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May 28, 2021

BY EMAIL ONLY

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 ("Eversource")  
Notice of Transmission Line Maintenance on the A111 Line (Franklin to New Hampton)**

Dear Chair Martin:

Thank you for the opportunity to brief the Committee on May 24<sup>th</sup> regarding upcoming essential maintenance to be performed on Eversource's A111 Line. As we committed at that meeting, this letter provides additional information intended to help the Committee better understand the mapping that accompanied Eversource's April 8<sup>th</sup> notice letter and the scope of temporary and permanent construction related impacts associated with the A111 line replacement project. This information responds to questions raised by Commissioner Duprey and which, owing to challenges with the video conferencing platform, Eversource was unable to answer fully on the 24<sup>th</sup>.

The Committee has longstanding experience with Eversource's management of property owners' interests and concerns and is familiar with our successful outreach in avoiding complaints and formal dispute resolution, even with projects involving hundreds of property owners such as more recently with Merrimack Valley Reliability Project and Seacoast Reliability Projects. This letter also includes a discussion of Eversource's abutter outreach and post-construction restoration practices, in response to correspondence directed to the Committee from Ms. Marguerite Francis dated May 24<sup>th</sup>.

Recognizing that the Committee could receive questions from the public, legislators or other interested parties arising from Eversource's ongoing outreach in support of the upcoming A111 maintenance project, Eversource sought to provide comprehensive detail and disclosure, including the 20-page preliminary project map set at Exhibit B to Eversource's April 8<sup>th</sup> letter. The map set is a valuable project document that outlines many important pieces of information about how this maintenance project will be constructed.<sup>1</sup> However, given the extent of project detail, the map set may be misunderstood, particularly in the small scale format of the Exhibit. Hopefully this letter will resolve any questions and

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<sup>1</sup> The map set is a somewhat dynamic document which may be adjusted based on ongoing field inspections and refinement of aspects of construction, Eversource will update the Committee should they be revised in a material manner.

help the Committee appreciate the considerable design efforts that Eversource undertook to remain as faithful as possible to the existing A111 Line configuration and appearance, while minimizing impacts to resources and complying with updated National Electric Safety Code standards.

**MAP SET DISCUSSION.** At the bottom of each page of the map set is a legend that is typically used for similar submittals to environmental and siting agencies across the Eversource enterprise. In addition, there are three core areas of focus for understanding how to read the maps, outlined below.

**1. Engineering details:**

- **Red circle** – proposed location of the replacement/new structure.
- **Black circle** – existing structure that **is not** being replaced as part of the A111 project.
  - There are only 3 of these which were replaced recently as part of emergency maintenance, due to their severely degraded condition.
- **Gray circle** – existing structure that **is** being removed.
  - Wooden poles will either be jacked/pulled out of the ground and backfilled with topsoil or cut at the base and left in the ground.
  - In residential areas, wooden poles will be completely removed; in steeper terrain or in wetlands, they may be cut at the base and left in the ground.
- **Orange circle** – existing structure that is being replaced exactly in the same footprint it's in today. In these areas, the wooden poles will be removed completely.
- **Light black dashed line** – the existing 115kV line (the A111 line), which will remain in the same centerline it's in today.
- **Solid black lines** – the edge of the existing easement, which is not changing with this project.

**2. Construction details:**

- **ACCESS ROADS AND WORK PADS:** Due to the frequently difficult/steep terrain along this corridor, most access roads and work pads are proposed to be gravel, as compared to timber matting which can be used in gentler terrain. Timber matting will be used in environmentally and culturally sensitive areas. Consistent with policies and industry best practices, roads are improved to be approximately 12-16 feet wide and are built to withstand the heavy construction equipment required for the work with the minimal disturbance possible to complete that work. They are constructed in a manner to ensure that Eversource and our contractors can perform the work in a safe and efficient manner. Once the project is complete, the improved access roads will be removed in their entirety in wetlands and sensitive areas such as maintained lawns. Other sections may remain as necessary where removal would cause increased impacts, or to facilitate ready and safe access to the infrastructure to conduct any needed emergency repairs. All sites will be stabilized to minimize erosion or other impacts.

Although Eversource is guided by its maintenance construction policies which balance the interests of system safety and reliability foremost and also takes into consideration cost to our customers, Eversource routinely works with underlying property owners to leave the property in a condition that is suitable to their needs (often the Company will either remove or cover the improved access roads and work pads with topsoil and apply conservation seed mix, for example).

- Following Eversource’s construction policies and industry best practices, during construction, work pads around the structure are typically 100 feet x 100 feet, which provides enough space to perform the work safely. Because the A111 work may be performed while the transmission line is energized, the work pads cannot be smaller than 100 feet x 100 feet.
  - Once the project is complete, work pads may be left as-is to facilitate ready access for equipment in the event of emergency repairs and/or for regular maintenance and in some circumstances of steep slope terrain to provide additional resilience to the structure foundation; however, we will work with an underlying property owner to remove as much as feasible and restore the work pad area by loaming and seeding. In wetlands and maintained lawns, the work pads will be removed and the land will be restored to pre-construction conditions to the extent possible.
  - **Black dashed lines** – existing/established access routes within the ROW.
  - **Yellow dashed lines** – proposed access within the ROW.
    - A path used by our vegetation and other maintenance crews. While trucks and low-impact vehicles can drive over it, it is not necessarily a road that can allow for the safe passage of larger construction vehicles and equipment.
  - **White lines with red border** – access road within the easement that exists but may require the addition of gravel, matting, or other form of stabilization.
  - **Purple dashed lines** – proposed alternative/off-ROW access
    - identified to minimize impacts to wetland and other sensitive areas within the ROW. These access routes are not necessary to accomplish the project but provide benefits, with respect to further mitigating impacts, to the extent the owners provide consent. For the A111 project Eversource is pursuing permissions from landowners for these off-ROW access points to avoid wetlands and steep slopes to minimize erosion and impacts to the natural environment and to further promote the safety of the workers completing the maintenance project.
  - **Red dashed lines** – contingency access through the easement if we cannot secure the proposed off-ROW access.
  - **Yellow hatched areas** – temporary construction matting to be used in wetlands.
  - **Purple hatched areas** – temporary construction matting to be used in upland, maintained areas (typically lawns or agricultural lands that will be restored to pre-construction condition).
  - **Gray hatched areas** – areas which will be used as wire pulling staging areas.
  - **Gray areas (outlined in black)** – the aggregate work pads previously described for performing the work at the structure location(s).
3. **Environmental and Other Details:**
- **Pink lines** – erosion control barriers, for environmental protection.
  - **Green hatched areas** – areas that were previous identified as needing to have tree removal. However, as a result of Project redesign in these sections, there’s no longer a need to perform any tree removal.
  - **Blue lines** – wetland areas (shoreland references, waterways, etc.)
  - **Green shaded areas** – field delineated wetlands.
  - **Orange shaded areas** – delineated peatlands.
  - **Gray lines** – parcel boundaries.
  - **Parcels outlined in pink** – Eversource-owned property.

- **Bright pink and black dashed lines** – town lines.
- **White and black circles** – stone walls.
- **Other items of note:** contours, gates, fences, and railroads (where applicable).

The extent of detail encompassed by the map set can create an impression of scale that distorts the actual permanent impacts of the work. This maintenance project amounts to a replacement largely in kind of an existing facility which prior SEC Orders recognize among the criteria supporting a finding that jurisdiction is not required. The replacement line will be constructed on the same alignment using the same horizontal H-frame configuration, fully within the existing right-of-way and will result in a nominal net additional impact to the right-of-way. The existing line will be removed as the new line is constructed resulting in only one line in the right-of-way.

**OUTREACH DISCUSSION.** In addition to the above discussion of the map set, we wish to provide an overview of outreach that has been accomplished to date on the A111 and the continued engagement that will be performed leading up to, during and post-construction restoration. Our outreach efforts are a key component to all Eversource projects. In late 2020, municipal officials in Franklin, Hill and New Hampton were given a high-level overview of the project as the team continued to work through the technical engineering of the line design. Once the design was nearing finalization additional meetings were held in March with municipal officials to discuss the project in detail and seek feedback. Following these detailed briefings, the team also presented to various local boards in each town; Board of Selectmen, Conservation Commission, Zoning Board of Adjustment and had an on-site meeting with New Hampton officials to discuss off-ROW access.

In addition, property owners along the right of way have received three notifications relative to this project; Field Work notifications mailed in the summer of 2020, Project Introduction letters mailed in February 2021 and a Project Update letter in May 2021. These project update letters continue into construction and include project information, our project hotline and email address where we encourage residents to reach out with any questions or concerns with timely responses to inquiries. We also offer site visits and virtual briefings with residents to discuss the specific scope of work relative to their property. Prior to and during construction we conduct door-to-door outreach, leaving door hangers to share information and leave project updates. During the pandemic we've avoided door knocking to minimize in-person contacts, but socially distant briefings remain an option for outreach. The field outreach representative maintains a field presence during construction, proactively communicates with residents about the project progress, tracks commitments, provides information to the project team, coordinates timely issue resolution, responds to all hotline and email inquiries and develops restoration plans with residents and the project team. Our outreach efforts begin at the planning phase of a project and continue through final restoration. These efforts have proven successful on many projects throughout the states, including several with which the Committee is familiar; Seacoast Reliability Project and Merrimack Valley Reliability Project.

We also recognize that a recent email was sent by Ms. Francis who lives along our M127 powerline in New London, where she presented concerns relative to a recent maintenance and structure replacement project that took place on her property, within the right of way. We have been working with Ms. Francis since last year to address her concerns relative to the access road, work pad, restoration and permitting questions. Last summer, a mutually agreeable restoration plan was developed and implemented. As part of our environmental monitoring efforts we assess restored work areas the following season to ensure that the restoration was successful. Unfortunately, based on timing and weather, the restoration did not successfully germinate as planned. A site visit was held on

May 21 with Ms. Francis and we're committed to re-restoring the work pad and access road as originally intended. The team is currently discussing the plans to ensure successful vegetation and restoration in this area and we will be coordinating to meet in the field with Ms. Francis again in the very near future to discuss a plan forward to resolve her remaining concerns.

The A111 Line and future line rebuilds that are necessitated by similar facility lifespans, are absolutely essential and must proceed on schedule owing to the degraded condition of this infrastructure. The limited impacts to resources will be fully addressed by permit applications and authorizations presently pending before NHDES, Fish and Game, DNCR, the USACE and the PUC and does not require additional oversight from this Committee. Nor does this maintenance project present a degree of regional impacts that are appreciable enough to merit the Committee's oversight. There are consequential benefits to system reliability and cost to customers with an orderly rebuild such as is planned, as compared to a reactive rebuild in response to a failure in the existing line. We thank you for the opportunity to provide this supplement on this critical maintenance project.

Very truly yours,



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