Public Service of New Hampshire d/b/a Eversource Energy Docket No. DE 19-057

Date Request Received: 07/19/2021 Request No. RR 1-003 Request from: Department of Energy Date of Response: 07/22/2021 Page 1 of 1

Witness: Lee G. Lajoie

#### **Request:**

Please identify any emergency projects included in the 2020 projects included in this step adjustment. To the extent there are such projects, please provide the supporting documentation for those projects.

#### **Response:**

For clarity, Eversource notes that absent something unknowable happening (such as when a vehicle hits a pole and damages capital assets that need to be replaced immediately for safety reasons), essentially every capital project, including those that might be referred to as "Emergency" projects, is planned to some extent. Even for "Emergency" projects, the Company will assure that provisions are implemented to assure continuity of service while the project to replace the failed piece of equipment is planned and executed. As an example, the Berlin substation transformer replacement project discussed during the hearing on July 19 was done on an emergency basis but still had significant planning to assure reliable service was maintained.

With that clarification, Eversource reviewed the projects included in Attachment LGL/DLP/JJD-1 in Exhibit 62 and identified one project that would qualify as an "Emergency" project - Project A20E43, East Northwood Regulator Replacement shown on Bates page 26 (in red) on line 41. This project involved the replacement of regulator controls that had failed in mid-2020 which led to voltage reductions affecting customers and outside the ranges permitted by Commission regulations. Given the age of the impacted regulators (approx. 60 years old), the regulators were replaced with new regulators and modern controls. A mobile substation was deployed to assure continuity of service while the replacements were installed. The PAF relating to this project is attached as Record Request 1-003 - Attachment 1.

## Operations Project Authorization Form Approved at September 2, 2020 EPAC Link to Meeting Minutes

Date Prepared: 09/08/2020	Project Title: East Northwood SS Regulator Replacement					
Company: Eversource NH	Project Number: A20E43					
Organization: Distribution Engineering	Class(es) of Plant: D SS					
Project Initiator: Mike Busby	Project Category: Stations - Other					
Project Manager: Thelma Brown	Project Type: Specific					
Project Sponsor: Russel Johnson	Project Purpose: Replace the failed three phase 12.47kV regulator at East Northwood SS					
Estimated in service date: 11/15/20	Capital Investment part of original Oper. Plan: No					
Eng./Constr. Resources Budgeted? Yes	O&M Expenses part of original Oper. Plan: N/A					
Authorization Type: Full Funding	Facility Type (check all that apply):					
Total Request: \$313K	□ PTF □ non-PTF					

## **Financial Requirements:**

**Project Authorization** 

ERM: \_\_\_\_\_

FP&A:

#### **Executive Summary**

East Northwood SS in Northwood, NH is a 34.5-12.47kV substation with a 3,750kVA transformer, recloser, and regulator feeding the 63W1 circuit. The regulator controls have failed. In June the controls were stuck in voltage reduction, which resulted in low voltage for some customers and the down-line pole top regulators to operate at +16 setting. The regulator was then set at the neutral position. In 2016, some Distribution Automation equipment was added at East Northwood SS but the GEMLT-32 control on the three-phase regulator was not capable of being monitored for tap position.

Full funding of \$313K is requested for the replacement of the GE 60 year old three phase regulator with three (3) single phase Siemens regulators with Beckwith M-6200 controls. The regulators will be monitored and capable of being controlled by SCADA. This project was approved by the Solutions Design Committee at the 8/19/2020 meeting.

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## Project Costs Summary Note: Dollar values are in thousands

Line item Category	Prior Authorized	Actuals to Date	2020 to Go	2021	2022	2023	2024	2025	Total
1. ROW / Easements / Land Acquisition	\$	\$	\$	\$	\$	\$	\$	\$	\$
2. Environmental Approvals / Permits	\$	\$	\$25	\$	\$	\$	\$	\$	\$25
3. Outreach	\$	\$	\$	\$	\$	\$	\$	\$	\$
4. Siting Approvals / Permits	\$	\$	\$	\$	\$	\$	\$	\$	\$
5. Engineering / Design	\$	\$	\$8	\$	\$	\$	\$	\$	\$8
6. Materials (Eversource purchased)	\$	\$	\$87	\$	\$	\$	\$	\$	\$87
7. Construction (incl matl's by contractors)	\$	\$	\$38	\$	\$	\$	\$	\$	\$38
8. Testing / Commissioning	\$	\$	\$1	\$	\$	\$	\$	\$	\$1
9. Project Mgmt Team	\$	\$	\$2	\$	\$	\$	\$	\$	\$2
10. Removals	\$	\$	\$2	\$	\$	\$	\$	\$	\$2
11. Other	\$	\$	\$1	\$	\$	\$	\$	\$	\$1
12. Risks	\$	\$	\$12	\$	\$	\$	\$	\$	\$12
SUBTOTAL DIRECTS W/ RISKS	\$	\$	\$176	\$	\$	\$	\$	\$	\$176
13. Indirects/Overhead	\$	\$	\$121	\$	\$	\$	\$	\$	\$121
14. AFUDC	\$	\$	\$8	\$	\$	\$	\$	\$	\$8
PROJECT TOTAL – BASELINE BUDGET	\$	\$	\$305	\$	\$	\$	\$	\$	\$305
15. Contingency	\$	\$	\$8	\$	\$	\$	\$	\$	\$8
TOTAL CAPITAL REQUEST	\$	\$	\$313	\$	\$	\$	\$	\$	\$313
16. Reimbursables/Customer Contribution	\$	\$	\$	\$	\$	\$	\$	\$	\$
PROJECT TOTAL (LESS REIMBURSABLES)	\$	\$	\$313	\$	\$	\$	\$	\$	\$313
O&M	\$	\$	\$	\$	\$	\$	\$	\$	\$
TOTAL REQUEST	\$	\$	\$313	\$	\$	\$	\$	\$	\$313

Note: Explain unique payment provisions, if applicable: Provide a detailed breakdown of Other costs here.

Other includes miscellaneous employee expenses and mileage (\$1K). Risk allocation includes potential for environmental remediation (\$12K).



#### **Breakout Costs**

Note: Dollar values are in thousands

Line item Category	Prior Authorized	Actuals to Date	2020 to Go	2021	2022	2023	2024	2025	Total
ST Labor	\$	\$	\$49	\$	\$	\$	\$	\$	\$49
OT Labor	\$	\$	\$	\$	\$	\$	\$	\$	\$
Outside Services Labor	\$	\$	\$25	\$	\$	\$	\$	\$	\$25
Materials*	\$	\$	\$87	\$	\$	\$	\$	\$	\$87
Removals	\$	\$	\$2	\$	\$	\$	\$	\$	\$2
Other	\$	\$	\$21	\$	\$	\$	\$	\$	\$21
Indirects	\$	\$	\$121	\$	\$	\$	\$	\$	\$121
AFUDC	\$	\$	\$8	\$	\$	\$	\$	\$	\$8
TOTAL CAPITAL REQUEST - W/O REIMBURSABLES	\$	\$	\$313	\$	\$	\$	\$	\$	\$313

\*All materials including Eversource purchased and outside service purchased. Note that outside service purchased material included in construction in project cost summary above.

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## **Future Financial Impacts:**

Provide below the estimated future costs that will result from the project: N/A Note: Dollar values are in thousands

									Total Future
Future Costs	s Yea	ar 20	Yea	ır 20	Yea	r 20	Yea	r 20+	Project Costs
Capital	\$	-	\$	-	\$	-	\$	-	\$ -
O&M		-		-		-		-	-
Other		-		-		-		-	-
Т	OTAL \$	-	\$	-	\$	-	\$	-	\$ -

Describe the estimated future Capital, O&M, and/or Other costs noted above:  $\underline{\text{N/A}}$ 

What functional area(s) will these future costs be funded in?\_\_\_\_\_N/A\_\_\_\_\_ A representative from the respective functional area is required to be included as a project approver.

Provide below the estimated future financial benefits that will result from the project: Note: Dollar values are in thousands

										То	tal Future
Future Benefit	ts	Yea	ar 20	Yea	ar 20	Yea	ar 20	Year	· 20+	Proje	ect Benefits
Capital		\$	-	\$	-	\$	-	\$	-	\$	-
O&M			-		-		-		-		-
Other			-		-		-		-		-
ТС	DTAL	\$	-	\$	-	\$	-	\$	-	\$	-

Describe the estimated future Capital, O&M, and/or Other benefits noted above: N/A

What functional area(s) will these benefits be reflected in?\_\_\_\_\_N/A\_\_\_\_\_ A representative from the respective functional area is required to be included as a project approver.

# Asset Retirement Obligation (ARO) and/ or Environmental Cleanup Costs (Environmental Liabilities):

Is there an ARO associated with this project? If yes, please provide details: No

Are there other environmental cleanup costs associated with this project? If yes, please provide details: An environmental assessment of the regulator foundation and surrounding soil will be completed to identify if soil/concrete remediation is required due to the potential presence of PCB oil contamination.

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## **Technical Justification:**

### **Project Need Statement**

East Northwood SS is a 34.5-12.47kV substation with a 3,750kVA transformer, recloser, and regulator feeding the 63W1 circuit. See Attachment A for the East Northwood SS One-Line diagram. The regulator controls have failed. In June the controls were stuck in voltage reduction, which resulted in low voltage for some customers and the down-line pole top regulators to operate at +16 setting. The regulator was then set at the neutral position. In 2016, some Distribution Automation equipment was added at East Northwood SS but the GEMLT-32 control on the three-phase regulator was not capable of being monitored for tap position.

New Hampshire Code of Administrative Rules PUC300 requires to customers be within 5% of the nominal voltage:

• Part PUC 304.02 (c): A utility shall maintain the nominal secondary voltage at the utility's service terminals or at the street lamp in the case of multiple street lighting, as installed for each customer, within plus or minus 5% average RMS.

Without automatic voltage regulation at the substation, customers are susceptible to voltages outside of the PUC300 mandated limits.

The Signal 60 radio control system is a 1970s vintage radio-based system used for voltage reduction. This system is being retired in NH as it is obsolete and replacement equipment is not available. The new systems are to provide full SCADA capability with the ESCC.

## **Project Objectives**

Replace the three-phase regulator that has a failed controller at East Northwood with three (3) single phase regulators with modern controllers.

## **Project Scope**

Removals

- 1. One (1) three phase 12.47kV GE 418A regulator
- 2. The existing regulator foundation
- 3. The existing recloser/regulator bypass switch 109
- 4. The Signal 60 system

#### Additions

- 1. Three (3) single phase 7.2kV 438A regulators with Beckwith M-6200 controllers
- 2. Steel support platform for regulators to be mounted on existing steel structure foundations that are set up for the new steel platform
- 3. Three (3) single phase fused disconnect switches
- 4. One (1) RTAC and associated communication cable in existing conduit to communicate with the new regulator controls. There is an existing SEL-RTU cabinet that will be used.
- 5. Animal protection on the bushings and taps to the regulator.

A mobile substation will be installed in order to deenergize the substation during construction.

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The project scope includes an environmental assessment which is included in the base cost estimate for outside services. If remediation is required and soil/foundation removal is needed, these costs have been included in the risk allocation.

A constructability review was completed on August 13, 2020. See Attachment C for the completed review form.

#### **Background / Justification**

The three phase 12.47kV regulator at East Northwood SS is 60 years old, as shown in the photograph below. The regulator controls have failed. Station Operations has recommended the replacement of this unit with three (3) 7.2kV regulators which is more common on the Eversource NH system. Much of the load on the substation is single phase so this solution is also preferred by Field Engineering.



Existing Three Phase Regulator at East Northwood SS

#### **Business Process and / or Technical Improvements**

Replace obsolete equipment and automate regulation of system voltage to meet PUC300 requirements and increase reliability.

## Alternatives Considered with Cost Estimates

#### Alternative 1 (This is the chosen solution)

Replace the three-phase regulator with a failed controller at East Northwood with three (3) single phase regulators with modern controllers.

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Estimated Cost: \$314K Planning grade estimate (-25%/+25%).

#### Advantages

- 1. This replaces obsolete and a unique three phase substation regulator with standard single-phase regulators.
- 2. This alternative allows for the ability to full SCADA control of the substation including replacing the Signal 60 voltage reduction controls.

#### Disadvantages

1. This alternative is costlier than just updating controls for the existing three phase regulator.

The project was presented to the Solution Design Committee and approved on August 19, 2020.

#### Alternative 2 (This is NOT the preferred solution)

Replace the failed three phase regulator controller at East Northwood SS.

Estimated Cost: \$202K Conceptual grade estimate (-25%/+50%).

#### **Advantages**

1. This is a less costly alternative since it is only for replacing the controller, although the installation is unique and problematic.

#### **Disadvantages**

- 1. This alternative will not allow for the removal of Signal 60 as the tap position of the regulator cannot be readily obtained with this unit.
- 2. This alternative has been looked into in the past and there was no direct replacement available for the device.
- 3. This alternative does not address that the three-phase regulator is 60 years old, obsolete and unique to the system.

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#### **Project Schedule**

Milestone/Phase Name	Estimated Date
SDC Review of Preferred Solution	8/19/20
Full Funding request at EPAC	9/2/20
Order major materials	9/16/20
Construction Start	10/1/20
In Service Date	11/15/20

See Attachment D for the P6 schedule.

#### **Regulatory Approvals**

None

#### **Risks and Risk Mitigation Plans**

There is a risk and additional cost to the project for potential environmental remediation of the foundation and soil around the existing regulator.

• \$12K is included in the estimate for potential environmental remediation.

The mobile substation will be used to allow the substation to be deenergized during construction. This substation is currently subject to an SCLL under normal conditions. The use of the mobile will not increase exposure to SCLL conditions. The cost for the mobile installation is included in the cost estimate.

#### Contingency

Estimating has included a contingency amount of 5% (\$8,210) in the estimate.

#### References

New Hampshire Code of Administrative Rules PUC300 - Part PUC 304.02 (c) A20E43 - East Northwood SS Regulator Replacement - Solution Selection Form

#### Attachments (One-Line Diagrams, Images, etc.)

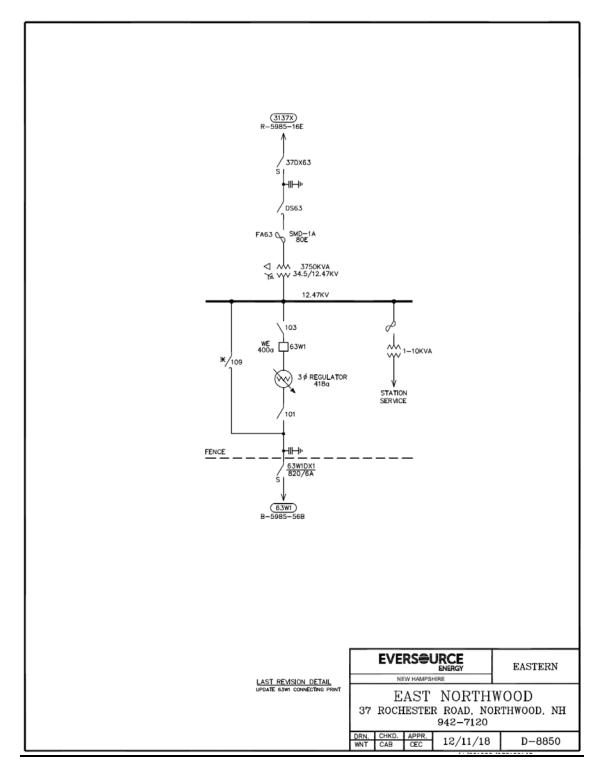
Attachment A - One-Line Diagram

- Attachment B Backup Cost Estimate
- Attachment C Constructability Review Form

Attachment D - Project Schedule

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## Attachment A - One-Line Diagram



#### **INSTRUCTIONS:**

It is the responsibility of the initiator to contact the subject matter experts in the listed area disciplines to determine if the project considerations contained in this list are applicable to their project. They should fill out the checklist and determine a transition plan for the purpose of project execution. See the PAF Guide for additional instruction.

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Project Checklist - Transmission &	Substation Capital Project
Project Name: E. Northwood SS Regulator P Replacement P	roject Number: A20E43
Facility Type: BPS BES PTF non	-PTF 🗌 CIP 🛛 Distribution
PLANNING	
Is a NX-9 required?	No
Is an ISO-NE PAC presentation required?	No
ISO-NE Presentation Date (if completed):	Enter Date
Cost in ISO-NE Presentation (\$M) (if completed)	Enter Cost (\$M)
Is a PPA required?	No
Is a TCA Application Required?	No
TCA Submittal Date (if submitted):	Enter Date
Cost in TCA Submittal (\$M) (if submitted):	Enter Cost (\$M)
Enter ISO-NE RSP / Asset Condition ID, if assigned:	Enter ISO-NE ID
PLANNING/PROTECTION & CONTROLS	Nia
Are RAS/SPS/UVLs affected?	No
OPERATIONS	
Outage Required? Transfer)	Secondary Equipment  Outage Not (P&C only) Required
Do SCLL Conditions Exist?	Yes
Has an outage schedule been approved?	No
Are Operations & Maintenance procedures/training requi	red? No
STANDARDS	
Does the project include standard equipment and design	s? Yes
SUBSTATION ENGINEERING	
Does this impact Revenue Metering	No
Is preliminary short circuit/ breaker duty analysis required	
Are there any changes to the baseline audible noise?	No
Is there an impact to the existing ground grid?	No NR
Is a Transient Over Voltage (TOV) analysis required?	INIK

Project Checklist - Transmission & S	Substation Capital Project
Project Name: E. Northwood SS Regulator Project	ect Number: A20E43
Replacement	
P&C ENGINEERING	
OP-22 - Are PMUs and DDR required?	No
If BPS, is an NPCC Directory #4 presentation required?	No
Are ISO-NE OP-24 Appendix B updates necessary?	No
TRANSMISSION LINE ENGINEERING	
	Nia
Are there any changes that affect the baseline EMF?	No
Are there any changes that affect the baseline EMI?	<u> </u>
SITING	
Is a Siting filing required? (If yes, list in regulatory	
approvals section)	No
PERMITTING	
Is there any permitting required? (If yes, list in	
regulatory approvals section)	No
SITING & CONSTRUCTION SERVICES	
(OUTREACH)	
What is the level of outreach expected?	Low
INITIATOR	
	N/
Has a field constructability review been completed?	Yes
INVESTMENT RECOVERY	
Does the project require development of an	No
Investment Recovery plan?	
COST ESTIMATING	
What team/firm prepared the cost estimate?	Estimate was prepared by Eversource
	Engineering
Name of the person who prepared the estimate:	Caryn Murray
Was the estimate reviewed by Eversource Estimating?	Yes - Partial Review

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## **Cost Estimate Backup Details**

See Attachment B - P-20-478 A20E43 SSF East Northwood SS

ct Costs													_
	Prior Authorized	Actuals to Date	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	Total
	0 0	0 0	0 500	0 0									
	0 0 0	0 0 0	0 0	0 0 0									
	0	0	8,000 87,000 38,000	0	0	0	0	0	0	0	0	0	
	0	0	1,200 2,000	0	0	0	0	0	0	0	0	0	
	0 0	0 0	2,000 1,000	0 0									
	0 0	0 0	9,800 6,960	0 0									
	0	0	0	0	0	0	0	0	0	0	0	0	
	0 0 0	0 0 0	0 0 25,000	0 0 0									
	0	0	25,000 0 0	0	0	0	0	0	0	0	0	0	
	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
	0 0	0 0	0 0	0 0	0	0 0	0 0	0	0 0	0	0 0	0 0	
	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	
	0	0	1,800 1,250	0	0	0	0	0	0	0	0	0	
	0	0	0 184,510	0	0	0	0	0	0	0	0	0	184,510
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	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
	0 0	0 0	0 0	0	0	0	0	0	0	0	1	1 1	
	0 0	0	0	0	0	0	0	0	0	0	0	0	
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	0 0	0 0	0 0	0 0	0 0	0	0	0	0	0	0 0	0 0	
	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
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	0	0	0	0	0	0	0	0	0	0	0	0	
	0	0	500 0	0	0	0	0	0	0	0	0	0	
	0 0	0 0	0 8,000	0 0									
	0	0	87,000 38,000	0	0	0	0	0	0	0	0	0	
	0 0 0	0 0 0	1,200 2,000 2,000	0 0 0									
	0	0	1,000 9,800	0	0	0	0	0	0	0	0	0	
	0	0	6,960 0	0	0	0	0	0	0	0	0	0	
	0	0	0	0	0	0	0	0	0	0	0	0	
	0 0	0	0 25,000	0	0	0	0	0	0	0	0	0	
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	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	
	0 0	0	0	0 0	0 0	0 0	0	0	0	0	0	0	
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	0 0	0 0	1,800 1,250	0 0									
	0 0	0	0 184,510	0	0	0	0	0	0	0	0	0	184,510
	0 0	0	0	0	0	0	0	0	0	0	0	0	
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	0 0	0	41,200 87,000	0	0	0	0	0	0	0	0	0	
	0 0	0 0	25,000 1,000	0 0									
	0 0	0 0	11,600 8,210	0 0									
	0 0	0 0	0 184,510	0 0	184,510								
	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0
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	0 0	0	0 7,755	0	0	0	0	0	0	0	0	0	
	0 0	0 0	17,531 9,660	0 0									
	0 0	0	7,946 55,823	0	0	0	0	0	0	0	0	0	
	0 0	0	2,545 0	0	0	0	0	0	0	0	0	0 0	
	0 0	0	5,655 13,814	0	0	0	0	0	0	0	0	0 0	
	0	0	0 120,728	0	0	0	0	0	0	0	0	0	120,728
	0	0	305,238 0	0	0	0	0	0	0	0	0	0	305,238
	0	0	8,394	0	0	0	0	0	0	0	0	0	8,394

Submit a PDF copy of this signed form to TranEPAC@eversource.com along with the PAF

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Project Number(s): A20E43	<b>Project Title:</b> East Northwood SS Regulator Replacement
Date of Constructability Review: 08/13/2020	

<u>Constructability Review Team</u>: *list below the department and names of all who participated in the constructability review walkdown* 

Lead*	Department**	Name and Title
	Project Management	
	Operations	
	Construction	
$\boxtimes$	Engineering	Gary Stanton, Senior Designer, Substation Engineering
	Siting	
	Siting & Construction Services	
	Environmental	
	Rights & Survey	
	Other:	David Still, Senior Engineer, Civil Engineering
	Other:	
	Other:	

\*Check the box of the individual who coordinated/led the constructability review

\*\*List names from any other departments who attended the constructability review, add additional rows to the table if necessary

#### Observations/Findings/Scope Review/Risks Identified:

*list below the outcome of the constructability review.* 

#### **Observations**:

- Mobile substation connections to both 34.5kV and 12.47kV lines ARE available. Minimal work required to position and connect mobile.
- Existing fence is not to current standards.
- Active bee hive under the switch sled of the 109(12.47kV) bypass switch

#### Findings:

- Northern fence line fabric and posts will need to be removed to allow regulator to be rigged out of yard.
- Fill will be required on Northern side of fenced area to also allow rigging of regulator.
- No evidence of wetland issues in proposed fill area (Environmental/Kurt Nelson should confirm)

• An additional beam may be required to accommodate the regulator disconnect switch/bypass switch configuration.

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Scope Review:

• Construction Scope Document has not been written as of the writing of this form to support this project

#### Risks Identified:

- Switching Mobile substation into service
- 63W1 Circuit fed from Mobile Substation
- Single customer fed from Distribution transformer mounted on first pole outside yard on 63W1 Circuit (Is on line side of suspension disconnect 63W1DX1).
- There is wetland in the area near where the regulator will be rigged out. Caution will need to be taken to insure there are not wetland impacts.
- Small site to accomplish work. Parking will be an issue. (there is a Park and Ride a few hundred yards South of the site at the intersection of Rte. 202 and Rte. 4 that can be used.
- Limited clearance above area to rig out regulator. Inline disconnect 63W1DX1 (visual opening for clearance) is in this span.

The Construction Services Supervisor, Engineer lead, or Project Manager must sign below.

Gary Stanton

8/17/20

Signature

Date

			A20E4	3 East Northwood S	S Regulator Replace	ment Project S	chedule			100010	Request 1-003 - Attachme 13-Aug-2020 10
Activity ID	isWork Order	Activity Name	isStreet	BL Project Start	BL Project Finish	BL Project	BL Project Labor Units	Total Float		2020	2021
						Duration	Labor Units		tember October	November     December       01     08     15     22     29     06     13     20     1	January Ja
CP-17621960	A20E43	2020 Capital: Begin A20E43 East Northwood SS Regulator Replacement Project	EastNorthwood	01-Oct-2020 07		0.00d	0.00h	5.00d	◆ 2020 Capital: Begin	A20E43 East Northwood SS Regulator Replac	ementProject
CP-17621970		2020 Capital: Mobile Install	EastNorthwood	01-Oct-2020 07	07-Oct-2020 15	5.00d	160.00h	5.00d	1		
CP-17621980		2020 Capital: Construction, Testing & Commissioning	EastNorthwood		29-Oct-2020 15	15.00d	480.00h	5.00d		2020 Capital: Construction, Testing & Commi	ssioning
CP-17621990		2020 Capital: Mobile Removal	EastNorthwood		05-Nov-2020 15	5.00d	160.00h	5.00d		2020 Capital: Mobile Removal	Ŭ
CP-17622000		2020 Capital: End A20E43 East Northwood SS Regulator Replacement Project	EastNorthwood		05-Nov-2020 15	0.00d	0.00h	5.00d		♦ 2020 Capital: End A20E43 East Northw	ood SS Regulator Replacem
Proje	ect Baseline Bar				Page 1 of 1						
♦ Miles	stone										
											© Oracle Corporati

## Docket DE 19-057 - Exhibit 67

Docket No. DE 19-057 Record Request 1-003 - Attachment 1