

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
d/b/a EVERSOURCE ENERGY**

DOCKET No. DE 21-_____

**PETITION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY FOR LICENSE AMENDMENTS TO CONSTRUCT AND MAINTAIN ELECTRIC
LINES OVER AND ACROSS THE NASHUA RIVER IN NASHUA AND MERRIMACK RIVER
IN NASHUA AND HUDSON, NEW HAMPSHIRE**

Pursuant to RSA 371:17, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “the Company”), a public utility engaged in the transmission, distribution and sale of electricity in the State of New Hampshire, hereby petitions the Public Utilities Commission (“Commission”), for license amendments to construct and maintain electric lines over and across certain public waters in the Nashua and Hudson. In support of this petition Eversource states as follows:

1. In order to meet the requirements for reasonable service to the public, Eversource has previously constructed and currently operates and maintains an overhead 115 kV electrical transmission line, designated as the Eversource G192 Line, originally constructed in 1941, over and across the public waters of the Nashua River in Nashua and the Merrimack River in Nashua and Hudson, New Hampshire. The Merrimack River crossing was originally licensed under Order # 12,219¹ in Docket 76-22. The Nashua River crossing was licensed under Order 22,454² in Docket DE 96-370. The location of the public water crossings which are the subject of this petition are depicted on the Overview Map attached hereto as Exhibit 1 and more detailed location descriptions are as follows:

The G192 crosses the Nashua River between Structures 1 and 2 in Nashua and the Merrimack River between structures 5 and 6 in Nashua and Hudson. The line originates from the Bridge Street Substation, located off Bridge Street in Nashua, NH where Armory and Bridge Street intersect.

¹ Order 12,219 (copy enclosed) was issued pursuant to a petition seeking to bulk license lines throughout the state – See, in pertinent part, Exhibit 27A for the subject Merrimack River crossing.

² Order 22,454 (copy enclosed) was another bulk crossing license covering multiple lines and 10 public waters crossing locations, including both the Nashua River and Merrimack River crossing spans that are the subject of the present petition. Said Order acknowledged that the Nashua River location was previously unlicensed.

The line extends east from the substation and immediately crosses the Nashua River between Structures 1 and 2. The line continues east as it passes through an intersection with another transmission line right-of-way, crosses the Pan-Am railroad and meets and crosses over the Merrimack River into the Town of Hudson. The crossing over the Merrimack River into Hudson is approximately 460 feet west of where the line crosses Webster Street, approximately 365 feet north of the intersection of Daw Street and Webster Street.

2. Through Eversource's ongoing program of field inspection, Eversource has determined that Structure 5 at the crossing of the Merrimack River on the G192 Line requires replacement to continue to function safely and reliability. Structure 6 on the opposite side of that public water span was previously replaced in 2017 (wood to weathering steel) without obtaining a license due to an apparent oversight. Structure 5 will similarly be replaced with weathering steel. At both the Nashua River and Merrimack River crossing spans that are the subject of this petition, the current G192 Line maintenance project scope also includes removal and elimination of an underbuilt ADSS wire and replacement of two existing pole-top shield wires with OPGW communications wire having the specifications noted on the Cable Schedules on Exhibits 2 and 3 hereto, respectively. The three existing conductors will be transferred to new replacement Structure 5 and shall otherwise remain unchanged.

3. The design of replacement Structures 5 and 6 spanning the Merrimack River are in accordance with the National Electrical Safety Code (NESC), as shown on the Eversource Plan and Profile Drawing, attached as Exhibit 3. Replacement Structure 5 will be installed within 5 feet of the current wood structure and previously replaced Structure 6 was installed within 10 feet of the previous wood structure.

4. Wire specifications for the Nashua River and Merrimack River crossing spans are depicted and noted on the Exhibit 2 and 3 Structure Detail and Plan View.

5. This petition addresses the following crossing spans:

- a. Nashua River: Nashua (Exhibit 2)
 - i. Structures: 1 to 2
 - ii. Structure Span (ft): 685.35
 - iii. Public Waters Span: 107.34

- b. Merrimack River: Nashua/Hudson (Exhibit 3)
 - i. Structures: 5 to 6
 - ii. Structure Span (ft): 749.24
 - iii. Public Waters Span: 614.47

6. All conductors and wires have been drawn on Exhibits 2 and 3 to show the minimum clearance at maximum sag conditions in reference to the public water body span, as noted.

7. Eversource will maintain and operate the clearance of the crossing over the Nashua River at a height no less than what is required by the 2012 National Electrical Safety Code (NESC, Table 232-1), which requires at least 18.6 feet for 115 kV open supply conductors over water not suitable for sail boating. The clearance over the 10 year flood level as depicted on the attached Exhibit 2 exceeds that minimum requirement. Eversource will maintain and operate the clearance of the crossings over the Merrimack River at a height no less than what is required by the Army Corps requirements under 33 CFR Part 322.5, which requires at least 20.0 feet for 115 kV conductors over the navigable channel provided by existing bridges. The clearances depicted on the attached Exhibit 3 exceed that minimum requirement. Flood level elevations were derived as stated in Note 2 on Exhibits 2 and 3.

8. The previously replaced Structure 6 required a NHDES Utility Maintenance Notification in the Town of Hudson (Permit # 2017-00188) to account for temporary wetland impacts associated with construction. No other permitting was or is necessary for the Structure 5 and 6 replacements due to only temporary disturbance and no grading needed in proximity of the Nashua and Merrimack River crossings.

9. The U.S. Army Corps of Engineers (ACOE) does regulate the subject portion of the Merrimack River as navigable waters and the scope of work discussed in this petition at that crossing location is covered through the Self-Verification process under the ACOE New Hampshire Programmatic General Permit #4, provided, however, that ACOE has requested to receive a copy of the plans depicting the replacement crossing which will be supplied.

10. It is not anticipated that abutters on either side of the Nashua River or Merrimack River crossings would be affected by the proposed structure and wire replacements, as the G192 Line is an existing line, and the work to be performed outside the edges of the Nashua River in the vicinity of Structures 1 and 2 is within parcels owned in fee by Eversource as noted on Exhibit 2 and the work to be performed outside the edges of the Merrimack River in the vicinity of structures 5 and 6 is within Eversource's existing utility easements as noted on Exhibit 3.

11. Eversource submits that the license amendments petitioned for herein may be exercised without substantially affecting the rights of the public in the public waters of the Nashua and Merrimack Rivers. Minimum safe clearances above the public waters shall be maintained at all times. The use and enjoyment

by the public of Nashua and Merrimack Rivers will not be diminished in any material respect as a result of the described structure and wire replacements.

WHEREFORE, Eversource respectfully requests that the Commission:

1. Find that the amended licenses petitioned for herein may be exercised without substantially affecting the public rights in the public waters which are the subject of this petition;
2. Grant Eversource amended licenses to construct and maintain electric lines over and across the public waters as identified and described in this petition; and
3. Issue an order *Nisi* and orders for their publication.

Dated at Manchester, New Hampshire this 14th day of March, 2021.

Respectfully submitted,
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
By Its Attorney



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