

JUN 03 2024

## TOWNS OF EASTON and BETHLEHEM, NEW HAMPSHIRE RECEIVED

May 29, 2024

New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301

RE: Petition to the New Hampshire Site Evaluation Committee to assume jurisdiction and oversight for Eversource's proposed X-178 transmission line replacement project.

Dear Chairman Goldner & Members of the Site Evaluation Committee:

The Governing Bodies of the Towns of Easton and Bethlehem on behalf of their residents submit this petition requesting that the Site Evaluation Committee (S.E.C.) consider the applicability of RSA Chapter 162-H and the certificate requirement to the proposed Eversource proposed X-178 transmission Line Replacement project

The submission of this petition is in accordance with RSA 162-H:2,XII whereby the S.E.C. may determine that the project requires a certificate if requested by at least two petitioners. Or, the S.E.C. may also make the determination to require a certificate based on its own motion. A filing fee is exempted for the petitioners under RSA 162-H:8-a,IV.

We, the above mentioned, petition S.E.C. to review the Project comprehensively as only the S.E.C. can do. We believe that the project falls under the "sizeable changes and additions" language of RSA 162-H.

We note the Commission's previous statements regarding it's views on "sizeable":

"...Whether a proposed addition or change to an energy facility is sizeable is a fact-driven determination. See *Order Granting Motion for Declaratory Ruling, Docket No. 2014-01, at 9.*

Furthermore, in previous decisions, the Committee considered the following factors in determining whether a change or addition to an existing facility was sizeable: (i) the existing size of the energy facility and the size of the proposed change; (ii) whether the proposed change will require the acquisition of new land; (iii) whether the proposed change will create a change in the capacity of the existing facility; (iv) whether the proposed change is merely a replacement of existing components of the facility as opposed to an expansion or increase in size of those components; and (v) whether the proposed addition or change to a facility will cause disruption in the existing environment. *Id. At 9-10; see Order Granting Motion for Declaratory Ruling, Docket No. 2012-02, at 4; see also Order Denying Motion for Declaratory Ruling, NHSEC Docket No. 2009-01, at 8 (vacated on jurisdictional grounds in In re Campaign for Ratepayers' Rights, 162 N.H. 245 (2011)).* "The vast difference in size, type and capacity of existing energy facilities must govern the nature of the consideration and the weight applied to various factors." *Order Granting Motion for Declaratory Ruling, Docket No. 2014-01, at 10.*"

[https://www.nhsec.nh.gov/projects/2018-02/orders\\_notices/2018-02\\_2018-08-02\\_order\\_grant\\_petition.pdf](https://www.nhsec.nh.gov/projects/2018-02/orders_notices/2018-02_2018-08-02_order_grant_petition.pdf)

Eversource states that 41 poles (out of 580 structures) on the X-178 are category C; needing to be replaced or repaired at the next maintenance cycle, which appears to be around ten years. In response to this need, Eversource proposes to completely rebuild the 49 miles X-178 line, which runs from Whitefield to the Streeter Pond tap (rebuilt in 1969) and from there to the Beebe River substation (rebuilt in 1985.)

The petitioners believe that Eversource's proposed rebuild of the X-178 line is a sizeable change per RSA 162-H for the following reasons.

At present the X-178 has wood H-frame structures averaging 55' tall, with 795 ASCR conductor that weighs 1,094 lbs. per 1,000' and can carry 908 amps, and two galvanized steel 7/16" ground wires that weigh 399 lbs. per 1,000'.

Eversource proposes to replace the wood H-frame structures with steel H-frame structures with an average height increase of 12', and add two OPGWs (Optical Ground Wire) that weigh 537 lbs. per 1,000', and replace three 795 conductors with three 1272 ACSS conductor that can carry 2,200 amps (vs. 908 amps currently) and weigh 1,633 lbs. per 1,000'.

Eversource also proposes to construct permanent 16' wide and 9" deep gravel roads along the whole easement (except for in wetlands) and permanent 100' x 100' excavated, graveled and graded construction pads at each structure. (Northern Pass's overhead route included these roads and pads but also their removal and restoration.) Removal of plants, topsoils and subsoils on 240 acres (estimated from A-111 line; 118 structures = 50 acres permanent impacts) of land for roads and construction pads for unexplained reasons, would inflict sizeable damage to the ecosystem of the easement, to its water absorbing and filtering capacity, and to its appearance. The effects on wildlife of further fragmentation of 49 miles of terrain already negatively impacted by the transmission line clearing would also constitute sizeable damage.

The doubling of transmission capacity does not seem to be incidental to the replacement of all the deficient structures. Neither does the installation of OPGW seem to be incidental to the replacement of all the structures.

While the petitioners express no position for or against the project as a whole, we believe that a review by the S.E.C. for a required certificate is absolutely necessary and required for the public good.

#### The Benefits to the Public of an S.E.C. Review and Compliance Oversight:

The S.E.C. would be able to evaluate the sufficiency of the financial, technical, and managerial capabilities of the Company.

Determine whether the Project interferes with orderly development of the region.

Evaluate the scope and necessity of the project

Evaluate what adverse effects there might be to aesthetics, such as visibility of the higher towers

Evaluate the impacts to air and water quality from large-scale gravel road building, the loss of trees, shrubs and other vegetation that sequester carbon and cleanse water.

Evaluate the effects on associated wetlands. Evaluate the effects on vernal pools and vernal-pool-dependent wildlife, as well as the overall functioning of the wetland complex of interrelated and interdependent uplands and wetlands.

In closing, because the assessments of the broad range of impacts of the proposed Project reaches beyond what the New Hampshire Department of Environmental Services (NHDES) and the New Hampshire Fish & Game Department (as a consulting agency to NHDES) may be able to evaluate individually, the petitioners respectfully request that the S.E.C. require a certificate so that it will be able to conduct a much more thorough review of the Project as allowed under law.

Let us know if you would like additional information and documentation.

Thank you for your consideration of our request.

Respectfully submitted,

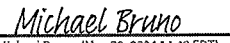
Easton Select Board

  
Zak Mei, Chair

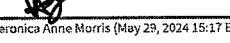
  
Bob Thibault


  
Toni Woodward

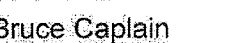
Bethlehem Select Board

  
Michael Bruno (May 29, 2024 14:40 EDT)  
Michael Bruno, Chair

  
Nancy Strand (May 30, 2024 07:32 EDT)  
Nancy Strand

  
Veronica Anne Morris (May 29, 2024 15:17 EDT)  
Veronica Morris

  
April Hibberd (May 30, 2024 14:00 EDT)  
April Hibberd

  
Bruce Caplain

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