



August 16, 2024
Via electronic mail

Eversource Energy
56 Prospect St.
Hartford, CT 06103

Re: Eversource Energy's X-178 Asset Condition Project

Consumer Advocates of New England (CANE) – the informal organization representing the statutorily designated ratepayer advocates of Connecticut, Maine, Massachusetts, New Hampshire, and Rhode Island – joins with NESCOE in strongly encouraging Eversource to reconsider its plan to move forward with a full rebuild of the X-178 line in New Hampshire. As NESCOE eloquently stated in its August 1 memo,¹ the evidence that Eversource has offered to stakeholders in its two presentations on this project² at the ISO-NE Planning Advisory Committee (“PAC”) does not demonstrate that this project is a “reasonable use of consumer dollars.”³ CANE echoes that sentiment. Eversource has fallen well short of showing that this massive expenditure of ratepayer money to pursue these supposed improvements to the X-178 line will result in reasonable pool transmission costs.

As voting members of the NEPOOL Participants’ Committee, CANE’s representatives have participated in the PAC meetings, have reviewed Eversource’s presentations and response to stakeholder feedback,⁴ and

¹ See NESCOE Memo to Eversource Regarding New Hampshire Line X-178 Rebuild (August 1, 2024) (“NESCOE Memo”), https://www.iso-ne.com/static-assets/documents/100014/2024_08_02_nescoe_memo_x178_asset_condition_project.pdf.

² See Eversource, New Hampshire Line X-178 Rebuild (February 28, 2024), https://www.iso-ne.com/static-assets/documents/100008/a05_2024_02_28_pac_line_x178_rebuild_presentation.pdf; Eversource, New Hampshire Line X-178 Rebuild Follow-Up (June 20, 2024) (“Eversource Follow-Up Presentation”), https://www.iso-ne.com/static-assets/documents/100012/a04_line_x178_follow_up_presentation.pdf.

³ See NESCOE Memo, at 2.

⁴ Eversource Memo Regarding Stakeholder Feedback on Eversource’s Proposed X-178 Rebuild Project (June 12, 2024) (“Eversource Stakeholder Feedback Memo”), https://www.iso-ne.com/static-assets/documents/100012/eversource_x178_stakeholder_feedback_memo.pdf.

have raised both oral and written concerns with the scope, cost, and necessity of the project.⁵ Although Eversource has “answered” some questions we have posed, the company has largely ignored us and other stakeholders by failing to revise, in any substantive manner, the magnitude or cost of the X-178 project. Instead of providing requested information,⁶ or scaling back or significantly altering the project, Eversource used its second presentation on the X-178 project to offer new justifications for the scope of the project as it was initially presented in February. Eversource’s disregard for the legitimate concerns raised by many stakeholders in the PAC process – including from consumer advocates who represent the individuals and companies who will ultimately pay for the X-178 project – lays bare the problems with the way that asset condition projects appear before ISO-NE and the lack of meaningful oversight over improvements to the privately owned facilities that make up the regional electric system.

We hope that our objections, coupled with those from NESCOE and others, will make clear how seriously we take the significant issues that Eversource’s X-178 project raises. In our view, the X-178 project and Eversource’s handling of the valid criticisms that stakeholders raised to it perfectly exemplifies the inadequacy of the asset condition oversight process in New England. If Eversource decides to move forward with the project as currently formulated, CANE’s members – the undersigned consumer advocates in Connecticut, Maine, Massachusetts, New Hampshire, and Rhode Island, who represent roughly 96 percent of New England’s ratepayers – stand ready to use our collective and individual resources to challenge this project through necessary avenues.

We remain open to discussing with you what we hope to see in amendments to the X-178 project that might

⁵ Eversource’s preferred solution would remove 583 existing structures and install 580 new steel structures, replace 49 miles of existing conductor, and replace existing shield wire with Optical Ground Wire, for an estimated cost of \$360.8 million (-25%/+50%, in current dollars, without escalation). Eversource Follow-Up Presentation, at 15.

⁶ CANE underscores NESCOE’s call for Eversource to respond to outstanding information requests regarding the project.

forestall the need for challenges to the prudence of these expenditures before the Federal Energy Regulatory Commission.

Sincerely,



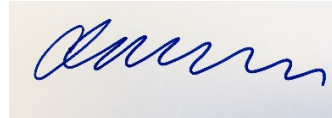
Claire Coleman
Consumer Counsel, State of Connecticut



William Harwood
Public Advocate, Maine



Elizabeth Anderson
Chief, Energy & Ratepayer Advocacy
Division, Massachusetts Office of Attorney
General



Donald Kreis
Consumer Advocate, New Hampshire



Linda George
Administrator, Rhode Island Division of
Public Utilities & Carriers