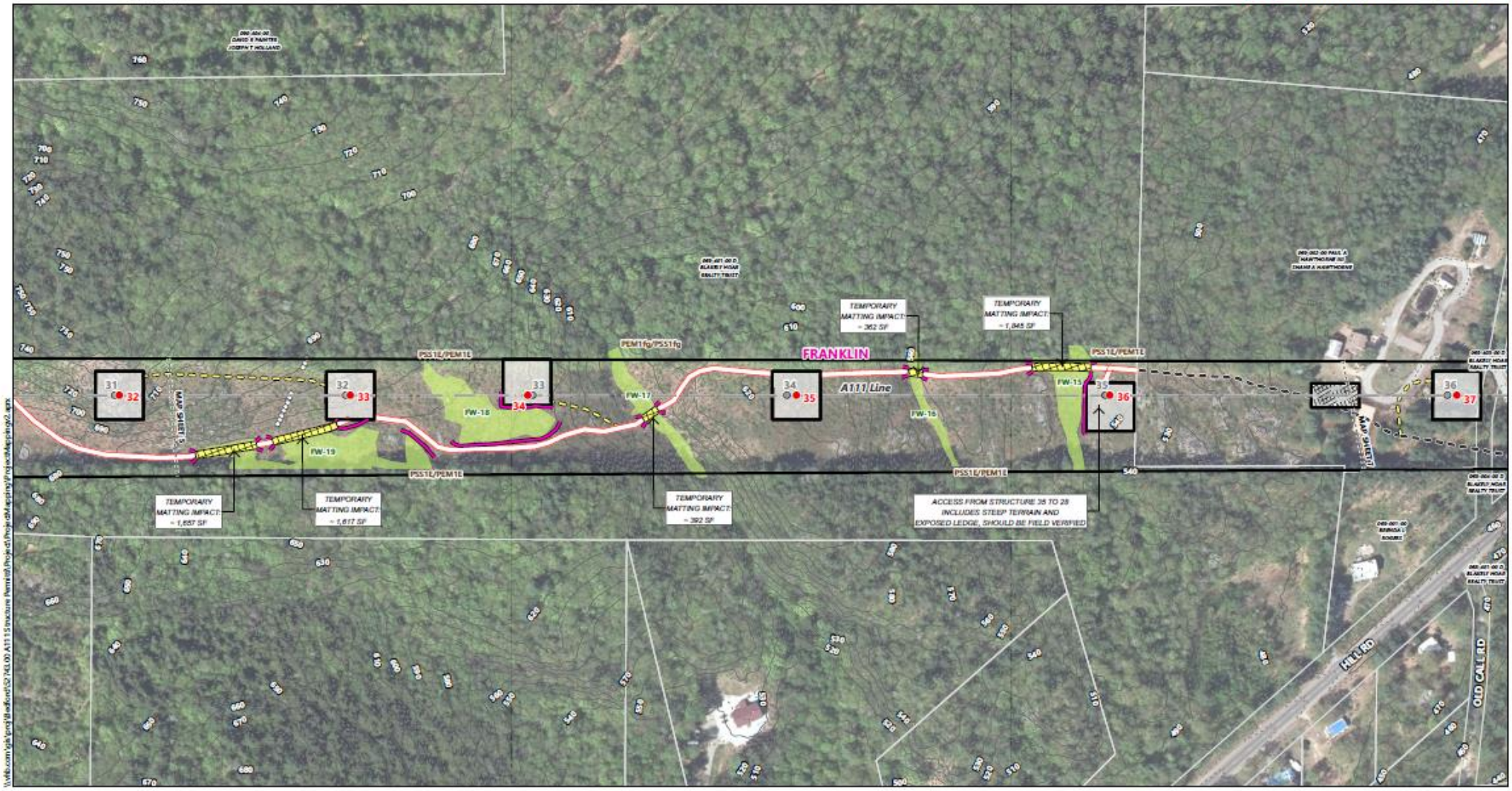

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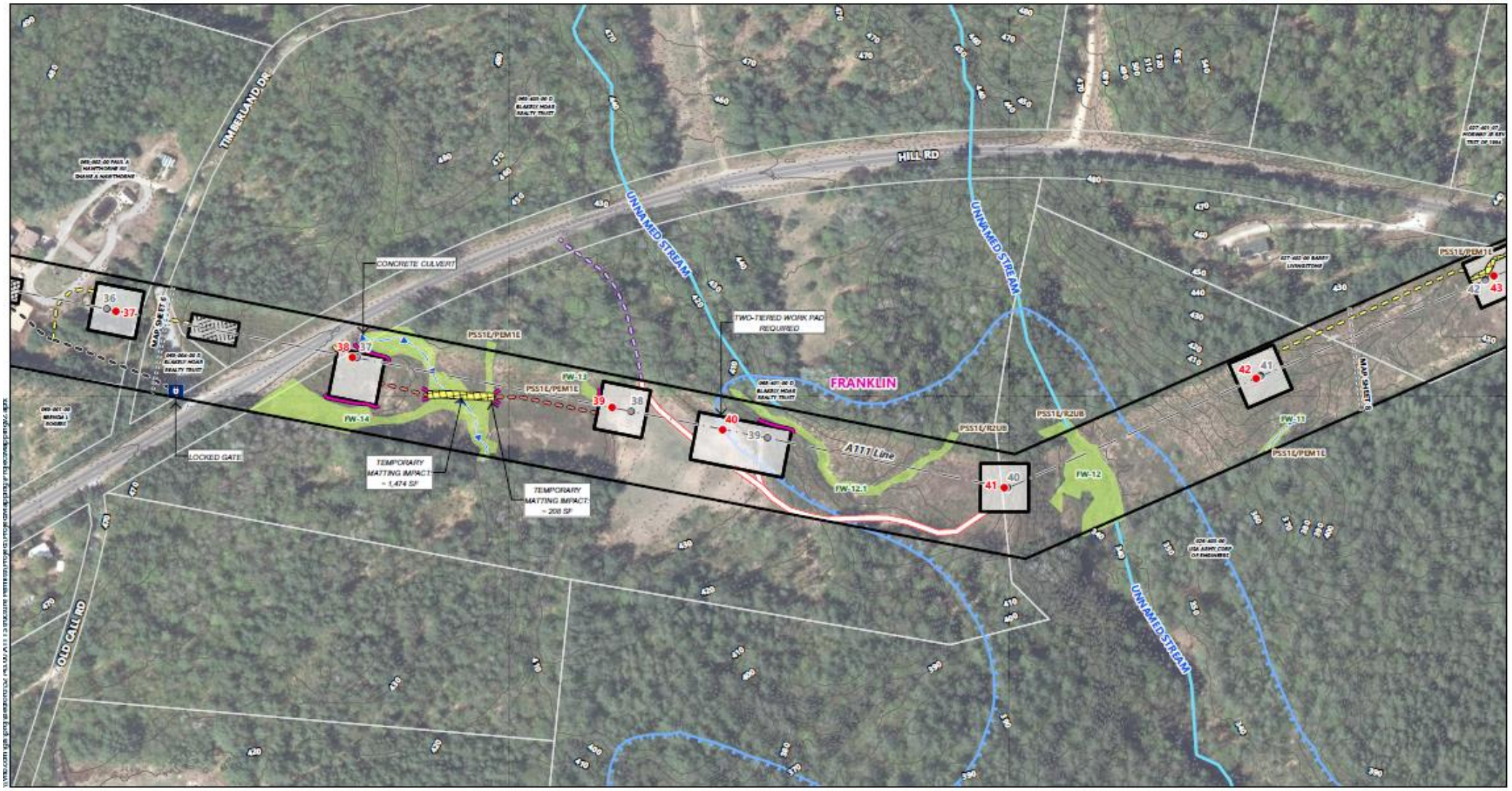

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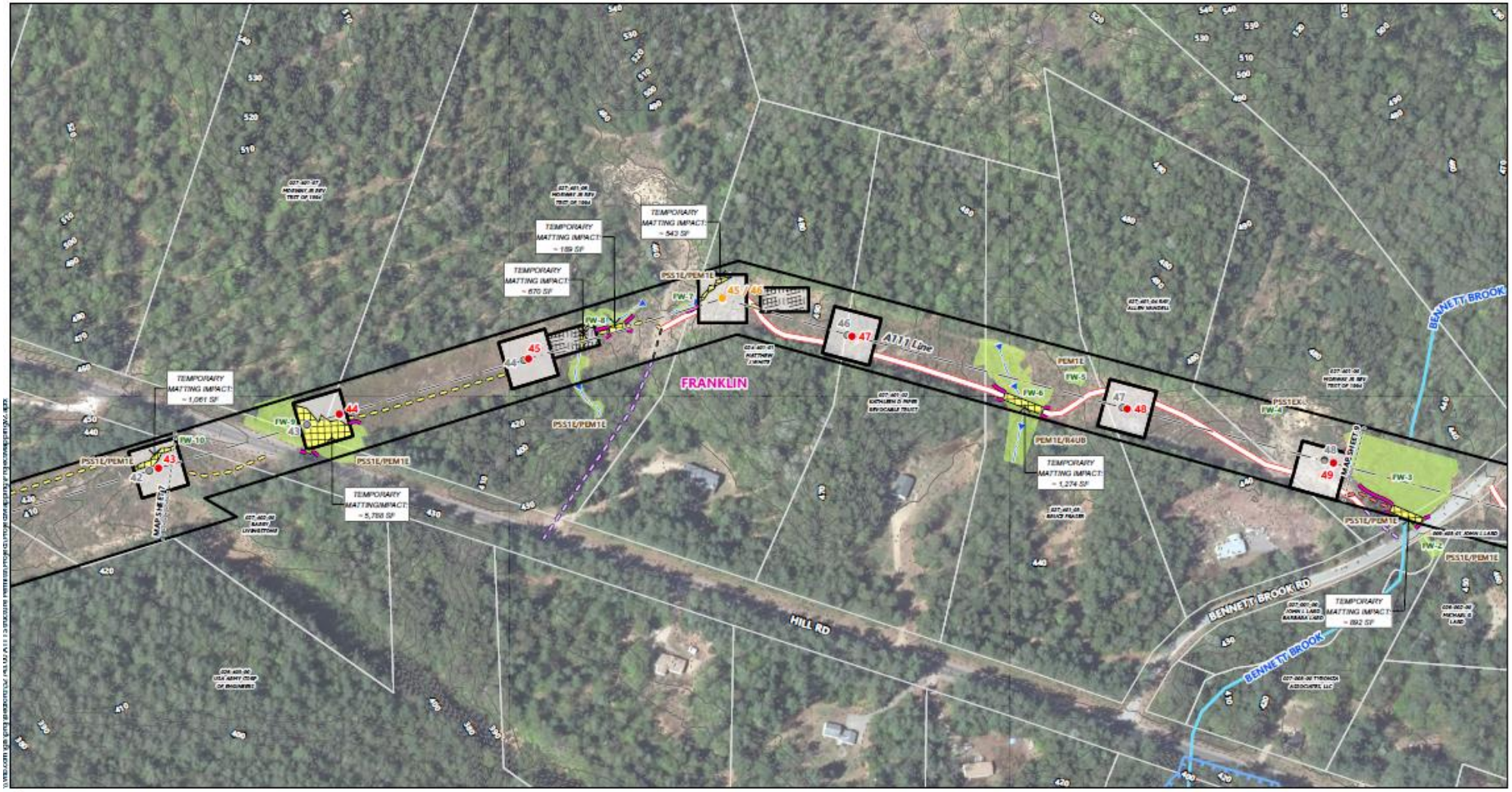

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Franklin - New Hampton, NH

Preliminary Project Plans

Source: VHB, GZA, Eversource, GRANIT

EVERSOURCE ENERGY

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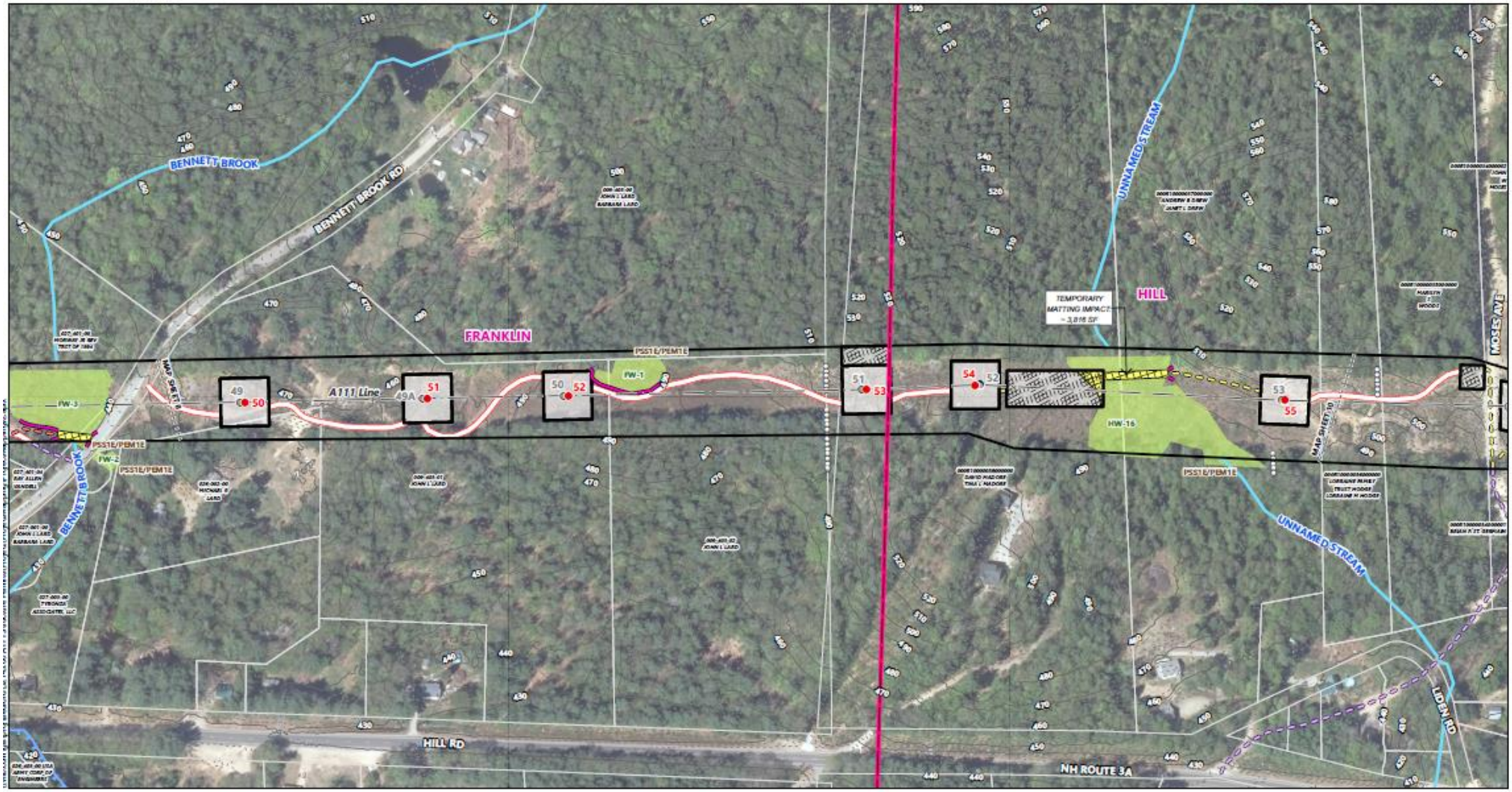

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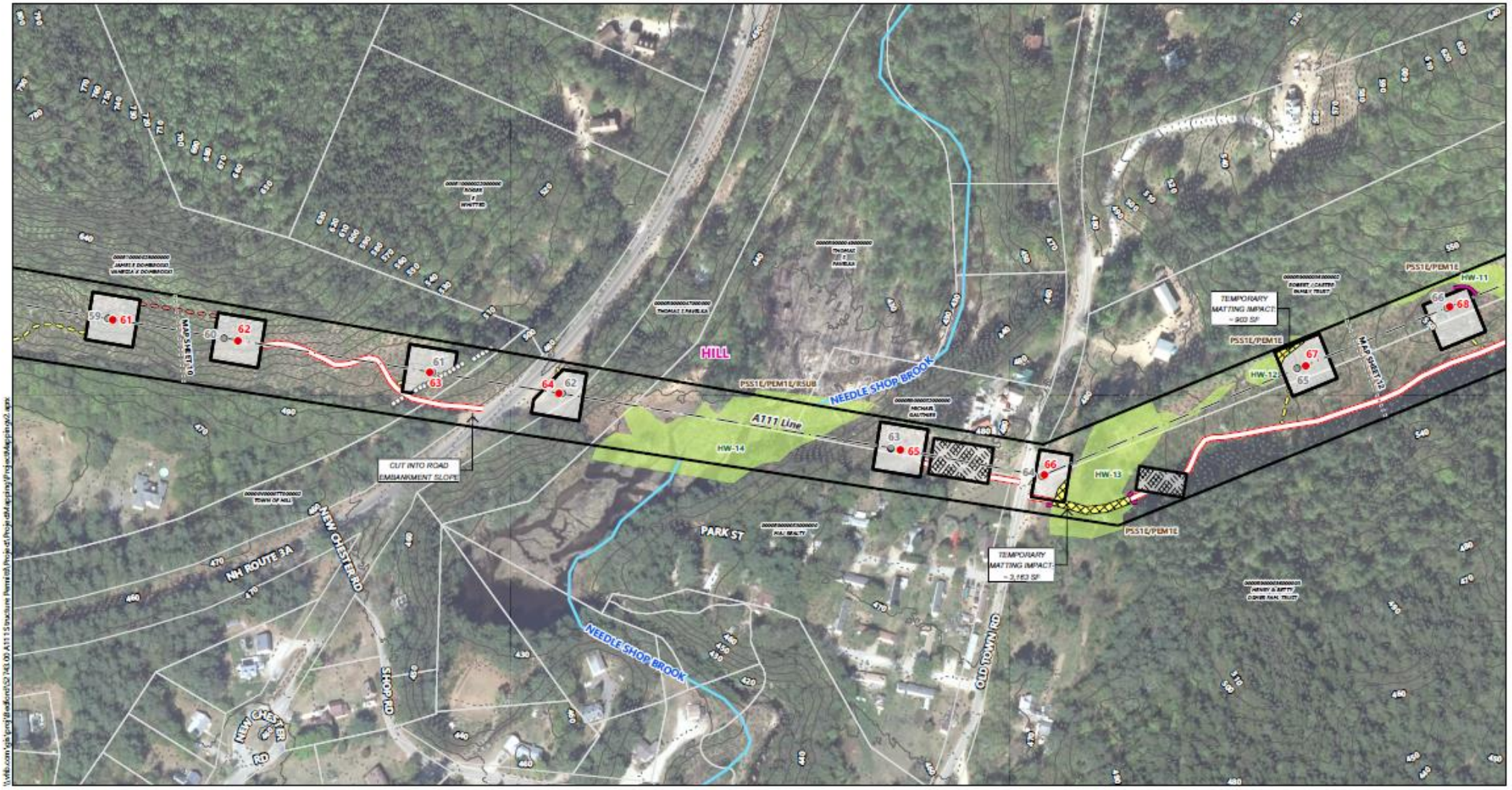

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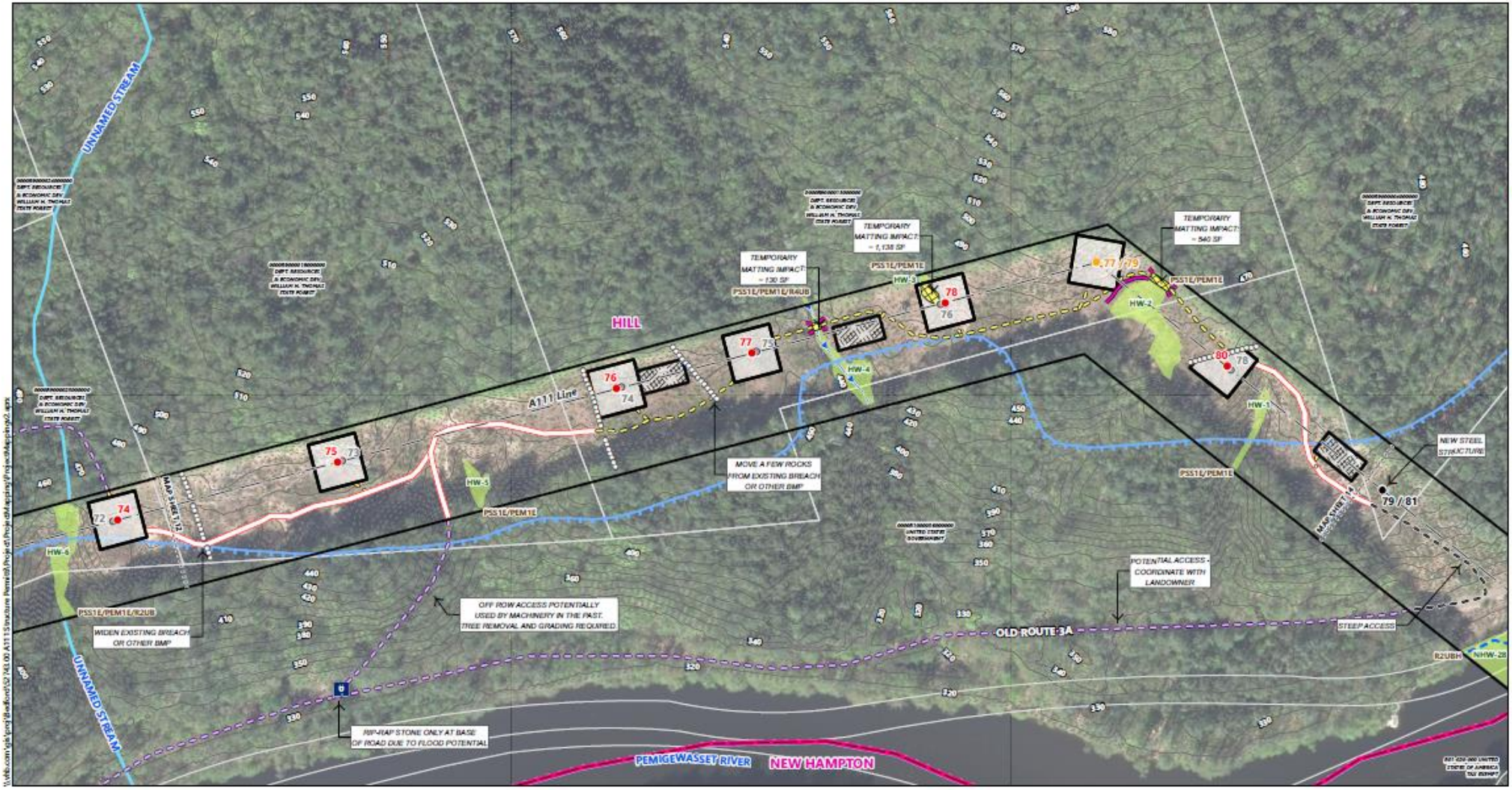

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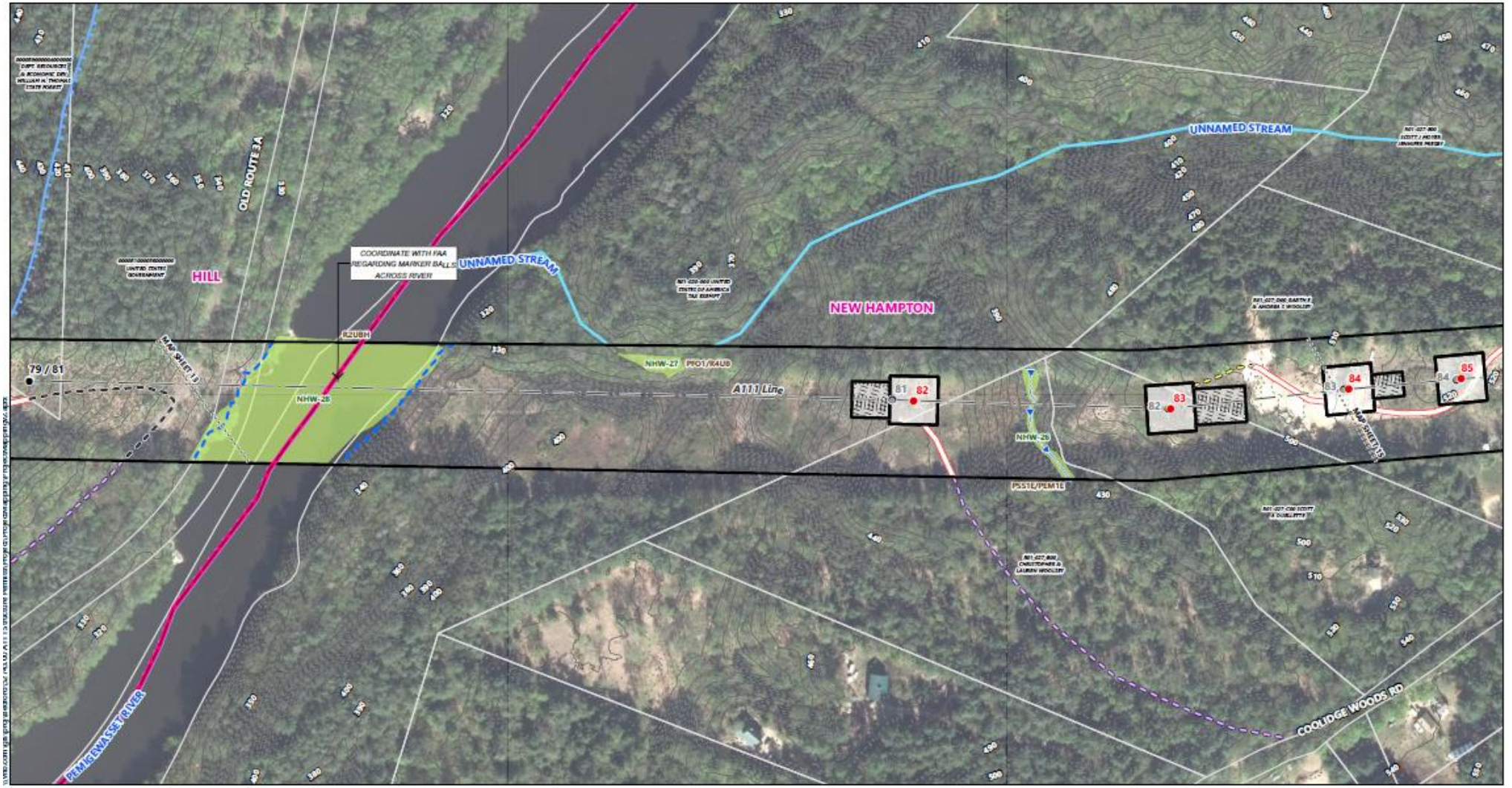

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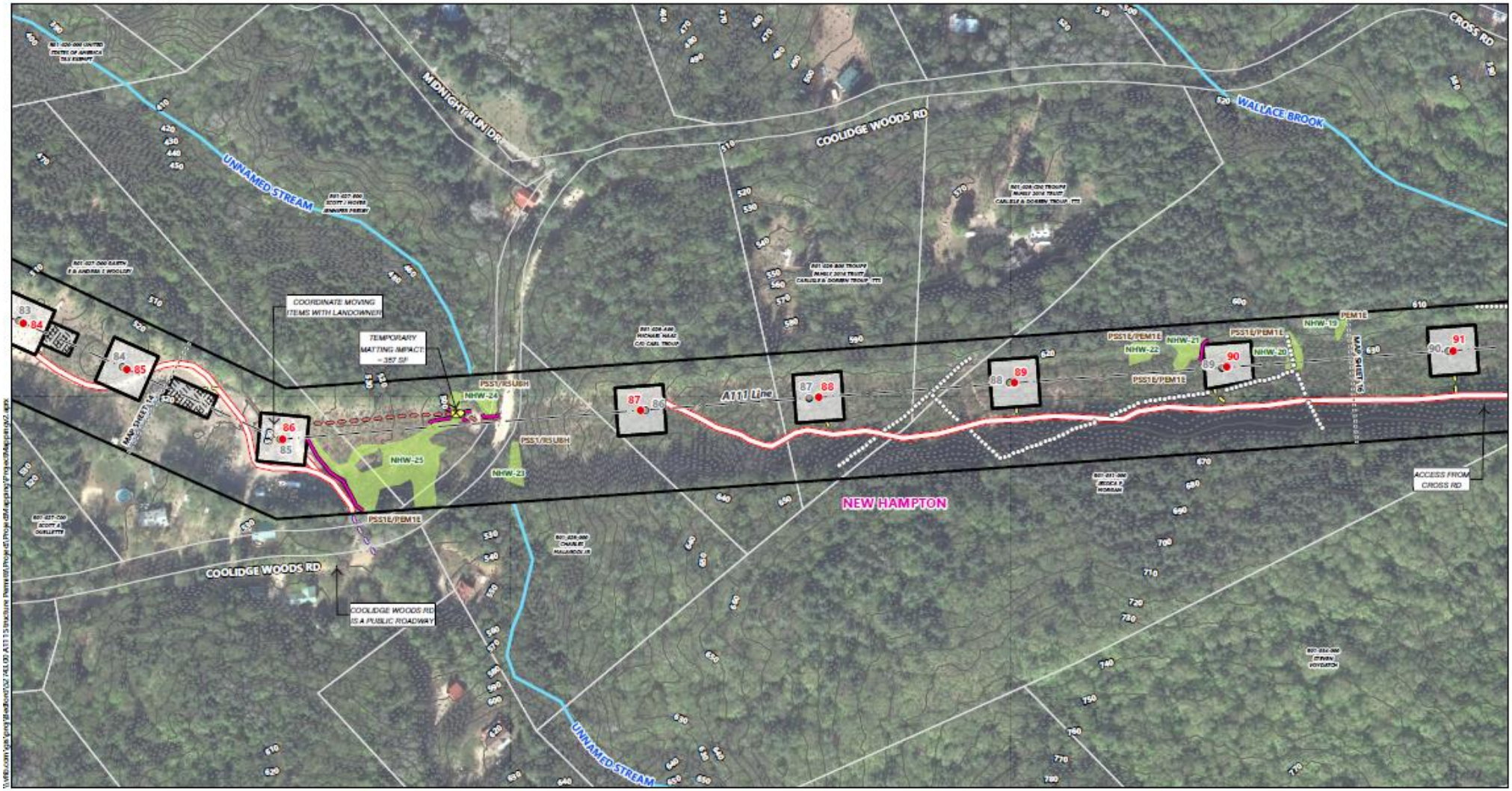

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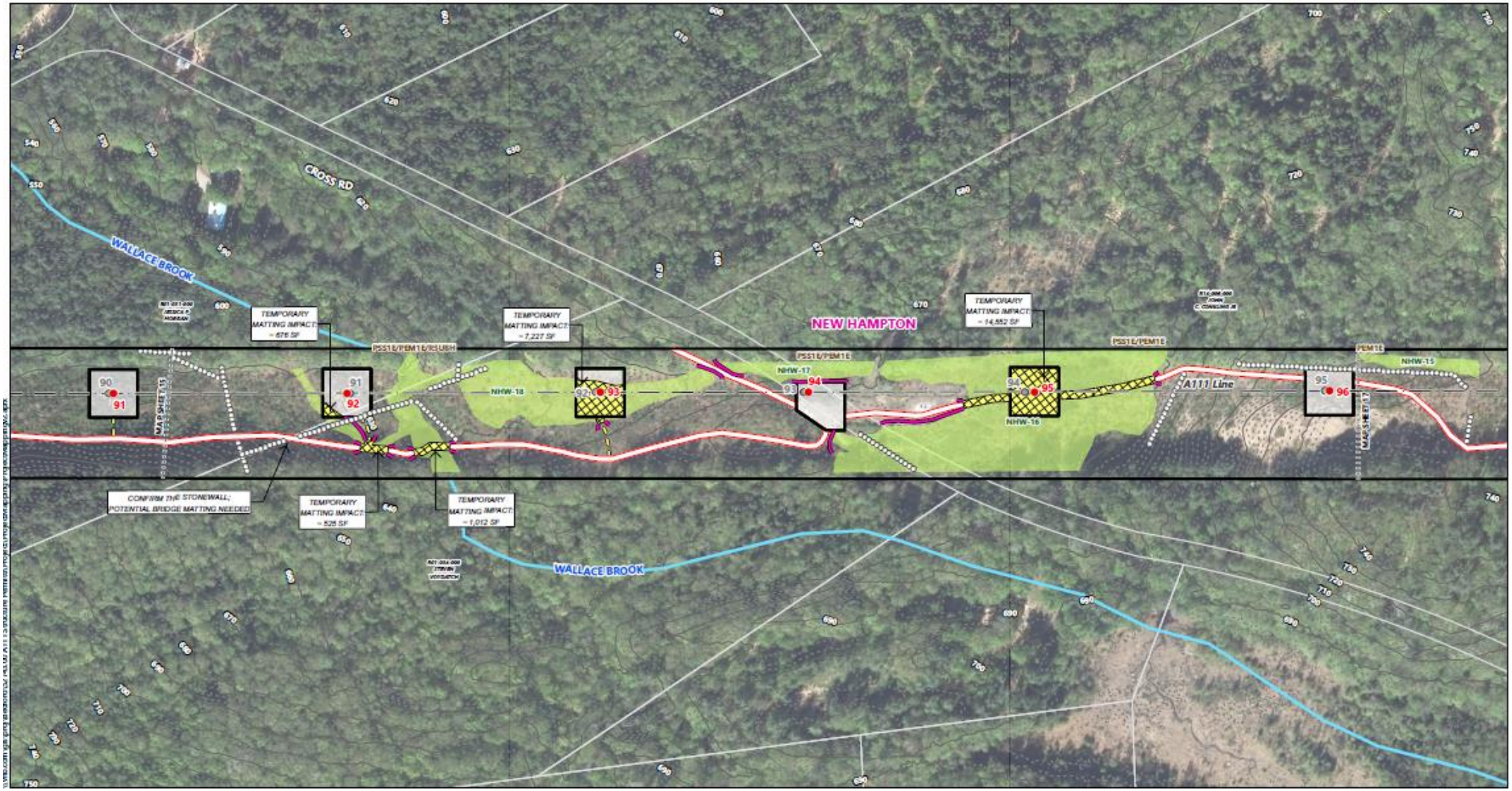

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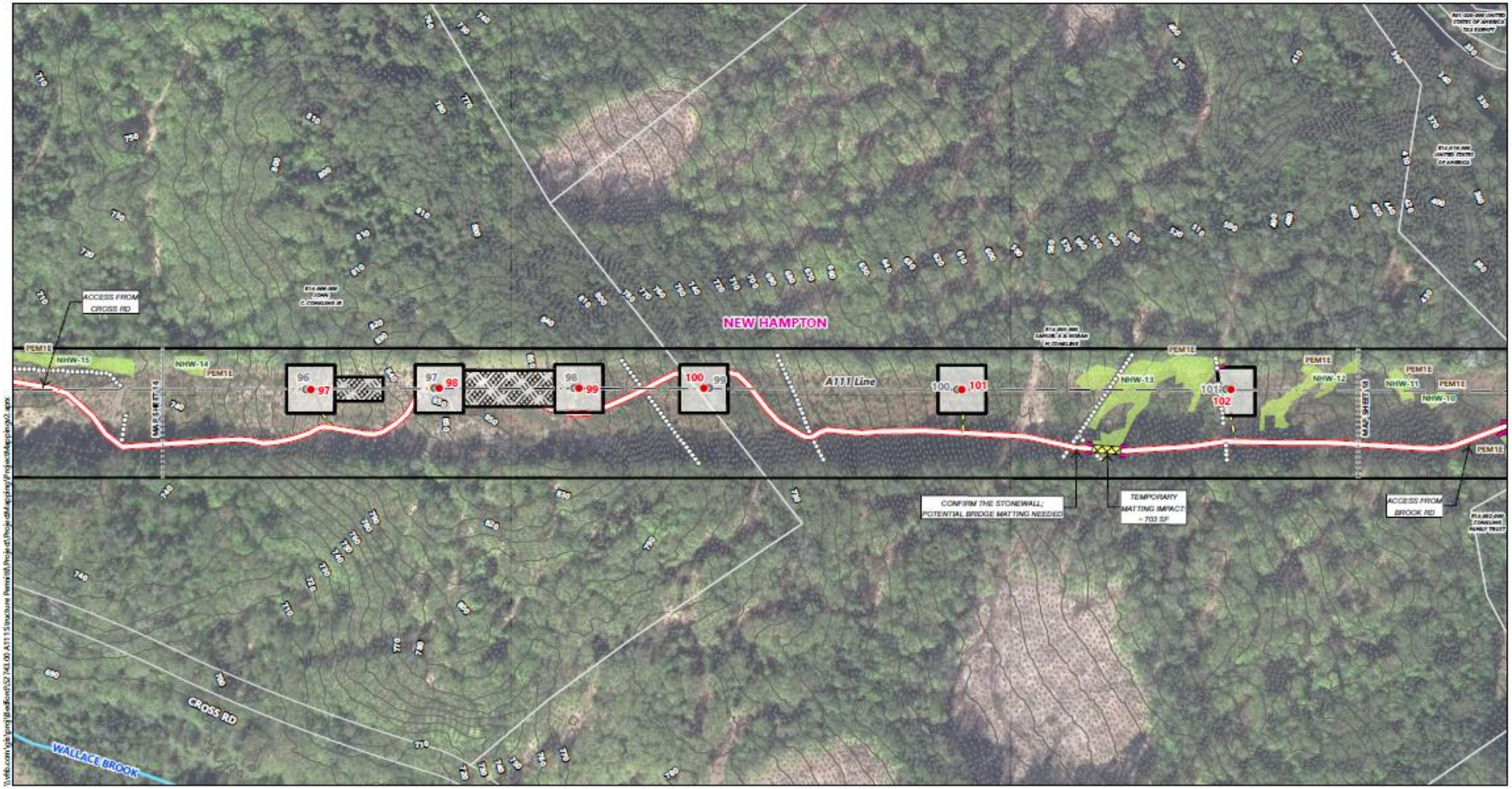

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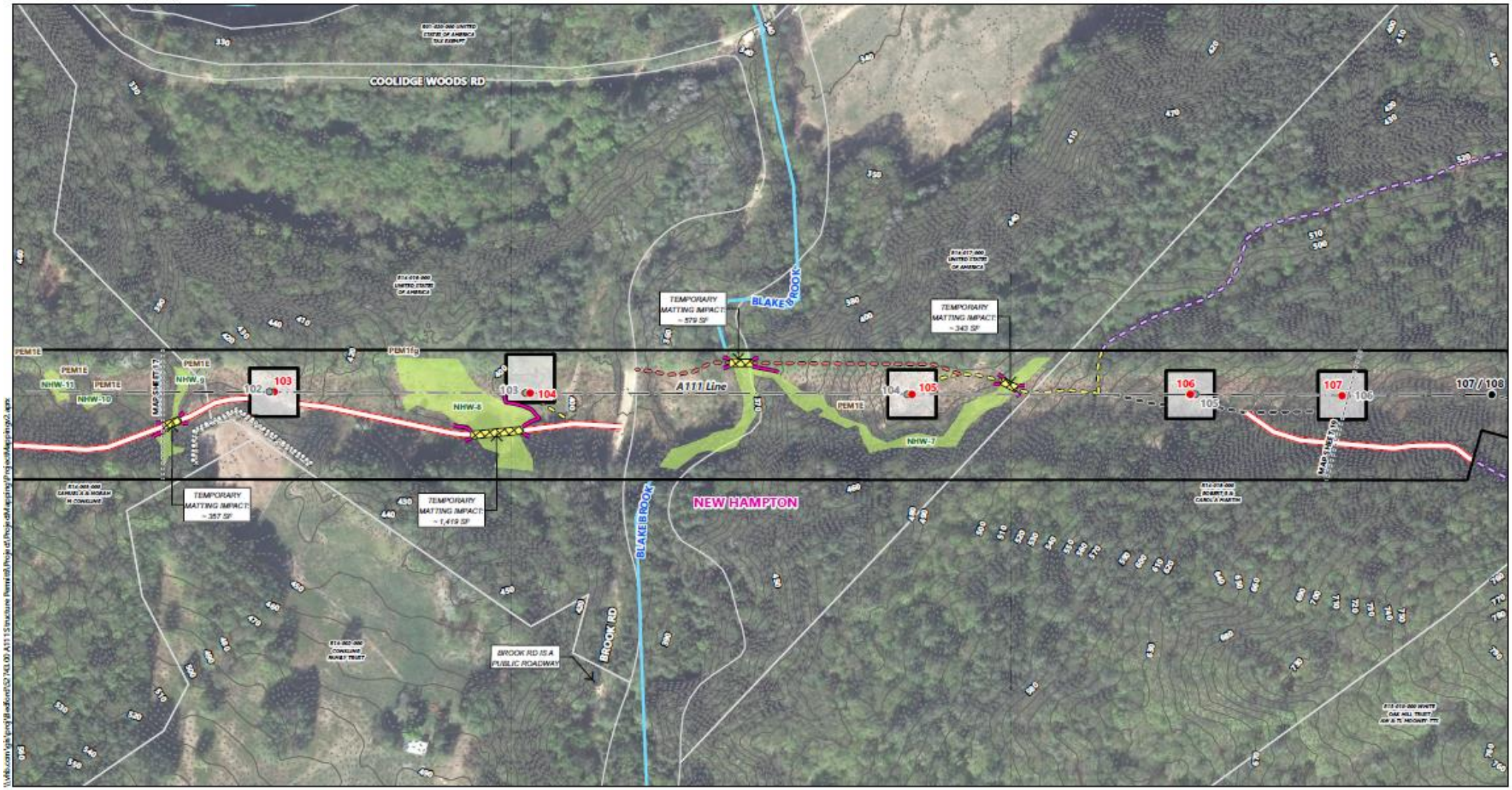

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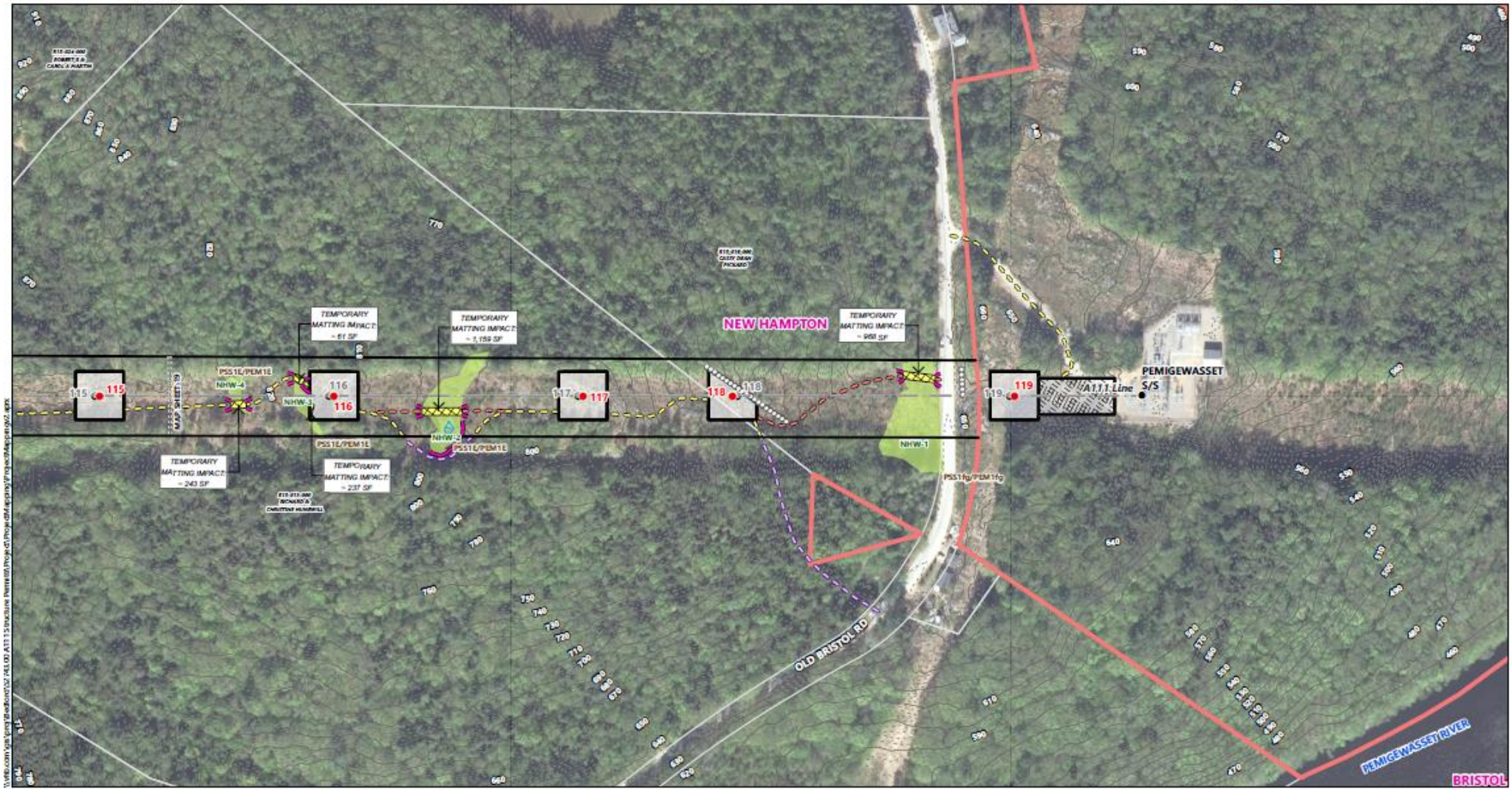

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