

Comparative Analysis of PSNH’s Proposal with PBR Plans in Massachusetts – Exogenous Factors

Company/Element	Exogenous Z Factor	Exogenous Cost Threshold	Operating Revenues	Number of Customers
PSNH Proposed (DE 24-070)	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = \$1.5M	\$1.5m	\$1.5b	539k
National Grid (D.P.U. 23-150)	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$3.6m adjusted by GDP-PI annually	\$3.6m	\$2.8b	1.3m
Unitil Electric PBR1 (D.P.U. 23-80)	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$110,000 adjusted by GDP-PI annually	\$110k	\$88m	46k
NSTAR PBR2 (D.P.U. 22-22)	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$4M adjusted by GDP-PI annually	\$4m	\$3.1b	1.4m
NSTAR GAS PBR1 (D.P.U. 19-120)	Positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. ¹ Threshold = 0.001253 times total operating revenues = \$700,000 adjusted by GDP-PI annually	\$700k	\$500m	296k
NSTAR PBR1 (D.P.U. 17-05)	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = \$5M adjusted by GDP-PI annually	\$5m	\$3.2b	1.4m

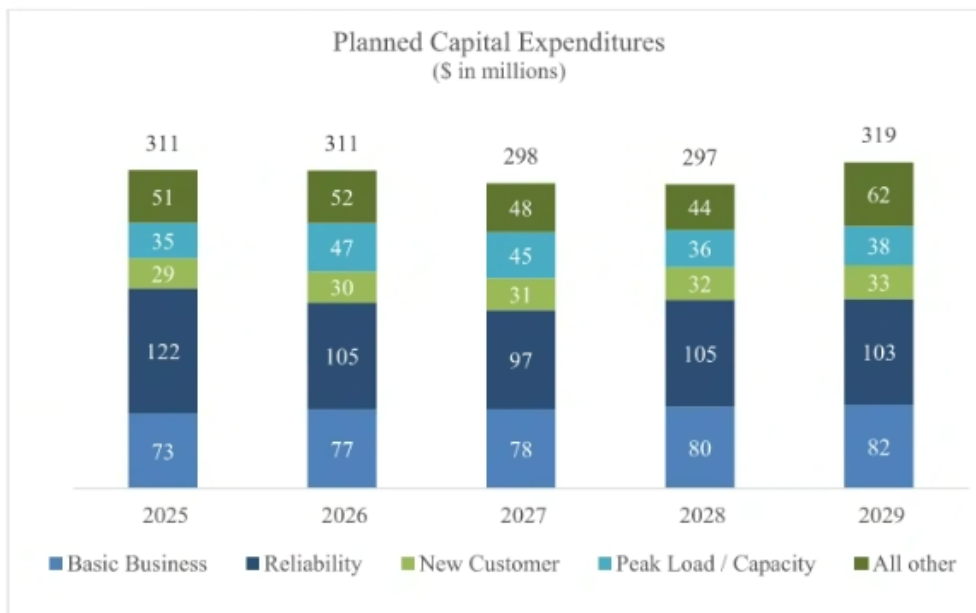
¹ The Department accepted an additional exogenous event due to certain pipeline safety requirements

Regulatory Reconciliation Adjustment Mechanism (RRA)			
Component	Current Mechanism	Proposed DE 24-070 Test Year Baseline Includes:	Company Proposal
Regulatory Assessments and Consultant Costs	Regulatory Commission annual assessments and consultants hired or retained by the Commission and OCA.	1) Regulatory assessments for the most recent FY 2) Consultant costs incurred during the test year	Eliminate annual reconciliation of over/under through RRA; Annual amount to be recovered through base rates, subject to reconciliation at the Company's next rate case.
Property Tax	Property tax expenses, as compared to the amount in base rates (DE 19-057)	2024 Tax Year property expense	Eliminate annual reconciliation of amount over/under base rates
Vegetation Management	Vegetation management program variances as compared to the amount in base rates (DE 19-057)	2023 actual plus post-TY adjustment for \$2m budget increase	Eliminate annual reconciliation of amount over/under base rates
Storm Cost LTD True-Up	Storm cost amortization final reconciliation and annual reconciliation updated for actual cost of long-term debt	Proposed LTD cost in proceeding	Eliminate annual reconciliation of amount over/under base rates
Lost Base Revenues - Net Metering	Lost-base distribution revenues associated with net metering, as calculated consistent with RSA 362-A:9, VII and the Commission's approved method in Order No. 26,029 (June 23, 2017) in Docket No. DE 16-576.	Not Included	Eliminate annual recovery for expenses incurred after August 1, 2024
Rate Case Expense	Order No. 26,634 (May, 27, 2022) at 1. The Commission approved a settlement agreement relating to Eversource's motion to recover rate case expenses for DE 19-057. Pursuant to that agreement, Eversource is authorized to collect \$1,762,807 through its Regulatory Reconciliation Adjustment mechanism over five years, beginning August 1, 2022.	1) Recover remaining balance of approved rate case expense from DE 19-057 over 5 years 2) DE 24-070 rate case expense over 5 years	Eliminate annual reconciliation of over/under through RRA, subject to reconciliation at the Company's next rate case.
Pole Plant Adjustment Mechanism			
Component	Current Mechanism	Proposed DE 24-070 Test Year Baseline Includes:	Company Proposal
Pole Replacement O&M Transfer costs	The actual costs associated with replacement poles for the prior calendar year based on the actual number of poles replaced and the actual Eversource cost to transfer the conductor from the old to the new poles.	Actual expenses for 2023 Test Year	Eliminate annual recovery for expenses incurred after August 1, 2024
Annual Inspection Costs	The actual inspection costs and other upfront costs for the prior calendar year consisting of the number of poles inspected in the former Consolidated maintenance area and the per pole rate in effect. Upfront costs of \$250,000 in years 1 and 2 and \$75,000 in year 3 will also be included.	Actual expenses for 2023 Test Year	Eliminate annual recovery for expenses incurred after August 1, 2024
Pole Attachment Revenue	Incremental third-party pole attachment revenues is applied as an offset to the items in (a) and (b). Pole attachment revenues for formerly Consolidated owned poles will be tracked separately and billed at the Consolidated rate at the time of closing until a full pole attachment survey is conducted and, or a single, unified rate is applied to all poles.	Not Included - amount not known and measurable at this time	Eliminate annual recovery for expenses incurred after August 1, 2024
Vegetation Management Expense	The incremental vegetation management expense is calculated as the vegetation management expenses formerly billed to Consolidated.	Normalized actual expenses for 2023 Test Year by reflecting a monthly average of CCI vegetation management billings from November 2017 through December 2023 annualized to reflect a twelve-month period. This resulted in a decrease to the actual test year vegetation management expense of \$902,206.	Eliminate annual recovery for expenses incurred after August 1, 2024
Other			
Component	Current Mechanism	Proposed DE 24-070 Test Year Baseline Includes:	Company Proposal
Lost Base Revenues - Energy Efficiency	Systems Benefits Charge	Not Included	Eliminate annual recovery for expenses incurred after August 1, 2024

Other Mechanisms (No Changes)			
Component	Current Mechanism	Proposed DE 24-070 Test Year Baseline Includes:	Company Proposal
Systems Benefit Charge	To fund energy efficiency and energy assistance programs	No costs included in DE 24-070	No change except for the elimination of energy efficiency-related lost base revenues as shown in Attachment PUC TSI-004(a).
Stranded Cost Recovery Charge (SCRC)	<p>The SCRC is the portion of the unbundled retail delivery service bill that is a non-bypassable charge as provided by RSA 369-B:4,IV and RSA 374-F:3, XII to recover the portion of the Company's Part 1 and Part 2 Stranded Costs that are allowed by the Settlement Agreement. The SCRC include the RRB Charge defined in RSA Chapter 369-B, overmarket or under-market IPP and Power Purchase Agreement costs, Non-Securitized Stranded Costs, and other costs and expenses allowed or as authorized by the Commission. The SCRC also includes the:</p> <ul style="list-style-type: none"> - Regional Greenhouse Gas Initiative ("RGGI") refund as required by RSA 125-O:23,II and Order No. 25,664 dated May 9, 2014, which directs the Company to refund RGGI auction revenue it receives to its Customers through the SCRC. - Costs of implementing 2018 N.H. Laws, Chapter 340, "AN ACT requiring the public utilities commission to revise its order affecting the Burgess BioPower plant in Berlin, ..." per Order No. 26,332 ("Ch. 340" costs). - Costs of implementing Section 7.1 of the DE 19-057 Settlement Agreement as approved in Order No. 26,433 to recover Environmental Remediation costs. - Costs of the DE 20-136 Settlement Agreement to recover Net Metering and Group Host costs. 	No costs included in DE 24-070	No change
Transmission Cost Adjustment Mechanism (TCAM)	The Transmission Cost Adjustment Mechanism ("TCAM") recovers, on a fully reconciling basis, the costs incurred by the Company for transmission related services. These costs include charges under the ISO-NE Tariff; charges billed to the Company by Other Transmission Providers; third party charges billed to the Company for transmission related services such as charges relating to the stability of the transmission system which the Company is authorized to recover by order of the regulatory agency having jurisdiction over such charges; and transmissionbased assessments or fees billed by or through regulatory agencies, including those associated with the ISO-NE, regional transmission organization ("RTO") and the FERC.	No costs included in DE 24-070	No change

Capital Expenditure Long Range Plan
\$ Thousands

Sum of Amount		Year					Grand Total	
Budget Category	Budget Sub-Category	2025	2026	2027	2028	2029		
Basic Business	3rd Party/Joint Owner Work	\$ 5,253.00	\$ 5,410.59	\$ 5,572.91	\$ 5,740.09	\$ 5,912.30	\$ 27,888.89	
	Basic Business - Other	\$ 565.47	\$ 582.43	\$ 599.91	\$ 617.90	\$ 636.44	\$ 3,002.16	
	Capital Tool Purchases	\$ 3,017.39	\$ 3,077.27	\$ 3,138.95	\$ 3,202.49	\$ 3,267.94	\$ 15,704.04	
	Emergent Equipment Failure - Substation	\$ 2,850.00	\$ 2,850.00	\$ 2,850.00	\$ 2,850.00	\$ 2,850.00	\$ 14,250.00	
	Emergent Equipment Failures - Line	\$ 31,402.64	\$ 32,344.72	\$ 33,315.06	\$ 34,314.51	\$ 35,343.95	\$ 166,720.88	
	Environmental	\$ 412.00	\$ 424.36	\$ 437.09	\$ 449.84	\$ 463.71	\$ 2,187.00	
	Insurance Claim/Keep Cost	\$ 1,442.00	\$ 1,485.26	\$ 1,529.82	\$ 1,575.71	\$ 1,622.21	\$ 7,655.00	
	Lighting	\$ 1,534.70	\$ 1,580.74	\$ 1,295.04	\$ 1,653.89	\$ 1,727.32	\$ 7,791.68	
	Line Relocations/Act of Public Authority	\$ 3,701.82	\$ 5,812.87	\$ 3,927.26	\$ 3,927.26	\$ 4,166.43	\$ 21,535.65	
	Pre-Cap Line Transformers	\$ 23,194.57	\$ 23,890.41	\$ 24,607.12	\$ 25,345.33	\$ 26,105.69	\$ 123,143.12	
	Basic Business Total		\$ 73,373.59	\$ 77,458.66	\$ 77,273.16	\$ 79,677.03	\$ 82,095.99	\$ 389,878.43
	New Customer	Customer Driven	\$ 29,349.85	\$ 30,230.35	\$ 31,137.26	\$ 32,071.37	\$ 33,033.51	\$ 155,822.34
	New Customer Total		\$ 29,349.85	\$ 30,230.35	\$ 31,137.26	\$ 32,071.37	\$ 33,033.51	\$ 155,822.34
Reliability	Distribution Line Reliability	\$ 35,764.00	\$ 19,315.88	\$ 9,156.73	\$ 26,436.63	\$ 27,529.68	\$ 118,202.91	
	Distribution ROW Line Reliability	\$ 21,347.00	\$ 20,468.00	\$ 14,610.00	\$ 15,100.00	\$ 23,550.00	\$ 95,075.00	
	Distribution Automation	\$ 9,200.00	\$ 9,200.00	\$ 5,200.00	\$ 5,200.00	\$ 5,200.00	\$ 34,000.00	
	Substation Reliability	\$ 50,091.00	\$ 52,966.00	\$ 68,345.00	\$ 58,520.00	\$ 47,050.00	\$ 276,972.00	
	CCI Reject Pole Replacement	\$ 6,000.00	\$ 3,000.00	\$ -	\$ -	\$ -	\$ 9,000.00	
Reliability Total		\$ 122,402.00	\$ 104,949.88	\$ 97,311.73	\$ 105,256.63	\$ 103,329.68	\$ 533,249.91	
Peak Load	Distribution Line Capacity	\$ 9,102.00	\$ 18,643.00	\$ 18,926.00	\$ 12,000.00	\$ 14,000.00	\$ 72,671.00	
	Substation Capacity	\$ 25,582.00	\$ 28,574.00	\$ 26,320.00	\$ 24,000.00	\$ 24,000.00	\$ 128,476.00	
Peak Load Total		\$ 34,684.00	\$ 47,217.00	\$ 45,246.00	\$ 36,000.00	\$ 38,000.00	\$ 201,147.00	
All Other	Ops Services	\$ 15,133.30	\$ 15,429.31	\$ 15,290.53	\$ 16,025.60	\$ 16,622.43	\$ 78,501.18	
	Engineering	\$ 6,518.23	\$ 6,920.00	\$ 14,620.00	\$ 6,645.00	\$ 7,645.00	\$ 42,348.23	
	Facilities	\$ 14,500.00	\$ 21,000.00	\$ 7,800.00	\$ 11,700.00	\$ 28,800.00	\$ 83,800.00	
	Information Technology	\$ 7,410.92	\$ 1,800.25	\$ 3,247.66	\$ 4,072.46	\$ 3,376.30	\$ 19,907.59	
	Customer Group	\$ 5,982.00	\$ 5,066.59	\$ 5,088.59	\$ 5,108.00	\$ 5,130.00	\$ 26,375.18	
	Material Logistics	\$ 1,600.00	\$ 1,300.00	\$ 1,550.00	\$ 800.00	\$ 800.00	\$ 6,050.00	
	Internal Audit	\$ 95.00	\$ 95.00	\$ 95.00	\$ 95.00	\$ 95.00	\$ 475.00	
All Other Total		\$ 51,239.45	\$ 51,611.15	\$ 47,691.78	\$ 44,446.06	\$ 62,468.73	\$ 257,457.18	
Regulatory Improvement	Regulatory Improvements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Regulatory Improvements Total		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Grand Total		\$ 311,048.89	\$ 311,467.04	\$ 298,659.91	\$ 297,451.10	\$ 318,927.92	\$ 1,537,554.86	



Parent Project	Parent Project Description	Project
A22N27	COMCAST NON-BILLABLE LACONIA	A22N27
A22N27	COMCAST NON-BILLABLE LACONIA	A22N27
A22N28	COMCAST BILLABLE LACONIA	A22N28
A22N28	COMCAST BILLABLE LACONIA	A22N28
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C01SPA01	JOINT POLES PURCHASE & SALE	C01SPA01
C03CTV	CABLE TV PROJECTS ANNUAL	C03CTV
C03CTV	CABLE TV PROJECTS ANNUAL	C03CTV
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
C03TEL	TELEPHONE PROJECTS ANNUAL	C03TEL
A16X01	ESCC control of Generation	A16X01
A16X01	ESCC control of Generation	A16X01
A16X01	ESCC control of Generation	A16X01
A16X01	ESCC control of Generation	A16X01
A16X01	ESCC control of Generation	A16X01
A16X05	NH Energy Park: audio visual equip	A16X05
A16X06	NH SOC/ESCC Backup	A16X06
A16X08	1250 Hooksett Rd - AV Project	A16X08
A18W22	Peterborough Roadway and Bridge Pro	A18W22
A18W22	Peterborough Roadway and Bridge Pro	A18W22
A18W22	Peterborough Roadway and Bridge Pro	A18W22
A18W22	Peterborough Roadway and Bridge Pro	A18W22
A18W22	Peterborough Roadway and Bridge Pro	A18W22
A21C38	ANIMAL PROTECTION AT BROOK ST SS	A21C38
A21C40	ANIMAL PROTECTION AT EDDY SS	A21C40
A21C40	ANIMAL PROTECTION AT EDDY SS	A21C40
A21E41	Animal Protection Madbury SS	A21E41
A22C54	3271X Sound Barrier Pad-Mount Step	A22C54
A22C54	3271X Sound Barrier Pad-Mount Step	A22C54
A22E79	Animal Protection Brentwood SS	A22E79
A22N80	ANIMAL PROTECTION OAK HILL SS	A22N80

A22S81	Animal Protection Hudson SS	A22S81
A22S82	Animal Protection Reeds Ferry SS	A22S82
A23E44	15W4 Commercial Alley	A23E44
A23W27	W15 Lattice Tower Removal	A23W27
A23X47	NH Rubber Goods Lab Rebuild	A23X47
DTC9R	2022 Elec Sys Ops Equip Annual	DTC9R
DTC9R	2022 Elec Sys Ops Equip Annual	DTC9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
GF9R	Misc office equipment	GF9R
PT9R	Temporary Work Annual	PT9A
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PT9R	Temporary Work Annual	PT9B
PT9R	Temporary Work Annual	PT9B
PT9R	Temporary Work Annual	PT9B
PT9R	Temporary Work Annual	PT9B
PT9R	Temporary Work Annual	PT9C
PT9R	Temporary Work Annual	PT9C
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PT9R	Temporary Work Annual	PT9S
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PW9R	Private Work Annual	PW9A
PW9R	Private Work Annual	PW9A
PW9R	Private Work Annual	PW9B
PW9R	Private Work Annual	PW9B
PW9R	Private Work Annual	PW9C
PW9R	Private Work Annual	PW9C
PW9R	Private Work Annual	PW9C
PW9R	Private Work Annual	PW9D
PW9R	Private Work Annual	PW9D
PW9R	Private Work Annual	PW9D
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PW9R	Private Work Annual	PW9Y
PW9R	Private Work Annual	PW9Y

DQ9R	DQ Planned Obsolescence Annual	ARUG9K
DQ9R	DQ Planned Obsolescence Annual	ARUG9K
DQ9R	DQ Planned Obsolescence Annual	ARUG9L
DQ9R	DQ Planned Obsolescence Annual	ARUG9L
DQ9R	DQ Planned Obsolescence Annual	ARUG9L
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DQ9R	DQ Planned Obsolescence Annual	IFDB9Y
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DQ9R	DQ Planned Obsolescence Annual	IFOH9A
DQ9R	DQ Planned Obsolescence Annual	IFOH9A
DQ9R	DQ Planned Obsolescence Annual	IFOH9C
DQ9R	DQ Planned Obsolescence Annual	IFOH9D
DQ9R	DQ Planned Obsolescence Annual	IFOH9D
DQ9R	DQ Planned Obsolescence Annual	IFOH9D
DQ9R	DQ Planned Obsolescence Annual	IFOH9E
DQ9R	DQ Planned Obsolescence Annual	IFOH9E
DQ9R	DQ Planned Obsolescence Annual	IFOH9E
DQ9R	DQ Planned Obsolescence Annual	IFOH9K
DQ9R	DQ Planned Obsolescence Annual	IFOH9K
DQ9R	DQ Planned Obsolescence Annual	IFOH9K
DQ9R	DQ Planned Obsolescence Annual	IFOH9K
DQ9R	DQ Planned Obsolescence Annual	IFOH9N
DQ9R	DQ Planned Obsolescence Annual	IFOH9N
DQ9R	DQ Planned Obsolescence Annual	IFOH9P
DQ9R	DQ Planned Obsolescence Annual	IFOH9P
DQ9R	DQ Planned Obsolescence Annual	IFOH9P
DQ9R	DQ Planned Obsolescence Annual	IFOH9P
DQ9R	DQ Planned Obsolescence Annual	IFOH9S
DQ9R	DQ Planned Obsolescence Annual	IFOH9S
DQ9R	DQ Planned Obsolescence Annual	IFOH9S
DQ9R	DQ Planned Obsolescence Annual	IFOH9S
DQ9R	DQ Planned Obsolescence Annual	IFOH9W
DQ9R	DQ Planned Obsolescence Annual	IFOH9W
DQ9R	DQ Planned Obsolescence Annual	IFOH9Y
DQ9R	DQ Planned Obsolescence Annual	IFOH9Y
DQ9R	DQ Planned Obsolescence Annual	IFOH9Y
DQ9R	DQ Planned Obsolescence Annual	IFOH9Y
DQ9R	DQ Planned Obsolescence Annual	IFOH9Y
DQ9R	DQ Planned Obsolescence Annual	IFOH9Z
DQ9R	DQ Planned Obsolescence Annual	IFOH9Z
DQ9R	DQ Planned Obsolescence Annual	IFOH9Z
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
DS9RE	ROW REPLACE FAILED EQUIPMENT-ANNUA	DS9RE
MINOR9R	Minor Storms Annual	MINOR9A
MINOR9R	Minor Storms Annual	MINOR9A

MINOR9R	Minor Storms Annual	MINOR9Z
MINOR9R	Minor Storms Annual	MINOR9Z
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
NHLC03	NH LINE CONTRACTORS	NHLC03
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STORMCAP	NH STORM CAPITALIZATION	STORMCAP
STRM0617C	NH STORM CAP: Mar 2, 2017 event	STRM0617C
STRM0617N	NH STORM CAP: Oct 29, 2017 event	STRM0617N
STRM0617N	NH STORM CAP: Oct 29, 2017 event	STRM0617N
STRM0617N	NH STORM CAP: Oct 29, 2017 event	STRM0617N
STRM0618C	NH STORM CAP: Mar 7-8, 2018 event	STRM0618C
STRM0618D	NH STORM CAP: Apr 4-5, 2018 event	STRM0618D
STRM0618D	NH STORM CAP: Apr 4-5, 2018 event	STRM0618D
A12N01A	BERLIN 4KV SYSTEM RECONFIGURATION	A12N01A
A14N21	BERLIN EASTSIDE 34.5KV LINE BREAKER	A14N21
A14N21	BERLIN EASTSIDE 34.5KV LINE BREAKER	A14N21
A14N21	BERLIN EASTSIDE 34.5KV LINE BREAKER	A14N21
A21C43	REPLACE LTC CONTROLS EDDY SS	A21C43
A21C43	REPLACE LTC CONTROLS EDDY SS	A21C43
A21C43	REPLACE LTC CONTROLS EDDY SS	A21C43
A21C43	REPLACE LTC CONTROLS EDDY SS	A21C43
A21N78	BERLIN EAST SIDE SS REPLACE TRANSFO	A21N78
A21N78	BERLIN EAST SIDE SS REPLACE TRANSFO	A21N78
A21N78	BERLIN EAST SIDE SS REPLACE TRANSFO	A21N78
A21N78	BERLIN EAST SIDE SS REPLACE TRANSFO	A21N78
DS9RD2	2022 NH D SS Emergent Annual	DS9RD2
DS9RD2	2022 NH D SS Emergent Annual	DS9RD2
DS9RD2	2022 NH D SS Emergent Annual	DS9RD2
DS9RD3	2023 NH D SS Emergent Annual	DS9RD3
DS9RD3	2023 NH D SS Emergent Annual	DS9RD3
CO1PCB	PCB TRANSFORMER CHANGEOUT PROGRAM	CO1PCB
CO1PCB	PCB TRANSFORMER CHANGEOUT PROGRAM	CO1PCB

INS9R	Insurance Claim Annual	INSDB9S
INS9R	Insurance Claim Annual	INSDB9S
INS9R	Insurance Claim Annual	INSDB9S
INS9R	Insurance Claim Annual	INSDB9S
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9W
INS9R	Insurance Claim Annual	INSDB9Y
INS9R	Insurance Claim Annual	INSDB9Y
INS9R	Insurance Claim Annual	INSDB9Y
INS9R	Insurance Claim Annual	INSDB9Y
INS9R	Insurance Claim Annual	INSDB9Z
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INS9R	Insurance Claim Annual	INSOH9B
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INS9R	Insurance Claim Annual	INSOH9B
INS9R	Insurance Claim Annual	INSOH9B
INS9R	Insurance Claim Annual	INSOH9B
INS9R	Insurance Claim Annual	INSOH9C
INS9R	Insurance Claim Annual	INSOH9C
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DA9R	Non-Roadway Lighting Annual	DA9A
DA9R	Non-Roadway Lighting Annual	DA9A
DA9R	Non-Roadway Lighting Annual	DA9A
DA9R	Non-Roadway Lighting Annual	DA9A
DA9R	Non-Roadway Lighting Annual	DA9A
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DA9R	Non-Roadway Lighting Annual	DA9B
DA9R	Non-Roadway Lighting Annual	DA9B
DA9R	Non-Roadway Lighting Annual	DA9C
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DA9R	Non-Roadway Lighting Annual	DA9C
DA9R	Non-Roadway Lighting Annual	DA9C

DA9R	Non-Roadway Lighting Annual	DA9D
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DA9R	Non-Roadway Lighting Annual	DA9E
DA9R	Non-Roadway Lighting Annual	DA9E
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DA9R	Non-Roadway Lighting Annual	DA9Y
DA9R	Non-Roadway Lighting Annual	DA9Y

HPS9R	Roadway Lighting Annual	D79N
HPS9R	Roadway Lighting Annual	D79P
HPS9R	Roadway Lighting Annual	D79P
HPS9R	Roadway Lighting Annual	D79P
HPS9R	Roadway Lighting Annual	D79P
HPS9R	Roadway Lighting Annual	D79P
HPS9R	Roadway Lighting Annual	D79S
HPS9R	Roadway Lighting Annual	D79S
HPS9R	Roadway Lighting Annual	D79S
HPS9R	Roadway Lighting Annual	D79S
HPS9R	Roadway Lighting Annual	D79S
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HPS9R	Roadway Lighting Annual	D79W
HPS9R	Roadway Lighting Annual	D79W
HPS9R	Roadway Lighting Annual	D79Y
HPS9R	Roadway Lighting Annual	D79Y
HPS9R	Roadway Lighting Annual	D79Y
HPS9R	Roadway Lighting Annual	D79Y
HPS9R	Roadway Lighting Annual	D79Z
HPS9R	Roadway Lighting Annual	D79Z
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HPS9R	Roadway Lighting Annual	D79Z
HPS9R	Roadway Lighting Annual	D79Z
HPS9R	Roadway Lighting Annual	HPS9R
HPS9R	Roadway Lighting Annual	HPS9R
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HPS9R	Roadway Lighting Annual	HPS9R
HPS9R	Roadway Lighting Annual	HPS9R
HPS9R	Roadway Lighting Annual	HPS9R
HPS9R	Roadway Lighting Annual	HPS9R
9N031138P	LINE RELOCATE EAST HOLLIS ST NASHUA	9N031138P
A18C21	MANCHESTER AIRPORT DUCT RELOCATION	A18C21
A18E23	Rochester Comcast Make Ready	A18E23
A18E23	Rochester Comcast Make Ready	A18E23
A18E23	Rochester Comcast Make Ready	A18E23
A18E23	Rochester Comcast Make Ready	A18E23
A18W13	Route 9 Roxbury-Sullivan 10439	A18W13
A18W13	Route 9 Roxbury-Sullivan 10439	A18W13
A18W13	Route 9 Roxbury-Sullivan 10439	A18W13
A18W13	Route 9 Roxbury-Sullivan 10439	A18W13
A20N29	LACONIA COMCAST NON-BILLABLE 2020	A20N29
A20N29	LACONIA COMCAST NON-BILLABLE 2020	A20N29
A20N29	LACONIA COMCAST NON-BILLABLE 2020	A20N29

A20N30	LACONIA COMCAST BILLABLE 2020	A20N30
A20N30	LACONIA COMCAST BILLABLE 2020	A20N30
A20N30	LACONIA COMCAST BILLABLE 2020	A20N30
A20N30	LACONIA COMCAST BILLABLE 2020	A20N30
A20N31	GILFORD COMCAST NON-BILLABLE 2020	A20N31
A20N31	GILFORD COMCAST NON-BILLABLE 2020	A20N31
A20N31	GILFORD COMCAST NON-BILLABLE 2020	A20N31
A20N32	GILFORD COMCAST BILLABLE 2020	A20N32
A20N32	GILFORD COMCAST BILLABLE 2020	A20N32
A20N32	GILFORD COMCAST BILLABLE 2020	A20N32
A20N50	NHDOT LINE RELOC RTE 106 LOUDON	A20N50
A20N50	NHDOT LINE RELOC RTE 106 LOUDON	A20N50
A20N50	NHDOT LINE RELOC RTE 106 LOUDON	A20N50
A21N28	ROUTE 16 LINE RELOCATION NHDOT	A21N28
A21N28	ROUTE 16 LINE RELOCATION NHDOT	A21N28
A21N32	LACONIA COMCAST NONBILLABLE 2021	A21N32
A21N32	LACONIA COMCAST NONBILLABLE 2021	A21N32
A21N32	LACONIA COMCAST NONBILLABLE 2021	A21N32
A21N32	LACONIA COMCAST NONBILLABLE 2021	A21N32
A21N33	LACONIA COMCAST BILLABLE 2021	A21N33
A21N33	LACONIA COMCAST BILLABLE 2021	A21N33
A21N33	LACONIA COMCAST BILLABLE 2021	A21N33
A21N34	GILFORD COMCAST NONBILLABLE 2021	A21N34
A21N34	GILFORD COMCAST NONBILLABLE 2021	A21N34
A21N34	GILFORD COMCAST NONBILLABLE 2021	A21N34
A21N34	GILFORD COMCAST NONBILLABLE 2021	A21N34
A21N35	GILFORD COMCAST BILLABLE 2021	A21N35
A21N35	GILFORD COMCAST BILLABLE 2021	A21N35
A21N35	GILFORD COMCAST BILLABLE 2021	A21N35
A21S30	NHDOT PROJ #13065 - 365 Line	A21S30
A21S30	NHDOT PROJ #13065 - 365 Line	A21S30
A21S30	NHDOT PROJ #13065 - 365 Line	A21S30
A21S30	NHDOT PROJ #13065 - 365 Line	A21S30
A21S31	NHDOT PROJ #13761 3138/3151 LINES	A21S31
A21S31	NHDOT PROJ #13761 3138/3151 LINES	A21S31
A21S31	NHDOT PROJ #13761 3138/3151 LINES	A21S31
A21S31	NHDOT PROJ #13761 3138/3151 LINES	A21S31
A22N27	COMCAST NON-BILLABLE LACONIA	A22N27
A22N27	COMCAST NON-BILLABLE LACONIA	A22N27
A22N28	COMCAST BILLABLE LACONIA	A22N28
A22N29	COMCAST NON-BILLABLE GILFORD	A22N29
A22N29	COMCAST NON-BILLABLE GILFORD	A22N29
A22N29	COMCAST NON-BILLABLE GILFORD	A22N29
A22N30	COMCAST BILLABLE GILFORD	A22N30
A22N30	COMCAST BILLABLE GILFORD	A22N30
A23N03	COMCAST NON-BILLABLE BELMONT	A23N03
A23N04	COMCAST BILLABLE BELMONT	A23N04

DH9R	Line Relocations Annual	DH9H
DH9R	Line Relocations Annual	DH9H
DH9R	Line Relocations Annual	DH9K
DH9R	Line Relocations Annual	DH9K
DH9R	Line Relocations Annual	DH9K
DH9R	Line Relocations Annual	DH9K
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DH9R	Line Relocations Annual	DH9M
DH9R	Line Relocations Annual	DH9N
DH9R	Line Relocations Annual	DH9N
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DH9R	Line Relocations Annual	DH9N
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DH9R	Line Relocations Annual	DH9Z
DH9R	Line Relocations Annual	DH9Z
DH9R	Line Relocations Annual	DH9Z
DH9R	Line Relocations Annual	DH9Z

E03CTV	EXPENSE PORTION OF CATV PROJECTS	E03CTV
E03CTV	EXPENSE PORTION OF CATV PROJECTS	E03CTV
E03CTV	EXPENSE PORTION OF CATV PROJECTS	E03CTV
E03CTV	EXPENSE PORTION OF CATV PROJECTS	E03CTV
E03CTV	EXPENSE PORTION OF CATV PROJECTS	E03CTV
ROWLR	ROW Relocations - Reimbursable	ROWLR
UB1140	RELOCATE 12 SECTIONS LONDONDRY TPK	UB1140
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
DT7P	PURCHASE TRANSFORMERS AND REGULATOR	DT7P
99999906	PSNH Overheads	99999906
A18C24	922 ELM ST DEVELOPMENT	A18C24
A18C24	922 ELM ST DEVELOPMENT	A18C24
A18C24	922 ELM ST DEVELOPMENT	A18C24
A18C24	922 ELM ST DEVELOPMENT	A18C24
A18C25	SANBORN CROSSING APARTMENTS	A18C25
A18C25	SANBORN CROSSING APARTMENTS	A18C25
A18C25	SANBORN CROSSING APARTMENTS	A18C25
A18C29	PULPIT RD URD	A18C29
A18C29	PULPIT RD URD	A18C29
A18C29	PULPIT RD URD	A18C29
A19C42	MYRTLE SO. BK. CONV MANCHESTER	A19C42
A19C42	MYRTLE SO. BK. CONV MANCHESTER	A19C42
A19C60	BAE GOFFS FALLS RD SERVICE	A19C60
A19C60	BAE GOFFS FALLS RD SERVICE	A19C60
A19C60	BAE GOFFS FALLS RD SERVICE	A19C60
A19N37	348X3 CUSTOMER LINE EXT	A19N37
A19N37	348X3 CUSTOMER LINE EXT	A19N37
A19N37	348X3 CUSTOMER LINE EXT	A19N37
A19N37	348X3 CUSTOMER LINE EXT	A19N37
A19N37	348X3 CUSTOMER LINE EXT	A19N37
A19S43	WOODMONT COMMONS PHASE 1A 2019	A19S43
A19S43	WOODMONT COMMONS PHASE 1A 2019	A19S43
A19S43	WOODMONT COMMONS PHASE 1A 2019	A19S43
A19S43	WOODMONT COMMONS PHASE 1A 2019	A19S43
A19S43	WOODMONT COMMONS PHASE 1A 2019	A19S43
A19S44	WOODMONT COMMONS PHASE 1B 2019	A19S44
A19S44	WOODMONT COMMONS PHASE 1B 2019	A19S44
A19S44	WOODMONT COMMONS PHASE 1B 2019	A19S44
A19S44	WOODMONT COMMONS PHASE 1B 2019	A19S44

DV9R	Services Annual	DV9R
DV9R	Services Annual	DV9R
DV9R	Services Annual	DV9S
DV9R	Services Annual	DV9S
DV9R	Services Annual	DV9S
DV9R	Services Annual	DV9S
DV9R	Services Annual	DV9S
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9W
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Y
DV9R	Services Annual	DV9Z
DV9R	Services Annual	DV9Z
DV9R	Services Annual	DV9Z
DV9R	Services Annual	DV9Z
A21C52	T2504 MANCHESTER LANDFILL PV	A21C52
A21C52	T2504 MANCHESTER LANDFILL PV	A21C52
A21N88	#T1213 LOUDON PLEASANT STREET PV	A21N88
A21N88	#T1213 LOUDON PLEASANT STREET PV	A21N88
A21N88	#T1213 LOUDON PLEASANT STREET PV	A21N88
A21N90	#T1193 CONWAY LAKE PV	A21N90
A21N90	#T1193 CONWAY LAKE PV	A21N90
A21S89	T1402 & T2007 NASHUA PENNICHUCK PV	A21S89
A21S89	T1402 & T2007 NASHUA PENNICHUCK PV	A21S89
A21S89	T1402 & T2007 NASHUA PENNICHUCK PV	A21S89
A21X18	ADD SCADA RECLOSERS TO DG SITES	A21X18
A21X18	ADD SCADA RECLOSERS TO DG SITES	A21X18
A21X18	ADD SCADA RECLOSERS TO DG SITES	A21X18
A21X18	ADD SCADA RECLOSERS TO DG SITES	A21X18
A22C31	BEDFORD TRANSFER STATION PV (#T2942)	A22C31
A22C31	BEDFORD TRANSFER STATION PV (#T2942)	A22C31
A22C31	BEDFORD TRANSFER STATION PV (#T2942)	A22C31
A22C73	Pembroke Solar Interconnection	A22C73
A22C73	Pembroke Solar Interconnection	A22C73
A22W32	KEENE WWTF PV (#T2797A)	A22W32
A22W32	KEENE WWTF PV (#T2797A)	A22W32
A22W32	KEENE WWTF PV (#T2797A)	A22W32
A22W70	Nellie Solar Interconnection	A22W70
A22W70	Nellie Solar Interconnection	A22W70
A22W70	Nellie Solar Interconnection	A22W70

DG9R	DG FIELD DESIGN & CONSTR- REIMBURSE	DG9R
DG9R	DG FIELD DESIGN & CONSTR- REIMBURSE	DG9R
DG9R	DG FIELD DESIGN & CONSTR- REIMBURSE	DG9R
DG9R	DG FIELD DESIGN & CONSTR- REIMBURSE	DG9R
DG9R	DG FIELD DESIGN & CONSTR- REIMBURSE	DG9R
DSPP8001	DG ENG DESIGN & CONSTR	DSPP8001
DSPP8001	DG ENG DESIGN & CONSTR	DSPP8001
DSPP8001	DG ENG DESIGN & CONSTR	DSPP8001
DSPP8001	DG ENG DESIGN & CONSTR	DSPP8001
DSPP8001	DG ENG DESIGN & CONSTR	DSPP8001
A19C25	Reconductor Bedford Road, 360X7	A19C25
A19C25	Reconductor Bedford Road, 360X7	A19C25
A19C25	Reconductor Bedford Road, 360X7	A19C25
A19E26	Convert Four Rod Road in Rochester	A19E26
A19E26	Convert Four Rod Road in Rochester	A19E26
A19E26	Convert Four Rod Road in Rochester	A19E26
A19X31	ROW Peak Load Plug	A19X31
A06N30A	386/386A/340 LINES REBUILD FOR Y-17	A06N30A
A06N30A	386/386A/340 LINES REBUILD FOR Y-17	A06N30A
A06W42	RETROFIT CAPACITOR BANK CONTROLS	A06W42
A16C05	Valley St Area Solution	A16C05
A16C05	Valley St Area Solution	A16C05
A18E16	West Rd Overloaded Steps	A18E16
A19S46	SOUTH AVE DERRY STEP OVERLOAD	A19S46
A19S46	SOUTH AVE DERRY STEP OVERLOAD	A19S46
A19S46	SOUTH AVE DERRY STEP OVERLOAD	A19S46
A20C23	335X1 EXTEND 19.9kv 1P TO S. BOW RD	A20C23
A20C23	335X1 EXTEND 19.9kv 1P TO S. BOW RD	A20C23
A20C23	335X1 EXTEND 19.9kv 1P TO S. BOW RD	A20C23
A20C23	335X1 EXTEND 19.9kv 1P TO S. BOW RD	A20C23
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20C24	INSTALL PM STEP TRNSF RTE 13 GOFFS	A20C24
A20E25	OFFLOAD 63W1 AT E. NORTHWOOD	A20E25
A20E25	OFFLOAD 63W1 AT E. NORTHWOOD	A20E25
A20E25	OFFLOAD 63W1 AT E. NORTHWOOD	A20E25
A20E25	OFFLOAD 63W1 AT E. NORTHWOOD	A20E25
A20S22	RANGE RD WINDHAM CONVERSION	A20S22
A20S22	RANGE RD WINDHAM CONVERSION	A20S22
A20S22	RANGE RD WINDHAM CONVERSION	A20S22
A21C19	MEETINGHOUSE RD SS OFF- LOAD	A21C19
A21C19	MEETINGHOUSE RD SS OFF- LOAD	A21C19
A21C19	MEETINGHOUSE RD SS OFF- LOAD	A21C19
A21C19	MEETINGHOUSE RD SS OFF- LOAD	A21C19

A21C20	322X14 CIRCUIT OFFLOAD	A21C20
A21C20	322X14 CIRCUIT OFFLOAD	A21C20
A21C20	322X14 CIRCUIT OFFLOAD	A21C20
A21C20	322X14 CIRCUIT OFFLOAD	A21C20
A21C25	ADD PHASES ON NEW BOSTON RD	A21C25
A21C25	ADD PHASES ON NEW BOSTON RD	A21C25
A21C25	ADD PHASES ON NEW BOSTON RD	A21C25
A21C42	WESTLAND AVE CONVERSION	A21C42
A21C42	WESTLAND AVE CONVERSION	A21C42
A21C73	LINE 321/3182 LAM WOOD STR REPL	A21C73
A21C73	LINE 321/3182 LAM WOOD STR REPL	A21C73
A21E21	RECONDUCTOR 1.06 MI DRAKE HILL RD	A21E21
A21E21	RECONDUCTOR 1.06 MI DRAKE HILL RD	A21E21
A21E21	RECONDUCTOR 1.06 MI DRAKE HILL RD	A21E21
A21E21	RECONDUCTOR 1.06 MI DRAKE HILL RD	A21E21
A21E22	PISCASSIC RD CONVERSION	A21E22
A21E22	PISCASSIC RD CONVERSION	A21E22
A21E22	PISCASSIC RD CONVERSION	A21E22
A21E22	PISCASSIC RD CONVERSION	A21E22
A21E23	FOGG RD CONVERSION	A21E23
A21E23	FOGG RD CONVERSION	A21E23
A21E23	FOGG RD CONVERSION	A21E23
A21E23	FOGG RD CONVERSION	A21E23
A21E24	BEAUTY HILL RD CONVERSION	A21E24
A21E24	BEAUTY HILL RD CONVERSION	A21E24
A21E24	BEAUTY HILL RD CONVERSION	A21E24
A21E24	BEAUTY HILL RD CONVERSION	A21E24
A21N26	CONVERT RTE 132 IN NORTHFIELD	A21N26
A21N26	CONVERT RTE 132 IN NORTHFIELD	A21N26
A21S27	DAMREN RD CONVERSION	A21S27
A21S27	DAMREN RD CONVERSION	A21S27
A21S27	DAMREN RD CONVERSION	A21S27
A21W37	EXTEND THREE PHASE ROUTE 202 RINDGE	A21W37
A21W37	EXTEND THREE PHASE ROUTE 202 RINDGE	A21W37
A21W37	EXTEND THREE PHASE ROUTE 202 RINDGE	A21W37
A22C05	3108 PARALLEL STEP OVERLOAD	A22C05
A22C05	3108 PARALLEL STEP OVERLOAD	A22C05
A22C05	3108 PARALLEL STEP OVERLOAD	A22C05
A22E22	15W4 RUSSELL ST SWITCHGEAR PORTSMTH	A22E22
A22E23	3115X7 MAIN ST RAYMOND CONVERSION	A22E23
A22E23	3115X7 MAIN ST RAYMOND CONVERSION	A22E23
A22E23	3115X7 MAIN ST RAYMOND CONVERSION	A22E23
A22E23	3115X7 MAIN ST RAYMOND CONVERSION	A22E23
A22E24	377X20 MAIN ST EPPING CONVERSION	A22E24
A22E24	377X20 MAIN ST EPPING CONVERSION	A22E24
A22E24	377X20 MAIN ST EPPING CONVERSION	A22E24
A22E24	377X20 MAIN ST EPPING CONVERSION	A22E24

A22E25	6H2 CONVERSION OFFLOAD TO 67W2	A22E25
A22E25	6H2 CONVERSION OFFLOAD TO 67W2	A22E25
A22E25	6H2 CONVERSION OFFLOAD TO 67W2	A22E25
A22E25	6H2 CONVERSION OFFLOAD TO 67W2	A22E25
A22E59	15W4 Market Street U/G Service	A22E59
A22E59	15W4 Market Street U/G Service	A22E59
A22N19	3525X5 E SIDE RD, ERROL CONVERSION	A22N19
A22N19	3525X5 E SIDE RD, ERROL CONVERSION	A22N19
A22N19	3525X5 E SIDE RD, ERROL CONVERSION	A22N19
A22W20	42X3/44H1 EXTEND 34.5KV	A22W20
A22W20	42X3/44H1 EXTEND 34.5KV	A22W20
A22W20	42X3/44H1 EXTEND 34.5KV	A22W20
A22W20	42X3/44H1 EXTEND 34.5KV	A22W20
A22W21	3410 LAKE SUNAPEE EXT 34.5KV SPACER	A22W21
A22W21	3410 LAKE SUNAPEE EXT 34.5KV SPACER	A22W21
A22W21	3410 LAKE SUNAPEE EXT 34.5KV SPACER	A22W21
A23E14	377X20 Pleasant Street Conversion	A23E14
A23E14	377X20 Pleasant Street Conversion	A23E14
A23E36	3103X1 Beede Hill Road Conversion	A23E36
A23IFR	2023 Initial Funding Placeholder	A23IFR
A23N07	319X1 Conversion S Barnstead Rd	A23N07
A23N07	319X1 Conversion S Barnstead Rd	A23N07
A23N08	336X1 Conversion	A23N08
A23N09	3114W1 Conversion Ragged Mt Hwy	A23N09
A23S19	2H2 Line Extension	A23S19
A23S19	2H2 Line Extension	A23S19
A23S20	3155X Route 13 Conversion	A23S20
A23S20	3155X Route 13 Conversion	A23S20
A23S21	3211X Kimball Hill Rd Conversion	A23S21
A23S21	3211X Kimball Hill Rd Conversion	A23S21
A23S22	3217X Knowlton Rd Conversion	A23S22
A23W01	3155X Install Padmounted Step Xfmr	A23W01
A23W01	3155X Install Padmounted Step Xfmr	A23W01
A24E07	Pease Tradeport Upgrade	A24E07
DK9R	Maintain Voltage Annual	DK9A
DK9R	Maintain Voltage Annual	DK9A
DK9R	Maintain Voltage Annual	DK9A
DK9R	Maintain Voltage Annual	DK9A
DK9R	Maintain Voltage Annual	DK9A
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9B
DK9R	Maintain Voltage Annual	DK9C
DK9R	Maintain Voltage Annual	DK9C
DK9R	Maintain Voltage Annual	DK9C

DK9R	Maintain Voltage Annual	DK9Y
DK9R	Maintain Voltage Annual	DK9Y
DK9R	Maintain Voltage Annual	DK9Y
DK9R	Maintain Voltage Annual	DK9Y
DK9R	Maintain Voltage Annual	DK9Y
DK9R	Maintain Voltage Annual	DK9Z
DK9R	Maintain Voltage Annual	DK9Z
DK9R	Maintain Voltage Annual	DK9Z
DK9R	Maintain Voltage Annual	DK9Z
DK9R	Maintain Voltage Annual	DK9Z
UB0836	SO. ST. MILFORD REPL OH WITH UNDERG	UB0836
A13S01	RIMMON S/S ADD 2ND 115-34.5KV 44.8M	A13S01
A15N03	310/29X1 Survey & Purchase Land	A15N03
A15N06	White Lake S/S - replace TB82	A15N06
A17W06	RIVER ROAD SS	A17W06
A18E09	REPLACE 386 RELAY AT ROCHESTER SS	A18E09
A18E09	REPLACE 386 RELAY AT ROCHESTER SS	A18E09
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A18N05	Pemi SS Upgrade	A18N05
A20S19	SOUTH MILFORD SUBSTATION	A20S19
A20S19	SOUTH MILFORD SUBSTATION	A20S19
A20S19	SOUTH MILFORD SUBSTATION	A20S19
A20S19	SOUTH MILFORD SUBSTATION	A20S19
A20S19	SOUTH MILFORD SUBSTATION	A20S19
A21E71	Salmon Falls SS Capactiy Project	A21E71
A21E71L	Salmon Falls SS Capactiy (D-Line)	A21E71L
A21S85	So Milford SS Distribution Line Wrk	A21S85
A21S85	So Milford SS Distribution Line Wrk	A21S85
A21S85	So Milford SS Distribution Line Wrk	A21S85
A23N43	Colebrook D Subststation	A23N43
D1260C	Huse Road	D1260C
A07X98	NESC CAPITAL REPAIRS	A07X98
A07X98	NESC CAPITAL REPAIRS	A07X98
A07X98	NESC CAPITAL REPAIRS	A07X98
A07X98	NESC CAPITAL REPAIRS	A07X98
A07X98	NESC CAPITAL REPAIRS	A07X98
A19S23	Miller State Park/Pack Monadnock	A19S23
A19X24	NESC CAPITAL REPAIRS	A19X24
A19X24	NESC CAPITAL REPAIRS	A19X24
A19X24	NESC CAPITAL REPAIRS	A19X24
A22DA	2022 POLE TOP DISTRIBUTION AUTOMATN	A22DA

A22DA	2022 POLE TOP DISTRIBUTION AUTOMATN	A22DA
A22DA	2022 POLE TOP DISTRIBUTION AUTOMATN	A22DA
A22E43	GREAT EAST LAKE POLE REPLACEMENT	A22E43
A22E43	GREAT EAST LAKE POLE REPLACEMENT	A22E43
R15CDA	REP3 - 2015-2016 Central Region DA	R15CDA
R15CDA	REP3 - 2015-2016 Central Region DA	R15CDA
R15CDA	REP3 - 2015-2016 Central Region DA	R15CDA
R15CTC	Circuit Tie Construction	R15CTC
R15CTC	Circuit Tie Construction	R15CTC
R15CTC	Circuit Tie Construction	R15CTC
R15DBR	REP3 Direct Buried Cable Replace	R15DBR
R15DBR	REP3 Direct Buried Cable Replace	R15DBR
R15DBR	REP3 Direct Buried Cable Replace	R15DBR
R15EDA	REP 3 2015-2016 Eastern Region DA	R15EDA
R15EDA	REP 3 2015-2016 Eastern Region DA	R15EDA
R15HLDR	Hit List Reliability Enhancements	R15HLDR
R15HLDR	Hit List Reliability Enhancements	R15HLDR
R15HLR	Heather-Lite Replacement	R15HLR
R15HLR	Heather-Lite Replacement	R15HLR
R15HLR	Heather-Lite Replacement	R15HLR
R15NDA	REP3 - 2015-2016 Northern Region D	R15NDA
R15NDA	REP3 - 2015-2016 Northern Region D	R15NDA
R15NESC	NESC CAPITAL REPAIRS	R15NESC
R15NESC	NESC CAPITAL REPAIRS	R15NESC
R15NESC	NESC CAPITAL REPAIRS	R15NESC
R15POR	Porcelain Change-out	R15POR
R15POR	Porcelain Change-out	R15POR
R15POR	Porcelain Change-out	R15POR
R15RPR	REJECT POLE REPLACEMENT	R15RPR
R15RPR	REJECT POLE REPLACEMENT	R15RPR
R15RPR	REJECT POLE REPLACEMENT	R15RPR
R15RPR	REJECT POLE REPLACEMENT	R15RPR
R15RWM	ROW System Hardening	R15RWM
R15RWM	ROW System Hardening	R15RWM
R15SDA	REP3 - 2015-2016 Southern Re	R15SDA
R15SDA	REP3 - 2015-2016 Southern Re	R15SDA
R15SDA	REP3 - 2015-2016 Southern Re	R15SDA
R15SDA	REP3 - 2015-2017 Southern Re	R15SDA
R15SSAI	4 & 12 kV Substations	R15SSAI
R15TDA	TELECOM EXPANSION TO SUPPORT DA	R15TDA
R15TDA	TELECOM EXPANSION TO SUPPORT DA	R15TDA
R15WDA	REP3 - 2015-2016 Western Region DA	R15WDA
R15WDA	REP3 - 2015-2016 Western Region DA	R15WDA
R15WDA	REP3 - 2015-2016 Western Region DA	R15WDA
R16LS	2016 Line Sensor Project	R16LS
R16LS	2016 Line Sensor Project	R16LS
R17CTC	REP 4 CIRCUIT TIES	R17CTC

R17CTC	REP 4 CIRCUIT TIES	R17CTC
R17CTC	REP 4 CIRCUIT TIES	R17CTC
R17DA	REP 4 POLE TOP DA	R17DA
R17DA	REP 4 POLE TOP DA	R17DA
R17HLDR	REP 4 CIRCUIT RELIABILITY IMPROVE	R17HLDR
R17HLDR	REP 4 CIRCUIT RELIABILITY IMPROVE	R17HLDR
R17HLDR	REP 4 CIRCUIT RELIABILITY IMPROVE	R17HLDR
R17RWH	REP 4 ROW SYSTEM HARDENING	R17RWH
R18CTC01	W185 - 4W1 CIRCUIT TIE	R18CTC01
R18CTC01	W185 - 4W1 CIRCUIT TIE	R18CTC01
R18CTC01	W185 - 4W1 CIRCUIT TIE	R18CTC01
R18CTC02	3178X CIRCUIT TIE HINSDALE	R18CTC02
R18CTC02	3178X CIRCUIT TIE HINSDALE	R18CTC02
R18CTC02	3178X CIRCUIT TIE HINSDALE	R18CTC02
6DCIP	Avigilon Security Upgrades	6DCIP
6DCIP	Avigilon Security Upgrades	6DCIP
6DCIP	Avigilon Security Upgrades	6DCIP
6DCIP	Avigilon Security Upgrades	6DCIP
A19E63	JACKSON HILL SS FNCE & GRDNG REPLAC	A19E63
A19X64	SS SECURITY UPGRADES	A19X64
A19X64	SS SECURITY UPGRADES	A19X64
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A21C14	GARVINS SS OCB REPLACEMENT	A21C14
A21C14	GARVINS SS OCB REPLACEMENT	A21C14
A21W53	316 LINE DAVIT ARM & STRUCTURE REPL	A21W53
A21W53	316 LINE DAVIT ARM & STRUCTURE REPL	A21W53
A17E01	RYE AREA 4KV STUDY	A17E01
A17E01	RYE AREA 4KV STUDY	A17E01
A17E01	RYE AREA 4KV STUDY	A17E01
A17E01	RYE AREA 4KV STUDY	A17E01
A17E01	RYE AREA 4KV STUDY	A17E01
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A17E09	ROCHESTER 4KV CONVERSION	A17E09
A20E04	Ham St Conversion, Dover	A20E04
A20E04	Ham St Conversion, Dover	A20E04

A20E04	Ham St Conversion, Dover	A20E04
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A22C03	GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	A22C03
A22C03	GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	A22C03
A22N11	36W1 CONVERSION/VEC TIE STRAFFORD	A22N11
A15CDA	CENTRAL REGION 2015 DA	A15CDA
A15CDA	CENTRAL REGION 2015 DA	A15CDA
A15CDA	CENTRAL REGION 2015 DA	A15CDA
A15EDA	EASTERN REGION 2015 DA	A15EDA
A15EDA	EASTERN REGION 2015 DA	A15EDA
A15EDA	EASTERN REGION 2015 DA	A15EDA
A15EDA	EASTERN REGION 2015 DA	A15EDA
A15NDA	NORTHERN REGION 2015 DA	A15NDA
A15NDA	NORTHERN REGION 2015 DA	A15NDA
A15NDA	NORTHERN REGION 2015 DA	A15NDA
A15SDA	SOUTHERN REGION 2015 DA	A15SDA
A15SDA	SOUTHERN REGION 2015 DA	A15SDA
A15SDA	SOUTHERN REGION 2015 DA	A15SDA
A15SDA	SOUTHERN REGION 2015 DA	A15SDA
A15TDA	TELECOM BUILDOUT AUTOMATION 2015	A15TDA
A17VRP	G&W Viper Warranty Replacment	A17VRP
A17VRP	G&W Viper Warranty Replacment	A17VRP
A18DA	DISTRIBUTION AUTOMATION - POLE TOP	A18DA
A18DA	DISTRIBUTION AUTOMATION - POLE TOP	A18DA
A18DA	DISTRIBUTION AUTOMATION - POLE TOP	A18DA
A18DA	DISTRIBUTION AUTOMATION - POLE TOP	A18DA
A18VRP	Viper Replacement Project-Bettermnt	A18VRP
A18VRP	Viper Replacement Project-Bettermnt	A18VRP
A19DA	DISTRIBUTION AUTOMATION - POLE TOP	A19DA
A19DA	DISTRIBUTION AUTOMATION - POLE TOP	A19DA
A19DA	DISTRIBUTION AUTOMATION - POLE TOP	A19DA
A19DA	DISTRIBUTION AUTOMATION - POLE TOP	A19DA
A19DA	DISTRIBUTION AUTOMATION - POLE TOP	A19DA
A19LS	Distribution Automation - Line Sens	A19LS
A19LS	Distribution Automation - Line Sens	A19LS
A19LS	Distribution Automation - Line Sens	A19LS
A19LS	Distribution Automation - Line Sens	A19LS
A19TDA	Distribution Automation - Telecom	A19TDA
A19XDA	Distribution Automation - Substatio	A19XDA
A19XDA	Distribution Automation - Substatio	A19XDA
A20DA	DISTRIBUTION AUTOMATION POLE TOP	A20DA
A20DA	DISTRIBUTION AUTOMATION POLE TOP	A20DA
A20DA	DISTRIBUTION AUTOMATION POLE TOP	A20DA
A20DA	DISTRIBUTION AUTOMATION POLE TOP	A20DA

A20DA	DISTRIBUTION AUTOMATION POLE TOP	A20DA
A20LS	DISTRIBUTION AUTOMATION LINE SENSOR	A20LS
A20LS	DISTRIBUTION AUTOMATION LINE SENSOR	A20LS
A20LS	DISTRIBUTION AUTOMATION LINE SENSOR	A20LS
A20TDA	DISTRIBUTION AUTOMATION TELECOM	A20TDA
A20XDA	DISTRIBUTION AUTOMATION SUBSTATION	A20XDA
A21DA	DISTRIBUTION AUTOMATION POLE TOP	A21DA
A21DA	DISTRIBUTION AUTOMATION POLE TOP	A21DA
A21DA	DISTRIBUTION AUTOMATION POLE TOP	A21DA
A21DA	DISTRIBUTION AUTOMATION POLE TOP	A21DA
A21LS	DISTRIBUTION AUTOMATION LINE SENSOR	A21LS
A21LS	DISTRIBUTION AUTOMATION LINE SENSOR	A21LS
A21LS	DISTRIBUTION AUTOMATION LINE SENSOR	A21LS
A21LS	DISTRIBUTION AUTOMATION LINE SENSOR	A21LS
A21TDA	DISTRIBUTION AUTOMATION TELECOM	A21TDA
A21XDA	DISTRIBUTION AUTOMATION SUBSTATION	A21XDA
A22LS	2022 Distr Automation - Line Sensor	A22LS
A22LS	2022 Distr Automation - Line Sensor	A22LS
A22LS	2022 Distr Automation - Line Sensor	A22LS
A22TDA	DISTRIBUTION AUTOMATION TELECOM	A22TDA
A22XDA	DISTRIBUTION AUTOMATION SUBSTATION	A22XDA
A23DA	2023 Distr Automation - Pole Top	A23DA
A23DA	2023 Distr Automation - Pole Top	A23DA
A23LS	Distr Automation - Line Sensors	A23LS
A23LS	Distr Automation - Line Sensors	A23LS
A23X26	SCADA Reclosers at DG Sites	A23X26
A23XDA	2023 Distribution Automation - SS	A23XDA
UB1412	2014 DA DEPLOYMENT	UB1412
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A07X45	REJECT POLE REPLACEMENT	A07X45
A08X45	REPLACE STEEL TOWERS	A08X45
A08X45	REPLACE STEEL TOWERS	A08X45
A08X45	REPLACE STEEL TOWERS	A08X45
A08X45	REPLACE STEEL TOWERS	A08X45
A12W05	REPL LACONIA UNDRGRD SWITCHGEAR 70W	A12W05
A14CRL	Northern COOS Reliability Loop	A14CRL
A14S14	3818 NEW 34.5KV LINE 1.6 MI ON RTE	A14S14
A16C02	12H4 West Side Conversion	A16C02
A16C06	324 LINE, REBUILD AT INDUSTRIAL AVE	A16C06
A16C06	324 LINE, REBUILD AT INDUSTRIAL AVE	A16C06
A16N01	11W1 - Replace Submarine Cable	A16N01
A16N01	11W1 - Replace Submarine Cable	A16N01

A16N01	11W1 - Replace Submarine Cable	A16N01
A16N01	11W1 - Replace Submarine Cable	A16N01
A16X02	Circuit Tie 3271x2/311x1	A16X02
A16X04	CAIDI IMPROVEMENT	A16X04
A16X04	CAIDI IMPROVEMENT	A16X04
A16X04	CAIDI IMPROVEMENT	A16X04
A16X04	CAIDI IMPROVEMENT	A16X04
A17C10	BROOK ST REPLACE G&W SWITCHGEAR	A17C10
A17C10	BROOK ST REPLACE G&W SWITCHGEAR	A17C10
A17C10	BROOK ST REPLACE G&W SWITCHGEAR	A17C10
A17C10	BROOK ST REPLACE G&W SWITCHGEAR	A17C10
A17C12	3.74 PRI VOLT CONV NAVIGATOR RD	A17C12
A17C12	3.74 PRI VOLT CONV NAVIGATOR RD	A17C12
A17C13	BLAINE ST SUBSTATION LINE WORK	A17C13
A17C13	BLAINE ST SUBSTATION LINE WORK	A17C13
A17C17	CIRCUIT TIE 3115X12 TO 3615X1	A17C17
A17C17	CIRCUIT TIE 3115X12 TO 3615X1	A17C17
A17C17	CIRCUIT TIE 3115X12 TO 3615X1	A17C17
A17C26	328 LINE RECONDUCTOR	A17C26
A17C26	328 LINE RECONDUCTOR	A17C26
A17C26	328 LINE RECONDUCTOR	A17C26
A17C26	328 LINE RECONDUCTOR	A17C26
A17C26	328 LINE RECONDUCTOR	A17C26
A17E16	380 LINE BETTERMENT	A17E16
A18X18	ROW Hardening/Reconductoring	A18X18
A18X18	ROW Hardening/Reconductoring	A18X18
A18X20	CAIDI IMPROVEMENTS	A18X20
A19C05	Reconductor copper St Anselm Drive	A19C05
A19C05	Reconductor copper St Anselm Drive	A19C05
A19C05	Reconductor copper St Anselm Drive	A19C05
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E07	Downtown Portsmouth UG System Impro	A19E07
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E11	Circuit Ties-Wakefield 362 to 3157	A19E11
A19E52	DOVER UNDERGROUND BACKFEED RELOCATI	A19E52
A19E52	DOVER UNDERGROUND BACKFEED RELOCATI	A19E52

A19E52	DOVER UNDERGROUND BACKFEED RELOCATI	A19E52
A19E52	DOVER UNDERGROUND BACKFEED RELOCATI	A19E52
A19N09	Relocate 1W1 Main Line onto Route 3	A19N09
A19N09	Relocate 1W1 Main Line onto Route 3	A19N09
A19N09	Relocate 1W1 Main Line onto Route 3	A19N09
A19N09	Relocate 1W1 Main Line onto Route 3	A19N09
A19N12	Circuit Ties - Laconia 310 to 345	A19N12
A19N12	Circuit Ties - Laconia 310 to 345	A19N12
A19N12	Circuit Ties - Laconia 310 to 345	A19N12
A19N12	Circuit Ties - Laconia 310 to 345	A19N12
A19N12	Circuit Ties - Laconia 310 to 345	A19N12
A19N50	346X1 DEFECTIVE SPCA REPLACEMENT	A19N50
A19N50	346X1 DEFECTIVE SPCA REPLACEMENT	A19N50
A19S04	Reconductor #6 Copper @ Fordway Ext	A19S04
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S06	Replace Conductor Route 13 Amherst	A19S06
A19S08	Relocate 3168X Bridge St S/S	A19S08
A19S08	Relocate 3168X Bridge St S/S	A19S08
A19S08	Relocate 3168X Bridge St S/S	A19S08
A19S27	Relocate 314 Line around Heron Pond	A19S27
A19S27	Relocate 314 Line around Heron Pond	A19S27
A19S27	Relocate 314 Line around Heron Pond	A19S27
A19W03	Repl open wire w/ Spacer cble Rt 63	A19W03
A19W03	Repl open wire w/ Spacer cble Rt 63	A19W03
A19W03	Repl open wire w/ Spacer cble Rt 63	A19W03
A19W03	Repl open wire w/ Spacer cble Rt 63	A19W03
A19W10	Relocate feed to Hinsdale Wastewat	A19W10
A19W10	Relocate feed to Hinsdale Wastewat	A19W10
A19W10	Relocate feed to Hinsdale Wastewat	A19W10
A19W10	Relocate feed to Hinsdale Wastewat	A19W10
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W49	DIST LINE WORK FOR MONADNOCK SS REB	A19W49
A19W56	317 Line Reconstruction	A19W56
A19W56	317 Line Reconstruction	A19W56
A19X20	Replace Lattice Steel Towers	A19X20
A19X20	Replace Lattice Steel Towers	A19X20

A19X20	Replace Lattice Steel Towers	A19X20
A19X20	Replace Lattice Steel Towers	A19X20
A19X20	Replace Lattice Steel Towers	A19X20
A19X20	Replace Lattice Steel Towers	A19X20
A19X58	Replace Lattice Steel Towers	A19X58
A19X58	Replace Lattice Steel Towers	A19X58
A20C46	317 Line ROW section rebuild	A20C46
A20C46	317 Line ROW section rebuild	A20C46
A20C46	317 Line ROW section rebuild	A20C46
A20C46	317 Line ROW Section Rebuild	A20C46
A20N05	Reconductor Strafford St in Lacona	A20N05
A20N10	Relo 3200' main li fr ROW to roadsi	A20N10
A20N11	Voltage Conversion Lost Nation Rd a	A20N11
A20N15	43W1 (13W1) Construct Circuit Tie	A20N15
A20N15	43W1 (13W1) Construct Circuit Tie	A20N15
A20N15	43W1 (13W1) Construct Circuit Tie	A20N15
A20N15	43W1 (13W1) Construct Circuit Tie	A20N15
A20S02	Millyard SS Distribution Line Work	A20S02
A20S02	Millyard SS Distribution Line Work	A20S02
A20S02	Millyard SS Distribution Line Work	A20S02
A20S02	Millyard SS Distribution Line Work	A20S02
A20S02	Millyard SS Distribution Line Work	A20S02
A20S02	Millyard SS Distribution Line Work	A20S02
A20S06	3159X Extend 3 Phase Boston Post Rd	A20S06
A20S06	3159X Extend 3 Phase Boston Post Rd	A20S06
A20S06	3159X Extend 3 Phase Boston Post Rd	A20S06
A20S12	Replace 3891X cable along railroad t	A20S12
A20S12	Replace 3891X cable along railroad t	A20S12
A20S12	Replace 3891X cable along railroad t	A20S12
A20S12	Replace 3891X cable along railroad t	A20S12
A20S12	Replace 3891X cable along railroad t	A20S12
A20W07	Mason Rd Relo 1500' main li to road	A20W07
A20W07	Mason Rd Relo 1500' main li to road	A20W07
A20W07	Mason Rd Relo 1500' main li to road	A20W07
A20W07	Mason Rd Relo 1500' main li to road	A20W07
A20W08	3155X6 feed from the 3155X9	A20W08
A20W08	3155X6 feed from the 3155X9	A20W08
A20W08	3155X6 feed from the 3155X9	A20W08
A20W08	3155X6 feed from the 3155X9	A20W08
A20W09	Rte 9 Relo 2800' main li to roadsid	A20W09
A20W09	Rte 9 Relo 2800' main li to roadsid	A20W09
A20W09	Rte 9 Relo 2800' main li to roadsid	A20W09
A20W09	Rte 9 Relo 2800' main li to roadsid	A20W09
A20W13	3410 and 315 Circuit Tie	A20W13
A20W13	3410 and 315 Circuit Tie	A20W13

A20W13	3410 and 315 Circuit Tie	A20W13
A20W13	3410 and 315 Circuit Tie	A20W13
A20W14	24X1 and 313X1 Circuit Tie	A20W14
A20W14	24X1 and 313X1 Circuit Tie	A20W14
A20W14	24X1 and 313X1 Circuit Tie	A20W14
A20W14	24X1 and 313X1 Circuit Tie	A20W14
A20W18	317/3410 RECON BRADFORD TO WARNER	A20W18
A20W18	317/3410 RECON BRADFORD TO WARNER	A20W18
A20W18	317/3410 RECON BRADFORD TO WARNER	A20W18
A20W18	317/3410 RECON BRADFORD TO WARNER	A20W18
A20X38	2020 CIRCUIT PATROL REPAIRS	A20X38
A20X38	2020 CIRCUIT PATROL REPAIRS	A20X38
A20X38	2020 CIRCUIT PATROL REPAIRS	A20X38
A20X38	2020 CIRCUIT PATROL REPAIRS	A20X38
A21C05	RECONDUCTOR ACADEMY RD PEMBROKE SPA	A21C05
A21C07	MALVERN VALLEY HANOVER CIRCUIT TIE	A21C07
A21C07	MALVERN VALLEY HANOVER CIRCUIT TIE	A21C07
A21C07	MALVERN VALLEY HANOVER CIRCUIT TIE	A21C07
A21C11	CIRCUIT TIE 14X188 TO 3248	A21C11
A21C11	CIRCUIT TIE 14X188 TO 3248	A21C11
A21C11	CIRCUIT TIE 14X188 TO 3248	A21C11
A21C74	LINE M164 LAMINATED WOOD SYS STR REPL	A21C74
A21C74	LINE M164 LAMINATED WOOD SYS STR REPL	A21C74
A21C91	393 LINE ROW SECTION REBUILD	A21C91
A21C91	393 LINE ROW SECTION REBUILD	A21C91
A21C91	393 LINE ROW SECTION REBUILD	A21C91
A21C91	393 LINE ROW SECTION REBUILD	A21C91
A21E08	CIRCUIT TIE 3191X1B TO 377X2	A21E08
A21E08	CIRCUIT TIE 3191X1B TO 377X2	A21E08
A21E08	CIRCUIT TIE 3191X1B TO 377X2	A21E08
A21E08	CIRCUIT TIE 3191X1B TO 377X2	A21E08
A21E09	CIRCUIT TIE 3191X3 TO 3191X	A21E09
A21E09	CIRCUIT TIE 3191X3 TO 3191X	A21E09
A21E09	CIRCUIT TIE 3191X3 TO 3191X	A21E09
A21E09	CIRCUIT TIE 3191X3 TO 3191X	A21E09
A21E92	3174X4 ROUTE 11 OFF ROAD SHUNT	A21E92
A21E92	3174X4 ROUTE 11 OFF ROAD SHUNT	A21E92
A21RPR	ROADSIDE REJECT POLE REPLACEMENT	A21RPR
A21RPR	ROADSIDE REJECT POLE REPLACEMENT	A21RPR
A21RPR	ROADSIDE REJECT POLE REPLACEMENT	A21RPR
A21RPR	Roadside Reject Pole Replacement	A21RPR
A21S06	CONSTRUCT NEW FEED FOR RTE 122	A21S06
A21S06	CONSTRUCT NEW FEED FOR RTE 122	A21S06
A21S06	CONSTRUCT NEW FEED FOR RTE 122	A21S06
A21S06	CONSTRUCT NEW FEED FOR RTE 122	A21S06
A21X79	2021 WOOD POLE TREATMENT	A21X79
A21X79	2021 WOOD POLE TREATMENT	A21X79

A21X79	2021 WOOD POLE TREATMENT	A21X79
A21X93	2021 CIRCUIT PATROL REPAIRS PHASE 2	A21X93
A21X93	2021 CIRCUIT PATROL REPAIRS PHASE 2	A21X93
A21X93	2021 CIRCUIT PATROL REPAIRS PHASE 2	A21X93
A21X95	Mobile Utility & Mobile Pole Assemb	A21X95
A21X95	Mobile Utility & Mobile Pole Assemb	A21X95
A22C03	GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	A22C03
A22C03	GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	A22C03
A22DA	2022 POLE TOP DISTRIBUTION AUTOMATN	A22DA
A22E18	NORTH DOVER AUTOMATED SWITCHES	A22E18
A22E22	15W4 RUSSELL ST SWITCHGEAR PORTSMTH	A22E22
A22E45	386 Line Distribution Underbuild	A22E45
A22E47	3148X3 REMOVAL - NORTH DOVER	A22E47
A22E56	32 Line Pole Replacement	A22E56
A22E56	32 Line Pole Replacement	A22E56
A22E57	371 Line Pole Replacements	A22E57
A22E57	371 Line Pole Replacements	A22E57
A22N60	355 Line Emergent Str Replacement	A22N60
A22N71	355 Line Pole Replacement	A22N71
A22N71	355 Line Pole Replacement	A22N71
A22N71	355 Line Pole Replacement	A22N71
A22RPR	2022 Roadside Reject Pole Repl	A22RPR
A22RPR	2022 Roadside Reject Pole Repl	A22RPR
A22RPR	2022 Roadside Reject Pole Repl	A22RPR
A22S09	3154X2 - 377X1 CIRCUIT TIE	A22S09
A22S09	3154X2 - 377X1 CIRCUIT TIE	A22S09
A22S09	3154X2 - 377X1 CIRCUIT TIE	A22S09
A22S10	3217X ROCKY POND RD BACKFEED	A22S10
A22S10	3217X ROCKY POND RD BACKFEED	A22S10
A22S10	3217X ROCKY POND RD BACKFEED	A22S10
A22S50	GRIFFIN ROAD CONVERSION LONDONDERRY	A22S50
A22S50	GRIFFIN ROAD CONVERSION LONDONDERRY	A22S50
A22S64	389X8 Line Relocation	A22S64
A22S64	389X8 Line Relocation	A22S64
A22W02	3120X2 RT 119 CONVERSION	A22W02
A22W02	3120X2 RT 119 CONVERSION	A22W02
A22W02	3120X2 RT 119 CONVERSION	A22W02
A22W02	3120X2 RT 119 CONVERSION	A22W02
A22W07	3140X2 WASHINGTON RD SPACER CABLE	A22W07
A22W07	3140X2 WASHINGTON RD SPACER CABLE	A22W07
A22W07	3140X2 WASHINGTON RD SPACER CABLE	A22W07
A22W07	3140X2 WASHINGTON RD SPACER CABLE	A22W07
A22W08	3139X SPOFFORD RD RECONDUCTOR	A22W08
A22W08	3139X SPOFFORD RD RECONDUCTOR	A22W08
A22W08	3139X SPOFFORD RD RECONDUCTOR	A22W08
A22W26	317/3410 reconstr Roby Rd to Warner	A22W26
A22W26	317/3410 reconstr Roby Rd to Warner	A22W26

A22W26	317/3410 reconstr Roby Rd to Warner	A22W26
A22W26	317/3410 reconstr Roby Rd to Warner	A22W26
A22W63	313X1 Riverview UG Replacement	A22W63
A22W63	313X1 Riverview UG Replacement	A22W63
A22W68	3140X Stoddard Rebuild	A22W68
A22W68	3140X Stoddard Rebuild	A22W68
A22X17	2022 WOOD POLE TREATMENT	A22X17
A22X17	2022 WOOD POLE TREATMENT	A22X17
A22X17	2022 WOOD POLE TREATMENT	A22X17
A23C24	Hampshire Plaza UG Reconfiguration	A23C24
A23CCI	CCI Reject Pole Replacement	A23CCI
A23E11	399X15 Mcintosh Commons	A23E11
A23E11	399X15 Mcintosh Commons	A23E11
A23E12	392X1-392X2 Circuit Tie	A23E12
A23E12	392X1-392X2 Circuit Tie	A23E12
A23E15	3112X1 Reconductor	A23E15
A23E15	3112X1 Reconductor	A23E15
A23E16	3137X1-377X3 Circuit Tie	A23E16
A23E16	3137X1-377X3 Circuit Tie	A23E16
A23E25	North Dover 4kV Conversion	A23E25
A23E25	North Dover 4kV Conversion	A23E25
A23N10	355X10 Line Extension	A23N10
A23N31	338 Line Reconstruction	A23N31
A23N34	355 Line Reconstruction	A23N34
A23N37	31W2 Transformer Repl	A23N37
A23N49	3025 Line Structure Replacement	A23N49
A23N52	319 Line Structure Repl Bear Hill	A23N52
A23RPR	Roadside Reject Pole Replacement 2023	A23RPR
A23RPR	Roadside Reject Pole Replacement 2023	A23RPR
A23S18	3891 UG Cable Replacement	A23S18
A23W01	3155X Install Padmounted Step Xfmr	A23W01
A23W17	42X3-316X1 Circuit Tie Ph 1	A23W17
A23W17	42X3-316X1 Circuit Tie Ph 1	A23W17
A23W29	317 Roadway Rebuild	A23W29
A23W29	317 Roadway Rebuild	A23W29
A23W30	317 / 3410 Removal	A23W30
A23W32	313 Line Lattice Tower Repl	A23W32
A23W33	3178 Line - Lattice Tower Repl	A23W33
A23W48	3139X-3178 Circuit Tie	A23W48
A23X22	Replace Degraded Manholes	A23X22
A23X28	2023 Wood Pole Treatment	A23X28
A23X28	2023 Wood Pole Treatment	A23X28
A23X41	2023 Semi-annual Circuit Patrol	A23X41
A24C35	322 Line Pole Repl	A24C35
A24C36	3151 Line Pole Replacement	A24C36
DL9R	DIST LINE ROW PROGRAM	DL9R
DL9R	DIST LINE ROW PROGRAM	DL9R

DR9R	Reliability Improvements Annual	DR9N
DR9R	Reliability Improvements Annual	DR9P
DR9R	Reliability Improvements Annual	DR9P
DR9R	Reliability Improvements Annual	DR9P
DR9R	Reliability Improvements Annual	DR9P
DR9R	Reliability Improvements Annual	DR9P
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9R
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9S
DR9R	Reliability Improvements Annual	DR9W
DR9R	Reliability Improvements Annual	DR9W
DR9R	Reliability Improvements Annual	DR9W
DR9R	Reliability Improvements Annual	DR9W
DR9R	Reliability Improvements Annual	DR9W
DR9R	Reliability Improvements Annual	DR9Y
DR9R	Reliability Improvements Annual	DR9Y
DR9R	Reliability Improvements Annual	DR9Y
DR9R	Reliability Improvements Annual	DR9Y
DR9R	Reliability Improvements Annual	DR9Y
DR9R	Reliability Improvements Annual	DR9Z
DR9R	Reliability Improvements Annual	DR9Z
DR9R	Reliability Improvements Annual	DR9Z
DR9R	Reliability Improvements Annual	DR9Z
UB1313	CONSTRUCT NEW CIRCUIT-BRISTOL S/S	UB1313
UB3CAD	Porcelain Change-out	UB3CAD
UB3CAD	Porcelain Change-out	UB3CAD
UB3CAD	Porcelain Change-out	UB3CAD
UB3CAD	Porcelain Change-out	UB3CAD
A03S13	REPLACE VAULT TOPS	A03S13
A08W49	KEENE DOWNTOWN UG REPLACEMENT PROJ	A08W49
A08W49	KEENE DOWNTOWN UG REPLACEMENT PROJ	A08W49
A08W49	KEENE DOWNTOWN UG REPLACEMENT PROJ	A08W49
A08W49	KEENE DOWNTOWN UG REPLACEMENT PROJ	A08W49
A08W49	KEENE DOWNTOWN UG REPLACEMENT PROJ	A08W49
A18X01	DIRECT BURIED CABLE REPLACEMENT	A18X01

A18X01	DIRECT BURIED CABLE REPLACEMENT	A18X01
A18X01	DIRECT BURIED CABLE REPLACEMENT	A18X01
A19X01	Replace Degraded Manholes	A19X01
A19X01	Replace Degraded Manholes	A19X01
A19X01	Replace Degraded Manholes	A19X01
A20C40	MANCHESTER NETWORK CABLE REPLACEMENT	A20C40
A20C40	MANCHESTER NETWORK CABLE REPLACEMENT	A20C40
A20C40	MANCHESTER NETWORK CABLE REPLACEMENT	A20C40
A20C40	MANCHESTER NETWORK CABLE REPLACEMENT	A20C40
A20C40	MANCHESTER NETWORK CABLE REPLACEMENT	A20C40
A20E47	CODFISH CORNER ROAD LOOP	A20E47
A20E47	CODFISH CORNER ROAD LOOP	A20E47
A20E47	CODFISH CORNER ROAD LOOP	A20E47
A20N01	Rebuild Berlin UG system	A20N01
A20N01	Rebuild Berlin UG system	A20N01
A20N01	Rebuild Berlin UG system	A20N01
A20N01	Rebuild Berlin UG system	A20N01
A21E94	TIDEWATER FARM URD LOOP	A21E94
A21E94	TIDEWATER FARM URD LOOP	A21E94
A21W99	Monadnock Trailer Park Underground	A21W99
A21W99	Monadnock Trailer Park Underground	A21W99
A14W18	N KEENE S/S NEW DIST CIRC	A14W18
A16S02	RECON LINES 3110, 353, 3445X	A16S02
A20W33	PACK MONADNOCK SUMMIT SOLUTION	A20W33
A20W33	PACK MONADNOCK SUMMIT SOLUTION	A20W33
A20W33	PACK MONADNOCK SUMMIT SOLUTION	A20W33
A21C01	REPLACE DEGRADED MANHOLE ROOFS	A21C01
A21C01	REPLACE DEGRADED MANHOLE ROOFS	A21C01
A21E87	49W1 TIMCO ROW TAP REMOVAL	A21E87
A21E87	49W1 TIMCO ROW TAP REMOVAL	A21E87
A14N10	SOMERSWORTH 34.5 KV OCB REPLACEMENT	A14N10
A16C10	JACKMAN - REPLACE OBSOLETE EQUIPMENT	A16C10
A16C10	JACKMAN - REPLACE OBSOLETE EQUIPMENT	A16C10
A16C10	JACKMAN - REPLACE OBSOLETE EQUIPMENT	A16C10
A16C10	JACKMAN - REPLACE OBSOLETE EQUIPMENT	A16C10
A16C10	JACKMAN - REPLACE OBSOLETE EQUIPMENT	A16C10
A17N18	LACONIA SS EQUIPMENT REPLACEMENT	A17N18
A17N18	LACONIA SS EQUIPMENT REPLACEMENT	A17N18
A17N18	LACONIA SS EQUIPMENT REPLACEMENT	A17N18
A17N18	LACONIA SS EQUIPMENT REPLACEMENT	A17N18
A17N18	LACONIA SS EQUIPMENT REPLACEMENT	A17N18
A17N24	LACONIA SS 24 VDC CNTRL SYS & RELAY	A17N24
A19S40	AMHERST S/S - PLC AUTOMATION REPLACEMENT	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLACEMENT	A19S40
A19W55	JACKMAN SS LTC CONTROL REPLACEMENT	A19W55
A19W55	JACKMAN SS LTC CONTROL REPLACEMENT	A19W55
A19W55	JACKMAN SS LTC CONTROL REPLACEMENT	A19W55

A19X35	CAPACITOR SWITCH REPLACEMENTS	A19X35
A19X351	LONG HILL SS 34.5kv CAP BANK SWITCH	A19X351
A19X351	LONG HILL SS 34.5kv CAP BANK SWITCH	A19X351
A19X351	LONG HILL SS 34.5kv CAP BANK SWITCH	A19X351
A19X351	LONG HILL SS 34.5kv CAP BANK SWITCH	A19X351
A20W37	RIVER ROAD SS UPGRADES	A20W37
A20W37	RIVER ROAD SS UPGRADES	A20W37
A20X36	GARVINS S/S OCB REPLACEMENT	A20X36
A21C14	GARVINS SS OCB REPLACEMENT	A21C14
A21C14	GARVINS SS OCB REPLACEMENT	A21C14
A21C76	DUNBARTON RD SS EQUIP REPLACMNT	A21C76
A21C76	DUNBARTON RD SS EQUIP REPLACMNT	A21C76
A21C76	DUNBARTON RD SS EQUIP REPLACMNT	A21C76
A21E16	REPLACE ROCHESTER SS BUS TIE AUTOCL	A21E16
A21E16	REPLACE ROCHESTER SS BUS TIE AUTOCL	A21E16
A21E16	REPLACE ROCHESTER SS BUS TIE AUTOCL	A21E16
A21E16	REPLACE ROCHESTER SS BUS TIE AUTOCL	A21E16
A21E16	REPLACE ROCHESTER SS BUS TIE AUTOCL	A21E16
A21N45	ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	A21N45
A21N45	ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	A21N45
A21N77	SACO VALLEY 34.5kv OCB REPLACE	A21N77
A21N96	BEEBE RIVER SS TB70 REMOVAL	A21N96
A21N96	BEEBE RIVER SS TB70 REMOVAL	A21N96
A21S17	34.5kv CAP BANK SWTCH REP BROAD ST	A21S17
A21S17	34.5kv CAP BANK SWTCH REP BROAD ST	A21S17
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A21X15	REPLACE 5 ABB TPU-2000R RELAYS	A21X15
A22C52	Contoocook SS Oil Recloser Replacement	A22C52
A22C77	Mammoth Rd SS TPU Relay Repl	A22C77
A22C77	Mammoth Rd SS TPU Relay Repl	A22C77
A22E41	RESISTANCE SS RETIREMENT	A22E41
A22E41	RESISTANCE SS RETIREMENT	A22E41
A22E41	RESISTANCE SS RETIREMENT	A22E41
A22E76	Tasker Farm SS TPU Relay Replacement	A22E76
A22E76	Tasker Farm SS TPU Relay Replacement	A22E76
A22E76	Tasker Farm SS TPU Relay Replacement	A22E76
A22N51	Colebrook SS Oil Recloser Replacement	A22N51
A22X42	SS OIL RECLOSER REPL PROGRAM	A22X42
A22X42	SS OIL RECLOSER REPL PROGRAM	A22X42
A23E35	Great Bay PLC Automation Scheme	A23E35
UB1325	RE-FEED 20H1 & RETIRE LISBON S/S	UB1325
A17C30	Pack Monadnock Rbl Single-Phase Li	A17C30
A17C30	Pack Monadnock Rbl Single-Phase Li	A17C30
A17C30	Pack Monadnock Rbl Single-Phase Li	A17C30

A17C30	Pack Monadnock RblD Single-Phase Li	A17C30
A17C30	Pack Monadnock RblD Single-Phase Li	A17C30
A17C30	PACK MONADNOCK RBLD SINGLE-PHASE LI	A17C30
A18E12	CIRCUIT TIES 3172X1 - 3112X3	A18E12
A18E12	CIRCUIT TIES 3172X1 - 3112X3	A18E12
A18E12	CIRCUIT TIES 3172X1 - 3112X3	A18E12
A18W10	55H1 PETERBOROUGH URD	A18W10
A18W11	316X1 CIRCUIT TIE EASTMAN DEVELOPME	A18W11
A18W11	316X1 CIRCUIT TIE EASTMAN DEVELOPME	A18W11
A18W11	316X1 CIRCUIT TIE EASTMAN DEVELOPME	A18W11
A18W17	EMERALD ST LINE WORK	A18W17
A18W17	EMERALD ST LINE WORK	A18W17
A18W17	EMERALD ST LINE WORK	A18W17
A18W17	EMERALD ST LINE WORK	A18W17
A18X28	44 & 60 WEST PENN TELECOM	A18X28
A18X28	44 & 60 WEST PENN TELECOM	A18X28
A18X28	44 & 60 WEST PENN TELECOM	A18X28
A18XDA	Distribution Automation - Substatio	A18XDA
A18XDA	Distribution Automation - Substatio	A18XDA
A19C54	Pettingill Switchgear Reconfigurati	A19C54
A19C54	Pettingill Switchgear Reconfigurati	A19C54
A19X28	Advanced Load Flow Software	A19X28
A19X29	NH DMS Pilot Phase 2	A19X29
A19X32	NH Lateral Initiative	A19X32
A19X32	NH Lateral Initiative	A19X32
A19X32	NH Lateral Initiative	A19X32
A21S17	34.5kV CAP BANK SWTCH REP BROAD ST	A21S17
A21S17	34.5kV CAP BANK SWTCH REP BROAD ST	A21S17
A21S17	34.5kV CAP BANK SWTCH REP BROAD ST	A21S17
A21W36	REMOVE LATTICE STEEL TOWERS W15	A21W36
A21X44	2021 CIRCUIT PATROL REPAIRS	A21X44
A21X44	2021 CIRCUIT PATROL REPAIRS	A21X44
A21X44	2021 CIRCUIT PATROL REPAIRS	A21X44
A22C61	323 Line Underbuild Re-attachment	A22C61
A22C85	317 Line ROW section rebuild	A22C85
A22C85	317 Line ROW Section Rebuild	A22C85
A22E56	32 Line Pole Replacement	A22E56
A22E57	371 Line Pole Replacements	A22E57
A22W33	Remove Lattice Steel Towers – W15	A22W33
A22X35	2022 CIRCUIT PATROL REPAIRS	A22X35
A22X35	2022 CIRCUIT PATROL REPAIRS	A22X35
A22X67	NH Cutout Installation 2022	A22X67
A22X67	NH Cutout Installation 2022	A22X67
A22X74	2022 TripSaver Initiative	A22X74
A22X74	2022 TripSaver Initiative	A22X74
A23C60	SMART Inspect Reliability Upgrades Central Region	A23C60
A23N59	SMART Inspect Reliability Northern	A23N59

A23W55	SMART Inspect Reliability Western	A23W55
A23X02	2023 DB Fault Indicator Repl	A23X02
A23X02	2023 DB Fault Indicator Repl	A23X02
A23X45	2023 Trip Saver Program Phase 1	A23X45
A23X51	TripSaver Program 2023 Phase 2	A23X51
A24X25	2024 NH URD Inspections	A24X25
D1328AH	Distribution Design P134 Line	D1328AH
D1328AH	Distribution Design P134 Line	D1328AH
D1328I	Distribution Design Y138 Line	D1328I
D1328I	Distribution Design Y138 Line	D1328I
DPMNHAMP	UCONN Damage Prediction Model Expan	DPMNHAMP
A07X44A	34.5KV BREAKER REPL PROGRAM	A07X44A
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A08N10	Portsmouth S/S - add transformer	A08N10
A12X01	SUBSTATION BATTERY REPLACEMENT	A12X01
A12X01	Substation Battery Replacement	A12X01
A12X02	SUBSTATION GROUND GRID UPGRADES	A12X02
A12X02	SUBSTATION GROUND GRID UPGRADES	A12X02
A12X02	SUBSTATION GROUND GRID UPGRADES	A12X02
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14N08	GORHAM SS-GENERATION DIVESTITURE	A14N08
A14S08	GARVINS SUBSTATION REBUILD	A14S08
A14S08	GARVINS SUBSTATION REBUILD	A14S08
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W01	EMERALD STREET SUBSTATION	A14W01
A14W02	DANIEL SS (WEBSTER)-34.5KV SS UPGRD	A14W02
A14W02	DANIEL SS (WEBSTER)-34.5KV SS UPGRD	A14W02
A14W02	DANIEL SS (WEBSTER)-34.5KV SS UPGRD	A14W02
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08

A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C08	Brook St S/S - 13TR1 Replacement	A16C08
A16C09	Blaine St SS add 34.5-12kV 10MVA tr	A16C09
A16C09	Blaine St SS add 34.5-12kV 10MVA tr	A16C09
A16E06	West Rye S/S Re-build	A16E06
A16E06	West Rye S/S Re-build	A16E06
A16N02	Second transformer at Lost Nation S	A16N02
A16N02	Second transformer at Lost Nation S	A16N02
A16N02	Second transformer at Lost Nation S	A16N02
A16N02	Second transformer at Lost Nation S	A16N02
A16N02	Second transformer at Lost Nation S	A16N02
A16S01	PLC AUTOMATION SCHEME REPLACEMENT	A16S01
A16S01	PLC AUTOMATION SCHEME REPLACEMENT	A16S01
A16S01	PLC AUTOMATION SCHEME REPLACEMENT	A16S01
A16S01	PLC AUTOMATION SCHEME REPLACEMENT	A16S01
A16S01	PLC AUTOMATION SCHEME REPLACEMENT	A16S01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A16W01	CLAREMONT AREA SUBSTATION UPGRADES	A16W01
A17C04	GREGGS SS REBUILD SS	A17C04
A17C04	GREGGS SS REBUILD SS	A17C04
A17C04	GREGGS SS REBUILD SS	A17C04
A17C04	GREGGS SS REBUILD SS	A17C04
A17C21	PINE HILL SS PLC AUTO SCH REPLACE	A17C21
A17C21	PINE HILL SS PLC AUTO SCH REPLACE	A17C21
A17C21	PINE HILL SS PLC AUTO SCH REPLACE	A17C21
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E05	TWOMBLEY SS REBUILD	A17E05
A17E20	OCEAN RD SS 34.5KV OCB REPLACE	A17E20
A17E20	OCEAN RD SS 34.5KV OCB REPLACE	A17E20
A17E20	OCEAN RD SS 34.5KV OCB REPLACE	A17E20
A17N02	MESSER ST - REPLACE TB70	A17N02
A17N02	MESSER ST - REPLACE TB70	A17N02
A17N02	MESSER ST - REPLACE TB70	A17N02
A17N22	Beebe River SS Cap Switcher Replace	A17N22

A18N03	WHITE LAKE SS REBUILD	A18N03
A18N03	WHITE LAKE SS REBUILD	A18N03
A18N27	Laconia SS Replace LTC Controls	A18N27
A18N27	Laconia SS Replace LTC Controls	A18N27
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18W06	MONADNOCK SS REPLACE TRANSFRMR TB40	A18W06
A18X08	ELECTROMECHANICAL RELAY REPLACEMENT	A18X08
A18X08	ELECTROMECHANICAL RELAY REPLACEMENT	A18X08
A18X08	ELECTROMECHANICAL RELAY REPLACEMENT	A18X08
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A18X26	Mobile Substatn 46x34.5kV-12.47/7.2	A18X26
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19C33	Animal Protection at Rimmon SS	A19C33
A19E30	Retire Foyes Corner S/S 4kV	A19E30
A19E41	REPLACE LTC CONTROLS AT MADBURY SS	A19E41
A19E41	REPLACE LTC CONTROLS AT MADBURY SS	A19E41
A19E41	REPLACE LTC CONTROLS AT MADBURY SS	A19E41
A19E41	REPLACE LTC CONTROLS AT MADBURY SS	A19E41
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19S40	AMHERST S/S - PLC AUTOMATION REPLAC	A19S40
A19X22	Install animal protection	A19X22

A19X22	Install animal protection	A19X22
A19X22	Install animal protection	A19X22
A19X22	Install animal protection	A19X22
A19X220	Animal Protection at Tasker Farm SS	A19X220
A19X220	Animal Protection at Tasker Farm SS	A19X220
A19X220	Animal Protection at Tasker Farm SS	A19X220
A19X220	Animal Protection at Tasker Farm SS	A19X220
A19X221	Animal Protection at Thornton SS	A19X221
A19X222	ANIMAL PROTECTION AT AMHERST SS	A19X222
A19X222	ANIMAL PROTECTION AT AMHERST SS	A19X222
A19X223	ANIMAL PROTECTION AT VALLEY ST SS	A19X223
A19X223	ANIMAL PROTECTION AT VALLEY ST SS	A19X223
A19X223	ANIMAL PROTECTION AT VALLEY ST SS	A19X223
A19X23	2023 SS Animal Protection Program	A19X23
A19X36	34.5kV OCB BREAKER AND ANCILLARY EQ	A19X36
A19X36	34.5kV OCB BREAKER AND ANCILLARY EQ	A19X36
A19X36	34.5kV OCB BREAKER AND ANCILLARY EQ	A19X36
A19X3601	REEDS FERRY SS OCB REPLACEMENT	A19X3601
A19X3601	REEDS FERRY SS OCB REPLACEMENT	A19X3601
A19X3601	REEDS FERRY SS OCB REPLACEMENT	A19X3601
A19X3601	REEDS FERRY SS OCB REPLACEMENT	A19X3601
A19X3601	REEDS FERRY SS OCB REPLACEMENT	A19X3601
A19X61	HIGH IMPEDANCE GND FLT DETECT NH	A19X61
A19X61	HIGH IMPEDANCE GND FLT DETECT NH	A19X61
A19X61	HIGH IMPEDANCE GND FLT DETECT NH	A19X61
A19X61	HIGH IMPEDANCE GND FLT DETECT NH	A19X61
A20E43	East Northwood SS Regulator Replace	A20E43
A20E43	East Northwood SS Regulator Replace	A20E43
A20E43	East Northwood SS Regulator Replace	A20E43
A20N45	REPLACE CT TRNSF BERLIN ES SS	A20N45
A20N45	REPLACE CT TRNSF BERLIN ES SS	A20N45
A20W34	BYRD AVE SS UPGRADES	A20W34
A20W34	BYRD AVE SS UPGRADES	A20W34
A20W35	SPRING STREET SS UPGRADES	A20W35
A20W35	SPRING STREET SS UPGRADES	A20W35
A20W35	SPRING STREET SS UPGRADES	A20W35
A20W36	SUGAR RIVER SS UPGRADES	A20W36
A20W36	SUGAR RIVER SS UPGRADES	A20W36
A20W36	SUGAR RIVER SS UPGRADES	A20W36
A20W37	RIVER ROAD SS UPGRADES	A20W37
A20W37	RIVER ROAD SS UPGRADES	A20W37
A20W44	NEWPORT SS RECLOSER PROJECT	A20W44
A20W44	NEWPORT SS RECLOSER PROJECT	A20W44
A20W44	NEWPORT SS RECLOSER PROJECT	A20W44
A20X220	ANIMAL PROTECTION AT BEDFORD SS	A20X220
A20X220	ANIMAL PROTECTION AT BEDFORD SS	A20X220
A20X220	ANIMAL PROTECTION AT BEDFORD SS	A20X220

A20X221	ANIMAL PROTECTION AT MAMMOTH SS	A20X221
A20X221	ANIMAL PROTECTION AT MAMMOTH SS	A20X221
A20X222	ANIMAL PROTECTION AT WEARE SS	A20X222
A20X222	ANIMAL PROTECTION AT WEARE SS	A20X222
A20X223	ANIMAL PROTECTION TIMBER SWAMP SS	A20X223
A20X223	ANIMAL PROTECTION TIMBER SWAMP SS	A20X223
A20X223	ANIMAL PROTECTION TIMBER SWAMP SS	A20X223
A20X26	Spare 345-34.5kV Transformer	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X26	SPARE 345-34.5kV TRANSFORMER	A20X26
A20X351	BROAD ST CAP SWITTHHER REPL	A20X351
A20X361	GARVINS S/S OCB REPLACEMENT	A20X361
A20X39	NH T&D IEC 61850 SIMULATOR	A20X39
A20X39	NH T&D IEC 61850 SIMULATOR	A20X39
A20X39	NH T&D IEC 61850 SIMULATOR	A20X39
A20X39	NH T&D IEC 61850 SIMULATOR	A20X39
A20X42	GE L90 RELAYS MOD 14 REPLACE NH D	A20X42
A20X42	GE L90 RELAYS MOD 14 REPLACE NH D	A20X42
A20X42	GE L90 RELAYS MOD 14 REPLACE NH D	A20X42
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A21C04	GOFFSTOWN SS CONVERSION	A21C04
A21C59	GARVINS RELIABILITY PROJECT	A21C59
A21E41	Animal Protection Madbury SS	A21E41
A21E67	MADBURY RELIABILITY PROJECT	A21E67
A21E70	PORTSMOUTH 12KV RELIABILITY (CUTT S	A21E70
A21E70	PORTSMOUTH 12KV RELIABILITY (CUTT S	A21E70
A21E70	PORTSMOUTH 12KV RELIABILITY (CUTT S	A21E70
A21E70	PORTSMOUTH 12KV RELIABILITY (CUTT S	A21E70
A21E70L	Portsmouth 12kV Capacity (D Line)	A21E70L
A21E70L	Portsmouth 12kV Capacity (D Line)	A21E70L
A21E70L	Portsmouth 12kV Capacity (D Line)	A21E70L
A21N02	WEIRS SUBSTATION REBUILD	A21N02
A21N02	WEIRS SUBSTATION REBUILD	A21N02
A21N02	WEIRS SUBSTATION REBUILD	A21N02
A21N02	WEIRS SUBSTATION REBUILD	A21N02
A21N45	ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	A21N45
A21N45	ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	A21N45
A21N45	ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	A21N45
A21N55	ASHLAND RELIABILITY SS WORK	A21N55
A21N55	ASHLAND RELIABILITY SS WORK	A21N55
A21N55	ASHLAND RELIABILITY SS WORK	A21N55
A21N63	LACONIA SS RELIABILITY PROJECT	A21N63
A21N63	LACONIA SS RELIABILITY PROJECT	A21N63

A21N77	SACO VALLEY 34.5KV OCB REPLACE	A21N77
A21N86	Ashland SS Rel Proj - Line Work	A21N86
A21N86	Ashland SS Rel Proj - Line Work	A21N86
A21N86	Ashland SS Rel Proj - Line Work	A21N86
A21S39	ANIMAL PROTECTION AT CHESTER SS	A21S39
A21S39	ANIMAL PROTECTION AT CHESTER SS	A21S39
A21S39	ANIMAL PROTECTION AT CHESTER SS	A21S39
A21S58	DERRY RELIABILITY PROJECT	A21S58
A21S58	DERRY RELIABILITY PROJECT	A21S58
A21S64	LAWRENCE RD TRANSFORMER BREAKER	A21S64
A21S64	LAWRENCE RD TRANSFORMER BREAKER	A21S64
A21W49	SWANZEY SS CIRCUIT SWITCHER	A21W49
A21W49	SWANZEY SS CIRCUIT SWITCHER	A21W49
A21W49	SWANZEY SS CIRCUIT SWITCHER	A21W49
A21W69	North Road SS Reliability	A21W69
A21W69	North Road SS Reliability	A21W69
A21W69	North Road SS Reliability	A21W69
A21W75	N KEENE SS HIGH IMP GRND FAULT DET	A21W75
A21W75	N KEENE SS HIGH IMP GRND FAULT DET	A21W75
A21W75	N KEENE SS HIGH IMP GRND FAULT DET	A21W75
A21W80	SUGAR RIVER SS GMP TRANSFER TRIP	A21W80
A21W80	SUGAR RIVER SS GMP TRANSFER TRIP	A21W80
A21W80	SUGAR RIVER SS GMP TRANSFER TRIP	A21W80
A21W80	SUGAR RIVER SS GMP TRANSFER TRIP	A21W80
A21W80	SUGAR RIVER SS GMP TRANSFER TRIP	A21W80
A21X14	Gas Monitor Replacement Program	A21X14
A21X14	Gas Monitor Replacement Program	A21X14
A21X29	SUBSTATION RTU UPGRADE/REPLACE PROG	A21X29
A22E79	Animal Protection Brentwood SS	A22E79
A22N80	ANIMAL PROTECTION OAK HILL SS	A22N80
A22S81	Animal Protection Hudson SS	A22S81
A22S82	Animal Protection Reeds Ferry SS	A22S82
A22W78	Swanzy TB8S Xfmr SCADA Upgrade	A22W78
A22X38	BATTERY REPLACEMENT PROGRAM	A22X38
A22X38	BATTERY REPLACEMENT PROGRAM	A22X38
A22X38	BATTERY REPLACEMENT PROGRAM	A22X38
A22X48	SS Station Service Transformer Repl Program	A22X48
A23C39	Jackman Transformer TB61 Replacement	A23C39
A23C50	Brook Street Switchgear & Transformer Replacement	A23C50
D1249A	WEBSTR SS EXPN/CAP BNK SHRD ASTS-CE	D1249A
D1276A	Distribution Design for F107 Projec	D1276A
D1276A	Distribution Design for F107 Projec	D1276A
D1276A	Distribution Design for F107 Projec	D1276A
D1276A	Distribution Design for F107 Projec	D1276A
D1276A	Distribution Design for F107 Projec	D1276A
D1276A	Distribution Design for F107 Projec	D1276A
D1338A	DISTRIBUTION DESIGN L176 LINE REPLA	D1338A

D1338A	DISTRIBUTION DESIGN L176 LINE REPLA	D1338A
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD	DIST. S/S ANNUAL - DM	DS9RD
DS9RD1	DIST. S/S ANNUAL - DM	DS9RD1
DS9RD1	DIST. S/S ANNUAL - DM	DS9RD1
DS9RD1	DIST. S/S ANNUAL - DM	DS9RD1
DS9RD1	DIST. S/S ANNUAL - DM	DS9RD1
DS9RP	DIST S/S ANNUAL - P&C	DS9RP
DS9RP	DIST S/S ANNUAL - P&C	DS9RP
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS	SUBSTATION ANNUAL-SUBSTATION	DS9RS
DS9RS1	SUBSTATION ANNUAL-SUBSTATION	DS9RS1
DS9RS1	SUBSTATION ANNUAL-SUBSTATION	DS9RS1
DS9RS1	SUBSTATION ANNUAL-SUBSTATION	DS9RS1
DS9RS1	SUBSTATION ANNUAL-SUBSTATION	DS9RS1
DS9RS2	2022 NH D SS Planned Annual (Eng.)	DS9RS2
DS9RS2	2022 NH D SS Planned Annual (Eng.)	DS9RS2
DS9RS2	2022 NH D SS Planned Annual (Eng.)	DS9RS2
DS9RS3	2023 NH D SS Planned Annual (Eng)	DS9RS3
DS9RS3	2023 NH D SS Planned Annual (Eng)	DS9RS3
DSNP22	2022 NH D SS Planned Annual (Ops)	DSNP22
DSNP22	2022 NH D SS Planned Annual (Ops)	DSNP22
DSNP22	2022 NH D SS Planned Annual (Ops)	DSNP22
DSNP23	2023 NH D SS Planned Annual (Ops)	DSNP23
DSNP23	2023 NH D SS Planned Annual (Ops)	DSNP23
EMRELAY	Electromechanical Relay Replacement	EMRELAY
NS00002	BES BATTERY MONITOR INSTALL PROGRAM	NS00002
NS00002	BES BATTERY MONITOR INSTALL PROGRAM	NS00002
NS00002	BES BATTERY MONITOR INSTALL PROGRAM	NS00002
NS00002-1	BES Battery Monitoring Madbury SS	NS00002-1
NS00002-1	BES Battery Monitoring Madbury SS	NS00002-1
NS00002-10	BES Battery Monitor Ocean Rd SS	NS00002-10
NS00002-10	BES Battery Monitor Ocean Rd SS	NS00002-10
NS00002-3	BES Battery Monitor Installation	NS00002-3
NS00002-3	BES Battery Monitor Installation	NS00002-3

NS00002-4	BES Battery Monitor Lawrence Rd SS	NS00002-4
NS00002-4	BES Battery Monitor Lawrence Rd SS	NS00002-4
NS00002-8	BES Battery Monitor Oak Hill SS	NS00002-8
UB0830	CAPSWITCHER REPLACEMENT	UB0830
A20X21	NH DMS	A20X21
A20X21	NH DMS	A20X21
A21W53	316 LINE DAVIT ARM & STRUCTURE REPL	A21W53
A04S34	DIRECT BURIED CABLE REPLACEMENT	A04S34
A04S34	DIRECT BURIED CABLE REPLACEMENT	A04S34
A04S34	DIRECT BURIED CABLE REPLACEMENT	A04S34
A04S34	DIRECT BURIED CABLE REPLACEMENT	A04S34
A09S12	REPLACED FAILED CABLE - POST TESTED	A09S12
A09S12	REPLACED FAILED CABLE - POST TESTED	A09S12
A09S12	REPLACED FAILED CABLE - POST TESTED	A09S12
A10X04	DIRECT BURIED CABLE INJECTION	A10X04
A10X04	DIRECT BURIED CABLE INJECTION	A10X04
A10X04	DIRECT BURIED CABLE INJECTION	A10X04
A20C16	BOUCHARD ST RPL CBL & SWTCHGR	A20C16
A20C16	BOUCHARD ST RPL CBL & SWTCHGR	A20C16
A20C16	BOUCHARD ST RPL CBL & SWTCHGR	A20C16
A20C16	BOUCHARD ST RPL CBL & SWTCHGR	A20C16
A20C40	Manchester Network Cable Replacemen	A20C40
A20E48	FOUNDRY PLACE SWITCHGEAR	A20E48
A20E48	FOUNDRY PLACE SWITCHGEAR	A20E48
A20E48	FOUNDRY PLACE SWITCHGEAR	A20E48
A20S17	DB CBLE REPLACE MAPLE HILL ACREA	A20S17
A20S17	DB CBLE REPLACE MAPLE HILL ACREA	A20S17
A20S17	DB CBLE REPLACE MAPLE HILL ACREA	A20S17
A20S17	DB CBLE REPLACE MAPLE HILL ACREA	A20S17
A21C82	CIRCUIT 3138 RIVERWAY PL CABLE REPL	A21C82
A21C82	CIRCUIT 3138 RIVERWAY PL CABLE REPL	A21C82
A21E47	1275 MAPLEWOOD AVE DB CABLE REPL	A21E47
A21E47	1275 MAPLEWOOD AVE DB CABLE REPL	A21E47
A21S12	REBUILD APPLE TREE CINEMA URD	A21S12
A21S12	REBUILD APPLE TREE CINEMA URD	A21S12
A21S12	REBUILD APPLE TREE CINEMA URD	A21S12
A21S13	REPLACE PINE ISLE DRIVE URD	A21S13
A21S13	REPLACE PINE ISLE DRIVE URD	A21S13
A21S13	REPLACE PINE ISLE DRIVE URD	A21S13
A21S13	REPLACE PINE ISLE DRIVE URD	A21S13
A22C01	Manchester Network Cable Repl Ph 2	A22C01
A22C01	Manchester Network Cable Repl Ph 2	A22C01
A22C01	Manchester Network Cable Repl Ph 2	A22C01
A22C01	Manchester Network Cable Repl Ph 2	A22C01
A22C83	Manchester Network Cable Repl Ph 3	A22C83
A23X23	Submarine Cable Repair	A23X23
A24C01	Manchester Network Cable Ph 4	A24C01

Project Description	Period	Amount
COMCAST NON-BILLABLE LACONIA	2023 FY Actual	(134,051.95)
COMCAST NON-BILLABLE LACONIA	2023 FY Budget	26,516.00
COMCAST BILLABLE LACONIA	2023 FY Actual	51,892.43
COMCAST BILLABLE LACONIA	2023 FY Budget	(29.90)
JOINT POLES PURCHASE & SALE	2019 FY Actual	108,060.62
JOINT POLES PURCHASE & SALE	2019 FY Budget	199,985.24
JOINT POLES PURCHASE & SALE	2020 FY Actual	232,661.42
JOINT POLES PURCHASE & SALE	2020 FY Budget	150,649.86
JOINT POLES PURCHASE & SALE	2021 FY Actual	(40,911.70)
JOINT POLES PURCHASE & SALE	2021 FY Budget	152,999.88
JOINT POLES PURCHASE & SALE	2022 FY Actual	51,323.16
JOINT POLES PURCHASE & SALE	2022 FY Budget	191,079.46
JOINT POLES PURCHASE & SALE	2023 FY Budget	100,000.00
CABLE TV PROJECTS ANNUAL	2023 FY Actual	5,408,590.10
CABLE TV PROJECTS ANNUAL	2023 FY Budget	724,200.00
TELEPHONE PROJECTS ANNUAL	2019 FY Actual	236,438.04
TELEPHONE PROJECTS ANNUAL	2019 FY Budget	200,347.72
TELEPHONE PROJECTS ANNUAL	2020 FY Actual	605,037.87
TELEPHONE PROJECTS ANNUAL	2020 FY Budget	200,000.42
TELEPHONE PROJECTS ANNUAL	2021 FY Actual	231,370.77
TELEPHONE PROJECTS ANNUAL	2021 FY Budget	304,000.26
TELEPHONE PROJECTS ANNUAL	2022 FY Actual	91,062.16
TELEPHONE PROJECTS ANNUAL	2022 FY Budget	386,168.99
TELEPHONE PROJECTS ANNUAL	2023 FY Actual	(6,057.65)
TELEPHONE PROJECTS ANNUAL	2023 FY Budget	200,000.00
ESCC control of Generation	2019 FY Actual	37,449.91
ESCC control of Generation	2019 FY Budget	29,580.88
ESCC control of Generation	2020 FY Actual	8,524.17
ESCC control of Generation	2022 FY Actual	(2,027.24)
ESCC control of Generation	2023 FY Actual	(5,359.19)
NH Energy Park: audio visual equip	2019 FY Actual	67.91
NH SOC/ESCC Backup	2019 FY Actual	114,540.49
1250 Hooksett Rd - AV Project	2019 FY Actual	(114,540.49)
Peterborough Roadway and Bridge Pro	2019 FY Actual	515,184.09
Peterborough Roadway and Bridge Pro	2019 FY Budget	150,000.16
Peterborough Roadway and Bridge Pro	2020 FY Actual	3,769.95
Peterborough Roadway and Bridge Pro	2021 FY Actual	(6,373.60)
Peterborough Roadway and Bridge Pro	2022 FY Actual	(12,957.89)
ANIMAL PROTECTION AT BROOK ST SS	2021 FY Actual	13,103.39
ANIMAL PROTECTION AT EDDY SS	2021 FY Actual	14,859.02
ANIMAL PROTECTION AT EDDY SS	2023 FY Actual	(14,859.02)
Animal Protection Madbury SS	2022 FY Actual	71.06
3271X Sound Barrier Pad-Mount Step	2022 FY Actual	876.72
3271X Sound Barrier Pad-Mount Step	2023 FY Actual	20,619.77
Animal Protection Brentwood SS	2022 FY Actual	71.06
ANIMAL PROTECTION OAK HILL SS	2022 FY Actual	71.06

Animal Protection Hudson SS	2022 FY Actual	71.06
Animal Protection Reeds Ferry SS	2022 FY Actual	71.06
15W4 Commercial Alley	2023 FY Actual	642,624.49
W15 Lattice Tower Removal	2023 FY Budget	250,000.00
NH Rubber Goods Lab Rebuild	2023 FY Actual	104,492.26
2022 Elec Sys Ops Equip Annual	2022 FY Actual	30,294.07
2022 Elec Sys Ops Equip Annual	2023 FY Budget	100,000.00
Misc office equipment	2019 FY Actual	3,328.83
Misc office equipment	2019 FY Budget	100,209.35
Misc office equipment	2020 FY Budget	100,000.00
Misc office equipment	2021 FY Budget	102,000.00
Misc office equipment	2022 FY Budget	104,000.00
Misc office equipment	2023 FY Actual	6,111.00
Misc office equipment	2023 FY Budget	100,000.00
TEMPORARY WORK - LANCASTER	2021 FY Actual	22,224.32
TEMPORARY WORK - LANCASTER	2022 FY Actual	46,401.50
TEMPORARY WORK - LANCASTER	2023 FY Actual	12,456.62
TEMPORARY WORK - BERLIN	2021 FY Actual	3,336.11
TEMPORARY WORK - BERLIN	2022 FY Actual	27,510.65
TEMPORARY WORK - BERLIN	2023 FY Actual	(2,076.85)
TEMPORARY WORK - CHOCORUA	2021 FY Actual	8,611.62
TEMPORARY WORK - CHOCORUA	2022 FY Actual	33,515.79
TEMPORARY WORK - CHOCORUA	2023 FY Actual	42,875.82
TEMPORARY WORK - DERRY	2021 FY Actual	16,235.44
TEMPORARY WORK - DERRY	2022 FY Actual	17,299.65
TEMPORARY WORK - DERRY	2023 FY Actual	4,912.56
TEMPORARY WORK - EPPING	2021 FY Actual	7,610.99
TEMPORARY WORK - EPPING	2022 FY Actual	4,496.29
TEMPORARY WORK - EPPING	2023 FY Actual	10,258.56
TEMPORARY WORK - KEENE	2021 FY Actual	9,305.79
TEMPORARY WORK - KEENE	2022 FY Actual	49,469.00
TEMPORARY WORK - KEENE	2023 FY Actual	44,735.99
TEMPORARY WORK - HOOKSETT	2021 FY Actual	16,437.97
TEMPORARY WORK - HOOKSETT	2022 FY Actual	46,612.59
TEMPORARY WORK - HOOKSETT	2023 FY Actual	27,275.08
TEMPORARY WORK - LACONIA	2020 FY Actual	(1,671.40)
TEMPORARY WORK - LACONIA	2021 FY Actual	20,596.41
TEMPORARY WORK - LACONIA	2022 FY Actual	55,072.85
TEMPORARY WORK - LACONIA	2023 FY Actual	90,509.44
TEMPORARY WORK - NASHUA	2019 FY Actual	(230.40)
TEMPORARY WORK - NASHUA	2022 FY Actual	(988.00)
TEMPORARY WORK - NASHUA	2023 FY Actual	642.09
TEMPORARY WORK - PORTSMOUTH	2021 FY Actual	6,994.23
TEMPORARY WORK - PORTSMOUTH	2022 FY Actual	33,413.74
TEMPORARY WORK - PORTSMOUTH	2023 FY Actual	25,934.48
TEMPORARY WORK - NH	2023 FY Budget	300,000.00
TEMPORARY WORK - ROCHESTER	2021 FY Actual	8,909.99

TEMPORARY WORK - ROCHESTER	2022 FY Actual	14,692.94
TEMPORARY WORK - ROCHESTER	2023 FY Actual	29,375.33
TEMPORARY WORK - NEWPORT	2021 FY Actual	8,305.26
TEMPORARY WORK - NEWPORT	2022 FY Actual	9,370.39
TEMPORARY WORK - NEWPORT	2023 FY Actual	8,415.11
TEMPORARY WORK - MANCHESTER EAST	2021 FY Actual	6,053.21
TEMPORARY WORK - MANCHESTER EAST	2022 FY Actual	5,551.15
TEMPORARY WORK - MANCHESTER EAST	2023 FY Actual	17,372.10
TEMPORARY WORK - MANCHESTER WEST	2021 FY Actual	9,458.34
TEMPORARY WORK - MANCHESTER WEST	2022 FY Actual	16,494.85
TEMPORARY WORK - MANCHESTER WEST	2023 FY Actual	16,225.40
PRIVATE WORK - LANCASTER	2021 FY Actual	12,256.36
PRIVATE WORK - LANCASTER	2022 FY Actual	72,856.81
PRIVATE WORK - LANCASTER	2023 FY Actual	5,911.78
PRIVATE WORK - BERLIN	2022 FY Actual	(14,772.16)
PRIVATE WORK - BERLIN	2023 FY Actual	8,348.27
PRIVATE WORK - CHOCORUA	2021 FY Actual	13,434.30
PRIVATE WORK - CHOCORUA	2022 FY Actual	35,634.31
PRIVATE WORK - CHOCORUA	2023 FY Actual	17,529.90
PRIVATE WORK - DERRY	2021 FY Actual	667.12
PRIVATE WORK - DERRY	2022 FY Actual	45.58
PRIVATE WORK - DERRY	2023 FY Actual	(10,253.41)
PRIVATE WORK - EPPING	2021 FY Actual	3,734.77
PRIVATE WORK - EPPING	2022 FY Actual	15,237.73
PRIVATE WORK - EPPING	2023 FY Actual	51,593.43
PRIVATE WORK - KEENE	2021 FY Actual	19,615.86
PRIVATE WORK - KEENE	2022 FY Actual	8,897.25
PRIVATE WORK - KEENE	2023 FY Actual	18,970.30
PRIVATE WORK - LACONIA	2021 FY Actual	4,500.18
PRIVATE WORK - LACONIA	2022 FY Actual	33,999.48
PRIVATE WORK - LACONIA	2023 FY Actual	58,984.01
PRIVATE WORK - NASHUA	2021 FY Actual	3,905.15
PRIVATE WORK - NASHUA	2022 FY Actual	30,805.53
PRIVATE WORK - NASHUA	2023 FY Actual	194,731.41
PRIVATE WORK - PORTSMOUTH	2021 FY Actual	129,832.41
PRIVATE WORK - PORTSMOUTH	2022 FY Actual	(51,542.60)
PRIVATE WORK - PORTSMOUTH	2023 FY Actual	135,354.50
PRIVATE WORK - NH	2023 FY Budget	100,000.00
PRIVATE WORK - ROCHESTER	2021 FY Actual	11,368.93
PRIVATE WORK - ROCHESTER	2022 FY Actual	112,431.95
PRIVATE WORK - ROCHESTER	2023 FY Actual	95,048.04
PRIVATE WORK - NEWPORT	2021 FY Actual	3,449.84
PRIVATE WORK - NEWPORT	2022 FY Actual	5,327.68
PRIVATE WORK - HOOKSETT	2019 FY Actual	4,629.11
PRIVATE WORK - HOOKSETT	2021 FY Actual	5,151.80
PRIVATE WORK - HOOKSETT	2022 FY Actual	40,425.90
PRIVATE WORK - HOOKSETT	2023 FY Actual	(25,121.39)

PRIVATE WORK - MANCHESTER WEST	2021 FY Actual	58,681.07
PRIVATE WORK - MANCHESTER WEST	2022 FY Actual	13,432.57
PRIVATE WORK - MANCHESTER WEST	2023 FY Actual	4,985.51
Tools and Equipment - Engineering	2019 FY Actual	70,463.91
Tools and Equipment - Engineering	2019 FY Budget	75,000.00
Tools and Equipment - Engineering	2020 FY Actual	238.41
Tools and Equipment - Engineering	2020 FY Budget	75,000.00
Tools and Equipment - Engineering	2021 FY Actual	142,096.34
Tools and Equipment - Engineering	2021 FY Budget	75,000.00
Tools and Equipment - Engineering	2022 FY Actual	34,466.30
Tools and Equipment - Engineering	2022 FY Budget	75,000.00
Tools and Equipment - Engineering	2023 FY Actual	24,356.39
Tools and Equipment - Engineering	2023 FY Budget	75,000.00
Tools/equipment - S/S Operations	2019 FY Actual	109,385.96
Tools/equipment - S/S Operations	2019 FY Budget	160,000.00
Tools/equipment - S/S Operations	2020 FY Actual	339,180.20
Tools/equipment - S/S Operations	2020 FY Budget	159,882.28
Tools/equipment - S/S Operations	2021 FY Actual	74,331.83
Tools/equipment - S/S Operations	2021 FY Budget	163,000.00
2021 NH D SS Capital Tool Annual	2021 FY Actual	622,168.92
2021 NH D SS Capital Tool Annual	2022 FY Actual	84,264.32
2021 NH D SS Capital Tool Annual	2023 FY Actual	1,601.58
2022 NH D SS Capital Tool Annual	2022 FY Actual	317,007.17
2022 NH D SS Capital Tool Annual	2022 FY Budget	166,000.00
2022 NH D SS Capital Tool Annual	2023 FY Actual	66,479.64
2023 NH D SS Capital Tool Annual	2023 FY Actual	23,684.97
2023 NH D SS Capital Tool Annual	2023 FY Budget	200,000.00
Tools and Equipment- Troubleshooter	2019 FY Actual	148,169.24
Tools and Equipment- Troubleshooter	2019 FY Budget	560,000.00
Tools and Equipment- Troubleshooter	2020 FY Actual	412,049.90
Tools and Equipment- Troubleshooter	2020 FY Budget	60,000.00
Tools and Equipment- Troubleshooter	2021 FY Actual	490,996.62
Tools and Equipment- Troubleshooter	2021 FY Budget	60,000.00
Tools and Equipment- Troubleshooter	2022 FY Actual	179,692.01
Tools and Equipment- Troubleshooter	2022 FY Budget	60,000.00
Tools and Equipment- Troubleshooter	2023 FY Actual	290,082.15
Tools and Equipment- Troubleshooter	2023 FY Budget	500,000.00
Tools/equipment - Field Operations	2019 FY Actual	1,049,496.32
Tools/equipment - Field Operations	2019 FY Budget	1,100,000.00
Tools/equipment - Field Operations	2020 FY Actual	846,887.63
Tools/equipment - Field Operations	2020 FY Budget	1,100,000.00
Tools/equipment - Field Operations	2021 FY Actual	795,314.30
Tools/equipment - Field Operations	2021 FY Budget	1,122,000.00
Tools/equipment - Field Operations	2022 FY Actual	915,825.98
Tools/equipment - Field Operations	2022 FY Budget	1,122,000.00
Tools/equipment - Field Operations	2023 FY Actual	925,718.37
Tools/equipment - Field Operations	2023 FY Budget	1,064,880.00

REPLACE FAILED CABLE SPRING RD RYE	2019 FY Actual	232,949.36
Mobile Utility & Mobile Pole Assemb	2023 FY Actual	2,672.78
Mobile Utility & Mobile Pole Assemb	2023 FY Budget	385,000.00
DB PLANNED OBS ANNUAL - LANCASTER	2019 FY Actual	1,099.49
DB PLANNED OBS ANNUAL - LANCASTER	2020 FY Actual	1,884.79
DB PLANNED OBS ANNUAL - LANCASTER	2022 FY Actual	(1,252.92)
DB PLANNED OBS ANNUAL - BERLIN	2019 FY Actual	958.21
DB PLANNED OBS ANNUAL - BERLIN	2020 FY Actual	1,634.55
DB PLANNED OBS ANNUAL - BERLIN	2023 FY Actual	767.36
DB PLANNED OBS ANNUAL - CHOCORUA	2019 FY Actual	(6,286.01)
DB PLANNED OBS ANNUAL - CHOCORUA	2020 FY Actual	1,974.29
DB PLANNED OBS ANNUAL - CHOCORUA	2021 FY Actual	11,824.72
DB PLANNED OBS ANNUAL - CHOCORUA	2022 FY Actual	(414.64)
DB PLANNED OBS ANNUAL - DERRY	2019 FY Actual	120,802.28
DB PLANNED OBS ANNUAL - DERRY	2020 FY Actual	(1,902.38)
DB PLANNED OBS ANNUAL - DERRY	2021 FY Actual	72,785.97
DB PLANNED OBS ANNUAL - DERRY	2022 FY Actual	378,978.97
DB PLANNED OBS ANNUAL - DERRY	2023 FY Actual	17,757.40
DB PLANNED OBS ANNUAL - EPPING	2019 FY Actual	36,138.32
DB PLANNED OBS ANNUAL - EPPING	2020 FY Actual	15,979.19
DB PLANNED OBS ANNUAL - EPPING	2021 FY Actual	(963.95)
DB PLANNED OBS ANNUAL - EPPING	2022 FY Actual	1,140.92
DB PLANNED OBS ANNUAL - KEENE	2019 FY Actual	196,646.23
DB PLANNED OBS ANNUAL - KEENE	2020 FY Actual	8,838.91
DB PLANNED OBS ANNUAL - KEENE	2021 FY Actual	3,505.14
DB PLANNED OBS ANNUAL - KEENE	2022 FY Actual	2,017.34
DB PLANNED OBS ANNUAL - KEENE	2023 FY Actual	3,183.43
DB PLANNED OBS ANNUAL - TILTON	2019 FY Actual	5,429.57
DB PLANNED OBS ANNUAL - TILTON	2020 FY Actual	32,933.02
DB PLANNED OBS ANNUAL - TILTON	2021 FY Actual	34,485.76
DB PLANNED OBS ANNUAL - TILTON	2022 FY Actual	6,135.51
DB PLANNED OBS ANNUAL - NASHUA	2019 FY Actual	529,442.74
DB PLANNED OBS ANNUAL - NASHUA	2020 FY Actual	133,930.59
DB PLANNED OBS ANNUAL - NASHUA	2021 FY Actual	(11,445.29)
DB PLANNED OBS ANNUAL - NASHUA	2022 FY Actual	(1,304.86)
DB PLANNED OBS ANNUAL - NASHUA	2023 FY Actual	74,800.09
DB PLANNED OBS ANNUAL - PORTSMOUTH	2019 FY Actual	51,894.96
DB PLANNED OBS ANNUAL - PORTSMOUTH	2020 FY Actual	212,356.65
DB PLANNED OBS ANNUAL - PORTSMOUTH	2021 FY Actual	(33,106.96)
DB PLANNED OBS ANNUAL - PORTSMOUTH	2022 FY Actual	(12,435.61)
DB PLANNED OBS ANNUAL - PORTSMOUTH	2023 FY Actual	(5.40)
DB PLANNED OBS ANNUAL - ROCHESTER	2019 FY Actual	278,640.09
DB PLANNED OBS ANNUAL - ROCHESTER	2020 FY Actual	175,234.33
DB PLANNED OBS ANNUAL - ROCHESTER	2021 FY Actual	6,091.31
DB PLANNED OBS ANNUAL - ROCHESTER	2022 FY Actual	(1,163.49)
DB PLANNED OBS ANNUAL - ROCHESTER	2023 FY Actual	208.82
DB PLANNED OBS ANNUAL - NEWPORT	2019 FY Actual	27,643.95

DB PLANNED OBS ANNUAL - NEWPORT	2020 FY Actual	194,296.69
DB PLANNED OBS ANNUAL - NEWPORT	2021 FY Actual	2,697.90
DB PLANNED OBS ANNUAL - NEWPORT	2022 FY Actual	(3,407.04)
DB PLANNED OBS ANNUAL - HOOKSETT	2019 FY Actual	193.07
DB PLANNED OBS ANNUAL - HOOKSETT	2020 FY Actual	118,898.32
DB PLANNED OBS ANNUAL - HOOKSETT	2021 FY Actual	29,844.34
DB PLANNED OBS ANNUAL - HOOKSETT	2022 FY Actual	30,285.56
DB PLANNED OBS ANNUAL - BEDFORD	2019 FY Actual	113,919.64
DB PLANNED OBS ANNUAL - BEDFORD	2020 FY Actual	41,453.22
DB PLANNED OBS ANNUAL - BEDFORD	2021 FY Actual	2,864.57
DB PLANNED OBS ANNUAL - BEDFORD	2022 FY Actual	11,057.86
DB PLANNED OBS ANNUAL - BEDFORD	2023 FY Actual	4,366.21
OH PLANNED OBS ANNUAL LANCASTER	2019 FY Actual	74,420.08
OH PLANNED OBS ANNUAL LANCASTER	2020 FY Actual	407,183.40
OH PLANNED OBS ANNUAL LANCASTER	2021 FY Actual	260,729.39
OH PLANNED OBS ANNUAL LANCASTER	2022 FY Actual	143,094.39
OH PLANNED OBS ANNUAL LANCASTER	2023 FY Actual	475,733.21
OH PLANNED OBS ANNUAL BERLIN	2019 FY Actual	103,449.79
OH PLANNED OBS ANNUAL BERLIN	2020 FY Actual	96,416.33
OH PLANNED OBS ANNUAL BERLIN	2021 FY Actual	167,883.36
OH PLANNED OBS ANNUAL BERLIN	2022 FY Actual	322,255.61
OH PLANNED OBS ANNUAL BERLIN	2023 FY Actual	14,598.47
OH PLANNED OBS ANNUAL CHOCORUA	2019 FY Actual	137,022.03
OH PLANNED OBS ANNUAL CHOCORUA	2020 FY Actual	181,992.49
OH PLANNED OBS ANNUAL CHOCORUA	2021 FY Actual	76,147.79
OH PLANNED OBS ANNUAL CHOCORUA	2022 FY Actual	88,224.23
OH PLANNED OBS ANNUAL CHOCORUA	2023 FY Actual	115,617.08
OH PLANNED OBS ANNUAL DERRY	2019 FY Actual	240,154.02
OH PLANNED OBS ANNUAL DERRY	2020 FY Actual	276,544.92
OH PLANNED OBS ANNUAL DERRY	2021 FY Actual	409,703.20
OH PLANNED OBS ANNUAL DERRY	2022 FY Actual	669,301.68
OH PLANNED OBS ANNUAL DERRY	2023 FY Actual	504,404.42
OH PLANNED OBS ANNUAL EPPING	2019 FY Actual	584,733.25
OH PLANNED OBS ANNUAL EPPING	2020 FY Actual	568,604.56
OH PLANNED OBS ANNUAL EPPING	2021 FY Actual	314,888.77
OH PLANNED OBS ANNUAL EPPING	2022 FY Actual	408,141.01
OH PLANNED OBS ANNUAL EPPING	2023 FY Actual	235,294.01
OH PLANNED OBS ANNUAL KEENE	2019 FY Actual	1,016,681.91
OH PLANNED OBS ANNUAL KEENE	2020 FY Actual	784,411.51
OH PLANNED OBS ANNUAL KEENE	2021 FY Actual	643,073.25
OH PLANNED OBS ANNUAL KEENE	2022 FY Actual	522,775.31
OH PLANNED OBS ANNUAL KEENE	2023 FY Actual	1,643,740.31
OH PLANNED OBS ANNUAL TILTON	2019 FY Actual	963,388.91
OH PLANNED OBS ANNUAL TILTON	2020 FY Actual	328,225.17
OH PLANNED OBS ANNUAL TILTON	2021 FY Actual	257,189.67
OH PLANNED OBS ANNUAL TILTON	2022 FY Actual	472,433.06
OH PLANNED OBS ANNUAL TILTON	2023 FY Actual	434,505.10

OH PLANNED OBS ANNUAL MILFORD	2019 FY Actual	(1,307.44)
OH PLANNED OBS ANNUAL MILFORD	2020 FY Actual	7,258.52
OH PLANNED OBS ANNUAL MILFORD	2021 FY Actual	(3,027.53)
OH PLANNED OBS ANNUAL MILFORD	2023 FY Actual	(108.35)
OH PLANNED OBS ANNUAL NASHUA	2019 FY Actual	437,473.23
OH PLANNED OBS ANNUAL NASHUA	2020 FY Actual	475,847.56
OH PLANNED OBS ANNUAL NASHUA	2021 FY Actual	593,221.91
OH PLANNED OBS ANNUAL NASHUA	2022 FY Actual	880,512.71
OH PLANNED OBS ANNUAL NASHUA	2023 FY Actual	1,093,934.41
OH PLANNED OBS ANNUAL PORTSMOUTH	2019 FY Actual	163,746.89
OH PLANNED OBS ANNUAL PORTSMOUTH	2020 FY Actual	637,681.47
OH PLANNED OBS ANNUAL PORTSMOUTH	2021 FY Actual	497,764.24
OH PLANNED OBS ANNUAL PORTSMOUTH	2022 FY Actual	329,746.54
OH PLANNED OBS ANNUAL PORTSMOUTH	2023 FY Actual	276,558.01
OH PLANNED OBS ANNUAL ROCHESTER	2019 FY Actual	436,121.02
OH PLANNED OBS ANNUAL ROCHESTER	2020 FY Actual	721,102.13
OH PLANNED OBS ANNUAL ROCHESTER	2021 FY Actual	539,339.70
OH PLANNED OBS ANNUAL ROCHESTER	2022 FY Actual	211,458.33
OH PLANNED OBS ANNUAL ROCHESTER	2023 FY Actual	316,302.74
OH PLANNED OBS ANNUAL NEWPORT	2019 FY Actual	511,878.50
OH PLANNED OBS ANNUAL NEWPORT	2020 FY Actual	488,348.66
OH PLANNED OBS ANNUAL NEWPORT	2021 FY Actual	233,476.59
OH PLANNED OBS ANNUAL NEWPORT	2022 FY Actual	284,398.74
OH PLANNED OBS ANNUAL NEWPORT	2023 FY Actual	536,027.38
OH PLANNED OBS ANNUAL HOOKSETT	2019 FY Actual	183,505.38
OH PLANNED OBS ANNUAL HOOKSETT	2020 FY Actual	465,703.56
OH PLANNED OBS ANNUAL HOOKSETT	2021 FY Actual	266,722.19
OH PLANNED OBS ANNUAL HOOKSETT	2022 FY Actual	104,272.48
OH PLANNED OBS ANNUAL HOOKSETT	2023 FY Actual	142,016.63
OH PLANNED OBS ANNUAL BEDFORD	2019 FY Actual	399,293.35
OH PLANNED OBS ANNUAL BEDFORD	2020 FY Actual	614,157.50
OH PLANNED OBS ANNUAL BEDFORD	2021 FY Actual	436,539.59
OH PLANNED OBS ANNUAL BEDFORD	2022 FY Actual	724,564.20
OH PLANNED OBS ANNUAL BEDFORD	2023 FY Actual	1,204,365.55
UG PLANNED OBS ANNUAL LANCASTER	2022 FY Actual	13,117.60
UG PLANNED OBS ANNUAL BERLIN	2023 FY Actual	7,242.64
UG PLANNED OBS ANNUAL CHOCORUA	2022 FY Actual	654.88
UG PLANNED OBS ANNUAL CHOCORUA	2023 FY Actual	(654.88)
UG PLANNED OBS ANNUAL DERRY	2021 FY Actual	174,634.38
UG PLANNED OBS ANNUAL DERRY	2022 FY Actual	211,405.32
UG PLANNED OBS ANNUAL DERRY	2023 FY Actual	252,906.21
UG PLANNED OBS ANNUAL EPPING	2021 FY Actual	53,580.36
UG PLANNED OBS ANNUAL EPPING	2022 FY Actual	79,648.26
UG PLANNED OBS ANNUAL EPPING	2023 FY Actual	139,868.36
UG PLANNED OBS ANNUAL KEENE	2019 FY Actual	2,243.54
UG PLANNED OBS ANNUAL KEENE	2020 FY Actual	69,806.57
UG PLANNED OBS ANNUAL KEENE	2021 FY Actual	1,450.09

		Attachment	PUC TS 1-005(b)
UG PLANNED OBS ANNUAL KEENE	2022 FY Actual	(1,316.84)	
UG PLANNED OBS ANNUAL KEENE	2023 FY Actual	2,757.05	Page 128 of 187
UG PLANNED OBS ANNUAL TILTON	2021 FY Actual	1,193.11	
UG PLANNED OBS ANNUAL TILTON	2022 FY Actual	7,586.37	
UG PLANNED OBS ANNUAL TILTON	2023 FY Actual	4,699.08	
UG PLANNED OBS ANNUAL NASHUA	2021 FY Actual	64,734.77	
UG PLANNED OBS ANNUAL NASHUA	2022 FY Actual	3,917.26	
UG PLANNED OBS ANNUAL NASHUA	2023 FY Actual	4,520.54	
UG PLANNED OBS ANNUAL PORTSMOUTH	2021 FY Actual	70,509.54	
UG PLANNED OBS ANNUAL PORTSMOUTH	2022 FY Actual	58,575.03	
UG PLANNED OBS ANNUAL PORTSMOUTH	2023 FY Actual	66,662.61	
UG PLANNED OBS ANNUAL ROCHESTER	2021 FY Actual	84,429.89	
UG PLANNED OBS ANNUAL ROCHESTER	2022 FY Actual	150,078.44	
UG PLANNED OBS ANNUAL ROCHESTER	2023 FY Actual	303,233.62	
UG PLANNED OBS ANNUAL HOOKSETT	2019 FY Actual	1,152.74	
UG PLANNED OBS ANNUAL HOOKSETT	2020 FY Actual	90,399.11	
UG PLANNED OBS ANNUAL HOOKSETT	2021 FY Actual	(68,566.13)	
UG PLANNED OBS ANNUAL HOOKSETT	2023 FY Actual	(2,085.76)	
UG PLANNED OBS ANNUAL BEDFORD	2021 FY Actual	3,630.07	
UG PLANNED OBS ANNUAL BEDFORD	2022 FY Actual	315,548.99	
UG PLANNED OBS ANNUAL BEDFORD	2023 FY Actual	77,206.82	
SYSTEM REPAIRS/OBSOLETE - LANCASTER	2019 FY Actual	73,287.06	
SYSTEM REPAIRS/OBSOLETE - LANCASTER	2020 FY Actual	18,248.82	
SYSTEM REPAIRS/OBSOLETE - LANCASTER	2021 FY Actual	(3,006.39)	
SYSTEM REPAIRS/OBSOLETE - LANCASTER	2022 FY Actual	3,844.72	
SYSTEM REPAIRS/OBSOLETE - BERLIN	2019 FY Actual	51,693.77	
SYSTEM REPAIRS/OBSOLETE - BERLIN	2020 FY Actual	35,566.53	
SYSTEM REPAIRS/OBSOLETE - BERLIN	2022 FY Actual	217,526.46	
SYSTEM REPAIRS/OBSOLETE - BERLIN	2023 FY Actual	(12,883.65)	
SYSTEM REPAIRS/OBSOLETE - BERLIN	2023 FY Budget	2,947,661.16	
SYSTEM REPAIRS/OBSOLETE - CHOCORUA	2019 FY Actual	32,756.00	
SYSTEM REPAIRS/OBSOLETE - CHOCORUA	2020 FY Actual	108,769.57	
SYSTEM REPAIRS/OBSOLETE - CHOCORUA	2021 FY Actual	30,842.79	
SYSTEM REPAIRS/OBSOLETE - CHOCORUA	2022 FY Actual	30,727.44	
SYSTEM REPAIRS/OBSOLETE - CHOCORUA	2023 FY Actual	79,622.01	
SYSTEM REPAIRS/OBSOLETE - DERRY	2019 FY Actual	30,707.50	
SYSTEM REPAIRS/OBSOLETE - DERRY	2020 FY Actual	11,055.72	
SYSTEM REPAIRS/OBSOLETE - DERRY	2021 FY Actual	11,663.01	
SYSTEM REPAIRS/OBSOLETE - DERRY	2022 FY Actual	65.57	
SYSTEM REPAIRS/OBSOLETE - EPPING	2019 FY Actual	9,051.56	
SYSTEM REPAIRS/OBSOLETE - EPPING	2020 FY Actual	6,869.62	
SYSTEM REPAIRS/OBSOLETE - EPPING	2021 FY Actual	225,727.69	
SYSTEM REPAIRS/OBSOLETE - EPPING	2022 FY Actual	571,504.05	
SYSTEM REPAIRS/OBSOLETE - EPPING	2023 FY Actual	649,668.59	
SYSTEM REPAIRS/OBSOLETE - HILLSBORO	2019 FY Actual	(205.00)	
SYSTEM REPAIRS/OBSOLETE - KEENE	2019 FY Actual	(1,947.92)	
SYSTEM REPAIRS/OBSOLETE - KEENE	2020 FY Actual	28,399.22	

SYSTEM REPAIRS/OBSOLETE - KEENE	2021 FY Actual	284,998.88
SYSTEM REPAIRS/OBSOLETE - KEENE	2022 FY Actual	447,283.12
SYSTEM REPAIRS/OBSOLETE - KEENE	2023 FY Actual	780,874.69
SYSTEM REPAIRS/OBSOLETE- LACONIA	2019 FY Actual	231,923.29
SYSTEM REPAIRS/OBSOLETE- LACONIA	2020 FY Actual	128,509.53
SYSTEM REPAIRS/OBSOLETE- LACONIA	2021 FY Actual	(27,494.41)
SYSTEM REPAIRS/OBSOLETE- LACONIA	2022 FY Actual	349,132.89
SYSTEM REPAIRS/OBSOLETE- LACONIA	2023 FY Actual	389,009.61
SYSTEM REPAIRS/OBSOLETE - MILFORD	2019 FY Actual	(1,025.00)
SYSTEM REPAIRS/OBSOLETE - MILFORD	2022 FY Actual	(3.32)
SYSTEM REPAIRS/OBSOLETE - NASHUA	2019 FY Actual	24,101.13
SYSTEM REPAIRS/OBSOLETE - NASHUA	2020 FY Actual	32,995.06
SYSTEM REPAIRS/OBSOLETE - NASHUA	2021 FY Actual	1,456.57
SYSTEM REPAIRS/OBSOLETE - NASHUA	2022 FY Actual	72,456.47
SYSTEM REPAIRS/OBSOLETE - NASHUA	2023 FY Actual	91,288.70
SYSTEM REPAIRS/OBSOLETE - NASHUA	2023 FY Budget	3,821,256.96
SYSTEM REPAIRS/OBSOLETE - PORTSMOUT	2019 FY Actual	28,541.02
SYSTEM REPAIRS/OBSOLETE - PORTSMOUT	2020 FY Actual	40,158.48
SYSTEM REPAIRS/OBSOLETE - PORTSMOUT	2021 FY Actual	69,711.10
SYSTEM REPAIRS/OBSOLETE - PORTSMOUT	2022 FY Actual	111,126.26
SYSTEM REPAIRS/OBSOLETE - PORTSMOUT	2023 FY Actual	98,547.87
SYSTEM REPAIRS/OBSOLETE	2019 FY Budget	9,506,168.31
SYSTEM REPAIRS/OBSOLETE	2020 FY Budget	9,999,634.65
SYSTEM REPAIRS/OBSOLETE	2021 FY Actual	1,507,569.85
SYSTEM REPAIRS/OBSOLETE	2021 FY Budget	10,253,999.99
SYSTEM REPAIRS/OBSOLETE	2022 FY Actual	1,913,114.78
SYSTEM REPAIRS/OBSOLETE	2022 FY Budget	5,948,915.17
SYSTEM REPAIRS/OBSOLETE	2023 FY Actual	1,190,128.20
SYSTEM REPAIRS/OBSOLETE	2023 FY Budget	2,146,509.24
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2019 FY Actual	47,117.09
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2020 FY Actual	61,795.69
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2021 FY Actual	238,180.55
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2022 FY Actual	758,856.76
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2023 FY Actual	390,572.18
SYSTEM REPAIRS/OBSOLETE - ROCHESTER	2023 FY Budget	3,052,604.64
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2019 FY Actual	218,878.38
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2020 FY Actual	10,282.98
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2021 FY Actual	67,313.29
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2022 FY Actual	49,954.52
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2023 FY Actual	189,959.84
SYSTEM REPAIRS/OBSOLETE - NEWPORT	2023 FY Budget	2,045,480.40
SYSTEM REPAIRS/OBSOLETE - HOOKSETT	2019 FY Actual	101,484.86
SYSTEM REPAIRS/OBSOLETE - HOOKSETT	2020 FY Actual	191,533.71
SYSTEM REPAIRS/OBSOLETE - HOOKSETT	2021 FY Actual	178,410.31
SYSTEM REPAIRS/OBSOLETE - HOOKSETT	2022 FY Actual	195,457.57
SYSTEM REPAIRS/OBSOLETE - HOOKSETT	2023 FY Actual	488,231.01
SYSTEM REPAIRS/OBSOLETE - BEDFORD	2019 FY Actual	24,078.37

SYSTEM REPAIRS/OBSOLETE - BEDFORD	2020 FY Actual	28,430.96
SYSTEM REPAIRS/OBSOLETE - BEDFORD	2021 FY Actual	75,666.70
SYSTEM REPAIRS/OBSOLETE - BEDFORD	2022 FY Actual	124,883.74
SYSTEM REPAIRS/OBSOLETE - BEDFORD	2023 FY Actual	75,301.26
SYSTEM REPAIRS/OBSOLETE - BEDFORD	2023 FY Budget	2,941,487.52
DB FAILED EQUIPMENT LANCASTER	2019 FY Actual	279,993.85
DB FAILED EQUIPMENT LANCASTER	2020 FY Actual	258,042.68
DB FAILED EQUIPMENT LANCASTER	2021 FY Actual	109,274.17
DB FAILED EQUIPMENT LANCASTER	2022 FY Actual	17,110.29
DB FAILED EQUIPMENT LANCASTER	2023 FY Actual	2,769.84
DB FAILED EQUIPMENT BERLIN	2019 FY Actual	178,627.12
DB FAILED EQUIPMENT BERLIN	2020 FY Actual	77,156.07
DB FAILED EQUIPMENT BERLIN	2021 FY Actual	5,468.72
DB FAILED EQUIPMENT BERLIN	2022 FY Actual	16,635.02
DB FAILED EQUIPMENT BERLIN	2023 FY Actual	3,684.28
DB FAILED EQUIPMENT CHOCORUA	2019 FY Actual	184,568.02
DB FAILED EQUIPMENT CHOCORUA	2020 FY Actual	23,123.31
DB FAILED EQUIPMENT CHOCORUA	2021 FY Actual	26,799.78
DB FAILED EQUIPMENT CHOCORUA	2022 FY Actual	5,394.47
DB FAILED EQUIPMENT CHOCORUA	2023 FY Actual	58,442.53
DB FAILED EQUIPMENT DERRY	2019 FY Actual	798,120.97
DB FAILED EQUIPMENT DERRY	2020 FY Actual	466,439.51
DB FAILED EQUIPMENT DERRY	2021 FY Actual	190,456.91
DB FAILED EQUIPMENT DERRY	2022 FY Actual	151,530.32
DB FAILED EQUIPMENT DERRY	2023 FY Actual	1,617.56
DB FAILED EQUIPMENT EPPING	2019 FY Actual	377.05
DB FAILED EQUIPMENT EPPING	2020 FY Actual	(207.21)
DB FAILED EQUIPMENT EPPING	2021 FY Actual	109,920.72
DB FAILED EQUIPMENT EPPING	2022 FY Actual	7,486.42
DB FAILED EQUIPMENT EPPING	2023 FY Actual	5,630.17
DB FAILED EQUIPMENT KEENE	2019 FY Actual	27,731.87
DB FAILED EQUIPMENT KEENE	2020 FY Actual	24,588.94
DB FAILED EQUIPMENT KEENE	2021 FY Actual	88,881.25
DB FAILED EQUIPMENT KEENE	2022 FY Actual	129,040.45
DB FAILED EQUIPMENT KEENE	2023 FY Actual	154,606.14
DB FAILED EQUIPMENT TILTON	2019 FY Actual	288,459.56
DB FAILED EQUIPMENT TILTON	2020 FY Actual	306,464.64
DB FAILED EQUIPMENT TILTON	2021 FY Actual	270,747.12
DB FAILED EQUIPMENT TILTON	2022 FY Actual	219,891.36
DB FAILED EQUIPMENT TILTON	2023 FY Actual	467,094.84
DB FAILED EQUIPMENT NASHUA	2019 FY Actual	786,641.49
DB FAILED EQUIPMENT NASHUA	2020 FY Actual	970,376.97
DB FAILED EQUIPMENT NASHUA	2021 FY Actual	434,714.74
DB FAILED EQUIPMENT NASHUA	2022 FY Actual	648,951.76
DB FAILED EQUIPMENT NASHUA	2023 FY Actual	124,195.37
DB FAILED EQUIPMENT PORTSMOUTH	2019 FY Actual	228,803.23
DB FAILED EQUIPMENT PORTSMOUTH	2020 FY Actual	220,496.22

DB FAILED EQUIPMENT PORTSMOUTH	2021 FY Actual	156,267.01
DB FAILED EQUIPMENT PORTSMOUTH	2022 FY Actual	9,478.53
DB FAILED EQUIPMENT PORTSMOUTH	2023 FY Actual	105,974.35
DB FAILED EQUIPMENT ROCHESTER	2019 FY Actual	63,806.89
DB FAILED EQUIPMENT ROCHESTER	2020 FY Actual	48,850.90
DB FAILED EQUIPMENT ROCHESTER	2021 FY Actual	123,695.24
DB FAILED EQUIPMENT ROCHESTER	2022 FY Actual	201,583.61
DB FAILED EQUIPMENT ROCHESTER	2023 FY Actual	123,004.33
DB FAILED EQUIPMENT NEWPORT	2019 FY Actual	306,981.55
DB FAILED EQUIPMENT NEWPORT	2020 FY Actual	204,770.82
DB FAILED EQUIPMENT NEWPORT	2021 FY Actual	166,483.19
DB FAILED EQUIPMENT NEWPORT	2022 FY Actual	296,412.85
DB FAILED EQUIPMENT NEWPORT	2023 FY Actual	405,017.17
DB FAILED EQUIPMENT HOOKSETT	2019 FY Actual	198,445.67
DB FAILED EQUIPMENT HOOKSETT	2020 FY Actual	427,409.57
DB FAILED EQUIPMENT HOOKSETT	2021 FY Actual	189,855.95
DB FAILED EQUIPMENT HOOKSETT	2022 FY Actual	247,784.64
DB FAILED EQUIPMENT HOOKSETT	2023 FY Actual	151,620.82
DB FAILED EQUIPMENT BEDFORD	2019 FY Actual	769,704.41
DB FAILED EQUIPMENT BEDFORD	2020 FY Actual	427,249.76
DB FAILED EQUIPMENT BEDFORD	2021 FY Actual	295,183.52
DB FAILED EQUIPMENT BEDFORD	2022 FY Actual	246,345.78
DB FAILED EQUIPMENT BEDFORD	2023 FY Actual	393,658.66
OH FAILED EQUIPMENT LANCASTER	2019 FY Actual	201,236.94
OH FAILED EQUIPMENT LANCASTER	2020 FY Actual	167,747.22
OH FAILED EQUIPMENT LANCASTER	2021 FY Actual	334,931.38
OH FAILED EQUIPMENT LANCASTER	2022 FY Actual	146,701.36
OH FAILED EQUIPMENT LANCASTER	2023 FY Actual	469,029.41
OH FAILED EQUIPMENT BERLIN	2019 FY Actual	124,615.61
OH FAILED EQUIPMENT BERLIN	2020 FY Actual	31,585.53
OH FAILED EQUIPMENT BERLIN	2021 FY Actual	404,373.13
OH FAILED EQUIPMENT BERLIN	2022 FY Actual	48,626.41
OH FAILED EQUIPMENT BERLIN	2023 FY Actual	145,004.05
OH FAILED EQUIPMENT CHOCORUA	2019 FY Actual	55,737.03
OH FAILED EQUIPMENT CHOCORUA	2020 FY Actual	53,065.84
OH FAILED EQUIPMENT CHOCORUA	2021 FY Actual	165,129.26
OH FAILED EQUIPMENT CHOCORUA	2022 FY Actual	96,434.59
OH FAILED EQUIPMENT CHOCORUA	2023 FY Actual	253,014.24
OH FAILED EQUIPMENT DERRY	2019 FY Actual	195,997.65
OH FAILED EQUIPMENT DERRY	2020 FY Actual	131,590.67
OH FAILED EQUIPMENT DERRY	2021 FY Actual	180,932.59
OH FAILED EQUIPMENT DERRY	2022 FY Actual	143,348.48
OH FAILED EQUIPMENT DERRY	2023 FY Actual	202,803.33
OH FAILED EQUIPMENT EPPING	2019 FY Actual	665.87
OH FAILED EQUIPMENT EPPING	2020 FY Actual	(214.65)
OH FAILED EQUIPMENT EPPING	2021 FY Actual	294,810.27
OH FAILED EQUIPMENT EPPING	2022 FY Actual	47,330.10

OH FAILED EQUIPMENT EPPING	2023 FY Actual	28,056.02
OH FAILED EQUIPMENT KEENE	2019 FY Actual	152,232.68
OH FAILED EQUIPMENT KEENE	2020 FY Actual	355,910.96
OH FAILED EQUIPMENT KEENE	2021 FY Actual	250,432.75
OH FAILED EQUIPMENT KEENE	2022 FY Actual	105,926.80
OH FAILED EQUIPMENT KEENE	2023 FY Actual	159,616.06
OH FAILED EQUIPMENT TILTON	2019 FY Actual	389,033.67
OH FAILED EQUIPMENT TILTON	2020 FY Actual	231,443.36
OH FAILED EQUIPMENT TILTON	2021 FY Actual	525,653.82
OH FAILED EQUIPMENT TILTON	2022 FY Actual	527,891.66
OH FAILED EQUIPMENT TILTON	2023 FY Actual	899,423.67
OH FAILED EQUIPMENT NASHUA	2019 FY Actual	173,598.14
OH FAILED EQUIPMENT NASHUA	2020 FY Actual	335,906.56
OH FAILED EQUIPMENT NASHUA	2021 FY Actual	405,443.86
OH FAILED EQUIPMENT NASHUA	2022 FY Actual	500,213.61
OH FAILED EQUIPMENT NASHUA	2023 FY Actual	803,676.74
OH FAILED EQUIPMENT PORTSMOUTH	2019 FY Actual	93,053.93
OH FAILED EQUIPMENT PORTSMOUTH	2020 FY Actual	63,733.10
OH FAILED EQUIPMENT PORTSMOUTH	2021 FY Actual	168,038.71
OH FAILED EQUIPMENT PORTSMOUTH	2022 FY Actual	(51,632.43)
OH FAILED EQUIPMENT PORTSMOUTH	2023 FY Actual	117,604.09
OH FAILED EQUIPMENT PSNH	2019 FY Actual	(397,603.67)
OH FAILED EQUIPMENT PSNH	2020 FY Actual	(279,730.39)
OH FAILED EQUIPMENT PSNH	2021 FY Actual	(441,617.27)
OH FAILED EQUIPMENT PSNH	2022 FY Actual	(277,750.81)
OH FAILED EQUIPMENT PSNH	2023 FY Actual	(353,710.56)
OH FAILED EQUIPMENT ROCHESTER	2019 FY Actual	19,076.37
OH FAILED EQUIPMENT ROCHESTER	2020 FY Actual	146,616.22
OH FAILED EQUIPMENT ROCHESTER	2021 FY Actual	268,608.50
OH FAILED EQUIPMENT ROCHESTER	2022 FY Actual	417,605.91
OH FAILED EQUIPMENT ROCHESTER	2023 FY Actual	267,580.87
OH FAILED EQUIPMENT NEWPORT	2019 FY Actual	55,571.10
OH FAILED EQUIPMENT NEWPORT	2020 FY Actual	168,196.14
OH FAILED EQUIPMENT NEWPORT	2021 FY Actual	129,675.59
OH FAILED EQUIPMENT NEWPORT	2022 FY Actual	120,997.86
OH FAILED EQUIPMENT NEWPORT	2023 FY Actual	197,975.69
OH FAILED EQUIPMENT HOOKSETT	2019 FY Actual	236,438.22
OH FAILED EQUIPMENT HOOKSETT	2020 FY Actual	287,133.11
OH FAILED EQUIPMENT HOOKSETT	2021 FY Actual	248,485.13
OH FAILED EQUIPMENT HOOKSETT	2022 FY Actual	455,485.58
OH FAILED EQUIPMENT HOOKSETT	2023 FY Actual	874,605.79
OH FAILED EQUIPMENT BEDFORD	2019 FY Actual	179,537.85
OH FAILED EQUIPMENT BEDFORD	2020 FY Actual	102,235.30
OH FAILED EQUIPMENT BEDFORD	2021 FY Actual	439,745.69
OH FAILED EQUIPMENT BEDFORD	2022 FY Actual	480,591.39
OH FAILED EQUIPMENT BEDFORD	2023 FY Actual	693,410.80
UG FAILED EQUIPMENT LANCASTER	2022 FY Actual	929.89

UG FAILED EQUIPMENT LANCASTER	2023 FY Actual	135,647.29
UG FAILED EQUIPMENT BERLIN	2023 FY Actual	4,924.61
UG FAILED EQUIPMENT CHOCORUA	2021 FY Actual	475.63
UG FAILED EQUIPMENT DERRY	2021 FY Actual	5,834.92
UG FAILED EQUIPMENT DERRY	2022 FY Actual	(2,528.25)
UG FAILED EQUIPMENT DERRY	2023 FY Actual	(2,634.80)
UG FAILED EQUIPMENT EPPING	2021 FY Actual	81,238.30
UG FAILED EQUIPMENT EPPING	2022 FY Actual	7,181.50
UG FAILED EQUIPMENT EPPING	2023 FY Actual	(385.75)
UG FAILED EQUIPMENT KEENE	2019 FY Actual	120,010.69
UG FAILED EQUIPMENT KEENE	2020 FY Actual	16,268.54
UG FAILED EQUIPMENT KEENE	2021 FY Actual	20,507.93
UG FAILED EQUIPMENT KEENE	2022 FY Actual	(5,042.79)
UG FAILED EQUIPMENT KEENE	2023 FY Actual	79,158.29
UG FAILED EQUIPMENT TILTON	2019 FY Actual	38,444.79
UG FAILED EQUIPMENT TILTON	2020 FY Actual	(7,267.54)
UG FAILED EQUIPMENT TILTON	2021 FY Actual	4,582.89
UG FAILED EQUIPMENT TILTON	2022 FY Actual	177,723.04
UG FAILED EQUIPMENT TILTON	2023 FY Actual	456,945.33
UG FAILED EQUIPMENT NASHUA	2021 FY Actual	307,513.15
UG FAILED EQUIPMENT NASHUA	2022 FY Actual	29,213.12
UG FAILED EQUIPMENT NASHUA	2023 FY Actual	545,669.39
UG FAILED EQUIPMENT PORTSMOUTH	2021 FY Actual	150,428.68
UG FAILED EQUIPMENT PORTSMOUTH	2022 FY Actual	29,178.88
UG FAILED EQUIPMENT PORTSMOUTH	2023 FY Actual	156,838.49
UG FAILED EQUIPMENT ROCHESTER	2021 FY Actual	25,530.19
UG FAILED EQUIPMENT ROCHESTER	2022 FY Actual	22,753.99
UG FAILED EQUIPMENT ROCHESTER	2023 FY Actual	101,878.26
UG FAILED EQUIPMENT NEWPORT	2021 FY Actual	20,936.26
UG FAILED EQUIPMENT NEWPORT	2022 FY Actual	(2,506.36)
UG FAILED EQUIPMENT NEWPORT	2023 FY Actual	58,462.47
UG FAILED EQUIPMENT HOOKSETT	2019 FY Actual	335,715.52
UG FAILED EQUIPMENT HOOKSETT	2020 FY Actual	206,217.60
UG FAILED EQUIPMENT HOOKSETT	2021 FY Actual	6,344.54
UG FAILED EQUIPMENT HOOKSETT	2022 FY Actual	30,730.21
UG FAILED EQUIPMENT HOOKSETT	2023 FY Actual	41,023.46
UG FAILED EQUIPMENT BEDFORD	2021 FY Actual	235,727.38
UG FAILED EQUIPMENT BEDFORD	2022 FY Actual	47,676.76
UG FAILED EQUIPMENT BEDFORD	2023 FY Actual	307,802.78
DB INSPECTION FAILED EQUIPMENT MILF	2020 FY Actual	90.41
DB INSPECTION FAILED EQUIPMENT NASH	2019 FY Actual	(348.66)
DB INSPECTION FAILED EQUIPMENT ROCH	2019 FY Actual	106.85
DB INSPECTION FAILED EQUIPMENT ROCH	2020 FY Actual	(1,358.94)
DB INSPECTION FAILED EQUIPMENT HOOK	2019 FY Actual	157.96
DB INSPECTION FAILED EQUIPMENT BEDF	2019 FY Actual	(349.04)
DB INSPECTION FAILED EQUIPMENT BEDF	2020 FY Actual	14,334.71
DB INSPECTION FAILED EQUIPMENT BEDF	2021 FY Actual	148.02

DB INSPECTION FAILED EQUIPMENT BEDF	2023 FY Actual	(15,071.56)
OH INSPECTION FAILED EQUIPMENT-LANC	2019 FY Actual	(88.97)
OH INSPECTION FAILED EQUIPMENT-LANC	2022 FY Actual	(70.18)
OH INSPECTION FAILED EQUIPMENT-LANC	2023 FY Actual	3,491.35
OH INSPECTION FAILED EQUIPMENT-CHOC	2021 FY Actual	3,053.93
OH INSPECTION FAILED EQUIPMENT - DE	2021 FY Actual	14,272.18
OH INSPECTION FAILED EQUIPMENT - DE	2022 FY Actual	(7,415.24)
OH INSPECTION FAILED EQUIPMENT - DE	2023 FY Actual	9,877.36
OH INSPECTION FAILED EQUIPMENT - EP	2021 FY Actual	195,101.44
OH INSPECTION FAILED EQUIPMENT - EP	2022 FY Actual	115,259.38
OH INSPECTION FAILED EQUIPMENT - EP	2023 FY Actual	20,613.68
OH INSPECTION FAILED EQUIPMENT - KE	2019 FY Actual	2.84
OH INSPECTION FAILED EQUIPMENT - KE	2021 FY Actual	43,138.35
OH INSPECTION FAILED EQUIPMENT - KE	2022 FY Actual	8,755.31
OH INSPECTION FAILED EQUIPMENT - KE	2023 FY Actual	67,803.55
OH INSPECTION FAILED EQUIPMENT - NA	2021 FY Actual	6,557.70
OH INSPECTION FAILED EQUIPMENT - NA	2022 FY Actual	5,704.62
OH INSPECTION FAILED EQUIP - PORTSM	2019 FY Actual	3,262.65
OH INSPECTION FAILED EQUIP - PORTSM	2020 FY Actual	1,634.08
OH INSPECTION FAILED EQUIP - PORTSM	2021 FY Actual	1.08
OH INSPECTION FAILED EQUIP - PORTSM	2023 FY Actual	5,819.94
OH INSPECTION FAILED EQUIPMENT-ROCH	2019 FY Actual	5,702.61
OH INSPECTION FAILED EQUIPMENT-ROCH	2021 FY Actual	5,270.01
OH INSPECTION FAILED EQUIPMENT-ROCH	2022 FY Actual	(162.32)
OH INSPECTION FAILED EQUIPMENT-ROCH	2023 FY Actual	(148.43)
OH INSPECTION FAILED EQUIPMENT - NE	2022 FY Actual	20,835.43
OH INSPECTION FAILED EQUIPMENT - NE	2023 FY Actual	83,071.04
OH INSPECTION FAILED EQUIPMENT-HOOK	2019 FY Actual	110,696.50
OH INSPECTION FAILED EQUIPMENT-HOOK	2020 FY Actual	31,452.82
OH INSPECTION FAILED EQUIPMENT-HOOK	2021 FY Actual	(974.60)
OH INSPECTION FAILED EQUIPMENT-HOOK	2022 FY Actual	(10,937.52)
OH INSPECTION FAILED EQUIPMENT-HOOK	2023 FY Actual	(2,088.60)
OH INSPECTION FAILED EQUIPMENT - BE	2019 FY Actual	21,804.15
OH INSPECTION FAILED EQUIPMENT - BE	2020 FY Actual	34,922.71
OH INSPECTION FAILED EQUIPMENT - BE	2021 FY Actual	210.91
ROW REPLACE FAILED EQUIPMENT-ANNUA	2019 FY Actual	1,038,875
ROW REPLACE FAILED EQUIPMENT-ANNUA	2019 FY Budget	1,199,925
ROW REPLACE FAILED EQUIPMENT-ANNUA	2020 FY Actual	562,288
ROW REPLACE FAILED EQUIPMENT-ANNUA	2020 FY Budget	1,091,993
ROW REPLACE FAILED EQUIPMENT-ANNUA	2021 FY Actual	1,082,002
ROW REPLACE FAILED EQUIPMENT-ANNUA	2021 FY Budget	1,122,000
ROW REPLACE FAILED EQUIPMENT-ANNUA	2022 FY Actual	1,023,660
ROW REPLACE FAILED EQUIPMENT-ANNUA	2022 FY Budget	1,113,581
ROW REPLACE FAILED EQUIPMENT-ANNUA	2023 FY Actual	1,119,642
ROW REPLACE FAILED EQUIPMENT-ANNUA	2023 FY Budget	1,250,000
MINOR STORMS CAPITAL - LANCASTER AW	2022 FY Actual	47,888.01
MINOR STORMS CAPITAL - LANCASTER AW	2023 FY Actual	57,527.83

Minor Storms Capital - Berlin AWC	2023 FY Actual	5,928.97
MINOR STORMS CAPITAL - CHOCORUA AWC	2021 FY Actual	8,703.09
MINOR STORMS CAPITAL - CHOCORUA AWC	2022 FY Actual	27,156.34
MINOR STORMS CAPITAL - CHOCORUA AWC	2023 FY Actual	107,672.23
MINOR STORMS CAPITAL - DERRY AWC	2021 FY Actual	12,416.78
MINOR STORMS CAPITAL - DERRY AWC	2022 FY Actual	206,996.64
MINOR STORMS CAPITAL - DERRY AWC	2023 FY Actual	31,278.80
MINOR STORMS CAPITAL - EPPING AWC	2019 FY Actual	63.69
MINOR STORMS CAPITAL - EPPING AWC	2021 FY Actual	7,873.16
MINOR STORMS CAPITAL - EPPING AWC	2022 FY Actual	(4,310.08)
MINOR STORMS CAPITAL - KEENE AWC	2019 FY Actual	1,360.66
MINOR STORMS CAPITAL - KEENE AWC	2020 FY Actual	23,944.77
MINOR STORMS CAPITAL - KEENE AWC	2021 FY Actual	36,967.40
MINOR STORMS CAPITAL - KEENE AWC	2022 FY Actual	36,449.98
MINOR STORMS CAPITAL - KEENE AWC	2023 FY Actual	32,877.30
MINOR STORMS CAPITAL - TILTON AWC	2019 FY Actual	6,569.68
MINOR STORMS CAPITAL - TILTON AWC	2020 FY Actual	(1,221.72)
MINOR STORMS CAPITAL - TILTON AWC	2021 FY Actual	133,674.16
MINOR STORMS CAPITAL - TILTON AWC	2022 FY Actual	194,290.59
MINOR STORMS CAPITAL - TILTON AWC	2023 FY Actual	346,016.52
MINOR STORMS CAPITAL - NASHUA AWC	2019 FY Actual	75.36
MINOR STORMS CAPITAL - NASHUA AWC	2021 FY Actual	48,593.48
MINOR STORMS CAPITAL - NASHUA AWC	2022 FY Actual	595,968.99
MINOR STORMS CAPITAL - NASHUA AWC	2023 FY Actual	251,303.41
MINOR STORMS CAPITAL - PORTSMOUTH A	2021 FY Actual	52,224.52
MINOR STORMS CAPITAL - PORTSMOUTH A	2022 FY Actual	42,948.09
MINOR STORMS CAPITAL - PORTSMOUTH A	2023 FY Actual	7,379.57
Minor storms capital	2019 FY Budget	129,166.04
Minor storms capital	2020 FY Budget	132,486.28
Minor storms capital	2021 FY Budget	135,299.57
Minor storms capital	2022 FY Budget	166,946.83
Minor storms capital	2023 FY Budget	500,000.00
MINOR STORMS CAPITAL - ROCHESTER AW	2021 FY Actual	7,779.42
MINOR STORMS CAPITAL - ROCHESTER AW	2022 FY Actual	28,389.51
MINOR STORMS CAPITAL - ROCHESTER AW	2023 FY Actual	159,930.14
MINOR STORMS CAPITAL - NEWPORT AWC	2020 FY Actual	17,715.32
MINOR STORMS CAPITAL - NEWPORT AWC	2021 FY Actual	73,445.70
MINOR STORMS CAPITAL - NEWPORT AWC	2022 FY Actual	77,450.61
MINOR STORMS CAPITAL - NEWPORT AWC	2023 FY Actual	133,039.61
MINOR STORMS CAPITAL - HOOKSETT AWC	2019 FY Actual	313.62
MINOR STORMS CAPITAL - HOOKSETT AWC	2020 FY Actual	123,585.23
MINOR STORMS CAPITAL - HOOKSETT AWC	2021 FY Actual	88,468.78
MINOR STORMS CAPITAL - HOOKSETT AWC	2022 FY Actual	160,723.76
MINOR STORMS CAPITAL - HOOKSETT AWC	2023 FY Actual	81,809.11
MINOR STORMS CAPITAL - BEDFORD AWC	2019 FY Actual	(3,871.10)
MINOR STORMS CAPITAL - BEDFORD AWC	2020 FY Actual	1,814.92
MINOR STORMS CAPITAL - BEDFORD AWC	2021 FY Actual	182,392.28

MINOR STORMS CAPITAL - BEDFORD AWC	2022 FY Actual	130,395.92
MINOR STORMS CAPITAL - BEDFORD AWC	2023 FY Actual	554,603.68
NH LINE CONTRACTORS	2019 FY Actual	82,378.03
NH LINE CONTRACTORS	2019 FY Budget	300,092.40
NH LINE CONTRACTORS	2020 FY Actual	(319,556.68)
NH LINE CONTRACTORS	2020 FY Budget	299,905.20
NH LINE CONTRACTORS	2021 FY Actual	1,149,950.41
NH LINE CONTRACTORS	2021 FY Budget	306,000.00
NH LINE CONTRACTORS	2022 FY Actual	(510,209.49)
NH LINE CONTRACTORS	2022 FY Budget	299,488.70
NH LINE CONTRACTORS	2023 FY Actual	387,129.90
NH STORM CAPITALIZATION	2019 FY Actual	(3,449.18)
NH STORM CAPITALIZATION	2019 FY Budget	605,109.72
NH STORM CAPITALIZATION	2020 FY Actual	1,494,071.14
NH STORM CAPITALIZATION	2020 FY Budget	611,268.99
NH STORM CAPITALIZATION	2021 FY Actual	114,138.53
NH STORM CAPITALIZATION	2021 FY Budget	624,199.99
NH STORM CAPITALIZATION	2022 FY Actual	2,745,560.93
NH STORM CAPITALIZATION	2022 FY Budget	597,995.66
NH STORM CAPITALIZATION	2023 FY Actual	3,269,593.53
NH STORM CAPITALIZATION	2023 FY Budget	2,550,000.00
NH STORM CAP: Mar 2, 2017 event	2019 FY Actual	(2,885.33)
NH STORM CAP: Oct 29, 2017 event	2019 FY Actual	(10,107.67)
NH STORM CAP: Oct 29, 2017 event	2020 FY Actual	(8,891.00)
NH STORM CAP: Oct 29, 2017 event	2021 FY Actual	(2,658.84)
NH STORM CAP: Mar 7-8, 2018 event	2019 FY Actual	50,651.43
NH STORM CAP: Apr 4-5, 2018 event	2019 FY Actual	83.34
NH STORM CAP: Apr 4-5, 2018 event	2021 FY Actual	(529.40)
BERLIN 4KV SYSTEM RECONFIGURATION	2019 FY Actual	1,849.50
BERLIN EASTSIDE 34.5KV LINE BREAKER	2019 FY Actual	(5,563.38)
BERLIN EASTSIDE 34.5KV LINE BREAKER	2020 FY Actual	(5,286.59)
BERLIN EASTSIDE 34.5KV LINE BREAKER	2022 FY Actual	10,605.00
REPLACE LTC CONTROLS EDDY SS	2021 FY Actual	88,631.00
REPLACE LTC CONTROLS EDDY SS	2022 FY Actual	515,630.18
REPLACE LTC CONTROLS EDDY SS	2022 FY Budget	82,335.40
REPLACE LTC CONTROLS EDDY SS	2023 FY Actual	7,559.17
BERLIN EAST SIDE SS REPLACE TRANSFO	2021 FY Actual	2,114,931.92
BERLIN EAST SIDE SS REPLACE TRANSFO	2022 FY Actual	1,763,722.59
BERLIN EAST SIDE SS REPLACE TRANSFO	2022 FY Budget	1,721,504.08
BERLIN EAST SIDE SS REPLACE TRANSFO	2023 FY Actual	5,699.30
2022 NH D SS Emergent Annual	2022 FY Actual	265,305
2022 NH D SS Emergent Annual	2022 FY Budget	1,200,000
2022 NH D SS Emergent Annual	2023 FY Actual	474,806
2023 NH D SS Emergent Annual	2023 FY Actual	615,611
2023 NH D SS Emergent Annual	2023 FY Budget	846,600
PCB TRANSFORMER CHANGEOUT PROGRAM	2019 FY Actual	52,324.78
PCB TRANSFORMER CHANGEOUT PROGRAM	2019 FY Budget	75,049.13

PCB TRANSFORMER CHANGEOUT PROGRAM	2020 FY Actual	89,820.91
PCB TRANSFORMER CHANGEOUT PROGRAM	2020 FY Budget	74,333.99
PCB TRANSFORMER CHANGEOUT PROGRAM	2021 FY Actual	275,568.26
PCB TRANSFORMER CHANGEOUT PROGRAM	2021 FY Budget	76,500.00
PCB TRANSFORMER CHANGEOUT PROGRAM	2022 FY Actual	207,137.79
PCB TRANSFORMER CHANGEOUT PROGRAM	2022 FY Budget	148,906.99
PCB TRANSFORMER CHANGEOUT PROGRAM	2023 FY Actual	410,588.34
PCB TRANSFORMER CHANGEOUT PROGRAM	2023 FY Budget	265,200.00
DB INSURANCE CLAIM ANNUAL LANCASTER	2019 FY Actual	2,138.50
DB INSURANCE CLAIM ANNUAL LANCASTER	2020 FY Actual	3,552.88
DB INSURANCE CLAIM ANNUAL LANCASTER	2021 FY Actual	3,656.98
DB INSURANCE CLAIM ANNUAL LANCASTER	2022 FY Actual	555.82
DB INSURANCE CLAIM ANNUAL LANCASTER	2023 FY Actual	(392.51)
DB INSURANCE CLAIM ANNUAL BERLIN	2022 FY Actual	448.06
DB INSURANCE CLAIM ANNUAL BERLIN	2023 FY Actual	155.14
DB INSURANCE CLAIM ANNUAL CHOCORUA	2021 FY Actual	1,816.85
DB INSURANCE CLAIM ANNUAL CHOCORUA	2022 FY Actual	(1,477.86)
DB INSURANCE CLAIM ANNUAL CHOCORUA	2023 FY Actual	(114.75)
DB INSURANCE CLAIM ANNUAL - DERRY	2019 FY Actual	(5,832.09)
DB INSURANCE CLAIM ANNUAL - DERRY	2020 FY Actual	28,827.21
DB INSURANCE CLAIM ANNUAL - DERRY	2021 FY Actual	(13,139.51)
DB INSURANCE CLAIM ANNUAL - DERRY	2022 FY Actual	5,732.66
DB INSURANCE CLAIM ANNUAL - DERRY	2023 FY Actual	3,612.82
DB INSURANCE CLAIM ANNUAL EPPING	2019 FY Actual	(1,087.65)
DB INSURANCE CLAIM ANNUAL EPPING	2021 FY Actual	24,713.30
DB INSURANCE CLAIM ANNUAL EPPING	2022 FY Actual	6.43
DB INSURANCE CLAIM ANNUAL EPPING	2023 FY Actual	(24,477.70)
DB INSURANCE CLAIM ANNUAL - KEENE	2019 FY Actual	2,744.94
DB INSURANCE CLAIM ANNUAL - KEENE	2020 FY Actual	1,145.41
DB INSURANCE CLAIM ANNUAL - KEENE	2021 FY Actual	8,078.54
DB INSURANCE CLAIM ANNUAL - KEENE	2022 FY Actual	442.91
DB INSURANCE CLAIM ANNUAL - KEENE	2023 FY Actual	19,348.42
DB INSURANCE CLAIM ANNUAL TILTON	2019 FY Actual	460.95
DB INSURANCE CLAIM ANNUAL TILTON	2020 FY Actual	2,820.07
DB INSURANCE CLAIM ANNUAL TILTON	2021 FY Actual	17,866.65
DB INSURANCE CLAIM ANNUAL TILTON	2022 FY Actual	90,629.90
DB INSURANCE CLAIM ANNUAL TILTON	2023 FY Actual	(21,606.56)
DB INSURANCE CLAIM ANNUAL - NASHUA	2019 FY Actual	91,348.58
DB INSURANCE CLAIM ANNUAL - NASHUA	2020 FY Actual	170,807.02
DB INSURANCE CLAIM ANNUAL - NASHUA	2021 FY Actual	(18,674.57)
DB INSURANCE CLAIM ANNUAL - NASHUA	2022 FY Actual	8,911.57
DB INSURANCE CLAIM ANNUAL - NASHUA	2023 FY Actual	14,518.90
DB INSURANCE CLAIM ANNUAL PORTSMOUT	2019 FY Actual	34,465.51
DB INSURANCE CLAIM ANNUAL PORTSMOUT	2020 FY Actual	66,816.21
DB INSURANCE CLAIM ANNUAL PORTSMOUT	2021 FY Actual	(44,684.67)
DB INSURANCE CLAIM ANNUAL PORTSMOUT	2022 FY Actual	7,113.66
DB INSURANCE CLAIM ANNUAL PORTSMOUT	2023 FY Actual	147,018.22

DB INSURANCE CLAIM ANNUAL ROCHESTER	2020 FY Actual	103.51
DB INSURANCE CLAIM ANNUAL ROCHESTER	2021 FY Actual	23,376.46
DB INSURANCE CLAIM ANNUAL ROCHESTER	2022 FY Actual	5,168.93
DB INSURANCE CLAIM ANNUAL ROCHESTER	2023 FY Actual	13,846.83
DB INSURANCE CLAIM ANNUAL NEWPORT	2019 FY Actual	2,374.83
DB INSURANCE CLAIM ANNUAL NEWPORT	2020 FY Actual	29,042.33
DB INSURANCE CLAIM ANNUAL NEWPORT	2021 FY Actual	1,768.55
DB INSURANCE CLAIM ANNUAL NEWPORT	2022 FY Actual	28,388.80
DB INSURANCE CLAIM ANNUAL NEWPORT	2023 FY Actual	(27,210.45)
DB INSURANCE CLAIM ANNUAL - HOOKSET	2019 FY Actual	7,123.94
DB INSURANCE CLAIM ANNUAL - HOOKSET	2020 FY Actual	(9,040.49)
DB INSURANCE CLAIM ANNUAL - HOOKSET	2021 FY Actual	53,954.97
DB INSURANCE CLAIM ANNUAL - HOOKSET	2022 FY Actual	(15,917.05)
DB INSURANCE CLAIM ANNUAL - HOOKSET	2023 FY Actual	(4,320.89)
DB INSURANCE CLAIM ANNUAL BEDFORD	2019 FY Actual	10,705.17
DB INSURANCE CLAIM ANNUAL BEDFORD	2020 FY Actual	(6,365.77)
DB INSURANCE CLAIM ANNUAL BEDFORD	2021 FY Actual	20,422.15
DB INSURANCE CLAIM ANNUAL BEDFORD	2022 FY Actual	(10,434.77)
DB INSURANCE CLAIM ANNUAL BEDFORD	2023 FY Actual	603.22
OH INSURANCE CLAIM LANCASTER	2019 FY Actual	8,657.36
OH INSURANCE CLAIM LANCASTER	2020 FY Actual	29,928.62
OH INSURANCE CLAIM LANCASTER	2021 FY Actual	148,952.53
OH INSURANCE CLAIM LANCASTER	2022 FY Actual	20,341.58
OH INSURANCE CLAIM LANCASTER	2023 FY Actual	60,953.38
OH INSURANCE CLAIM BERLIN	2019 FY Actual	64,349.32
OH INSURANCE CLAIM BERLIN	2020 FY Actual	(13,180.31)
OH INSURANCE CLAIM BERLIN	2021 FY Actual	(16,482.91)
OH INSURANCE CLAIM BERLIN	2022 FY Actual	(7,652.51)
OH INSURANCE CLAIM BERLIN	2023 FY Actual	41,676.64
OH INSURANCE CLAIM CHOCORUA	2019 FY Actual	15,809.76
OH INSURANCE CLAIM CHOCORUA	2020 FY Actual	20,404.86
OH INSURANCE CLAIM CHOCORUA	2021 FY Actual	117,407.45
OH INSURANCE CLAIM CHOCORUA	2022 FY Actual	(21,656.55)
OH INSURANCE CLAIM CHOCORUA	2023 FY Actual	92,507.99
OH INSURANCE CLAIM DERRY	2019 FY Actual	164,604.31
OH INSURANCE CLAIM DERRY	2020 FY Actual	(61,462.09)
OH INSURANCE CLAIM DERRY	2021 FY Actual	303,774.23
OH INSURANCE CLAIM DERRY	2022 FY Actual	138,362.04
OH INSURANCE CLAIM DERRY	2023 FY Actual	(42,208.50)
OH INSURANCE CLAIM EPPING	2019 FY Actual	38,989.24
OH INSURANCE CLAIM EPPING	2020 FY Actual	35,014.83
OH INSURANCE CLAIM EPPING	2021 FY Actual	129,065.89
OH INSURANCE CLAIM EPPING	2022 FY Actual	102,322.71
OH INSURANCE CLAIM EPPING	2023 FY Actual	67,981.52
OH INSURANCE CLAIM KEENE	2019 FY Actual	83,825.25
OH INSURANCE CLAIM KEENE	2020 FY Actual	134,681.16
OH INSURANCE CLAIM KEENE	2021 FY Actual	254,277.74

OH INSURANCE CLAIM KEENE	2022 FY Actual	207,290.11
OH INSURANCE CLAIM KEENE	2023 FY Actual	(101,227.03)
OH INSURANCE CLAIM TILTON	2019 FY Actual	95,455.43
OH INSURANCE CLAIM TILTON	2020 FY Actual	99,146.61
OH INSURANCE CLAIM TILTON	2021 FY Actual	157,499.18
OH INSURANCE CLAIM TILTON	2022 FY Actual	41,118.26
OH INSURANCE CLAIM TILTON	2023 FY Actual	170,229.79
OH INSURANCE CLAIM MILFORD	2023 FY Actual	(211.11)
OH INSURANCE CLAIM NASHUA	2019 FY Actual	246,168.54
OH INSURANCE CLAIM NASHUA	2020 FY Actual	33,269.36
OH INSURANCE CLAIM NASHUA	2021 FY Actual	456,182.80
OH INSURANCE CLAIM NASHUA	2022 FY Actual	(193,900.08)
OH INSURANCE CLAIM NASHUA	2023 FY Actual	213,483.15
OH INSURANCE CLAIM PORTSMOUTH	2019 FY Actual	11,038.41
OH INSURANCE CLAIM PORTSMOUTH	2020 FY Actual	10,129.43
OH INSURANCE CLAIM PORTSMOUTH	2021 FY Actual	147,577.50
OH INSURANCE CLAIM PORTSMOUTH	2022 FY Actual	21,590.84
OH INSURANCE CLAIM PORTSMOUTH	2023 FY Actual	(25,709.12)
OH INSURANCE CLAIM PSNH	2019 FY Budget	600,190.46
OH INSURANCE CLAIM PSNH	2020 FY Budget	600,001.30
OH INSURANCE CLAIM PSNH	2021 FY Budget	611,999.95
OH INSURANCE CLAIM PSNH	2022 FY Budget	1,435,299.96
OH INSURANCE CLAIM PSNH	2023 FY Budget	1,770,720.00
OH INSURANCE CLAIM ROCHESTER	2019 FY Actual	133,949.91
OH INSURANCE CLAIM ROCHESTER	2020 FY Actual	62,803.30
OH INSURANCE CLAIM ROCHESTER	2021 FY Actual	197,268.06
OH INSURANCE CLAIM ROCHESTER	2022 FY Actual	140,247.67
OH INSURANCE CLAIM ROCHESTER	2023 FY Actual	112,644.01
OH INSURANCE CLAIM NEWPORT	2019 FY Actual	19,775.87
OH INSURANCE CLAIM NEWPORT	2020 FY Actual	56,768.40
OH INSURANCE CLAIM NEWPORT	2021 FY Actual	79,925.50
OH INSURANCE CLAIM NEWPORT	2022 FY Actual	(47,510.39)
OH INSURANCE CLAIM NEWPORT	2023 FY Actual	59,408.21
OH INSURANCE CLAIM HOOKSETT	2019 FY Actual	29,415.19
OH INSURANCE CLAIM HOOKSETT	2020 FY Actual	131,651.30
OH INSURANCE CLAIM HOOKSETT	2021 FY Actual	342,010.15
OH INSURANCE CLAIM HOOKSETT	2022 FY Actual	124,342.43
OH INSURANCE CLAIM HOOKSETT	2023 FY Actual	(57,693.93)
OH INSURANCE CLAIM BEDFORD	2019 FY Actual	(81,497.23)
OH INSURANCE CLAIM BEDFORD	2020 FY Actual	96,306.53
OH INSURANCE CLAIM BEDFORD	2021 FY Actual	315,959.39
OH INSURANCE CLAIM BEDFORD	2022 FY Actual	(146,717.84)
OH INSURANCE CLAIM BEDFORD	2023 FY Actual	86,720.75
UG INSURANCE CLAIM LANCASTER	2023 FY Actual	414.46
UG INSURANCE CLAIM BERLIN	2021 FY Actual	423.41
UG INSURANCE CLAIM BERLIN	2022 FY Actual	111.27
UG INSURANCE CLAIM BERLIN	2023 FY Actual	569.50

UG INSURANCE CLAIM CHOCORUA	2021 FY Actual	151.70
UG INSURANCE CLAIM CHOCORUA	2022 FY Actual	539.98
UG INSURANCE CLAIM CHOCORUA	2023 FY Actual	60.21
UG INSURANCE CLAIM DERRY	2021 FY Actual	85.29
UG INSURANCE CLAIM DERRY	2022 FY Actual	8,353.39
UG INSURANCE CLAIM DERRY	2023 FY Actual	6,254.47
UG INSURANCE CLAIM EPPING	2023 FY Actual	5,864.31
UG INSURANCE CLAIM KEENE	2019 FY Actual	(8,550.82)
UG INSURANCE CLAIM KEENE	2020 FY Actual	3,923.04
UG INSURANCE CLAIM KEENE	2021 FY Actual	656.01
UG INSURANCE CLAIM KEENE	2022 FY Actual	12,283.92
UG INSURANCE CLAIM KEENE	2023 FY Actual	(13,857.10)
UG INSURANCE CLAIM TILTON	2021 FY Actual	8,844.40
UG INSURANCE CLAIM TILTON	2022 FY Actual	293.34
UG INSURANCE CLAIM TILTON	2023 FY Actual	1,248.29
UG INSURANCE CLAIM NASHUA	2021 FY Actual	425.84
UG INSURANCE CLAIM NASHUA	2022 FY Actual	46,465.64
UG INSURANCE CLAIM NASHUA	2023 FY Actual	14,326.00
UG INSURANCE CLAIM PORTSMOUTH	2021 FY Actual	10,251.11
UG INSURANCE CLAIM PORTSMOUTH	2022 FY Actual	6,538.88
UG INSURANCE CLAIM PORTSMOUTH	2023 FY Actual	70,910.42
UG INSURANCE CLAIM ROCHESTER	2021 FY Actual	11,947.29
UG INSURANCE CLAIM ROCHESTER	2022 FY Actual	22,882.17
UG INSURANCE CLAIM ROCHESTER	2023 FY Actual	7,548.55
UG INSURANCE CLAIM NEWPORT	2022 FY Actual	870.49
UG INSURANCE CLAIM NEWPORT	2023 FY Actual	6,004.30
UG INSURANCE CLAIM HOOKSETT	2020 FY Actual	2,324.78
UG INSURANCE CLAIM HOOKSETT	2022 FY Actual	(1,151.24)
UG INSURANCE CLAIM HOOKSETT	2023 FY Actual	3,126.93
UG INSURANCE CLAIM BEDFORD	2021 FY Actual	2,540.50
UG INSURANCE CLAIM BEDFORD	2022 FY Actual	7,649.25
UG INSURANCE CLAIM BEDFORD	2023 FY Actual	2,506.76
NON-ROADWAY LIGHTING - LANCASTER	2019 FY Actual	30,523.58
NON-ROADWAY LIGHTING - LANCASTER	2020 FY Actual	12,582.82
NON-ROADWAY LIGHTING - LANCASTER	2021 FY Actual	12,179.64
NON-ROADWAY LIGHTING - LANCASTER	2022 FY Actual	9,090.75
NON-ROADWAY LIGHTING - LANCASTER	2023 FY Actual	8,108.90
NON-ROADWAY LIGHTING - BERLIN	2019 FY Actual	3,937.34
NON-ROADWAY LIGHTING - BERLIN	2020 FY Actual	7,257.73
NON-ROADWAY LIGHTING - BERLIN	2021 FY Actual	12,697.33
NON-ROADWAY LIGHTING - BERLIN	2022 FY Actual	14,610.27
NON-ROADWAY LIGHTING - BERLIN	2023 FY Actual	1,777.01
NON-ROADWAY LIGHTING - CHOCORUA	2019 FY Actual	15,870.57
NON-ROADWAY LIGHTING - CHOCORUA	2020 FY Actual	8,175.75
NON-ROADWAY LIGHTING - CHOCORUA	2021 FY Actual	5,520.78
NON-ROADWAY LIGHTING - CHOCORUA	2022 FY Actual	52,005.41
NON-ROADWAY LIGHTING - CHOCORUA	2023 FY Actual	20,257.05

NON-ROADWAY LIGHTING - DERRY	2019 FY Actual	41,144.59
NON-ROADWAY LIGHTING - DERRY	2020 FY Actual	22,645.06
NON-ROADWAY LIGHTING - DERRY	2021 FY Actual	38,835.90
NON-ROADWAY LIGHTING - DERRY	2022 FY Actual	21,335.09
NON-ROADWAY LIGHTING - DERRY	2023 FY Actual	55,556.67
NON-ROADWAY LIGHTING - EPPING	2019 FY Actual	20,177.60
NON-ROADWAY LIGHTING - EPPING	2020 FY Actual	13,897.60
NON-ROADWAY LIGHTING - EPPING	2021 FY Actual	22,487.24
NON-ROADWAY LIGHTING - EPPING	2022 FY Actual	27,797.04
NON-ROADWAY LIGHTING - EPPING	2023 FY Actual	39,725.41
NON-ROADWAY LIGHTING - KEENE	2019 FY Actual	37,899.12
NON-ROADWAY LIGHTING - KEENE	2020 FY Actual	26,828.02
NON-ROADWAY LIGHTING - KEENE	2021 FY Actual	34,801.03
NON-ROADWAY LIGHTING - KEENE	2022 FY Actual	30,813.54
NON-ROADWAY LIGHTING - KEENE	2023 FY Actual	80,360.81
NON-ROADWAY LIGHTING LACONIA	2019 FY Actual	56,337.82
NON-ROADWAY LIGHTING LACONIA	2020 FY Actual	30,340.52
NON-ROADWAY LIGHTING LACONIA	2021 FY Actual	30,773.38
NON-ROADWAY LIGHTING LACONIA	2022 FY Actual	92,840.73
NON-ROADWAY LIGHTING LACONIA	2023 FY Actual	102,675.95
NON-ROADWAY LIGHTING - NASHUA	2019 FY Actual	67,021.92
NON-ROADWAY LIGHTING - NASHUA	2020 FY Actual	96,459.67
NON-ROADWAY LIGHTING - NASHUA	2021 FY Actual	52,940.59
NON-ROADWAY LIGHTING - NASHUA	2022 FY Actual	86,702.66
NON-ROADWAY LIGHTING - NASHUA	2023 FY Actual	130,102.84
NON-ROADWAY LIGHTING - PORTSMOUTH	2019 FY Actual	9,231.88
NON-ROADWAY LIGHTING - PORTSMOUTH	2020 FY Actual	23,972.79
NON-ROADWAY LIGHTING - PORTSMOUTH	2021 FY Actual	10,979.34
NON-ROADWAY LIGHTING - PORTSMOUTH	2022 FY Actual	7,224.37
NON-ROADWAY LIGHTING - PORTSMOUTH	2023 FY Actual	17,538.46
NON-ROADWAY LIGHTING	2019 FY Budget	400,126.57
NON-ROADWAY LIGHTING	2020 FY Budget	407,574.25
NON-ROADWAY LIGHTING	2021 FY Budget	416,200.06
NON-ROADWAY LIGHTING	2022 FY Budget	765,705.04
NON-ROADWAY LIGHTING	2023 FY Budget	693,600.00
NON-ROADWAY LIGHTING - ROCHESTER	2019 FY Actual	31,349.13
NON-ROADWAY LIGHTING - ROCHESTER	2020 FY Actual	47,636.14
NON-ROADWAY LIGHTING - ROCHESTER	2021 FY Actual	20,598.45
NON-ROADWAY LIGHTING - ROCHESTER	2022 FY Actual	59,710.16
NON-ROADWAY LIGHTING - ROCHESTER	2023 FY Actual	51,158.33
NON-ROADWAY LIGHTING - NEWPORT	2019 FY Actual	20,676.46
NON-ROADWAY LIGHTING - NEWPORT	2020 FY Actual	11,522.05
NON-ROADWAY LIGHTING - NEWPORT	2021 FY Actual	8,929.37
NON-ROADWAY LIGHTING - NEWPORT	2022 FY Actual	4,942.99
NON-ROADWAY LIGHTING - NEWPORT	2023 FY Actual	17,698.47
NON-ROADWAY LIGHTING - MANCHESTER E	2019 FY Actual	70,122.46
NON-ROADWAY LIGHTING - MANCHESTER E	2020 FY Actual	25,692.21

NON-ROADWAY LIGHTING - MANCHESTER E	2021 FY Actual	24,031.08
NON-ROADWAY LIGHTING - MANCHESTER E	2022 FY Actual	34,344.47
NON-ROADWAY LIGHTING - MANCHESTER E	2023 FY Actual	264,739.05
NON-ROADWAY LIGHTING - MANCHESTER W	2019 FY Actual	33,471.52
NON-ROADWAY LIGHTING - MANCHESTER W	2020 FY Actual	25,336.83
NON-ROADWAY LIGHTING - MANCHESTER W	2021 FY Actual	45,896.00
NON-ROADWAY LIGHTING - MANCHESTER W	2022 FY Actual	28,313.21
NON-ROADWAY LIGHTING - MANCHESTER W	2023 FY Actual	32,358.30
ROADWAY LIGHTING - LANCASTER	2019 FY Actual	(195.38)
ROADWAY LIGHTING - LANCASTER	2020 FY Actual	1,283.72
ROADWAY LIGHTING - LANCASTER	2021 FY Actual	1,199.13
ROADWAY LIGHTING - LANCASTER	2022 FY Actual	538.43
ROADWAY LIGHTING - LANCASTER	2023 FY Actual	2,515.66
ROADWAY LIGHTING - BERLIN	2019 FY Actual	2,252.72
ROADWAY LIGHTING - BERLIN	2020 FY Actual	(190.00)
ROADWAY LIGHTING - BERLIN	2021 FY Actual	369.65
ROADWAY LIGHTING - BERLIN	2022 FY Actual	1,306.98
ROADWAY LIGHTING - BERLIN	2023 FY Actual	(8.38)
ROADWAY LIGHTING - CHOCORUA	2019 FY Actual	2,603.05
ROADWAY LIGHTING - CHOCORUA	2020 FY Actual	2,572.20
ROADWAY LIGHTING - CHOCORUA	2021 FY Actual	1,898.26
ROADWAY LIGHTING - CHOCORUA	2022 FY Actual	7,350.82
ROADWAY LIGHTING - CHOCORUA	2023 FY Actual	14,525.14
ROADWAY LIGHTING - DERRY	2019 FY Actual	3,215.96
ROADWAY LIGHTING - DERRY	2020 FY Actual	1,311.94
ROADWAY LIGHTING - DERRY	2021 FY Actual	5,023.81
ROADWAY LIGHTING - DERRY	2022 FY Actual	18,912.90
ROADWAY LIGHTING - DERRY	2023 FY Actual	112,547.95
ROADWAY LIGHTING - EPPING	2019 FY Actual	1,845.34
ROADWAY LIGHTING - EPPING	2020 FY Actual	8,225.76
ROADWAY LIGHTING - EPPING	2021 FY Actual	761.22
ROADWAY LIGHTING - EPPING	2022 FY Actual	3,025.88
ROADWAY LIGHTING - EPPING	2023 FY Actual	59,095.73
ROADWAY LIGHTING - KEENE	2019 FY Actual	(3,134.64)
ROADWAY LIGHTING - KEENE	2020 FY Actual	5,766.09
ROADWAY LIGHTING - KEENE	2021 FY Actual	7,104.74
ROADWAY LIGHTING - KEENE	2022 FY Actual	2,809.98
ROADWAY LIGHTING - KEENE	2023 FY Actual	47,469.67
ROADWAY LIGHTING - LACONIA	2019 FY Actual	25,080.03
ROADWAY LIGHTING - LACONIA	2020 FY Actual	6,382.32
ROADWAY LIGHTING - LACONIA	2021 FY Actual	5,003.93
ROADWAY LIGHTING - LACONIA	2022 FY Actual	24,614.30
ROADWAY LIGHTING - LACONIA	2023 FY Actual	108,147.73
ROADWAY LIGHTING - NASHUA	2019 FY Actual	5,060.04
ROADWAY LIGHTING - NASHUA	2020 FY Actual	9,549.52
ROADWAY LIGHTING - NASHUA	2021 FY Actual	6,035.69
ROADWAY LIGHTING - NASHUA	2022 FY Actual	10,431.15

ROADWAY LIGHTING - NASHUA	2023 FY Actual	53,570.83
ROADWAY LIGHTING - PORTSMOUTH	2019 FY Actual	14,334.90
ROADWAY LIGHTING - PORTSMOUTH	2020 FY Actual	5,242.46
ROADWAY LIGHTING - PORTSMOUTH	2021 FY Actual	36,192.52
ROADWAY LIGHTING - PORTSMOUTH	2022 FY Actual	4,065.26
ROADWAY LIGHTING - PORTSMOUTH	2023 FY Actual	25,874.91
ROADWAY LIGHTING - ROCHESTER	2019 FY Actual	12,761.33
ROADWAY LIGHTING - ROCHESTER	2020 FY Actual	16,516.26
ROADWAY LIGHTING - ROCHESTER	2021 FY Actual	35,932.59
ROADWAY LIGHTING - ROCHESTER	2022 FY Actual	(1,600.30)
ROADWAY LIGHTING - ROCHESTER	2023 FY Actual	77,148.66
ROADWAY LIGHTING - NEWPORT	2019 FY Actual	1,118.86
ROADWAY LIGHTING - NEWPORT	2020 FY Actual	612.62
ROADWAY LIGHTING - NEWPORT	2021 FY Actual	263.40
ROADWAY LIGHTING - NEWPORT	2022 FY Actual	(66.09)
ROADWAY LIGHTING - NEWPORT	2023 FY Actual	11,291.97
ROADWAY LIGHTING - MANCHESTER EAST	2019 FY Actual	(4,816.99)
ROADWAY LIGHTING - MANCHESTER EAST	2020 FY Actual	(9,862.70)
ROADWAY LIGHTING - MANCHESTER EAST	2021 FY Actual	12,213.54
ROADWAY LIGHTING - MANCHESTER EAST	2022 FY Actual	18,889.33
ROADWAY LIGHTING - MANCHESTER EAST	2023 FY Actual	34,085.52
ROADWAY LIGHTING - BEDFORD	2019 FY Actual	12,784.45
ROADWAY LIGHTING - BEDFORD	2020 FY Actual	465.94
ROADWAY LIGHTING - BEDFORD	2021 FY Actual	11,939.27
ROADWAY LIGHTING - BEDFORD	2022 FY Actual	5,601.39
ROADWAY LIGHTING - BEDFORD	2023 FY Actual	12,438.64
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2019 FY Actual	(2,682.14)
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2019 FY Budget	119,925.77
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2020 FY Actual	(10,363.28)
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2020 FY Budget	120,000.06
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2021 FY Actual	(7,184.24)
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2021 FY Budget	122,399.85
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2022 FY Budget	268,008.71
EOL (ENERGY EFFICIENT OUTDOOR LIGHT	2023 FY Budget	224,400.00
LINE RELOCATE EAST HOLLIS ST NASHUA	2022 FY Actual	1,194.99
MANCHESTER AIRPORT DUCT RELOCATION	2019 FY Actual	(7,630.04)
Rochester Comcast Make Ready	2019 FY Actual	772,086.46
Rochester Comcast Make Ready	2019 FY Budget	535,877.48
Rochester Comcast Make Ready	2020 FY Actual	38,004.96
Rochester Comcast Make Ready	2022 FY Actual	(52,552.22)
Route 9 Roxbury-Sullivan 10439	2019 FY Actual	(41,532.51)
Route 9 Roxbury-Sullivan 10439	2020 FY Actual	(2,183.36)
Route 9 Roxbury-Sullivan 10439	2021 FY Actual	586.59
Route 9 Roxbury-Sullivan 10439	2022 FY Actual	(1,598.85)
LACONIA COMCAST NON-BILLABLE 2020	2020 FY Actual	279,259.91
LACONIA COMCAST NON-BILLABLE 2020	2021 FY Actual	226,679.67
LACONIA COMCAST NON-BILLABLE 2020	2022 FY Actual	(31,723.88)

LACONIA COMCAST BILLABLE 2020	2020 FY Actual	(106,529.57)
LACONIA COMCAST BILLABLE 2020	2021 FY Actual	(288,427.97)
LACONIA COMCAST BILLABLE 2020	2022 FY Actual	(2,369.25)
LACONIA COMCAST BILLABLE 2020	2023 FY Actual	(4,495.30)
GILFORD COMCAST NON-BILLABLE 2020	2020 FY Actual	306,087.14
GILFORD COMCAST NON-BILLABLE 2020	2021 FY Actual	121,294.18
GILFORD COMCAST NON-BILLABLE 2020	2022 FY Actual	(22,138.58)
GILFORD COMCAST BILLABLE 2020	2020 FY Actual	(216,470.72)
GILFORD COMCAST BILLABLE 2020	2021 FY Actual	163,820.94
GILFORD COMCAST BILLABLE 2020	2022 FY Actual	(48,704.17)
NHDOT LINE RELOC RTE 106 LOUDON	2020 FY Actual	121,095.34
NHDOT LINE RELOC RTE 106 LOUDON	2021 FY Actual	259,789.63
NHDOT LINE RELOC RTE 106 LOUDON	2022 FY Actual	(27,810.29)
ROUTE 16 LINE RELOCATION NHDOT	2021 FY Actual	225,781.65
ROUTE 16 LINE RELOCATION NHDOT	2022 FY Actual	(3,370.96)
LACONIA COMCAST NONBILLABLE 2021	2021 FY Actual	163,030.08
LACONIA COMCAST NONBILLABLE 2021	2022 FY Actual	161,237.08
LACONIA COMCAST NONBILLABLE 2021	2022 FY Budget	90,946.80
LACONIA COMCAST NONBILLABLE 2021	2023 FY Actual	(472.78)
LACONIA COMCAST BILLABLE 2021	2021 FY Actual	1,639.45
LACONIA COMCAST BILLABLE 2021	2022 FY Actual	(179,001.05)
LACONIA COMCAST BILLABLE 2021	2023 FY Actual	151,789.55
GILFORD COMCAST NONBILLABLE 2021	2021 FY Actual	181,744.44
GILFORD COMCAST NONBILLABLE 2021	2022 FY Actual	357,760.71
GILFORD COMCAST NONBILLABLE 2021	2022 FY Budget	94,378.53
GILFORD COMCAST NONBILLABLE 2021	2023 FY Actual	362.57
GILFORD COMCAST BILLABLE 2021	2021 FY Actual	(237.62)
GILFORD COMCAST BILLABLE 2021	2022 FY Actual	(257,106.25)
GILFORD COMCAST BILLABLE 2021	2023 FY Actual	184,584.95
NHDOT PROJ #13065 - 365 Line	2021 FY Actual	49,970.92
NHDOT PROJ #13065 - 365 Line	2022 FY Actual	1,022,344.83
NHDOT PROJ #13065 - 365 Line	2022 FY Budget	402,816.51
NHDOT PROJ #13065 - 365 Line	2023 FY Actual	(1,007,422.62)
NHDOT PROJ #13761 3138/3151 LINES	2021 FY Actual	73,088.61
NHDOT PROJ #13761 3138/3151 LINES	2022 FY Actual	838.72
NHDOT PROJ #13761 3138/3151 LINES	2022 FY Budget	(92,457.16)
NHDOT PROJ #13761 3138/3151 LINES	2023 FY Actual	(108,923.99)
COMCAST NON-BILLABLE LACONIA	2022 FY Actual	256,938.43
COMCAST NON-BILLABLE LACONIA	2022 FY Budget	299,992.09
COMCAST BILLABLE LACONIA	2022 FY Actual	(60,511.06)
COMCAST NON-BILLABLE GILFORD	2022 FY Actual	589,012.92
COMCAST NON-BILLABLE GILFORD	2022 FY Budget	300,000.00
COMCAST NON-BILLABLE GILFORD	2023 FY Actual	(218,887.54)
COMCAST BILLABLE GILFORD	2022 FY Actual	(100,397.30)
COMCAST BILLABLE GILFORD	2023 FY Actual	30,177.74
COMCAST NON-BILLABLE BELMONT	2023 FY Actual	887,089.65
COMCAST BILLABLE BELMONT	2022 FY Actual	(103,808.28)

COMCAST BILLABLE BELMONT	2023 FY Actual	173,415.65
COMCAST NON-BILLABLE TILTON	2023 FY Actual	24,893.12
COMCAST BILLABLE TILTON	2023 FY Actual	(292,191.25)
CABLE TV PROJECTS ANNUAL	2019 FY Actual	188,908.23
CABLE TV PROJECTS ANNUAL	2019 FY Budget	500,214.10
CABLE TV PROJECTS ANNUAL	2020 FY Actual	267,199.10
CABLE TV PROJECTS ANNUAL	2020 FY Budget	509,858.60
CABLE TV PROJECTS ANNUAL	2021 FY Actual	434,606.28
CABLE TV PROJECTS ANNUAL	2021 FY Budget	749,999.76
CABLE TV PROJECTS ANNUAL	2022 FY Actual	1,929,573.45
CABLE TV PROJECTS ANNUAL	2022 FY Budget	986,748.71
NHDOT PROJECT PROGRAM	2019 FY Actual	2,286,844.69
NHDOT PROJECT PROGRAM	2019 FY Budget	1,849,665.88
NHDOT PROJECT PROGRAM	2020 FY Actual	1,411,585.99
NHDOT PROJECT PROGRAM	2020 FY Budget	2,039,543.49
NHDOT PROJECT PROGRAM	2021 FY Actual	329,366.86
NHDOT PROJECT PROGRAM	2021 FY Budget	2,068,000.49
NHDOT PROJECT PROGRAM	2022 FY Actual	84,324.91
NHDOT PROJECT PROGRAM	2022 FY Budget	2,441,401.62
NHDOT PROJECT PROGRAM	2023 FY Actual	842,935.69
NHDOT PROJECT PROGRAM	2023 FY Budget	1,530,000.00
LINE RELOCATIONS - LANCASTER	2019 FY Actual	283,168.18
LINE RELOCATIONS - LANCASTER	2020 FY Actual	229,606.94
LINE RELOCATIONS - LANCASTER	2021 FY Actual	306,740.52
LINE RELOCATIONS - LANCASTER	2022 FY Actual	35,975.80
LINE RELOCATIONS - LANCASTER	2023 FY Actual	65,005.93
LINE RELOCATIONS - BERLIN	2019 FY Actual	(10,207.16)
LINE RELOCATIONS - BERLIN	2020 FY Actual	17,381.55
LINE RELOCATIONS - BERLIN	2021 FY Actual	7,855.67
LINE RELOCATIONS - BERLIN	2022 FY Actual	3,478.47
LINE RELOCATIONS - BERLIN	2023 FY Actual	3,717.14
LINE RELOCATIONS - CHOCORUA	2019 FY Actual	(377,158.56)
LINE RELOCATIONS - CHOCORUA	2020 FY Actual	24,197.08
LINE RELOCATIONS - CHOCORUA	2021 FY Actual	27,425.98
LINE RELOCATIONS - CHOCORUA	2022 FY Actual	21,333.20
LINE RELOCATIONS - CHOCORUA	2023 FY Actual	780,854.54
LINE RELOCATIONS - DERRY	2019 FY Actual	(213,863.67)
LINE RELOCATIONS - DERRY	2020 FY Actual	72,286.89
LINE RELOCATIONS - DERRY	2021 FY Actual	42,238.32
LINE RELOCATIONS - DERRY	2022 FY Actual	119,807.85
LINE RELOCATIONS - DERRY	2023 FY Actual	58,884.57
LINE RELOCATIONS - EPPING	2019 FY Actual	44,284.76
LINE RELOCATIONS - EPPING	2020 FY Actual	18,910.08
LINE RELOCATIONS - EPPING	2021 FY Actual	18,072.80
LINE RELOCATIONS - EPPING	2022 FY Actual	53,897.68
LINE RELOCATIONS - EPPING	2023 FY Actual	159,039.72
LINE RELOCATIONS - HILLSBORO	2021 FY Actual	59,077.36

LINE RELOCATIONS - HILLSBORO	2022 FY Actual	209,272.95
LINE RELOCATIONS - HILLSBORO	2023 FY Actual	150,657.35
LINE RELOCATIONS - KEENE	2019 FY Actual	10,547.69
LINE RELOCATIONS - KEENE	2020 FY Actual	23,634.86
LINE RELOCATIONS - KEENE	2021 FY Actual	245,609.05
LINE RELOCATIONS - KEENE	2022 FY Actual	325,142.73
LINE RELOCATIONS - KEENE	2023 FY Actual	193,283.55
LINE RELOCATIONS - LACONIA	2019 FY Actual	378,223.97
LINE RELOCATIONS - LACONIA	2020 FY Actual	(23,640.43)
LINE RELOCATIONS - LACONIA	2021 FY Actual	64,212.19
LINE RELOCATIONS - LACONIA	2022 FY Actual	115,157.26
LINE RELOCATIONS - LACONIA	2023 FY Actual	112,521.15
LINE RELOCATIONS - MILFORD	2020 FY Actual	99.32
LINE RELOCATIONS - NASHUA	2019 FY Actual	63,204.64
LINE RELOCATIONS - NASHUA	2020 FY Actual	127,821.01
LINE RELOCATIONS - NASHUA	2021 FY Actual	247,751.94
LINE RELOCATIONS - NASHUA	2022 FY Actual	(9,582.76)
LINE RELOCATIONS - PORTSMOUTH	2019 FY Actual	143,020.12
LINE RELOCATIONS - PORTSMOUTH	2020 FY Actual	120,151.38
LINE RELOCATIONS - PORTSMOUTH	2021 FY Actual	105,466.35
LINE RELOCATIONS - PORTSMOUTH	2022 FY Actual	116,878.71
LINE RELOCATIONS - PORTSMOUTH	2023 FY Actual	386,799.30
LINE RELOCATIONS	2019 FY Budget	1,000,013.58
LINE RELOCATIONS	2020 FY Budget	1,019,623.52
LINE RELOCATIONS	2021 FY Budget	1,040,400.44
LINE RELOCATIONS	2022 FY Budget	1,341,131.08
LINE RELOCATIONS	2023 FY Budget	1,275,000.00
LINE RELOCATIONS - ROCHESTER	2019 FY Actual	151,788.00
LINE RELOCATIONS - ROCHESTER	2020 FY Actual	176,400.98
LINE RELOCATIONS - ROCHESTER	2021 FY Actual	(12,993.25)
LINE RELOCATIONS - ROCHESTER	2022 FY Actual	104,984.19
LINE RELOCATIONS - ROCHESTER	2023 FY Actual	659,623.32
LINE RELOCATIONS - NEWPORT	2019 FY Actual	5,259.15
LINE RELOCATIONS - NEWPORT	2020 FY Actual	22,180.19
LINE RELOCATIONS - NEWPORT	2021 FY Actual	128,696.42
LINE RELOCATIONS - NEWPORT	2022 FY Actual	402,828.33
LINE RELOCATIONS - NEWPORT	2023 FY Actual	48,315.94
LINE RELOCATIONS - HOOKSETT	2019 FY Actual	179,330.67
LINE RELOCATIONS - HOOKSETT	2020 FY Actual	28,496.52
LINE RELOCATIONS - HOOKSETT	2021 FY Actual	56,579.09
LINE RELOCATIONS - HOOKSETT	2022 FY Actual	208,309.04
LINE RELOCATIONS - HOOKSETT	2023 FY Actual	210,675.27
LINE RELOCATIONS - BEDFORD	2019 FY Actual	84,155.91
LINE RELOCATIONS - BEDFORD	2020 FY Actual	317,851.47
LINE RELOCATIONS - BEDFORD	2021 FY Actual	192,391.10
LINE RELOCATIONS - BEDFORD	2022 FY Actual	163,147.08
LINE RELOCATIONS - BEDFORD	2023 FY Actual	182,509.31

		Attachment	PUC TS 1-005(b)
EXPENSE PORTION OF CATV PROJECTS	2019 FY Actual	(81,165.29)	Page 147 of 187
EXPENSE PORTION OF CATV PROJECTS	2020 FY Actual	(5,548.86)	
EXPENSE PORTION OF CATV PROJECTS	2021 FY Actual	46,765.53	
EXPENSE PORTION OF CATV PROJECTS	2022 FY Actual	22,852.84	
EXPENSE PORTION OF CATV PROJECTS	2023 FY Actual	1,366.94	
ROW Relocations - Reimbursable	2019 FY Budget	2,741.57	
RELOCATE 12 SECTIONS LONDONDRY TPK	2023 FY Actual	3,341.40	
PURCHASE TRANSFORMERS AND REGULATOR	2019 FY Actual	11,072,349.31	
PURCHASE TRANSFORMERS AND REGULATOR	2019 FY Budget	10,189,950.47	
PURCHASE TRANSFORMERS AND REGULATOR	2020 FY Actual	12,024,594.95	
PURCHASE TRANSFORMERS AND REGULATOR	2020 FY Budget	9,999,426.42	
PURCHASE TRANSFORMERS AND REGULATOR	2021 FY Actual	14,624,957.54	
PURCHASE TRANSFORMERS AND REGULATOR	2021 FY Budget	11,499,999.95	
PURCHASE TRANSFORMERS AND REGULATOR	2022 FY Actual	15,328,045.59	
PURCHASE TRANSFORMERS AND REGULATOR	2022 FY Budget	11,504,443.96	
PURCHASE TRANSFORMERS AND REGULATOR	2023 FY Actual	21,976,565.59	
PURCHASE TRANSFORMERS AND REGULATOR	2023 FY Budget	11,066,455.65	
PSNH Overheads	2023 FY Actual	34.76	
922 ELM ST DEVELOPMENT	2019 FY Actual	600,171.56	
922 ELM ST DEVELOPMENT	2020 FY Actual	(3,276.20)	
922 ELM ST DEVELOPMENT	2021 FY Actual	(850.92)	
922 ELM ST DEVELOPMENT	2022 FY Actual	9,197.72	
SANBORN CROSSING APARTMENTS	2019 FY Actual	143,646.81	
SANBORN CROSSING APARTMENTS	2020 FY Actual	(956.89)	
SANBORN CROSSING APARTMENTS	2022 FY Actual	5,882.09	
PULPIT RD URD	2019 FY Actual	298.02	
PULPIT RD URD	2020 FY Actual	(29,111.06)	
PULPIT RD URD	2021 FY Actual	5,292.62	
MYRTLE SO. BK. CONV MANCHESTER	2019 FY Actual	136,730.67	
MYRTLE SO. BK. CONV MANCHESTER	2020 FY Actual	(8,071.49)	
BAE GOFFS FALLS RD SERVICE	2019 FY Actual	129,983.36	
BAE GOFFS FALLS RD SERVICE	2020 FY Actual	66,529.30	
BAE GOFFS FALLS RD SERVICE	2021 FY Actual	6,385.33	
348X3 CUSTOMER LINE EXT	2019 FY Actual	3,601.67	
348X3 CUSTOMER LINE EXT	2020 FY Actual	1,466.15	
348X3 CUSTOMER LINE EXT	2021 FY Actual	(237,152.91)	
348X3 CUSTOMER LINE EXT	2022 FY Actual	1,573.49	
348X3 CUSTOMER LINE EXT	2023 FY Actual	(25,018.40)	
WOODMONT COMMONS PHASE 1A 2019	2019 FY Actual	(9,308.36)	
WOODMONT COMMONS PHASE 1A 2019	2020 FY Actual	23,455.06	
WOODMONT COMMONS PHASE 1A 2019	2021 FY Actual	39,731.38	
WOODMONT COMMONS PHASE 1A 2019	2022 FY Actual	77,342.00	
WOODMONT COMMONS PHASE 1A 2019	2023 FY Actual	1,074.28	
WOODMONT COMMONS PHASE 1B 2019	2019 FY Actual	(165,607.16)	
WOODMONT COMMONS PHASE 1B 2019	2020 FY Actual	119,803.87	
WOODMONT COMMONS PHASE 1B 2019	2021 FY Actual	45,803.29	
WOODMONT COMMONS PHASE 1B 2019	2022 FY Actual	101,037.19	

Service to new Nashua Performing Art	2020 FY Budget	199,028.84
Service to new Nashua Performing Art	2021 FY Actual	344,728.87
COLEBROOK LINE EXT AMER PERF POLYMR	2021 FY Actual	469,008.77
COLEBROOK LINE EXT AMER PERF POLYMR	2022 FY Actual	96,048.67
COLEBROOK LINE EXT AMER PERF POLYMR	2023 FY Actual	860.99
Allenstown School Project	2022 FY Actual	(86,130.62)
Allenstown School Project	2023 FY Actual	20,920.79
355 Upgrades and Rt 26 Line Extension	2023 FY Actual	397.35
NEW BUSINESS SPECIFICS UNKNOWN	2019 FY Actual	(3,478.50)
NEW BUSINESS SPECIFICS UNKNOWN	2020 FY Budget	(132.72)
NEW BUSINESS SPECIFICS UNKNOWN	2022 FY Actual	363.90
NEW/EXISTING CUSTOMERS - LANCASTER	2019 FY Actual	496,349.82
NEW/EXISTING CUSTOMERS - LANCASTER	2020 FY Actual	595,655.92
NEW/EXISTING CUSTOMERS - LANCASTER	2021 FY Actual	2,219,844.13
NEW/EXISTING CUSTOMERS - LANCASTER	2022 FY Actual	1,377,013.96
NEW/EXISTING CUSTOMERS - LANCASTER	2023 FY Actual	1,820,814.10
NEW/EXISTING CUSTOMERS - BERLIN	2019 FY Actual	245,136.60
NEW/EXISTING CUSTOMERS - BERLIN	2020 FY Actual	68,807.23
NEW/EXISTING CUSTOMERS - BERLIN	2021 FY Actual	361,478.76
NEW/EXISTING CUSTOMERS - BERLIN	2022 FY Actual	320,849.32
NEW/EXISTING CUSTOMERS - BERLIN	2023 FY Actual	1,307,958.94
NEW/EXISTING CUSTOMERS - CHOCORUA	2019 FY Actual	603,690.85
NEW/EXISTING CUSTOMERS - CHOCORUA	2020 FY Actual	425,715.42
NEW/EXISTING CUSTOMERS - CHOCORUA	2021 FY Actual	1,337,924.70
NEW/EXISTING CUSTOMERS - CHOCORUA	2022 FY Actual	881,343.49
NEW/EXISTING CUSTOMERS - CHOCORUA	2023 FY Actual	1,999,310.63
NEW/EXISTING CUSTOMERS - DERRY	2019 FY Actual	243,691.55
NEW/EXISTING CUSTOMERS - DERRY	2020 FY Actual	751,472.71
NEW/EXISTING CUSTOMERS - DERRY	2021 FY Actual	1,197,245.70
NEW/EXISTING CUSTOMERS - DERRY	2022 FY Actual	907,383.06
NEW/EXISTING CUSTOMERS - DERRY	2023 FY Actual	1,414,199.06
NEW/EXISTING CUSTOMERS - EPPING	2019 FY Actual	341,257.72
NEW/EXISTING CUSTOMERS - EPPING	2020 FY Actual	337,930.22
NEW/EXISTING CUSTOMERS - EPPING	2021 FY Actual	1,675,753.48
NEW/EXISTING CUSTOMERS - EPPING	2022 FY Actual	1,952,420.17
NEW/EXISTING CUSTOMERS - EPPING	2023 FY Actual	2,930,121.43
NEW/EXISTING CUSTOMERS - KEENE	2019 FY Actual	1,520,056.81
NEW/EXISTING CUSTOMERS - KEENE	2020 FY Actual	1,615,066.63
NEW/EXISTING CUSTOMERS - KEENE	2021 FY Actual	3,680,905.55
NEW/EXISTING CUSTOMERS - KEENE	2022 FY Actual	3,287,309.35
NEW/EXISTING CUSTOMERS - KEENE	2023 FY Actual	2,244,524.08
NEW/EXISTING CUSTOMERS - LACONIA	2019 FY Actual	927,262.86
NEW/EXISTING CUSTOMERS - LACONIA	2020 FY Actual	940,191.46
NEW/EXISTING CUSTOMERS - LACONIA	2021 FY Actual	3,267,591.82
NEW/EXISTING CUSTOMERS - LACONIA	2022 FY Actual	4,401,067.16
NEW/EXISTING CUSTOMERS - LACONIA	2023 FY Actual	5,650,962.09
NEW/EXISTING CUSTOMERS - MILFORD	2019 FY Actual	(1,409.05)

NEW/EXISTING CUSTOMERS - MILFORD	2020 FY Actual	(1,678.66)
NEW/EXISTING CUSTOMERS - MILFORD	2021 FY Actual	(1,016.89)
NEW/EXISTING CUSTOMERS - MILFORD	2022 FY Actual	(24.53)
NEW/EXISTING CUSTOMERS - MILFORD	2023 FY Actual	581.21
NEW/EXISTING CUSTOMERS - NASHUA	2019 FY Actual	1,179,835.13
NEW/EXISTING CUSTOMERS - NASHUA	2020 FY Actual	765,157.66
NEW/EXISTING CUSTOMERS - NASHUA	2021 FY Actual	2,646,008.21
NEW/EXISTING CUSTOMERS - NASHUA	2022 FY Actual	1,821,162.07
NEW/EXISTING CUSTOMERS - NASHUA	2023 FY Actual	2,842,336.43
NEW/EXISTING CUSTOMERS - PORTSMOUTH	2019 FY Actual	744,113.06
NEW/EXISTING CUSTOMERS - PORTSMOUTH	2020 FY Actual	921,938.80
NEW/EXISTING CUSTOMERS - PORTSMOUTH	2021 FY Actual	1,103,252.59
NEW/EXISTING CUSTOMERS - PORTSMOUTH	2022 FY Actual	1,053,744.07
NEW/EXISTING CUSTOMERS - PORTSMOUTH	2023 FY Actual	1,021,640.80
NEW/EXISTING CUSTOMERS	2019 FY Budget	8,000,096.93
NEW/EXISTING CUSTOMERS	2020 FY Budget	8,000,000.49
NEW/EXISTING CUSTOMERS	2021 FY Budget	10,322,999.95
NEW/EXISTING CUSTOMERS	2022 FY Actual	(7,090.20)
NEW/EXISTING CUSTOMERS	2022 FY Budget	6,474,287.12
NEW/EXISTING CUSTOMERS	2023 FY Actual	31,217.15
NEW/EXISTING CUSTOMERS	2023 FY Budget	13,860,643.00
NEW/EXISTING CUSTOMERS - ROCHESTER	2019 FY Actual	929,721.38
NEW/EXISTING CUSTOMERS - ROCHESTER	2020 FY Actual	1,416,475.00
NEW/EXISTING CUSTOMERS - ROCHESTER	2021 FY Actual	2,620,684.49
NEW/EXISTING CUSTOMERS - ROCHESTER	2022 FY Actual	2,083,460.95
NEW/EXISTING CUSTOMERS - ROCHESTER	2023 FY Actual	2,529,221.82
NEW/EXISTING CUSTOMERS - NEWPORT	2019 FY Actual	526,164.76
NEW/EXISTING CUSTOMERS - NEWPORT	2020 FY Actual	791,216.16
NEW/EXISTING CUSTOMERS - NEWPORT	2021 FY Actual	1,930,073.83
NEW/EXISTING CUSTOMERS - NEWPORT	2022 FY Actual	1,323,665.83
NEW/EXISTING CUSTOMERS - NEWPORT	2023 FY Actual	1,690,252.57
NEW/EXISTING CUSTOMERS - HOOKSETT	2019 FY Actual	577,528.15
NEW/EXISTING CUSTOMERS - HOOKSETT	2020 FY Actual	392,163.71
NEW/EXISTING CUSTOMERS - HOOKSETT	2021 FY Actual	1,596,482.30
NEW/EXISTING CUSTOMERS - HOOKSETT	2022 FY Actual	1,388,262.37
NEW/EXISTING CUSTOMERS - HOOKSETT	2023 FY Actual	1,592,459.53
NEW/EXISTING CUSTOMERS - BEDFORD	2019 FY Actual	732,172.65
NEW/EXISTING CUSTOMERS - BEDFORD	2020 FY Actual	837,902.59
NEW/EXISTING CUSTOMERS - BEDFORD	2021 FY Actual	2,606,325.71
NEW/EXISTING CUSTOMERS - BEDFORD	2022 FY Actual	1,842,544.96
NEW/EXISTING CUSTOMERS - BEDFORD	2023 FY Actual	2,170,205.73
SERVICES - LANCASTER	2019 FY Actual	124,782.04
SERVICES - LANCASTER	2020 FY Actual	188,354.07
SERVICES - LANCASTER	2021 FY Actual	42,379.48
SERVICES - LANCASTER	2022 FY Actual	51,967.84
SERVICES - LANCASTER	2023 FY Actual	58,162.05
SERVICES - BERLIN	2019 FY Actual	113,243.60

SERVICES - BERLIN	2020 FY Actual	91,738.60
SERVICES - BERLIN	2021 FY Actual	18,557.13
SERVICES - BERLIN	2022 FY Actual	7,637.00
SERVICES - BERLIN	2023 FY Actual	20,588.50
SERVICES - CHOCORUA	2019 FY Actual	18,534.01
SERVICES - CHOCORUA	2020 FY Actual	108,770.58
SERVICES - CHOCORUA	2021 FY Actual	62,387.65
SERVICES - CHOCORUA	2022 FY Actual	20,919.57
SERVICES - CHOCORUA	2023 FY Actual	6,382.91
SERVICES - DERRY	2019 FY Actual	291,743.88
SERVICES - DERRY	2020 FY Actual	355,592.06
SERVICES - DERRY	2021 FY Actual	875,230.83
SERVICES - DERRY	2022 FY Actual	414,859.23
SERVICES - DERRY	2023 FY Actual	(387,791.67)
SERVICES - EPPING	2019 FY Actual	210,821.02
SERVICES - EPPING	2020 FY Actual	291,649.05
SERVICES - EPPING	2021 FY Actual	268,304.84
SERVICES - EPPING	2022 FY Actual	143,761.78
SERVICES - EPPING	2023 FY Actual	244,166.30
SERVICES - KEENE	2019 FY Actual	294,804.05
SERVICES - KEENE	2020 FY Actual	374,881.61
SERVICES - KEENE	2021 FY Actual	98,256.35
SERVICES - KEENE	2022 FY Actual	78,009.09
SERVICES - KEENE	2023 FY Actual	374,523.39
SERVICES - LACONIA	2019 FY Actual	432,541.99
SERVICES - LACONIA	2020 FY Actual	475,234.34
SERVICES - LACONIA	2021 FY Actual	281,075.02
SERVICES - LACONIA	2022 FY Actual	467,848.28
SERVICES - LACONIA	2023 FY Actual	561,961.19
SERVICES - NASHUA	2019 FY Actual	466,276.85
SERVICES - NASHUA	2020 FY Actual	558,862.94
SERVICES - NASHUA	2021 FY Actual	724,665.64
SERVICES - NASHUA	2022 FY Actual	889,381.11
SERVICES - NASHUA	2023 FY Actual	1,190,034.48
SERVICES - PORTSMOUTH	2019 FY Actual	200,782.71
SERVICES - PORTSMOUTH	2020 FY Actual	217,927.83
SERVICES - PORTSMOUTH	2021 FY Actual	135,315.78
SERVICES - PORTSMOUTH	2022 FY Actual	55,456.01
SERVICES - PORTSMOUTH	2023 FY Actual	75,737.33
SERVICES - PSNH	2019 FY Actual	483,287.38
SERVICES - PSNH	2019 FY Budget	3,250,311.28
SERVICES - PSNH	2020 FY Actual	(172,488.13)
SERVICES - PSNH	2020 FY Budget	3,309,393.21
SERVICES - PSNH	2021 FY Actual	(560,692.87)
SERVICES - PSNH	2021 FY Budget	3,414,999.53
SERVICES - PSNH	2022 FY Actual	(1,434,999.18)
SERVICES - PSNH	2022 FY Budget	4,295,634.14

SERVICES - PSNH	2023 FY Actual	(1,096,766.51)
SERVICES - PSNH	2023 FY Budget	1,000,000.00
SERVICES - ROCHESTER	2019 FY Actual	486,720.15
SERVICES - ROCHESTER	2020 FY Actual	591,299.75
SERVICES - ROCHESTER	2021 FY Actual	165,821.23
SERVICES - ROCHESTER	2022 FY Actual	240,194.54
SERVICES - ROCHESTER	2023 FY Actual	273,537.48
SERVICES - NEWPORT	2019 FY Actual	83,303.17
SERVICES - NEWPORT	2020 FY Actual	89,011.39
SERVICES - NEWPORT	2021 FY Actual	45,720.26
SERVICES - NEWPORT	2022 FY Actual	7,613.38
SERVICES - NEWPORT	2023 FY Actual	48,053.56
SERVICES - HOOKSETT	2019 FY Actual	277,218.11
SERVICES - HOOKSETT	2020 FY Actual	377,431.15
SERVICES - HOOKSETT	2021 FY Actual	109,121.56
SERVICES - HOOKSETT	2022 FY Actual	129,694.91
SERVICES - HOOKSETT	2023 FY Actual	165,799.56
SERVICES - BEDFORD	2019 FY Actual	360,699.19
SERVICES - BEDFORD	2020 FY Actual	328,273.93
SERVICES - BEDFORD	2021 FY Actual	118,809.64
SERVICES - BEDFORD	2022 FY Actual	163,708.68
SERVICES - BEDFORD	2023 FY Actual	171,375.18
T2504 MANCHESTER LANDFILL PV	2021 FY Actual	15,301.66
T2504 MANCHESTER LANDFILL PV	2022 FY Actual	(78,533.35)
#T1213 LOUDON PLEASANT STREET PV	2021 FY Actual	37,627.54
#T1213 LOUDON PLEASANT STREET PV	2022 FY Actual	16,892.94
#T1213 LOUDON PLEASANT STREET PV	2023 FY Actual	1,311.39
#T1193 CONWAY LAKE PV	2021 FY Actual	(19,862.69)
#T1193 CONWAY LAKE PV	2022 FY Actual	(4,203.50)
T1402 & T2007 NASHUA PENNICHUCK PV	2021 FY Actual	(9,095.11)
T1402 & T2007 NASHUA PENNICHUCK PV	2022 FY Actual	(3,591.01)
T1402 & T2007 NASHUA PENNICHUCK PV	2023 FY Actual	12,230.78
ADD SCADA RECLOSERS TO DG SITES	2021 FY Actual	297,000.13
ADD SCADA RECLOSERS TO DG SITES	2021 FY Budget	1,000,000.23
ADD SCADA RECLOSERS TO DG SITES	2022 FY Actual	24,561.64
ADD SCADA RECLOSERS TO DG SITES	2022 FY Budget	500,000.00
BEDFORD TRANSFER STATION PV (#T2942)	2021 FY Actual	787.90
BEDFORD TRANSFER STATION PV (#T2942)	2022 FY Actual	23,920.90
BEDFORD TRANSFER STATION PV (#T2942)	2023 FY Actual	(298,701.80)
Pembroke Solar Interconnection	2022 FY Actual	(125,290.06)
Pembroke Solar Interconnection	2023 FY Actual	(317,246.71)
KEENE WWTF PV (#T2797A)	2021 FY Actual	(43,087.26)
KEENE WWTF PV (#T2797A)	2022 FY Actual	(77,607.82)
KEENE WWTF PV (#T2797A)	2023 FY Actual	163,024.31
Nellie Solar Interconnection	2022 FY Actual	(149,470.26)
Nellie Solar Interconnection	2023 FY Actual	(594,830.34)
Nellie Solar Interconnection	2023 FY Budget	121,000.00

DG FIELD DESIGN & CONSTR- REIMBURSE	2019 FY Actual	(134,773.77)
DG FIELD DESIGN & CONSTR- REIMBURSE	2020 FY Actual	274,788.18
DG FIELD DESIGN & CONSTR- REIMBURSE	2021 FY Actual	95,535.82
DG FIELD DESIGN & CONSTR- REIMBURSE	2022 FY Actual	130,213.44
DG FIELD DESIGN & CONSTR- REIMBURSE	2023 FY Actual	142,469.38
DG ENG DESIGN & CONSTR	2019 FY Actual	49,602.51
DG ENG DESIGN & CONSTR	2020 FY Actual	(236,272.25)
DG ENG DESIGN & CONSTR	2021 FY Actual	(60,679.74)
DG ENG DESIGN & CONSTR	2022 FY Actual	194,375.18
DG ENG DESIGN & CONSTR	2023 FY Actual	(701,871.64)
Reconductor Bedford Road, 360X7	2019 FY Actual	304,411.03
Reconductor Bedford Road, 360X7	2019 FY Budget	299,828.21
Reconductor Bedford Road, 360X7	2020 FY Actual	(182.86)
Convert Four Rod Road in Rochester	2019 FY Actual	182,902.22
Convert Four Rod Road in Rochester	2019 FY Budget	159,999.69
Convert Four Rod Road in Rochester	2020 FY Actual	(11,909.58)
ROW Peak Load Plug	2019 FY Budget	499,910.00
386/386A/340 LINES REBUILD FOR Y-17	2019 FY Actual	(680.84)
386/386A/340 LINES REBUILD FOR Y-17	2022 FY Actual	322.64
RETROFIT CAPACITOR BANK CONTROLS	2021 FY Actual	14,799.67
Valley St Area Solution	2019 FY Actual	1,495.72
Valley St Area Solution	2022 FY Actual	(2,388.02)
West Rd Overloaded Steps	2019 FY Actual	(15,518.57)
SOUTH AVE DERRY STEP OVERLOAD	2019 FY Actual	274,631.46
SOUTH AVE DERRY STEP OVERLOAD	2020 FY Actual	31.34
SOUTH AVE DERRY STEP OVERLOAD	2022 FY Actual	(10,063.34)
335X1 EXTEND 19.9kV 1P TO S. BOW RD	2020 FY Actual	221,839.91
335X1 EXTEND 19.9kV 1P TO S. BOW RD	2020 FY Budget	319,448.65
335X1 EXTEND 19.9kV 1P TO S. BOW RD	2021 FY Actual	8,708.21
335X1 EXTEND 19.9kV 1P TO S. BOW RD	2022 FY Actual	31,960.14
INSTALL PM STEP TRNSF RTE 13 GOFFS	2020 FY Actual	161,073.44
INSTALL PM STEP TRNSF RTE 13 GOFFS	2020 FY Budget	674,681.00
INSTALL PM STEP TRNSF RTE 13 GOFFS	2021 FY Actual	676,176.62
INSTALL PM STEP TRNSF RTE 13 GOFFS	2021 FY Budget	(553.67)
INSTALL PM STEP TRNSF RTE 13 GOFFS	2022 FY Actual	70,700.37
INSTALL PM STEP TRNSF RTE 13 GOFFS	2023 FY Actual	496.32
OFFLOAD 63W1 AT E. NORTHWOOD	2020 FY Actual	412,001.01
OFFLOAD 63W1 AT E. NORTHWOOD	2020 FY Budget	200,000.49
OFFLOAD 63W1 AT E. NORTHWOOD	2021 FY Actual	3,489.65
OFFLOAD 63W1 AT E. NORTHWOOD	2022 FY Actual	(6,940.98)
RANGE RD WINDHAM CONVERSION	2020 FY Actual	405,629.37
RANGE RD WINDHAM CONVERSION	2020 FY Budget	249,971.34
RANGE RD WINDHAM CONVERSION	2022 FY Actual	(0.37)
MEETINGHOUSE RD SS OFF- LOAD	2021 FY Actual	1,189,092.41
MEETINGHOUSE RD SS OFF- LOAD	2021 FY Budget	599,999.78
MEETINGHOUSE RD SS OFF- LOAD	2022 FY Actual	(389,470.86)
MEETINGHOUSE RD SS OFF- LOAD	2023 FY Actual	10,674.71

322X14 CIRCUIT OFFLOAD	2021 FY Actual	38,995.88
322X14 CIRCUIT OFFLOAD	2021 FY Budget	125,000.16
322X14 CIRCUIT OFFLOAD	2022 FY Actual	(9,123.15)
322X14 CIRCUIT OFFLOAD	2023 FY Actual	1,346.21
ADD PHASES ON NEW BOSTON RD	2021 FY Actual	479,471.37
ADD PHASES ON NEW BOSTON RD	2021 FY Budget	759,999.60
ADD PHASES ON NEW BOSTON RD	2022 FY Actual	(20,814.24)
WESTLAND AVE CONVERSION	2021 FY Actual	120,903.48
WESTLAND AVE CONVERSION	2022 FY Actual	534.09
LINE 321/3182 LAM WOOD STR REPL	2021 FY Actual	137,825.14
LINE 321/3182 LAM WOOD STR REPL	2022 FY Actual	(19,646.76)
RECONDUCTOR 1.06 MI DRAKE HILL RD	2021 FY Actual	902,452.88
RECONDUCTOR 1.06 MI DRAKE HILL RD	2021 FY Budget	899,999.92
RECONDUCTOR 1.06 MI DRAKE HILL RD	2022 FY Actual	(18,809.36)
RECONDUCTOR 1.06 MI DRAKE HILL RD	2023 FY Actual	(7,153.97)
PISCASSIC RD CONVERSION	2021 FY Actual	26,313.81
PISCASSIC RD CONVERSION	2021 FY Budget	446,000.34
PISCASSIC RD CONVERSION	2022 FY Actual	168,643.82
PISCASSIC RD CONVERSION	2023 FY Actual	510,756.21
FOGG RD CONVERSION	2021 FY Actual	272,486.47
FOGG RD CONVERSION	2021 FY Budget	451,999.72
FOGG RD CONVERSION	2022 FY Actual	471,413.73
FOGG RD CONVERSION	2023 FY Actual	60,607.70
BEAUTY HILL RD CONVERSION	2021 FY Actual	907,714.59
BEAUTY HILL RD CONVERSION	2021 FY Budget	491,000.44
BEAUTY HILL RD CONVERSION	2022 FY Actual	(85,456.16)
BEAUTY HILL RD CONVERSION	2023 FY Actual	(28,585.06)
CONVERT RTE 132 IN NORTHFIELD	2021 FY Budget	340,000.49
CONVERT RTE 132 IN NORTHFIELD	2022 FY Actual	(83,511.72)
DAMREN RD CONVERSION	2021 FY Actual	111,838.55
DAMREN RD CONVERSION	2021 FY Budget	282,999.87
DAMREN RD CONVERSION	2023 FY Actual	(12,182.61)
EXTEND THREE PHASE ROUTE 202 RINDGE	2021 FY Actual	271,565.80
EXTEND THREE PHASE ROUTE 202 RINDGE	2022 FY Actual	(8,496.02)
EXTEND THREE PHASE ROUTE 202 RINDGE	2023 FY Actual	1,583.79
3108 PARALLEL STEP OVERLOAD	2022 FY Budget	867,000.00
3108 PARALLEL STEP OVERLOAD	2023 FY Actual	123,838.17
3108 PARALLEL STEP OVERLOAD	2023 FY Budget	2,318,000.00
15W4 RUSSELL ST SWITCHGEAR PORTSMTH	2023 FY Budget	400,000.00
3115X7 MAIN ST RAYMOND CONVERSION	2022 FY Actual	978,909.71
3115X7 MAIN ST RAYMOND CONVERSION	2022 FY Budget	482,000.00
3115X7 MAIN ST RAYMOND CONVERSION	2023 FY Actual	347,772.83
3115X7 MAIN ST RAYMOND CONVERSION	2023 FY Budget	100,000.00
377X20 MAIN ST EPPING CONVERSION	2022 FY Actual	935,967.68
377X20 MAIN ST EPPING CONVERSION	2022 FY Budget	405,000.00
377X20 MAIN ST EPPING CONVERSION	2023 FY Actual	93,469.73
377X20 MAIN ST EPPING CONVERSION	2023 FY Budget	100,000.00

6H2 CONVERSION OFFLOAD TO 67W2	2022 FY Actual	896,921.92
6H2 CONVERSION OFFLOAD TO 67W2	2022 FY Budget	140,000.00
6H2 CONVERSION OFFLOAD TO 67W2	2023 FY Actual	(218,615.51)
6H2 CONVERSION OFFLOAD TO 67W2	2023 FY Budget	50,000.00
15W4 Market Street U/G Service	2022 FY Actual	1,828,821.13
15W4 Market Street U/G Service	2023 FY Actual	16,298.83
3525X5 E SIDE RD, ERROL CONVERSION	2022 FY Actual	92,060.67
3525X5 E SIDE RD, ERROL CONVERSION	2022 FY Budget	312,000.00
3525X5 E SIDE RD, ERROL CONVERSION	2023 FY Actual	13,245.25
42X3/44H1 EXTEND 34.5KV	2022 FY Actual	896,847.75
42X3/44H1 EXTEND 34.5KV	2022 FY Budget	1,298,000.00
42X3/44H1 EXTEND 34.5KV	2023 FY Actual	871,935.01
42X3/44H1 EXTEND 34.5KV	2023 FY Budget	1,418,513.14
3410 LAKE SUNAPEE EXT 34.5KV SPACER	2022 FY Actual	359,418.53
3410 LAKE SUNAPEE EXT 34.5KV SPACER	2022 FY Budget	396,070.99
3410 LAKE SUNAPEE EXT 34.5KV SPACER	2023 FY Actual	51,787.49
377X20 Pleasant Street Conversion	2023 FY Actual	853,997.43
377X20 Pleasant Street Conversion	2023 FY Budget	1,100,500.00
3103X1 Beede Hill Road Conversion	2023 FY Budget	279,500.00
2023 Initial Funding Placeholder	2023 FY Budget	700,000.00
319X1 Conversion S Barnstead Rd	2023 FY Actual	129,551.07
319X1 Conversion S Barnstead Rd	2023 FY Budget	713,520.00
336X1 Conversion	2023 FY Budget	2,500,000.00
3114W1 Conversion Ragged Mt Hwy	2023 FY Budget	2,596,000.00
2H2 Line Extension	2023 FY Actual	825,668.03
2H2 Line Extension	2023 FY Budget	550,000.00
3155X Route 13 Conversion	2023 FY Actual	1,915,395.56
3155X Route 13 Conversion	2023 FY Budget	3,500,000.00
3211X Kimball Hill Rd Conversion	2023 FY Actual	450,939.22
3211X Kimball Hill Rd Conversion	2023 FY Budget	709,000.00
3217X Knowlton Rd Conversion	2023 FY Budget	600,000.00
3155X Install Padmounted Step Xfmr	2023 FY Actual	29,935.96
3155X Install Padmounted Step Xfmr	2023 FY Budget	600,000.00
Pease Tradeport Upgrade	2023 FY Actual	10,582.72
MAINTAIN VOLTAGE - LANCASTER	2019 FY Actual	178,408.81
MAINTAIN VOLTAGE - LANCASTER	2020 FY Actual	6,585.73
MAINTAIN VOLTAGE - LANCASTER	2021 FY Actual	252,568.45
MAINTAIN VOLTAGE - LANCASTER	2022 FY Actual	253,655.42
MAINTAIN VOLTAGE - LANCASTER	2023 FY Actual	99,204.09
MAINTAIN VOLTAGE - BERLIN	2019 FY Actual	7,426.59
MAINTAIN VOLTAGE - BERLIN	2020 FY Actual	2,967.57
MAINTAIN VOLTAGE - BERLIN	2021 FY Actual	27,910.70
MAINTAIN VOLTAGE - BERLIN	2022 FY Actual	1,277.35
MAINTAIN VOLTAGE - BERLIN	2023 FY Actual	11,713.11
MAINTAIN VOLTAGE - CHOCORUA	2019 FY Actual	4,424.15
MAINTAIN VOLTAGE - CHOCORUA	2020 FY Actual	32,884.14
MAINTAIN VOLTAGE - CHOCORUA	2021 FY Actual	64,536.46

MAINTAIN VOLTAGE - CHOCORUA	2022 FY Actual	48,143.74
MAINTAIN VOLTAGE - CHOCORUA	2023 FY Actual	7,042.14
MAINTAIN VOLTAGE - DERRY	2019 FY Actual	27,283.35
MAINTAIN VOLTAGE - DERRY	2020 FY Actual	77,629.75
MAINTAIN VOLTAGE - DERRY	2021 FY Actual	8,344.44
MAINTAIN VOLTAGE - DERRY	2022 FY Actual	30,904.26
MAINTAIN VOLTAGE - DERRY	2023 FY Actual	29,272.64
MAINTAIN VOLTAGE - EPPING	2019 FY Actual	161,597.52
MAINTAIN VOLTAGE - EPPING	2020 FY Actual	55,965.22
MAINTAIN VOLTAGE - EPPING	2021 FY Actual	188,463.01
MAINTAIN VOLTAGE - EPPING	2022 FY Actual	173,962.26
MAINTAIN VOLTAGE - EPPING	2023 FY Actual	187,141.14
MAINTAIN VOLTAGE - KEENE	2019 FY Actual	79,481.69
MAINTAIN VOLTAGE - KEENE	2020 FY Actual	16,418.47
MAINTAIN VOLTAGE - KEENE	2021 FY Actual	76,936.60
MAINTAIN VOLTAGE - KEENE	2022 FY Actual	(18,472.34)
MAINTAIN VOLTAGE - KEENE	2023 FY Actual	27,394.27
MAINTAIN VOLTAGE - LACONIA	2019 FY Actual	100,449.48
MAINTAIN VOLTAGE - LACONIA	2020 FY Actual	129,817.03
MAINTAIN VOLTAGE - LACONIA	2021 FY Actual	627,371.59
MAINTAIN VOLTAGE - LACONIA	2022 FY Actual	301,449.24
MAINTAIN VOLTAGE - LACONIA	2023 FY Actual	97,333.19
MAINTAIN VOLTAGE - NASHUA	2019 FY Actual	152,209.24
MAINTAIN VOLTAGE - NASHUA	2020 FY Actual	174,974.23
MAINTAIN VOLTAGE - NASHUA	2021 FY Actual	158,070.06
MAINTAIN VOLTAGE - NASHUA	2022 FY Actual	124,056.33
MAINTAIN VOLTAGE - NASHUA	2023 FY Actual	125,195.00
MAINTAIN VOLTAGE - PORTSMOUTH	2019 FY Actual	42,827.02
MAINTAIN VOLTAGE - PORTSMOUTH	2020 FY Actual	(164,065.77)
MAINTAIN VOLTAGE - PORTSMOUTH	2021 FY Actual	375,232.95
MAINTAIN VOLTAGE - PORTSMOUTH	2022 FY Actual	134,598.54
MAINTAIN VOLTAGE - PORTSMOUTH	2023 FY Actual	161,275.23
MAINTAIN VOLTAGE	2019 FY Budget	700,008.79
MAINTAIN VOLTAGE	2020 FY Budget	699,851.98
MAINTAIN VOLTAGE	2021 FY Budget	700,000.31
MAINTAIN VOLTAGE	2022 FY Budget	826,107.37
MAINTAIN VOLTAGE	2023 FY Budget	1,500,000.00
MAINTAIN VOLTAGE - ROCHESTER	2019 FY Actual	35,740.27
MAINTAIN VOLTAGE - ROCHESTER	2020 FY Actual	440,700.02
MAINTAIN VOLTAGE - ROCHESTER	2021 FY Actual	433,735.21
MAINTAIN VOLTAGE - ROCHESTER	2022 FY Actual	26,384.49
MAINTAIN VOLTAGE - ROCHESTER	2023 FY Actual	347,212.97
MAINTAIN VOLTAGE - NEWPORT	2019 FY Actual	9,543.01
MAINTAIN VOLTAGE - NEWPORT	2020 FY Actual	10,169.57
MAINTAIN VOLTAGE - NEWPORT	2021 FY Actual	1,804.35
MAINTAIN VOLTAGE - NEWPORT	2022 FY Actual	52,099.55
MAINTAIN VOLTAGE - NEWPORT	2023 FY Actual	25,948.40

MAINTAIN VOLTAGE - HOOKSETT	2019 FY Actual	32,660.23
MAINTAIN VOLTAGE - HOOKSETT	2020 FY Actual	28,095.84
MAINTAIN VOLTAGE - HOOKSETT	2021 FY Actual	9,511.22
MAINTAIN VOLTAGE - HOOKSETT	2022 FY Actual	23,626.93
MAINTAIN VOLTAGE - HOOKSETT	2023 FY Actual	108,523.42
MAINTAIN VOLTAGE - BEDFORD	2019 FY Actual	55,814.56
MAINTAIN VOLTAGE - BEDFORD	2020 FY Actual	(9,681.66)
MAINTAIN VOLTAGE - BEDFORD	2021 FY Actual	145,980.21
MAINTAIN VOLTAGE - BEDFORD	2022 FY Actual	47,599.79
MAINTAIN VOLTAGE - BEDFORD	2023 FY Actual	151,451.42
SO. ST. MILFORD REPL OH WITH UNDERG	2021 FY Actual	(2,213.19)
RIMMON S/S ADD 2ND 115-34.5KV 44.8M	2019 FY Actual	414.16
310/29X1 Survey & Purchase Land	2021 FY Actual	175.11
White Lake S/S - replace TB82	2019 FY Actual	(106.88)
RIVER ROAD SS	2019 FY Budget	2,000,000.23
REPLACE 386 RELAY AT ROCHESTER SS	2019 FY Actual	168,394.42
REPLACE 386 RELAY AT ROCHESTER SS	2020 FY Actual	292,169.11
Pemi SS Upgrade	2019 FY Actual	1,335,055.79
Pemi SS Upgrade	2019 FY Budget	3,270,891.79
Pemi SS Upgrade	2020 FY Actual	5,068,385.24
Pemi SS Upgrade	2020 FY Budget	3,748,102.41
Pemi SS Upgrade	2021 FY Actual	(27,521.69)
Pemi SS Upgrade	2021 FY Budget	0.18
Pemi SS Upgrade	2022 FY Actual	(55,459.82)
Pemi SS Upgrade	2023 FY Actual	197.14
SOUTH MILFORD SUBSTATION	2021 FY Budget	(0.05)
SOUTH MILFORD SUBSTATION	2022 FY Actual	38,985.88
SOUTH MILFORD SUBSTATION	2022 FY Budget	1,783,269.92
SOUTH MILFORD SUBSTATION	2023 FY Actual	72,883.39
SOUTH MILFORD SUBSTATION	2023 FY Budget	2,506,647.01
Salmon Falls SS Capactiy Project	2023 FY Actual	320.54
Salmon Falls SS Capactiy (D-Line)	2023 FY Actual	427.52
So Milford SS Distribution Line Wrk	2022 FY Actual	26,682.70
So Milford SS Distribution Line Wrk	2023 FY Actual	26,594.98
So Milford SS Distribution Line Wrk	2023 FY Budget	36,867.15
Colebrook D Subststation	2023 FY Actual	275,017.20
Huse Road	2019 FY Actual	(5,014.25)
NESC CAPITAL REPAIRS	2019 FY Actual	(15,243.47)
NESC CAPITAL REPAIRS	2020 FY Actual	(24,693.88)
NESC CAPITAL REPAIRS	2021 FY Actual	794.84
NESC CAPITAL REPAIRS	2022 FY Actual	(4,136.53)
NESC CAPITAL REPAIRS	2023 FY Actual	25,419.22
Miller State Park/Pack Monadnock	2019 FY Budget	1,049,933.07
NESC CAPITAL REPAIRS	2019 FY Budget	100,009.37
NESC CAPITAL REPAIRS	2020 FY Budget	98,856.49
NESC CAPITAL REPAIRS	2021 FY Budget	100,000.00
2022 POLE TOP DISTRIBUTION AUTOMATN	2021 FY Actual	113.88

2022 POLE TOP DISTRIBUTION AUTOMATN	2022 FY Actual	6,477,095.31
2022 POLE TOP DISTRIBUTION AUTOMATN	2022 FY Budget	5,977,688.37
GREAT EAST LAKE POLE REPLACEMENT	2022 FY Actual	249,400.44
GREAT EAST LAKE POLE REPLACEMENT	2023 FY Actual	14,357.40
REP3 - 2015-2016 Central Region DA	2019 FY Actual	2,961.17
REP3 - 2015-2016 Central Region DA	2020 FY Actual	91,864.84
REP3 - 2015-2016 Central Region DA	2022 FY Actual	(1,420.29)
Circuit Tie Construction	2019 FY Actual	(50,243.58)
Circuit Tie Construction	2021 FY Actual	1,748.79
Circuit Tie Construction	2022 FY Actual	(3,317.19)
REP3 Direct Buried Cable Replace	2019 FY Actual	(11,124.77)
REP3 Direct Buried Cable Replace	2020 FY Actual	(1,897.53)
REP3 Direct Buried Cable Replace	2022 FY Actual	(8,341.77)
REP 3 2015-2016 Eastern Region DA	2019 FY Actual	(750.87)
REP 3 2015-2016 Eastern Region DA	2022 FY Actual	(1,238.61)
Hit List Reliability Enhancements	2019 FY Actual	(17,411.32)
Hit List Reliability Enhancements	2022 FY Actual	(563.18)
Heather-Lite Replacement	2019 FY Actual	2,673.17
Heather-Lite Replacement	2021 FY Actual	(2,422.85)
Heather-Lite Replacement	2022 FY Actual	(403.05)
REP3 - 2015-2016 Northern Region D	2019 FY Actual	79,523.55
REP3 - 2015-2016 Northern Region D	2020 FY Actual	9.81
NESC CAPITAL REPAIRS	2019 FY Actual	(5,259.66)
NESC CAPITAL REPAIRS	2022 FY Actual	(401.21)
NESC CAPITAL REPAIRS	2023 FY Actual	8,858.90
Porcelain Change-out	2019 FY Actual	6,713.30
Porcelain Change-out	2020 FY Actual	(3,574.04)
Porcelain Change-out	2022 FY Actual	1,913.71
REJECT POLE REPLACEMENT	2019 FY Actual	(132,188.06)
REJECT POLE REPLACEMENT	2020 FY Actual	(7,288.12)
REJECT POLE REPLACEMENT	2021 FY Actual	(1,657.77)
REJECT POLE REPLACEMENT	2022 FY Actual	(2,895.07)
ROW System Hardening	2019 FY Actual	(96,013.00)
ROW System Hardening	2020 FY Actual	40,229.08
REP3 - 2015-2017 Southern Re	2019 FY Actual	1,887.12
REP3 - 2015-2017 Southern Re	2020 FY Actual	(5,083.33)
REP3 - 2015-2017 Southern Re	2021 FY Actual	(1,899.79)
REP3 - 2015-2017 Southern Re	2022 FY Actual	(2,421.16)
4 & 12 kV Substations	2019 FY Actual	(2,309.05)
TELECOM EXPANSION TO SUPPORT DA	2019 FY Actual	157,193.25
TELECOM EXPANSION TO SUPPORT DA	2020 FY Actual	3,929.16
REP3 - 2015-2016 Western Region DA	2019 FY Actual	30,521.07
REP3 - 2015-2016 Western Region DA	2020 FY Actual	10,462.88
REP3 - 2015-2016 Western Region DA	2022 FY Actual	(90.94)
2016 Line Sensor Project	2019 FY Actual	(21,768.39)
2016 Line Sensor Project	2021 FY Actual	592.21
REP 4 CIRCUIT TIES	2019 FY Actual	(228,187.08)

		Attachment (2,302.67)	PUC TS 1-005(b) Page 158 of 187
REP 4 CIRCUIT TIES	2021 FY Actual	(2,302.67)	
REP 4 CIRCUIT TIES	2022 FY Actual	(33,051.55)	
REP 4 POLE TOP DA	2019 FY Actual	(40,483.10)	
REP 4 POLE TOP DA	2021 FY Actual	272.51	
REP 4 CIRCUIT RELIABILITY IMPROVE	2019 FY Actual	8,194.00	
REP 4 CIRCUIT RELIABILITY IMPROVE	2021 FY Actual	217.44	
REP 4 CIRCUIT RELIABILITY IMPROVE	2022 FY Actual	(6,781.74)	
REP 4 ROW SYSTEM HARDENING	2019 FY Actual	5,814.44	
W185 - 4W1 CIRCUIT TIE	2019 FY Actual	150,482.90	
W185 - 4W1 CIRCUIT TIE	2020 FY Actual	12,739.98	
W185 - 4W1 CIRCUIT TIE	2021 FY Actual	(51,698.82)	
3178X CIRCUIT TIE HINSDALE	2019 FY Actual	394,891.91	
3178X CIRCUIT TIE HINSDALE	2020 FY Actual	(11,781.51)	
3178X CIRCUIT TIE HINSDALE	2021 FY Actual	(56,291.89)	
NH Avigilon Intrusion Detection	2019 FY Actual	143,587.57	
NH Avigilon Intrusion Detection	2019 FY Budget	109,387.71	
NH Avigilon Intrusion Detection	2020 FY Actual	44,349.17	
NH Avigilon Intrusion Detection	2021 FY Actual	1,203.17	
JACKSON HILL SS FNCE & GRDNG REPLAC	2020 FY Actual	291,795.58	
SECURITY UPGRADES CIP5 NH	2019 FY Actual	26,889.92	
SECURITY UPGRADES CIP5 NH	2020 FY Actual	49,826.17	
NH DMS	2020 FY Actual	2,010,339.11	
NH DMS	2020 FY Budget	2,999,837.14	
NH DMS	2021 FY Actual	2,479,915.71	
NH DMS	2021 FY Budget	4,499,999.74	
NH DMS	2022 FY Actual	2,616,614.53	
NH DMS	2022 FY Budget	2,920,674.37	
GARVINS SS OCB REPLACEMENT	2022 FY Actual	742,001.50	
GARVINS SS OCB REPLACEMENT	2022 FY Budget	2,505,049.89	
316 LINE DAVIT ARM & STRUCTURE REPL	2021 FY Actual	1,528,153.78	
316 LINE DAVIT ARM & STRUCTURE REPL	2022 FY Actual	685,314.42	
RYE AREA 4KV STUDY	2019 FY Actual	2,874,158.60	
RYE AREA 4KV STUDY	2019 FY Budget	800,000.21	
RYE AREA 4KV STUDY	2020 FY Actual	883,570.89	
RYE AREA 4KV STUDY	2021 FY Actual	(1,984.20)	
RYE AREA 4KV STUDY	2022 FY Actual	(26,944.74)	
ROCHESTER 4KV CONVERSION	2019 FY Actual	1,039,220.42	
ROCHESTER 4KV CONVERSION	2019 FY Budget	793,000.28	
ROCHESTER 4KV CONVERSION	2020 FY Actual	1,580,541.79	
ROCHESTER 4KV CONVERSION	2020 FY Budget	1,812,025.32	
ROCHESTER 4KV CONVERSION	2021 FY Actual	2,929,630.40	
ROCHESTER 4KV CONVERSION	2021 FY Budget	1,813,932.95	
ROCHESTER 4KV CONVERSION	2022 FY Actual	(119,048.12)	
ROCHESTER 4KV CONVERSION	2022 FY Budget	292,734.17	
ROCHESTER 4KV CONVERSION	2023 FY Actual	(64,339.75)	
Ham St Conversion, Dover	2020 FY Actual	778,338.78	
Ham St Conversion, Dover	2020 FY Budget	349,999.74	

Ham St Conversion, Dover	2021 FY Actual	28,276.62
GOFFSTOWN SS CONVERSION	2021 FY Actual	1,865,905.55
GOFFSTOWN SS CONVERSION	2021 FY Budget	999,999.93
GOFFSTOWN SS CONVERSION	2022 FY Actual	31,031.02
GOFFSTOWN SS CONVERSION	2022 FY Budget	532,706.57
GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	2022 FY Actual	382,543.44
GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	2022 FY Budget	1,020,000.00
36W1 CONVERSION/VEC TIE STRATFORD	2022 FY Budget	502,000.00
CENTRAL REGION 2015 DA	2019 FY Actual	74,888.21
CENTRAL REGION 2015 DA	2020 FY Actual	(70,002.28)
CENTRAL REGION 2015 DA	2021 FY Actual	3,125.42
EASTERN REGION 2015 DA	2019 FY Actual	770,235.05
EASTERN REGION 2015 DA	2020 FY Actual	(257,288.59)
EASTERN REGION 2015 DA	2022 FY Actual	(1,623.19)
EASTERN REGION 2015 DA	2023 FY Actual	4,664.05
NORTHERN REGION 2015 DA	2019 FY Actual	17,498.07
NORTHERN REGION 2015 DA	2020 FY Actual	(675.99)
NORTHERN REGION 2015 DA	2022 FY Actual	(64.29)
SOUTHERN REGION 2015 DA	2019 FY Actual	10,926.80
SOUTHERN REGION 2015 DA	2020 FY Actual	(34,777.49)
SOUTHERN REGION 2015 DA	2021 FY Actual	51,571.56
SOUTHERN REGION 2015 DA	2022 FY Actual	(4,734.89)
TELECOM BUILDOUT AUTOMATION 2015	2019 FY Actual	(201,081.45)
G&W Viper Warranty Replacment	2019 FY Actual	87,566.40
G&W Viper Warranty Replacment	2020 FY Actual	(25,565.88)
DISTRIBUTION AUTOMATION - POLE TOP	2019 FY Actual	7,629,452.98
DISTRIBUTION AUTOMATION - POLE TOP	2020 FY Actual	214,658.68
DISTRIBUTION AUTOMATION - POLE TOP	2021 FY Actual	52,791.55
DISTRIBUTION AUTOMATION - POLE TOP	2022 FY Actual	(9,714.50)
Viper Replacement Project-Bettermnt	2019 FY Actual	(43,009.27)
Viper Replacement Project-Bettermnt	2020 FY Actual	(163,858.75)
DISTRIBUTION AUTOMATION - POLE TOP	2019 FY Actual	14,396,023.98
DISTRIBUTION AUTOMATION - POLE TOP	2019 FY Budget	16,743,056.52
DISTRIBUTION AUTOMATION - POLE TOP	2020 FY Actual	3,339,965.33
DISTRIBUTION AUTOMATION - POLE TOP	2021 FY Actual	(16,990.73)
DISTRIBUTION AUTOMATION - POLE TOP	2022 FY Actual	(42,900.36)
Distribution Automation - Line Sens	2019 FY Actual	100,591.81
Distribution Automation - Line Sens	2019 FY Budget	179,979.42
Distribution Automation - Line Sens	2020 FY Actual	27,685.01
Distribution Automation - Line Sens	2021 FY Actual	64.96
Distribution Automation - Telecom	2019 FY Budget	100,784.96
Distribution Automation - Substatio	2019 FY Budget	999,926.90
Distribution Automation - Substatio	2020 FY Budget	48,240.00
DISTRIBUTION AUTOMATION POLE TOP	2020 FY Actual	10,345,558.87
DISTRIBUTION AUTOMATION POLE TOP	2020 FY Budget	12,000,001.61
DISTRIBUTION AUTOMATION POLE TOP	2021 FY Actual	1,987,437.87
DISTRIBUTION AUTOMATION POLE TOP	2022 FY Actual	(59,508.92)

		Attachment	PUC TS 1-005(b)
DISTRIBUTION AUTOMATION POLE TOP	2023 FY Actual	(17,695.50)	Page 160 of 187
DISTRIBUTION AUTOMATION LINE SENSOR	2020 FY Actual	185,203.35	
DISTRIBUTION AUTOMATION LINE SENSOR	2020 FY Budget	179,999.80	
DISTRIBUTION AUTOMATION LINE SENSOR	2021 FY Actual	34,466.59	
DISTRIBUTION AUTOMATION TELECOM	2020 FY Budget	99,999.93	
DISTRIBUTION AUTOMATION SUBSTATION	2020 FY Budget	999,999.76	
DISTRIBUTION AUTOMATION POLE TOP	2021 FY Actual	5,168,016.13	
DISTRIBUTION AUTOMATION POLE TOP	2021 FY Budget	6,000,000.35	
DISTRIBUTION AUTOMATION POLE TOP	2022 FY Actual	1,242,338.68	
DISTRIBUTION AUTOMATION POLE TOP	2023 FY Actual	53,078.47	
DISTRIBUTION AUTOMATION LINE SENSOR	2021 FY Actual	372,904.39	
DISTRIBUTION AUTOMATION LINE SENSOR	2021 FY Budget	179,999.96	
DISTRIBUTION AUTOMATION LINE SENSOR	2022 FY Actual	54,403.39	
DISTRIBUTION AUTOMATION LINE SENSOR	2023 FY Actual	260.29	
DISTRIBUTION AUTOMATION TELECOM	2021 FY Budget	99,999.73	
DISTRIBUTION AUTOMATION SUBSTATION	2021 FY Budget	999,999.53	
2022 Distr Automation - Line Sensor	2022 FY Actual	477,643.72	
2022 Distr Automation - Line Sensor	2022 FY Budget	126,000.00	
2022 Distr Automation - Line Sensor	2023 FY Actual	9,170.94	
DISTRIBUTION AUTOMATION TELECOM	2022 FY Budget	93,000.00	
DISTRIBUTION AUTOMATION SUBSTATION	2022 FY Budget	528,000.00	
2023 Distr Automation - Pole Top	2023 FY Actual	6,394,322.02	
2023 Distr Automation - Pole Top	2023 FY Budget	6,500,000.00	
2023 Distr Automation - Line Sensor	2023 FY Actual	288,636.23	
2023 Distr Automation - Line Sensor	2023 FY Budget	180,000.00	
SCADA Reclosers at DG Sites	2023 FY Budget	500,000.00	
2023 Distribution Automation - SS	2023 FY Budget	500,000.00	
2014 DA DEPLOYMENT	2019 FY Actual	(928.31)	
REJECT POLE REPLACEMENT	2019 FY Actual	3,019,469.03	
REJECT POLE REPLACEMENT	2019 FY Budget	2,494,741.97	
REJECT POLE REPLACEMENT	2020 FY Actual	1,602,220.37	
REJECT POLE REPLACEMENT	2020 FY Budget	2,491,848.59	
REJECT POLE REPLACEMENT	2021 FY Actual	1,511,565.77	
REJECT POLE REPLACEMENT	2022 FY Actual	(4,756.30)	
REJECT POLE REPLACEMENT	2023 FY Actual	268,324.31	
REPLACE STEEL TOWERS	2019 FY Actual	(39,521.19)	
REPLACE STEEL TOWERS	2020 FY Actual	(6,561.82)	
REPLACE STEEL TOWERS	2021 FY Actual	5,225.22	
REPLACE STEEL TOWERS	2022 FY Actual	131.67	
REPL LACONIA UNDRGRD SWITCHGEAR 70W	2020 FY Actual	(4,760.52)	
Northern COOS Reliability Loop	2019 FY Actual	(50,650.20)	
3818 NEW 34.5KV LINE 1.6 MI ON RTE	2022 FY Actual	908.67	
12H4 West Side Conversion	2019 FY Actual	(21,129.99)	
324 LINE, REBUILD AT INDUSTRIAL AVE	2020 FY Actual	(3,085.82)	
324 LINE, REBUILD AT INDUSTRIAL AVE	2022 FY Actual	(5,659.59)	
11W1 - Replace Submarine Cable	2019 FY Actual	805,631.49	
11W1 - Replace Submarine Cable	2020 FY Actual	945,696.27	

11W1 - Replace Submarine Cable	2021 FY Actual	(163,342.59)
11W1 - Replace Submarine Cable	2022 FY Actual	(10,627.66)
Circuit Tie 3271x2/311x1	2019 FY Actual	7,106.67
CAIDI IMPROVEMENT	2019 FY Actual	24,963.69
CAIDI IMPROVEMENT	2020 FY Actual	4,472.43
CAIDI IMPROVEMENT	2021 FY Actual	(10,032.90)
CAIDI IMPROVEMENT	2022 FY Actual	(13,198.23)
BROOK ST REPLACE G&W SWITCHGEAR	2020 FY Actual	2,738.64
BROOK ST REPLACE G&W SWITCHGEAR	2021 FY Actual	20,066.43
BROOK ST REPLACE G&W SWITCHGEAR	2022 FY Actual	3,470.26
BROOK ST REPLACE G&W SWITCHGEAR	2023 FY Actual	(46,057.63)
3.74 PRI VOLT CONV NAVIGATOR RD	2019 FY Actual	219.23
3.74 PRI VOLT CONV NAVIGATOR RD	2020 FY Actual	228.54
BLAINE ST SUBSTATION LINE WORK	2019 FY Actual	(3,338.53)
BLAINE ST SUBSTATION LINE WORK	2020 FY Actual	(6,921.14)
CIRCUIT TIE 3115X12 TO 3615X1	2019 FY Actual	9,591.28
CIRCUIT TIE 3115X12 TO 3615X1	2020 FY Actual	(19,513.10)
CIRCUIT TIE 3115X12 TO 3615X1	2021 FY Actual	(15,130.27)
328 LINE RECONDUCTOR	2019 FY Actual	3,899,826.37
328 LINE RECONDUCTOR	2019 FY Budget	3,622,942.86
328 LINE RECONDUCTOR	2020 FY Actual	265,228.50
328 LINE RECONDUCTOR	2021 FY Actual	6,174.29
328 LINE RECONDUCTOR	2022 FY Actual	(921.28)
380 LINE BETTERMENT	2019 FY Budget	140,000.00
ROW Hardening/Reconductoring	2019 FY Budget	1,509,999.80
ROW Hardening/Reconductoring	2020 FY Budget	1.00
CAIDI IMPROVEMENTS	2019 FY Actual	20,869.66
Reconductor copper St Anselm Drive	2019 FY Actual	241,202.88
Reconductor copper St Anselm Drive	2019 FY Budget	209,280.59
Reconductor copper St Anselm Drive	2020 FY Actual	(1,912.20)
Downtown Portsmouth UG System Impro	2019 FY Budget	99,960.93
Downtown Portsmouth UG System Impro	2020 FY Actual	120,383.41
Downtown Portsmouth UG System Impro	2020 FY Budget	78,135.55
Downtown Portsmouth UG System Impro	2021 FY Actual	135,047.75
Downtown Portsmouth UG System Impro	2021 FY Budget	99,999.71
Downtown Portsmouth UG System Impro	2022 FY Actual	14,798.33
Downtown Portsmouth UG System Impro	2022 FY Budget	187,659.09
Downtown Portsmouth UG System Impro	2023 FY Actual	41,176.94
Downtown Portsmouth UG System Impro	2023 FY Budget	100,000.00
Circuit Ties-Wakefield 362 to 3157	2019 FY Actual	2,289,179.05
Circuit Ties-Wakefield 362 to 3157	2019 FY Budget	2,699,956.03
Circuit Ties-Wakefield 362 to 3157	2020 FY Actual	594,195.94
Circuit Ties-Wakefield 362 to 3157	2020 FY Budget	38,750.00
Circuit Ties-Wakefield 362 to 3157	2021 FY Actual	(29,350.10)
Circuit Ties-Wakefield 362 to 3157	2022 FY Actual	14.18
DOVER UNDERGROUND BACKFEED RELOCATI	2019 FY Actual	220,364.76
DOVER UNDERGROUND BACKFEED RELOCATI	2020 FY Actual	572,566.47

DOVER UNDERGROUND BACKFEED RELOCATI	2021 FY Actual	15,857.55
DOVER UNDERGROUND BACKFEED RELOCATI	2022 FY Actual	(4,999.85)
Relocate 1W1 Main Line onto Route 3	2019 FY Actual	291,698.50
Relocate 1W1 Main Line onto Route 3	2019 FY Budget	259,952.45
Relocate 1W1 Main Line onto Route 3	2020 FY Actual	(1,059.78)
Relocate 1W1 Main Line onto Route 3	2022 FY Actual	(6,129.24)
Circuit Ties - Laconia 310 to 345	2019 FY Actual	1,341,169.63
Circuit Ties - Laconia 310 to 345	2019 FY Budget	4,100,098.37
Circuit Ties - Laconia 310 to 345	2020 FY Actual	1,381,957.13
Circuit Ties - Laconia 310 to 345	2021 FY Actual	2,685.39
Circuit Ties - Laconia 310 to 345	2022 FY Actual	(9,723.74)
346X1 DEFECTIVE SPCA REPLACEMENT	2019 FY Actual	188,699.27
346X1 DEFECTIVE SPCA REPLACEMENT	2020 FY Actual	(9,589.66)
Reconductor #6 Copper @ Fordway Ext	2019 FY Budget	350,028.36
Replace Conductor Route 13 Amherst	2019 FY Actual	1,083,967.76
Replace Conductor Route 13 Amherst	2019 FY Budget	892,980.47
Replace Conductor Route 13 Amherst	2020 FY Actual	790,437.76
Replace Conductor Route 13 Amherst	2020 FY Budget	500,480.23
Replace Conductor Route 13 Amherst	2021 FY Actual	2,717.90
Replace Conductor Route 13 Amherst	2022 FY Actual	1,350.20
Relocate 3168X Bridge St S/S	2019 FY Actual	777,401.34
Relocate 3168X Bridge St S/S	2019 FY Budget	516,969.58
Relocate 3168X Bridge St S/S	2020 FY Actual	(69,102.18)
Relocate 314 Line around Heron Pond	2019 FY Actual	927,819.11
Relocate 314 Line around Heron Pond	2019 FY Budget	599,992.36
Relocate 314 Line around Heron Pond	2020 FY Actual	(1,818.60)
Repl open wire w/ Spacer cble Rt 63	2019 FY Actual	1,555,675.14
Repl open wire w/ Spacer cble Rt 63	2019 FY Budget	999,983.21
Repl open wire w/ Spacer cble Rt 63	2020 FY Actual	104,424.20
Repl open wire w/ Spacer cble Rt 63	2021 FY Actual	223.50
Repl open wire w/ Spacer cble Rt 63	2022 FY Actual	(87,066.41)
Relocate feed to Hinsdale Wastewat	2019 FY Actual	325,619.06
Relocate feed to Hinsdale Wastewat	2019 FY Budget	250,032.55
Relocate feed to Hinsdale Wastewat	2020 FY Actual	2,780.26
Relocate feed to Hinsdale Wastewat	2021 FY Actual	260.36
Relocate feed to Hinsdale Wastewat	2022 FY Actual	31.80
DIST LINE WORK FOR MONADNOCK SS REB	2020 FY Budget	600,036.37
DIST LINE WORK FOR MONADNOCK SS REB	2021 FY Actual	180.84
DIST LINE WORK FOR MONADNOCK SS REB	2021 FY Budget	600,000.13
DIST LINE WORK FOR MONADNOCK SS REB	2022 FY Actual	11,365.28
DIST LINE WORK FOR MONADNOCK SS REB	2022 FY Budget	(82.57)
DIST LINE WORK FOR MONADNOCK SS REB	2023 FY Actual	348.58
DIST LINE WORK FOR MONADNOCK SS REB	2023 FY Budget	446,857.64
317 Line Reconstruction	2019 FY Actual	1,385,749.81
317 Line Reconstruction	2020 FY Actual	20,264.65
Replace Lattice Steel Towers	2019 FY Actual	298,545.57
Replace Lattice Steel Towers	2019 FY Budget	250,000.22

Replace Lattice Steel Towers	2020 FY Budget	300,105.79
Replace Lattice Steel Towers	2021 FY Actual	183.04
Replace Lattice Steel Towers	2021 FY Budget	299,999.93
Replace Lattice Steel Towers	2023 FY Actual	(920.00)
Replace Lattice Steel Towers	2019 FY Actual	996,801.17
Replace Lattice Steel Towers	2020 FY Actual	2,556,538.61
317 Line ROW section rebuild	2020 FY Actual	719,872.47
317 Line ROW section rebuild	2021 FY Actual	759,599.97
317 Line ROW section rebuild	2022 FY Actual	412.60
317 Line ROW Section Rebuild	2023 FY Actual	136.59
Reconductor Strafford St in Lacona	2020 FY Budget	130,000.57
Relo 3200' main li fr ROW to roadsi	2020 FY Budget	180,000.54
Voltage Conversion Lost Nation Rd a	2020 FY Budget	169,999.66
43W1 (13W1) Construct Circuit Tie	2020 FY Actual	2,014,908.12
43W1 (13W1) Construct Circuit Tie	2020 FY Budget	1,649,999.91
43W1 (13W1) Construct Circuit Tie	2021 FY Actual	(58,725.66)
43W1 (13W1) Construct Circuit Tie	2022 FY Actual	817.87
Millyard SS Distribution Line Work	2020 FY Budget	2,938,539.06
Millyard SS Distribution Line Work	2021 FY Actual	176,983.21
Millyard SS Distribution Line Work	2021 FY Budget	2,900,000.18
Millyard SS Distribution Line Work	2022 FY Actual	3,728,199.37
Millyard SS Distribution Line Work	2022 FY Budget	2,983,824.47
Millyard SS Distribution Line Work	2023 FY Actual	326,343.51
Millyard SS Distribution Line Work	2023 FY Budget	510,545.00
3159X Extend 3 Phase Boston Post Rd	2020 FY Actual	334,047.88
3159X Extend 3 Phase Boston Post Rd	2020 FY Budget	255,323.89
3159X Extend 3 Phase Boston Post Rd	2021 FY Actual	(51,655.21)
Replace 3891X cable along railroad t	2020 FY Budget	789,172.76
Replace 3891X cable along railroad t	2021 FY Actual	754,159.09
Replace 3891X cable along railroad t	2021 FY Budget	850,000.00
Replace 3891X cable along railroad t	2022 FY Actual	(122,022.57)
Replace 3891X cable along railroad t	2022 FY Budget	750,000.00
Replace 3891X cable along railroad t	2023 FY Actual	2,991.42
Mason Rd Relo 1500' main li to road	2020 FY Actual	336,074.00
Mason Rd Relo 1500' main li to road	2020 FY Budget	200,029.47
Mason Rd Relo 1500' main li to road	2021 FY Actual	5,801.63
Mason Rd Relo 1500' main li to road	2022 FY Actual	(10,790.12)
3155X6 feed from the 3155X9	2020 FY Actual	603,794.12
3155X6 feed from the 3155X9	2020 FY Budget	200,195.77
3155X6 feed from the 3155X9	2021 FY Actual	(3,383.70)
3155X6 feed from the 3155X9	2022 FY Actual	(23,746.01)
Rte 9 Relo 2800' main li to roadsid	2020 FY Actual	656,508.74
Rte 9 Relo 2800' main li to roadsid	2020 FY Budget	299,934.61
Rte 9 Relo 2800' main li to roadsid	2021 FY Actual	5,719.02
Rte 9 Relo 2800' main li to roadsid	2022 FY Actual	(11,723.85)
3410 and 315 Circuit Tie	2020 FY Actual	1,409,279.98
3410 and 315 Circuit Tie	2020 FY Budget	1,349,923.33

3410 and 315 Circuit Tie	2021 FY Actual	658.28
3410 and 315 Circuit Tie	2022 FY Actual	1,401.64
24X1 and 313X1 Circuit Tie	2020 FY Actual	2,185,969.59
24X1 and 313X1 Circuit Tie	2020 FY Budget	2,799,859.18
24X1 and 313X1 Circuit Tie	2021 FY Actual	27,953.20
24X1 and 313X1 Circuit Tie	2022 FY Actual	(66,609.52)
317/3410 RECON BRADFORD TO WARNER	2021 FY Actual	1,038,924.42
317/3410 RECON BRADFORD TO WARNER	2021 FY Budget	3,000,000.00
317/3410 RECON BRADFORD TO WARNER	2022 FY Actual	266,765.99
317/3410 RECON BRADFORD TO WARNER	2023 FY Actual	7,289.00
2020 CIRCUIT PATROL REPAIRS	2020 FY Actual	1,025,818.09
2020 CIRCUIT PATROL REPAIRS	2021 FY Actual	1,633,475.50
2020 CIRCUIT PATROL REPAIRS	2022 FY Actual	(38,168.73)
2020 CIRCUIT PATROL REPAIRS	2023 FY Actual	(31,806.69)
RECONDUCTOR ACADEMY RD PEMBROKE SPA	2021 FY Budget	725,651.55
MALVERN VALLEY HANOVER CIRCUIT TIE	2021 FY Actual	304,525.87
MALVERN VALLEY HANOVER CIRCUIT TIE	2021 FY Budget	583,984.25
MALVERN VALLEY HANOVER CIRCUIT TIE	2022 FY Actual	137,908.13
CIRCUIT TIE 14X188 TO 3248	2021 FY Actual	351,631.40
CIRCUIT TIE 14X188 TO 3248	2021 FY Budget	637,380.91
CIRCUIT TIE 14X188 TO 3248	2022 FY Actual	(12,017.89)
LINE M164 LAMINATED WOOD SYS STR REPL	2021 FY Actual	551,856.63
LINE M164 LAMINATED WOOD SYS STR REPL	2022 FY Actual	(5,979.72)
393 LINE ROW SECTION REBUILD	2021 FY Actual	463,288.43
393 LINE ROW SECTION REBUILD	2022 FY Actual	4,677,512.50
393 LINE ROW SECTION REBUILD	2022 FY Budget	3,042,769.44
393 LINE ROW SECTION REBUILD	2023 FY Actual	890.10
CIRCUIT TIE 3191X1B TO 377X2	2021 FY Actual	534,223.56
CIRCUIT TIE 3191X1B TO 377X2	2021 FY Budget	174,999.94
CIRCUIT TIE 3191X1B TO 377X2	2022 FY Actual	158,369.01
CIRCUIT TIE 3191X1B TO 377X2	2023 FY Actual	(40,848.64)
CIRCUIT TIE 3191X3 TO 3191X	2021 FY Actual	853,143.50
CIRCUIT TIE 3191X3 TO 3191X	2021 FY Budget	264,999.99
CIRCUIT TIE 3191X3 TO 3191X	2022 FY Actual	(113,132.50)
CIRCUIT TIE 3191X3 TO 3191X	2023 FY Actual	(40,117.59)
3174X4 ROUTE 11 OFF ROAD SHUNT	2022 FY Actual	1,599.62
3174X4 ROUTE 11 OFF ROAD SHUNT	2023 FY Actual	47,424.02
ROADSIDE REJECT POLE REPLACEMENT	2021 FY Actual	522,522.70
ROADSIDE REJECT POLE REPLACEMENT	2021 FY Budget	2,500,000.02
ROADSIDE REJECT POLE REPLACEMENT	2022 FY Actual	(38,593.97)
ROADSIDE REJECT POLE REPLACEMENT	2023 FY Actual	12,890.44
CONSTRUCT NEW FEED FOR RTE 122	2021 FY Actual	308,417.11
CONSTRUCT NEW FEED FOR RTE 122	2021 FY Budget	250,000.21
CONSTRUCT NEW FEED FOR RTE 122	2022 FY Actual	(39,560.72)
CONSTRUCT NEW FEED FOR RTE 122	2023 FY Actual	(19,039.31)
2021 WOOD POLE TREATMENT	2021 FY Actual	411,820.31
2021 WOOD POLE TREATMENT	2022 FY Actual	(99,346.97)

2021 WOOD POLE TREATMENT	2023 FY Actual	(11,151.89)
2021 CIRCUIT PATROL REPAIRS PHASE 2	2021 FY Actual	1,117,560.50
2021 CIRCUIT PATROL REPAIRS PHASE 2	2022 FY Actual	105,236.76
2021 CIRCUIT PATROL REPAIRS PHASE 2	2023 FY Actual	(9,276.11)
Mobile Utility & Mobile Pole Assemb	2021 FY Actual	70,477.80
Mobile Utility & Mobile Pole Assemb	2022 FY Actual	330,642.50
GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	2023 FY Actual	1,368,685.64
GOFFSTOWN SS ELIM PHASE 2 27W2 CONV	2023 FY Budget	1,691,629.24
2022 POLE TOP DISTRIBUTION AUTOMATN	2023 FY Actual	613,261.75
NORTH DOVER AUTOMATED SWITCHES	2022 FY Budget	439,988.87
15W4 RUSSELL ST SWITCHGEAR PORTSMTH	2022 FY Budget	220,000.00
386 Line Distribution Underbuild (Y170)	2022 FY Actual	5,118.69
3148X3 REMOVAL - NORTH DOVER	2022 FY Actual	1,052,102.56
32 Line Pole Replacement	2023 FY Actual	2,939,356.19
32 Line Pole Replacement	2023 FY Budget	2,754,000.00
371 Line Pole Replacements	2023 FY Actual	3,339,687.88
371 Line Pole Replacements	2023 FY Budget	3,137,000.00
355 Line Emergent Str Replacement	2022 FY Actual	567,733.18
355 Line Pole Replacement	2022 FY Actual	188,365.75
355 Line Pole Replacement	2023 FY Actual	660,476.95
355 Line Pole Replacement	2023 FY Budget	111,000.00
2022 Roadside Reject Pole Repl	2022 FY Actual	1,384,693.41
2022 Roadside Reject Pole Repl	2022 FY Budget	2,250,000.00
2022 Roadside Reject Pole Repl	2023 FY Actual	486,327.59
3154X2 - 377X1 CIRCUIT TIE	2022 FY Actual	28,892.38
3154X2 - 377X1 CIRCUIT TIE	2022 FY Budget	601,000.00
3154X2 - 377X1 CIRCUIT TIE	2023 FY Actual	1,287,738.71
3217X ROCKY POND RD BACKFEED	2022 FY Actual	275,808.67
3217X ROCKY POND RD BACKFEED	2022 FY Budget	128,000.00
3217X ROCKY POND RD BACKFEED	2023 FY Actual	(174,039.02)
GRIFFIN ROAD CONVERSION LONDONDERRY	2022 FY Actual	213,573.75
GRIFFIN ROAD CONVERSION LONDONDERRY	2023 FY Actual	490.34
389X8 Line Relocation	2022 FY Actual	55,806.62
389X8 Line Relocation	2023 FY Actual	355,454.80
3120X2 RT 119 CONVERSION	2022 FY Actual	350,261.74
3120X2 RT 119 CONVERSION	2022 FY Budget	421,307.20
3120X2 RT 119 CONVERSION	2023 FY Actual	181,596.72
3120X2 RT 119 CONVERSION	2023 FY Budget	100,000.00
3140X2 WASHINGTON RD SPACER CABLE	2022 FY Actual	67,334.38
3140X2 WASHINGTON RD SPACER CABLE	2022 FY Budget	149,800.00
3140X2 WASHINGTON RD SPACER CABLE	2023 FY Actual	12,642.37
3140X2 WASHINGTON RD SPACER CABLE	2023 FY Budget	50,000.00
3139X SPOFFORD RD RECONDUCTOR	2022 FY Actual	212,604.21
3139X SPOFFORD RD RECONDUCTOR	2022 FY Budget	252,000.00
3139X SPOFFORD RD RECONDUCTOR	2023 FY Actual	420.64
317/3410 reconstr Roby Rd to Warner	2022 FY Actual	2,039,404.99
317/3410 reconstr Roby Rd to Warner	2022 FY Budget	5,707,099.62

317/3410 reconstr Roby Rd to Warner	2023 FY Actual	2,150,629.06
317/3410 reconstr Roby Rd to Warner	2023 FY Budget	2,155,406.00
313X1 Riverview UG Replacement	2022 FY Actual	374,361.66
313X1 Riverview UG Replacement	2023 FY Actual	11,812.33
3140X Stoddard Rebuild	2022 FY Actual	226,775.65
3140X Stoddard Rebuild	2023 FY Actual	10,760.68
2022 WOOD POLE TREATMENT	2022 FY Actual	232,116.49
2022 WOOD POLE TREATMENT	2022 FY Budget	349,990.94
2022 WOOD POLE TREATMENT	2023 FY Actual	5,783.39
Hampshire Plaza UG Reconfiguration	2023 FY Budget	20,000.00
CCI Reject Pole Replacement	2023 FY Actual	2,887,469.28
399X15 Mcintosh Commons	2023 FY Actual	38,133.83
399X15 Mcintosh Commons	2023 FY Budget	876,000.00
392X1-392X2 Circuit Tie	2023 FY Actual	81,028.39
392X1-392X2 Circuit Tie	2023 FY Budget	1,738,000.00
3112X1 Reconductor	2023 FY Actual	1,342,943.35
3112X1 Reconductor	2023 FY Budget	1,760,000.00
3137X1-377X3 Circuit Tie	2023 FY Actual	758.90
3137X1-377X3 Circuit Tie	2023 FY Budget	3,133,500.00
North Dover 4kV Conversion	2023 FY Actual	427,551.79
North Dover 4kV Conversion	2023 FY Budget	2,400,000.00
355X10 Line Extension	2023 FY Budget	1,247,130.00
338 Line Reconstruction	2023 FY Budget	1,500,000.00
355 Line Reconstruction	2023 FY Budget	4,000,000.17
31W2 Transformer Repl	2023 FY Budget	1,000,000.00
3025 Line Structure Replacement	2023 FY Actual	1,287,167.59
319 Line Structure Repl Bear Hill	2023 FY Actual	1,488,975.30
2023 Roadside Reject Pole Repl	2023 FY Actual	2,194,677.96
2023 Roadside Reject Pole Repl	2023 FY Budget	2,000,000.00
3891 UG Cable Replacement	2023 FY Budget	865,000.00
3155X Install Padmounted Step Xfmr	2022 FY Actual	3,149.48
42X3-316X1 Circuit Tie Ph 1	2023 FY Actual	2,499,141.60
42X3-316X1 Circuit Tie Ph 1	2023 FY Budget	1,100,000.45
317 Roadway Rebuild	2023 FY Actual	1,034.56
317 Roadway Rebuild	2023 FY Budget	3,140,000.00
317 / 3410 Removal	2023 FY Budget	2,200,000.00
313 Line Lattice Tower Repl	2023 FY Budget	120,000.00
3178 Line - Lattice Tower Repl	2023 FY Budget	500,000.00
3139X-3178 Circuit Tie	2023 FY Actual	9,661.08
Replace Degraded Manholes	2023 FY Budget	300,000.00
2023 Wood Pole Treatment	2023 FY Actual	296,166.21
2023 Wood Pole Treatment	2023 FY Budget	420,000.00
2023 Semi-annual Circuit Patrol	2023 FY Actual	1,290,133.96
322 Line Pole Replacement	2023 FY Actual	2,868.74
3151 Line Pole Replacement	2023 FY Actual	3,129.84
DIST LINE ROW PROGRAM	2019 FY Actual	4,491,035.87
DIST LINE ROW PROGRAM	2019 FY Budget	4,993,797.19

DIST LINE ROW PROGRAM	2020 FY Actual	3,298,539.90
DIST LINE ROW PROGRAM	2020 FY Budget	5,040,716.19
DIST LINE ROW PROGRAM	2021 FY Actual	6,213,643.02
DIST LINE ROW PROGRAM	2021 FY Budget	5,099,999.52
DIST LINE ROW PROGRAM	2022 FY Actual	4,474,347.11
DIST LINE ROW PROGRAM	2022 FY Budget	4,829,480.85
DIST LINE ROW PROGRAM	2023 FY Actual	4,688,750.71
DIST LINE ROW PROGRAM	2023 FY Budget	5,000,000.00
RELIABILITY IMPROVEMENTS - LANCASTE	2019 FY Actual	331,543
RELIABILITY IMPROVEMENTS - LANCASTE	2020 FY Actual	114,891
RELIABILITY IMPROVEMENTS - LANCASTE	2021 FY Actual	404,990.91
RELIABILITY IMPROVEMENTS - LANCASTE	2022 FY Actual	443,456.97
RELIABILITY IMPROVEMENTS - LANCASTE	2023 FY Actual	1,114,318.92
RELIABILITY IMPROVEMENTS - BERLIN	2019 FY Actual	75,686
RELIABILITY IMPROVEMENTS - BERLIN	2020 FY Actual	7,911
RELIABILITY IMPROVEMENTS - BERLIN	2021 FY Actual	43,900
RELIABILITY IMPROVEMENTS - BERLIN	2022 FY Actual	22,138
RELIABILITY IMPROVEMENTS - BERLIN	2023 FY Actual	159,608
RELIABILITY IMPROVEMENTS - CHOCORUA	2019 FY Actual	190,991
RELIABILITY IMPROVEMENTS - CHOCORUA	2020 FY Actual	66,591
RELIABILITY IMPROVEMENTS - CHOCORUA	2021 FY Actual	76,787
RELIABILITY IMPROVEMENTS - CHOCORUA	2022 FY Actual	22,827
RELIABILITY IMPROVEMENTS - CHOCORUA	2023 FY Actual	466,041
RELIABILITY IMPROVEMENTS - DERRY	2019 FY Actual	173,075
RELIABILITY IMPROVEMENTS - DERRY	2020 FY Actual	76,929
RELIABILITY IMPROVEMENTS - DERRY	2021 FY Actual	353,346
RELIABILITY IMPROVEMENTS - DERRY	2022 FY Actual	292,109
RELIABILITY IMPROVEMENTS - DERRY	2023 FY Actual	88,661
RELIABILITY IMPROVEMENTS - EPPING	2019 FY Actual	242,051
RELIABILITY IMPROVEMENTS - EPPING	2020 FY Actual	177,125
RELIABILITY IMPROVEMENTS - EPPING	2021 FY Actual	818,173
RELIABILITY IMPROVEMENTS - EPPING	2022 FY Actual	169,021
RELIABILITY IMPROVEMENTS - EPPING	2023 FY Actual	164,141
RELIABILITY IMPROVEMENTS - KEENE	2019 FY Actual	496,112
RELIABILITY IMPROVEMENTS - KEENE	2020 FY Actual	263,710
RELIABILITY IMPROVEMENTS - KEENE	2021 FY Actual	540,350
RELIABILITY IMPROVEMENTS - KEENE	2022 FY Actual	391,094
RELIABILITY IMPROVEMENTS - KEENE	2023 FY Actual	443,468
RELIABILITY IMPROVEMENTS - LACONIA	2019 FY Actual	483,126
RELIABILITY IMPROVEMENTS - LACONIA	2020 FY Actual	146,761
RELIABILITY IMPROVEMENTS - LACONIA	2021 FY Actual	311,583
RELIABILITY IMPROVEMENTS - LACONIA	2022 FY Actual	666,368
RELIABILITY IMPROVEMENTS - LACONIA	2023 FY Actual	1,205,645
RELIABILITY IMPROVEMENTS - NASHUA	2019 FY Actual	692,487
RELIABILITY IMPROVEMENTS - NASHUA	2020 FY Actual	1,093,043
RELIABILITY IMPROVEMENTS - NASHUA	2021 FY Actual	326,244
RELIABILITY IMPROVEMENTS - NASHUA	2022 FY Actual	1,233,963

RELIABILITY IMPROVEMENTS - NASHUA	2023 FY Actual	72,027
RELIABILITY IMPROVEMENTS - PORTSMOU	2019 FY Actual	269,204
RELIABILITY IMPROVEMENTS - PORTSMOU	2020 FY Actual	(49,408)
RELIABILITY IMPROVEMENTS - PORTSMOU	2021 FY Actual	892,303
RELIABILITY IMPROVEMENTS - PORTSMOU	2022 FY Actual	112,570
RELIABILITY IMPROVEMENTS - PORTSMOU	2023 FY Actual	221,713
RELIABILITY IMPROVEMENTS	2019 FY Actual	(12,610)
RELIABILITY IMPROVEMENTS	2019 FY Budget	2,000,011
RELIABILITY IMPROVEMENTS	2020 FY Actual	(750)
RELIABILITY IMPROVEMENTS	2020 FY Budget	2,000,000
RELIABILITY IMPROVEMENTS	2021 FY Actual	770
RELIABILITY IMPROVEMENTS	2021 FY Budget	2,000,000
RELIABILITY IMPROVEMENTS	2022 FY Actual	(769)
RELIABILITY IMPROVEMENTS	2022 FY Budget	2,342,895
RELIABILITY IMPROVEMENTS	2023 FY Budget	5,000,000
RELIABILITY IMPROVEMENTS - ROCHESTE	2019 FY Actual	204,918
RELIABILITY IMPROVEMENTS - ROCHESTE	2020 FY Actual	498,822
RELIABILITY IMPROVEMENTS - ROCHESTE	2021 FY Actual	685,891
RELIABILITY IMPROVEMENTS - ROCHESTE	2022 FY Actual	213,791
RELIABILITY IMPROVEMENTS - ROCHESTE	2023 FY Actual	940,634
RELIABILITY IMPROVEMENTS - NEWPORT	2019 FY Actual	166,604
RELIABILITY IMPROVEMENTS - NEWPORT	2020 FY Actual	164,804
RELIABILITY IMPROVEMENTS - NEWPORT	2021 FY Actual	409,105
RELIABILITY IMPROVEMENTS - NEWPORT	2022 FY Actual	363,170
RELIABILITY IMPROVEMENTS - NEWPORT	2023 FY Actual	224,458
RELIABILITY IMPROVEMENTS - HOOKSETT	2019 FY Actual	68,888
RELIABILITY IMPROVEMENTS - HOOKSETT	2020 FY Actual	313,654
RELIABILITY IMPROVEMENTS - HOOKSETT	2021 FY Actual	376,276
RELIABILITY IMPROVEMENTS - HOOKSETT	2022 FY Actual	92,018
RELIABILITY IMPROVEMENTS - HOOKSETT	2023 FY Actual	330,028
RELIABILITY IMPROVEMENTS - BEDFORD	2019 FY Actual	171,825
RELIABILITY IMPROVEMENTS - BEDFORD	2020 FY Actual	69,425
RELIABILITY IMPROVEMENTS - BEDFORD	2021 FY Actual	165,533
RELIABILITY IMPROVEMENTS - BEDFORD	2022 FY Actual	210,320
RELIABILITY IMPROVEMENTS - BEDFORD	2023 FY Actual	96,704
CONSTRUCT NEW CIRCUIT-BRISTOL S/S	2022 FY Actual	(15,164.73)
Porcelain Change-out	2019 FY Actual	-9884.81
Porcelain Change-out	2020 FY Actual	-1893.74
Porcelain Change-out	2021 FY Actual	2
Porcelain Change-out	2022 FY Actual	718.91
REPLACE VAULT TOPS	2023 FY Actual	23,822.56
KEENE DOWNTOWN UG REPLACEMENT PROJ	2019 FY Actual	1,003,841.83
KEENE DOWNTOWN UG REPLACEMENT PROJ	2019 FY Budget	794,111.25
KEENE DOWNTOWN UG REPLACEMENT PROJ	2020 FY Actual	149,990.58
KEENE DOWNTOWN UG REPLACEMENT PROJ	2021 FY Actual	(296,426.93)
KEENE DOWNTOWN UG REPLACEMENT PROJ	2022 FY Actual	103,560.75
DIRECT BURIED CABLE REPLACEMENT	2019 FY Actual	571,932.98

		Attachment PUC TS 1-005(b)
DIRECT BURIED CABLE REPLACEMENT	2019 FY Budget	699,999.63
DIRECT BURIED CABLE REPLACEMENT	2022 FY Actual	(4,504.81)
Replace Degraded Manholes	2019 FY Budget	200,053.35
Replace Degraded Manholes	2020 FY Actual	42,162.71
Replace Degraded Manholes	2020 FY Budget	128,380.47
MANCHESTER NETWORK CABLE REPLACEMENT	2020 FY Actual	79,404.73
MANCHESTER NETWORK CABLE REPLACEMENT	2021 FY Actual	1,968,368.00
MANCHESTER NETWORK CABLE REPLACEMENT	2021 FY Budget	2,064,752.41
MANCHESTER NETWORK CABLE REPLACEMENT	2022 FY Actual	(105,008.22)
MANCHESTER NETWORK CABLE REPLACEMENT	2022 FY Budget	91,758.24
CODFISH CORNER ROAD LOOP	2020 FY Actual	72,775.81
CODFISH CORNER ROAD LOOP	2021 FY Actual	427,042.63
CODFISH CORNER ROAD LOOP	2021 FY Budget	454,154.58
Rebuild Berlin UG system	2020 FY Actual	322,238.42
Rebuild Berlin UG system	2020 FY Budget	649,999.51
Rebuild Berlin UG system	2021 FY Actual	103,154.82
Rebuild Berlin UG system	2022 FY Actual	(17,712.77)
TIDEWATER FARM URD LOOP	2021 FY Actual	115.51
TIDEWATER FARM URD LOOP	2022 FY Actual	173,151.73
Monadnock Trailer Park Underground	2021 FY Actual	275,588.41
Monadnock Trailer Park Underground	2022 FY Actual	(18,618.48)
N KEENE S/S NEW DIST CIRC	2020 FY Actual	3,653.72
RECON LINES 3110, 353, 3445X	2020 FY Actual	(15,997.57)
PACK MONADNOCK SUMMIT SOLUTION	2020 FY Actual	2,623.31
PACK MONADNOCK SUMMIT SOLUTION	2021 FY Actual	291,407.48
PACK MONADNOCK SUMMIT SOLUTION	2021 FY Budget	400,000.00
REPLACE DEGRADED MANHOLE ROOFS	2021 FY Actual	112,212.05
REPLACE DEGRADED MANHOLE ROOFS	2021 FY Budget	94,000.48
49W1 TIMCO ROW TAP REMOVAL	2021 FY Actual	116,960.62
49W1 TIMCO ROW TAP REMOVAL	2022 FY Actual	(1,253.47)
SOMERSWORTH 34.5 KV OCB REPLACEMENT	2019 FY Actual	107.46
JACKMAN - REPLACE OBSOLETE EQUIPMEN	2019 FY Actual	18,998.76
JACKMAN - REPLACE OBSOLETE EQUIPMEN	2019 FY Budget	23,132.70
JACKMAN - REPLACE OBSOLETE EQUIPMEN	2020 FY Actual	(2,352.29)
JACKMAN - REPLACE OBSOLETE EQUIPMEN	2021 FY Actual	90.79
JACKMAN - REPLACE OBSOLETE EQUIPMEN	2022 FY Actual	126.68
LACONIA SS EQUIPMENT REPLACEMENT	2019 FY Actual	1,471,385.08
LACONIA SS EQUIPMENT REPLACEMENT	2019 FY Budget	1,530,995.69
LACONIA SS EQUIPMENT REPLACEMENT	2020 FY Actual	2,741,783.20
LACONIA SS EQUIPMENT REPLACEMENT	2020 FY Budget	1,800,762.49
LACONIA SS EQUIPMENT REPLACEMENT	2021 FY Actual	(4,469.62)
LACONIA SS 24 VDC CNTRL SYS & RELAY	2019 FY Actual	(6,420.87)
AMHERST S/S - PLC AUTOMATION REPLAC	2023 FY Actual	142,063.45
AMHERST S/S - PLC AUTOMATION REPLAC	2023 FY Budget	23,379.84
SS LTC CONTROL REPLACEMENT	2020 FY Actual	406,677.68
SS LTC CONTROL REPLACEMENT	2020 FY Budget	343,107.82
SS LTC CONTROL REPLACEMENT	2021 FY Actual	6,170.87

CAPACITOR SWITCH REPLACEMENTS	2023 FY Budget	800,000.00
LONG HILL SS 34.5kv CAP BANK SWITCH	2019 FY Actual	15,232.90
LONG HILL SS 34.5kv CAP BANK SWITCH	2020 FY Actual	834,413.24
LONG HILL SS 34.5kv CAP BANK SWITCH	2020 FY Budget	749,999.81
LONG HILL SS 34.5kv CAP BANK SWITCH	2021 FY Actual	10,264.96
RIVER ROAD SS UPGRADES	2023 FY Actual	1,767,950.93
RIVER ROAD SS UPGRADES	2023 FY Budget	1,450,501.64
GARVINS S/S OCB REPLACEMENT	2022 FY Budget	2,700,000.00
GARVINS SS OCB REPLACEMENT	2023 FY Actual	4,101,320.52
GARVINS SS OCB REPLACEMENT	2023 FY Budget	3,630,881.70
DUNBARTON RD SS EQUIP REPLACMNT	2021 FY Actual	6,185.27
DUNBARTON RD SS EQUIP REPLACMNT	2022 FY Actual	42,174.55
DUNBARTON RD SS EQUIP REPLACMNT	2023 FY Actual	44,213.23
REPLACE ROCHESTER SS BUS TIE AUTOCL	2021 FY Actual	28,668.41
REPLACE ROCHESTER SS BUS TIE AUTOCL	2021 FY Budget	299,999.71
REPLACE ROCHESTER SS BUS TIE AUTOCL	2022 FY Actual	442,534.90
REPLACE ROCHESTER SS BUS TIE AUTOCL	2022 FY Budget	350,384.54
REPLACE ROCHESTER SS BUS TIE AUTOCL	2023 FY Actual	41,167.63
ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	2023 FY Actual	1,263,025.12
ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	2023 FY Budget	2,086,590.27
SACO VALLEY 34.5kv OCB REPLACE	2023 FY Budget	449,612.89
BEEBE RIVER SS TB70 REMOVAL	2022 FY Actual	503,964.38
BEEBE RIVER SS TB70 REMOVAL	2023 FY Actual	11,119.71
34.5kv CAP BANK SWTCH REP BROAD ST	2023 FY Actual	821,461.24
34.5kv CAP BANK SWTCH REP BROAD ST	2023 FY Budget	604,289.65
REPLACE 5 ABB TPU-2000R RELAYS	2021 FY Budget	1,800,000.41
REPLACE 5 ABB TPU-2000R RELAYS	2022 FY Actual	5,711.02
REPLACE 5 ABB TPU-2000R RELAYS	2022 FY Budget	908,096.38
REPLACE 5 ABB TPU-2000R RELAYS	2023 FY Actual	63,940.21
REPLACE 5 ABB TPU-2000R RELAYS	2023 FY Budget	799,305.07
Contoocook SS Oil Recloser Replacement	2023 FY Actual	12,367.84
Mammoth Rd SS TPU Relay Repl	2022 FY Actual	253,832.76
Mammoth Rd SS TPU Relay Repl	2023 FY Actual	(63,398.85)
RESISTANCE SS RETIREMENT	2022 FY Actual	181,332.94
RESISTANCE SS RETIREMENT	2023 FY Actual	1,690,898.38
RESISTANCE SS RETIREMENT	2023 FY Budget	734,520.81
Tasker Farm SS TPU Relay Replacement	2022 FY Actual	83,600.54
Tasker Farm SS TPU Relay Replacement	2023 FY Actual	19,792.97
Tasker Farm SS TPU Relay Replacement	2023 FY Budget	225,332.59
Colebrook SS Oil Recloser Replacement	2023 FY Actual	23,143.02
SS OIL RECLOSER REPL PROGRAM	2022 FY Actual	18,773.58
SS OIL RECLOSER REPL PROGRAM	2023 FY Actual	67,819.55
Great Bay PLC Automation Scheme	2023 FY Budget	250,000.00
RE-FEED 20H1 & RETIRE LISBON S/S	2022 FY Actual	5,341.03
Pack Monadnock Rbld Single-Phase Li	2019 FY Actual	145,625.53
Pack Monadnock Rbld Single-Phase Li	2020 FY Actual	659,370.43
Pack Monadnock Rbld Single-Phase Li	2020 FY Budget	1,798,668.40

Pack Monadnock Rblid Single-Phase Li	2021 FY Actual	1,273,079.24
Pack Monadnock Rblid Single-Phase Li	2021 FY Budget	3,099,999.51
PACK MONADNOCK RBLD SINGLE-PHASE LI	2022 FY Actual	(140.42)
CIRCUIT TIES 3172X1 - 3112X3	2019 FY Actual	468,235.64
CIRCUIT TIES 3172X1 - 3112X3	2020 FY Actual	(4,376.52)
CIRCUIT TIES 3172X1 - 3112X3	2022 FY Actual	(7,897.03)
55H1 PETERBOROUGH URD	2019 FY Actual	(53,093.70)
316X1 CIRCUIT TIE EASTMAN DEVELOPME	2019 FY Actual	(20,476.27)
316X1 CIRCUIT TIE EASTMAN DEVELOPME	2020 FY Actual	458,396.43
316X1 CIRCUIT TIE EASTMAN DEVELOPME	2021 FY Actual	(446,399.72)
EMERALD ST LINE WORK	2019 FY Actual	112,038.14
EMERALD ST LINE WORK	2019 FY Budget	500,000.22
EMERALD ST LINE WORK	2020 FY Actual	201,213.80
EMERALD ST LINE WORK	2021 FY Actual	(74,904.85)
44 & 60 WEST PENN TELECOM	2019 FY Actual	303,672.27
44 & 60 WEST PENN TELECOM	2020 FY Actual	152,541.51
44 & 60 WEST PENN TELECOM	2020 FY Budget	95,826.00
Distribution Automation - Substatio	2019 FY Actual	8,809.30
Distribution Automation - Substatio	2022 FY Actual	37.25
Pettingill Switchgear Reconfigurati	2019 FY Actual	131,267.73
Pettingill Switchgear Reconfigurati	2020 FY Actual	197,125.70
Advanced Load Flow Software	2019 FY Budget	500,000.00
NH DMS Pilot Phase 2	2019 FY Budget	500,034.30
NH LATERAL INITIATIVE	2019 FY Actual	5,658,935.57
NH LATERAL INITIATIVE	2020 FY Actual	46,473.95
NH LATERAL INITIATIVE	2021 FY Actual	1,177.42
34.5kV CAP BANK SWTCH REP BROAD ST	2021 FY Actual	186,591.66
34.5kV CAP BANK SWTCH REP BROAD ST	2022 FY Actual	310,957.99
34.5kV CAP BANK SWTCH REP BROAD ST	2022 FY Budget	1,218,721.24
REMOVE LATTICE STEEL TOWERS W15	2021 FY Actual	252,109.92
2021 CIRCUIT PATROL REPAIRS	2021 FY Actual	1,053,961.61
2021 CIRCUIT PATROL REPAIRS	2022 FY Actual	49,719.66
2021 CIRCUIT PATROL REPAIRS	2023 FY Actual	70,620.93
323 Line Underbuild Re-attachment	2022 FY Actual	544,789.76
317 Line ROW section rebuild	2022 FY Actual	514,895.70
317 Line ROW Section Rebuild	2023 FY Actual	37,026.90
32 Line Pole Replacement	2022 FY Actual	3,207,332.36
371 Line Pole Replacements	2022 FY Actual	3,464,163.83
Remove Lattice Steel Towers – W15	2022 FY Actual	207,286.09
2022 CIRCUIT PATROL REPAIRS	2022 FY Actual	988,878.87
2022 CIRCUIT PATROL REPAIRS	2023 FY Actual	(29.15)
NH Cutout Installation 2022	2022 FY Actual	3,169,580.40
NH Cutout Installation 2022	2023 FY Actual	46,183.21
2022 TripSaver Initiative	2022 FY Actual	915,232.88
2022 TripSaver Initiative	2023 FY Actual	199,230.91
SMART Inspect Reliability Upgrades Central Region	2023 FY Actual	247,560.55
SMART Inspect Reliability Northern	2023 FY Actual	341,825.84

		Attachment	PUC TS 1-005(b)
SMART Inspect Reliability Western	2023 FY Actual	7,534,498.75	Page 172 of 187
2023 DB Fault Indicator Repl	2023 FY Actual	255,960.19	
2023 DB Fault Indicator Repl	2023 FY Budget	285,000.00	
2023 TripSaver Program Phase 1	2023 FY Actual	2,308,460.54	
TripSaver Program 2023 Phase 2	2023 FY Actual	7,370,755.27	
2024 NH URD Inspections	2023 FY Actual	92,631.03	
Distribution Design P134 Line	2019 FY Actual	(274.87)	
Distribution Design P134 Line	2020 FY Actual	3,112.96	
Distribution Design Y138 Line	2019 FY Actual	23.01	
Distribution Design Y138 Line	2020 FY Actual	44.08	
UCONN Damage Prediction Model Expan	2019 FY Actual	(40,898.43)	
34.5KV BREAKER REPL PROGRAM	2019 FY Budget	1,000,000.00	
Portsmouth S/S - add transformer	2019 FY Actual	2,403,956.67	
Portsmouth S/S - add transformer	2019 FY Budget	4,689,270.61	
Portsmouth S/S - add transformer	2020 FY Actual	2,539,491.97	
Portsmouth S/S - add transformer	2020 FY Budget	4,434,935.69	
Portsmouth S/S - add transformer	2021 FY Actual	1,036,082.15	
Portsmouth S/S - add transformer	2021 FY Budget	1,291,847.33	
Portsmouth S/S - add transformer	2022 FY Actual	135.42	
SUBSTATION BATTERY REPLACEMENT	2019 FY Actual	(969.24)	
Substation Battery Replacement	2023 FY Actual	28,349.44	
SUBSTATION GROUND GRID UPGRADES	2019 FY Actual	33,414.56	
SUBSTATION GROUND GRID UPGRADES	2020 FY Actual	1,889.68	
SUBSTATION GROUND GRID UPGRADES	2021 FY Actual	(2,267.60)	
GORHAM SS-GENERATION DIVESTITURE	2019 FY Actual	9,628.07	
GORHAM SS-GENERATION DIVESTITURE	2019 FY Budget	20,814.51	
GORHAM SS-GENERATION DIVESTITURE	2020 FY Actual	3,239.06	
GORHAM SS-GENERATION DIVESTITURE	2021 FY Actual	165,079.73	
GORHAM SS-GENERATION DIVESTITURE	2022 FY Actual	11,141.98	
GORHAM SS-GENERATION DIVESTITURE	2023 FY Actual	46,885.95	
GARVINS SUBSTATION REBUILD	2019 FY Actual	45,845.47	
GARVINS SUBSTATION REBUILD	2023 FY Actual	1,555.44	
EMERALD STREET SUBSTATION	2019 FY Actual	7,174,682.15	
EMERALD STREET SUBSTATION	2019 FY Budget	8,220,724.52	
EMERALD STREET SUBSTATION	2020 FY Actual	5,326,424.58	
EMERALD STREET SUBSTATION	2020 FY Budget	5,078,491.31	
EMERALD STREET SUBSTATION	2021 FY Actual	2,871,262.20	
EMERALD STREET SUBSTATION	2021 FY Budget	2,011,398.85	
EMERALD STREET SUBSTATION	2022 FY Actual	(24,207.66)	
DANIEL SS (WEBSTER)-34.5KV SS UPGRD	2019 FY Actual	319,703.12	
DANIEL SS (WEBSTER)-34.5KV SS UPGRD	2020 FY Actual	133,654.14	
DANIEL SS (WEBSTER)-34.5KV SS UPGRD	2021 FY Actual	204.86	
Brook St S/S - 13TR1 Replacement	2019 FY Actual	30,098.23	
Brook St S/S - 13TR1 Replacement	2019 FY Budget	200,000.21	
Brook St S/S - 13TR1 Replacement	2020 FY Actual	55,148.59	
Brook St S/S - 13TR1 Replacement	2020 FY Budget	2,537,698.26	
Brook St S/S - 13TR1 Replacement	2021 FY Actual	164,204.83	

Brook St S/S - 13TR1 Replacement	2021 FY Budget	2,499,606.03
Brook St S/S - 13TR1 Replacement	2022 FY Actual	621,483.02
Brook St S/S - 13TR1 Replacement	2022 FY Budget	4,614,729.95
Brook St S/S - 13TR1 Replacement	2023 FY Actual	(874,346.65)
Brook St S/S - 13TR1 Replacement	2023 FY Budget	6,493,879.00
Blaine St SS add 34.5-12kV 10MVA tr	2019 FY Actual	41,501.28
Blaine St SS add 34.5-12kV 10MVA tr	2020 FY Actual	(1,134.42)
West Rye S/S Re-build	2019 FY Actual	492,346.91
West Rye S/S Re-build	2022 FY Actual	(406.92)
Second transformer at Lost Nation S	2019 FY Actual	1,552,773.65
Second transformer at Lost Nation S	2019 FY Budget	1,326,551.64
Second transformer at Lost Nation S	2020 FY Actual	45,774.92
Second transformer at Lost Nation S	2021 FY Actual	(52,795.60)
Second transformer at Lost Nation S	2023 FY Actual	(28,349.44)
PLC AUTOMATION SCHEME REPLACEMENT	2019 FY Budget	198,756.96
PLC AUTOMATION SCHEME REPLACEMENT	2020 FY Actual	603.46
PLC AUTOMATION SCHEME REPLACEMENT	2021 FY Actual	(603.46)
PLC AUTOMATION SCHEME REPLACEMENT	2021 FY Budget	450,040.85
PLC AUTOMATION SCHEME REPLACEMENT	2022 FY Budget	179,319.39
CLAREMONT AREA SUBSTATION UPGRADES	2019 FY Actual	20,348.44
CLAREMONT AREA SUBSTATION UPGRADES	2019 FY Budget	100,000.21
CLAREMONT AREA SUBSTATION UPGRADES	2020 FY Actual	(91,629.55)
CLAREMONT AREA SUBSTATION UPGRADES	2020 FY Budget	498,594.73
CLAREMONT AREA SUBSTATION UPGRADES	2021 FY Actual	(175,329.78)
CLAREMONT AREA SUBSTATION UPGRADES	2021 FY Budget	500,757.18
CLAREMONT AREA SUBSTATION UPGRADES	2022 FY Actual	(335,578.93)
CLAREMONT AREA SUBSTATION UPGRADES	2022 FY Budget	(284,100.00)
GREGGS SS Removal	2019 FY Actual	292,863.57
GREGGS SS Removal	2019 FY Budget	999,999.76
GREGGS SS Removal	2020 FY Actual	323,202.15
GREGGS SS Removal	2020 FY Budget	418.65
PINE HILL SS PLC AUTO SCH REPLACE	2019 FY Actual	823,845.98
PINE HILL SS PLC AUTO SCH REPLACE	2019 FY Budget	764,503.15
PINE HILL SS PLC AUTO SCH REPLACE	2020 FY Actual	176.96
TWOMBLEY SS REBUILD	2019 FY Actual	836,554.58
TWOMBLEY SS REBUILD	2019 FY Budget	1,499,999.55
TWOMBLEY SS REBUILD	2020 FY Actual	5,012,077.71
TWOMBLEY SS REBUILD	2020 FY Budget	4,436,790.71
TWOMBLEY SS REBUILD	2021 FY Actual	11,149.88
TWOMBLEY SS REBUILD	2022 FY Actual	(6,586.87)
OCEAN RD SS 34.5KV OCB REPLACE	2019 FY Actual	1,175,585.39
OCEAN RD SS 34.5KV OCB REPLACE	2019 FY Budget	901,358.66
OCEAN RD SS 34.5KV OCB REPLACE	2020 FY Actual	9,780.46
MESSER ST - REPLACE TB70	2019 FY Actual	3,172,292.65
MESSER ST - REPLACE TB70	2019 FY Budget	2,652,734.58
MESSER ST - REPLACE TB70	2020 FY Actual	13,635.54
Beebe River SS Cap Switcher Replace	2019 FY Actual	692,033.99

Beebe River SS Cap Switcher Replace	2019 FY Budget	660,999.74
Beebe River SS Cap Switcher Replace	2020 FY Actual	61,956.39
Beebe River SS Cap Switcher Replace	2021 FY Actual	208.83
MILLYARD SS REPLACEMENT	2019 FY Actual	367,298.38
MILLYARD SS REPLACEMENT	2019 FY Budget	1,335,556.48
MILLYARD SS REPLACEMENT	2020 FY Actual	1,062,518.89
MILLYARD SS REPLACEMENT	2020 FY Budget	3,000,257.74
MILLYARD SS REPLACEMENT	2021 FY Actual	3,573,558.13
MILLYARD SS REPLACEMENT	2021 FY Budget	3,733,446.73
MILLYARD SS REPLACEMENT	2022 FY Actual	6,884,269.85
MILLYARD SS REPLACEMENT	2022 FY Budget	6,261,808.25
MILLYARD SS REPLACEMENT	2023 FY Actual	1,212,416.92
MILLYARD SS REPLACEMENT	2023 FY Budget	973,761.30
NORTH RD SS EQUIPMENT REPLACEMENT	2019 FY Actual	1,747,594.51
NORTH RD SS EQUIPMENT REPLACEMENT	2019 FY Budget	383,706.73
NORTH RD SS EQUIPMENT REPLACEMENT	2020 FY Actual	124,975.83
Monadnock SS Cap Switcher Replaceme	2019 FY Actual	183,022.52
Monadnock SS Cap Switcher Replaceme	2020 FY Actual	1,089.41
MOBILE 115-34.5KV SUBSTATION	2019 FY Actual	486,945.07
BEDFORD SS PLC AUTOMATION SCHEME	2019 FY Actual	497,539.65
BEDFORD SS PLC AUTOMATION SCHEME	2019 FY Budget	989,248.54
BEDFORD SS PLC AUTOMATION SCHEME	2020 FY Actual	2,579,862.11
BEDFORD SS PLC AUTOMATION SCHEME	2020 FY Budget	2,391,974.73
BEDFORD SS PLC AUTOMATION SCHEME	2021 FY Actual	7,880.50
EDDY SS CONTROL HOUSE	2019 FY Actual	556,089.13
EDDY SS CONTROL HOUSE	2019 FY Budget	523,325.03
EDDY SS CONTROL HOUSE	2020 FY Actual	2,411,374.09
EDDY SS CONTROL HOUSE	2020 FY Budget	5,909,690.22
EDDY SS CONTROL HOUSE	2021 FY Actual	6,180,483.20
EDDY SS CONTROL HOUSE	2021 FY Budget	3,702,132.17
EDDY SS CONTROL HOUSE	2022 FY Actual	2,474,126.24
EDDY SS CONTROL HOUSE	2022 FY Budget	1,931,282.07
EDDY SS CONTROL HOUSE	2023 FY Actual	5,394.84
DOVER SUBSTATION REBUILD	2019 FY Budget	1,862,999.67
DOVER SUBSTATION REBUILD	2020 FY Budget	500,092.83
DOVER SUBSTATION REBUILD	2021 FY Actual	60,591.05
DOVER SUBSTATION REBUILD	2021 FY Budget	2,000,000.37
DOVER SUBSTATION REBUILD	2022 FY Actual	64,239.55
DOVER SUBSTATION REBUILD	2022 FY Budget	1,224,528.21
DOVER SUBSTATION REBUILD	2023 FY Actual	52,061.08
DOVER SUBSTATION REBUILD	2023 FY Budget	1,731,763.43
WHITE LAKE SS REBUILD	2020 FY Actual	19,833.40
WHITE LAKE SS REBUILD	2020 FY Budget	500,049.02
WHITE LAKE SS REBUILD	2021 FY Actual	149,245.92
WHITE LAKE SS REBUILD	2021 FY Budget	1,999,718.27
WHITE LAKE SS REBUILD	2022 FY Actual	157,341.42
WHITE LAKE SS REBUILD	2022 FY Budget	2,313,418.80

WHITE LAKE SS REBUILD	2023 FY Actual	404,326.97
WHITE LAKE SS REBUILD	2023 FY Budget	5,808,816.88
Laconia SS Replace LTC Controls	2019 FY Actual	84,548.56
Laconia SS Replace LTC Controls	2020 FY Budget	82,931.78
MONADNOCK SS REPLACE TRANSFRMR TB40	2019 FY Actual	58,002.62
MONADNOCK SS REPLACE TRANSFRMR TB40	2019 FY Budget	3,500,394.88
MONADNOCK SS REPLACE TRANSFRMR TB40	2020 FY Actual	114,873.09
MONADNOCK SS REPLACE TRANSFRMR TB40	2020 FY Budget	3,024,765.93
MONADNOCK SS REPLACE TRANSFRMR TB40	2021 FY Actual	62,002.62
MONADNOCK SS REPLACE TRANSFRMR TB40	2021 FY Budget	3,500,120.53
MONADNOCK SS REPLACE TRANSFRMR TB40	2022 FY Actual	297,343.80
MONADNOCK SS REPLACE TRANSFRMR TB40	2022 FY Budget	6,518,322.75
MONADNOCK SS REPLACE TRANSFRMR TB40	2023 FY Actual	860,320.57
MONADNOCK SS REPLACE TRANSFRMR TB40	2023 FY Budget	11,660,700.88
S Milford Relay Replacement	2019 FY Actual	358,947.84
S Milford Relay Replacement	2019 FY Budget	999,999.68
S Milford Relay Replacement	2020 FY Actual	13,753.10
Mobile Substatn 46x34.5kV-12.47/7.2	2019 FY Actual	54,890.27
Mobile Substatn 46x34.5kV-12.47/7.2	2019 FY Budget	1,500,000.42
Mobile Substatn 46x34.5kV-12.47/7.2	2020 FY Actual	485,531.72
Mobile Substatn 46x34.5kV-12.47/7.2	2020 FY Budget	1,000,055.84
Mobile Substatn 46x34.5kV-12.47/7.2	2021 FY Actual	54,075.76
Mobile Substatn 46x34.5kV-12.47/7.2	2021 FY Budget	1,999,999.71
Mobile Substatn 46x34.5kV-12.47/7.2	2022 FY Actual	24,784.51
Mobile Substatn 46x34.5kV-12.47/7.2	2022 FY Budget	1,689,356.30
Mobile Substatn 46x34.5kV-12.47/7.2	2023 FY Actual	66,120.26
Mobile Substatn 46x34.5kV-12.47/7.2	2023 FY Budget	2,000,000.00
Animal Protection at Rimmon SS	2019 FY Actual	49,628.04
Animal Protection at Rimmon SS	2020 FY Actual	47,276.86
Animal Protection at Rimmon SS	2020 FY Budget	77,367.09
Animal Protection at Rimmon SS	2021 FY Actual	29,622.61
Animal Protection at Rimmon SS	2022 FY Actual	555,482.43
Animal Protection at Rimmon SS	2022 FY Budget	199,453.00
Animal Protection at Rimmon SS	2023 FY Actual	5,217.36
Retire Foyes Corner S/S 4kV	2019 FY Budget	99,999.76
REPLACE LTC CONTROLS AT MADBURY SS	2019 FY Actual	162,416.22
REPLACE LTC CONTROLS AT MADBURY SS	2020 FY Actual	330,095.38
REPLACE LTC CONTROLS AT MADBURY SS	2020 FY Budget	194,074.64
REPLACE LTC CONTROLS AT MADBURY SS	2021 FY Actual	742.09
AMHERST S/S - PLC AUTOMATION REPLAC	2019 FY Actual	68,063.83
AMHERST S/S - PLC AUTOMATION REPLAC	2020 FY Actual	985,752.65
AMHERST S/S - PLC AUTOMATION REPLAC	2020 FY Budget	1,120,881.72
AMHERST S/S - PLC AUTOMATION REPLAC	2021 FY Actual	1,498,489.31
AMHERST S/S - PLC AUTOMATION REPLAC	2021 FY Budget	6,703,019.24
AMHERST S/S - PLC AUTOMATION REPLAC	2022 FY Actual	2,219,445.79
AMHERST S/S - PLC AUTOMATION REPLAC	2022 FY Budget	2,489,541.41
Install animal protection	2019 FY Budget	500,002.22

Install animal protection	2020 FY Budget	249,629.43
Install animal protection	2021 FY Budget	600,000.38
Install animal protection	2022 FY Budget	496,893.59
Animal Protection at Tasker Farm SS	2019 FY Actual	50,060.21
Animal Protection at Tasker Farm SS	2020 FY Actual	457.24
Animal Protection at Tasker Farm SS	2021 FY Actual	24,430.55
Animal Protection at Tasker Farm SS	2022 FY Actual	145.55
Animal Protection at Thornton SS	2019 FY Actual	56,463.25
ANIMAL PROTECTION AT AMHERST SS	2019 FY Actual	81,057.60
ANIMAL PROTECTION AT AMHERST SS	2020 FY Actual	16,022.05
ANIMAL PROTECTION AT VALLEY ST SS	2019 FY Actual	6,374.72
ANIMAL PROTECTION AT VALLEY ST SS	2020 FY Actual	45,789.05
ANIMAL PROTECTION AT VALLEY ST SS	2021 FY Actual	2,457.70
2023 SS Animal Protection Program	2023 FY Budget	500,000.00
34.5kV OCB BREAKER AND ANCILLARY EQ	2021 FY Actual	444,238.88
34.5kV OCB BREAKER AND ANCILLARY EQ	2022 FY Actual	(289,250.63)
34.5kV OCB BREAKER AND ANCILLARY EQ	2023 FY Actual	67,262.30
REEDS FERRY SS OCB REPLACEMENT	2019 FY Actual	323,696.98
REEDS FERRY SS OCB REPLACEMENT	2020 FY Actual	2,281,831.01
REEDS FERRY SS OCB REPLACEMENT	2020 FY Budget	1,886,204.02
REEDS FERRY SS OCB REPLACEMENT	2021 FY Actual	60,089.09
REEDS FERRY SS OCB REPLACEMENT	2022 FY Actual	(4,732.28)
HIGH IMPEDANCE GND FLT DETECT NH	2020 FY Actual	2,021.52
HIGH IMPEDANCE GND FLT DETECT NH	2021 FY Actual	341,002.21
HIGH IMPEDANCE GND FLT DETECT NH	2021 FY Budget	(10.53)
HIGH IMPEDANCE GND FLT DETECT NH	2022 FY Actual	(8,633.48)
East Northwood SS Regulator Replace	2020 FY Actual	181,256.34
East Northwood SS Regulator Replace	2021 FY Actual	7,248.24
East Northwood SS Regulator Replace	2022 FY Actual	291.44
REPLACE CT TRNSF BERLIN ES SS	2020 FY Actual	2,622.97
REPLACE CT TRNSF BERLIN ES SS	2021 FY Actual	388,656.52
BYRD AVE SS UPGRADES	2020 FY Actual	517,027.34
BYRD AVE SS UPGRADES	2021 FY Actual	221,882.91
SPRING STREET SS UPGRADES	2020 FY Actual	1,292,012.72
SPRING STREET SS UPGRADES	2021 FY Actual	23,066.72
SPRING STREET SS UPGRADES	2022 FY Actual	5,521.87
SUGAR RIVER SS UPGRADES	2021 FY Actual	1,332,322.33
SUGAR RIVER SS UPGRADES	2021 FY Budget	0.49
SUGAR RIVER SS UPGRADES	2022 FY Actual	(321.95)
RIVER ROAD SS UPGRADES	2022 FY Actual	543,106.69
RIVER ROAD SS UPGRADES	2022 FY Budget	411,939.60
NEWPORT SS RECLOSER PROJECT	2021 FY Actual	1,023,070.05
NEWPORT SS RECLOSER PROJECT	2022 FY Actual	8,245.72
NEWPORT SS RECLOSER PROJECT	2023 FY Actual	71,166.74
ANIMAL PROTECTION AT BEDFORD SS	2020 FY Actual	50,679.23
ANIMAL PROTECTION AT BEDFORD SS	2021 FY Actual	26,726.66
ANIMAL PROTECTION AT BEDFORD SS	2022 FY Actual	3,101.96

ANIMAL PROTECTION AT MAMMOTH SS	2020 FY Actual	43,642.53
ANIMAL PROTECTION AT MAMMOTH SS	2021 FY Actual	13,971.34
ANIMAL PROTECTION AT WEARE SS	2020 FY Actual	29,171.60
ANIMAL PROTECTION AT WEARE SS	2022 FY Actual	4,220.38
ANIMAL PROTECTION TIMBER SWAMP SS	2020 FY Actual	62,956.13
ANIMAL PROTECTION TIMBER SWAMP SS	2021 FY Actual	34,865.48
ANIMAL PROTECTION TIMBER SWAMP SS	2022 FY Actual	189.97
Spare 345-34.5kv Transformer	2020 FY Actual	26,411.82
SPARE 345-34.5KV TRANSFORMER	2021 FY Actual	645,006.36
SPARE 345-34.5KV TRANSFORMER	2021 FY Budget	3,000,000.17
SPARE 345-34.5KV TRANSFORMER	2022 FY Actual	723,107.19
SPARE 345-34.5KV TRANSFORMER	2022 FY Budget	4,645,902.01
SPARE 345-34.5KV TRANSFORMER	2023 FY Actual	3,578,219.59
SPARE 345-34.5KV TRANSFORMER	2023 FY Budget	522,852.67
BROAD ST CAP SWITHHER REPL	2021 FY Budget	1,000,000.35
GARVINS S/S OCB REPLACEMENT	2021 FY Budget	2,299,999.57
NH T&D IEC 61850 SIMULATOR	2020 FY Actual	965,782.33
NH T&D IEC 61850 SIMULATOR	2021 FY Actual	171,663.77
NH T&D IEC 61850 SIMULATOR	2021 FY Budget	599,999.58
NH T&D IEC 61850 SIMULATOR	2022 FY Actual	(278.61)
GE L90 RELAYS MOD 14 REPLACE NH D	2020 FY Actual	3,063.47
GE L90 RELAYS MOD 14 REPLACE NH D	2021 FY Actual	3,125.67
GE L90 RELAYS MOD 14 REPLACE NH D	2021 FY Budget	200.11
GOFFSTOWN SS CONVERSION	2023 FY Actual	119,987.80
GOFFSTOWN SS CONVERSION	2023 FY Budget	98,588.00
GARVINS RELIABILITY PROJECT	2022 FY Budget	100,000.00
Animal Protection Madbury SS	2023 FY Actual	112,769.57
MADBURY RELIABILITY PROJECT	2022 FY Budget	100,000.00
PORTSMOUTH 12KV RELIABILITY (CUTT S	2022 FY Actual	5,943.54
PORTSMOUTH 12KV RELIABILITY (CUTT S	2022 FY Budget	100,000.00
PORTSMOUTH 12KV RELIABILITY (CUTT S	2023 FY Actual	38,322.54
PORTSMOUTH 12KV RELIABILITY (CUTT S	2023 FY Budget	68,000.00
Portsmouth 12kv Capacity (D Line)	2022 FY Actual	10,288.16
Portsmouth 12kv Capacity (D Line)	2023 FY Actual	63,693.28
Portsmouth 12kv Capacity (D Line)	2023 FY Budget	19,000.00
WEIRS SUBSTATION REBUILD	2021 FY Actual	60,046.02
WEIRS SUBSTATION REBUILD	2021 FY Budget	200,030.36
WEIRS SUBSTATION REBUILD	2022 FY Actual	22,720.27
WEIRS SUBSTATION REBUILD	2022 FY Budget	524,281.86
ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	2021 FY Actual	149,004.38
ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	2022 FY Actual	424,046.53
ASHLAND S/S-PLC REPLCMNT& P&C UPGRD	2022 FY Budget	330,217.14
ASHLAND RELIABILITY SS WORK	2022 FY Actual	52,531.11
ASHLAND RELIABILITY SS WORK	2023 FY Actual	21,095.29
ASHLAND RELIABILITY SS WORK	2023 FY Budget	1,519.06
LACONIA SS RELIABILITY PROJECT	2022 FY Actual	104,557.76
LACONIA SS RELIABILITY PROJECT	2023 FY Actual	45,465.60

SACO VALLEY 34.5KV OCB REPLACE	2022 FY Budget	100,046.67
Ashland SS Rel Proj - Line Work	2022 FY Actual	41,022.26
Ashland SS Rel Proj - Line Work	2023 FY Actual	74,579.97
Ashland SS Rel Proj - Line Work	2023 FY Budget	1,240.06
ANIMAL PROTECTION AT CHESTER SS	2021 FY Actual	28,301.01
ANIMAL PROTECTION AT CHESTER SS	2022 FY Actual	55,317.99
ANIMAL PROTECTION AT CHESTER SS	2023 FY Actual	4,862.16
DERRY RELIABILITY PROJECT	2022 FY Budget	100,000.00
DERRY RELIABILITY PROJECT	2023 FY Budget	750,000.00
LAWRENCE RD TRANSFORMER BREAKER	2022 FY Budget	100,000.00
LAWRENCE RD TRANSFORMER BREAKER	2023 FY Budget	100,000.00
SWANZEY SS CIRCUIT SWITCHER	2021 FY Actual	24,266.31
SWANZEY SS CIRCUIT SWITCHER	2022 FY Actual	(24,266.31)
SWANZEY SS CIRCUIT SWITCHER	2022 FY Budget	554,799.17
North Road SS Reliability	2022 FY Actual	13,904.76
North Road SS Reliability	2023 FY Actual	23,514.67
North Road SS Reliability	2023 FY Budget	96,000.00
N KEENE SS HIGH IMP GRND FAULT DET	2021 FY Actual	181,566.32
N KEENE SS HIGH IMP GRND FAULT DET	2022 FY Actual	42,759.29
N KEENE SS HIGH IMP GRND FAULT DET	2023 FY Actual	439.90
SUGAR RIVER SS GMP TRANSFER TRIP	2021 FY Actual	80,571.26
SUGAR RIVER SS GMP TRANSFER TRIP	2022 FY Actual	510,243.12
SUGAR RIVER SS GMP TRANSFER TRIP	2022 FY Budget	331,352.33
SUGAR RIVER SS GMP TRANSFER TRIP	2023 FY Actual	351,974.84
SUGAR RIVER SS GMP TRANSFER TRIP	2023 FY Budget	179,098.35
Gas Monitor Replacement Program	2022 FY Actual	43.82
Gas Monitor Replacement Program	2023 FY Actual	228.90
SUBSTATION RTU UPGRADE/REPLACE PROG	2023 FY Budget	201,491.81
Animal Protection Brentwood SS	2023 FY Actual	50,291.22
ANIMAL PROTECTION OAK HILL SS	2023 FY Actual	91,454.29
Animal Protection Hudson SS	2023 FY Actual	79,971.17
Animal Protection Reeds Ferry SS	2023 FY Actual	68,786.72
Swanzy TB8S Xfmr SCADA Upgrade	2023 FY Actual	40,922.41
BATTERY REPLACEMENT PROGRAM	2022 FY Actual	12,777.27
BATTERY REPLACEMENT PROGRAM	2023 FY Actual	63,228.16
BATTERY REPLACEMENT PROGRAM	2023 FY Budget	40,870.14
SS Station Service Transformer Repl Program	2023 FY Actual	7,596.27
Jackman Transformer TB61 Replacement	2023 FY Actual	32,447.23
Brook Street Switchgear & Transformer Replacement	2023 FY Actual	3,279,056.30
WEBSTR SS EXPN/CAP BNK SHRD ASTS-CE	2019 FY Actual	(18,738.78)
Distribution Design for F107 Projec	2019 FY Actual	(41,457.27)
Distribution Design for F107 Projec	2019 FY Budget	(169,456.60)
Distribution Design for F107 Projec	2020 FY Actual	(183,444.03)
Distribution Design for F107 Projec	2020 FY Budget	(161,264.20)
Distribution Design for F107 Projec	2021 FY Actual	58,876.87
Distribution Design for F107 Projec	2022 FY Actual	2,931.56
DISTRIBUTION DESIGN L176 LINE REPLA	2019 FY Actual	(3,279.42)

		Attachment	PUC TS 1-005(b)
DISTRIBUTION DESIGN L176 LINE REPLA	2023 FY Actual	(0.00)	
DIST. S/S ANNUAL - DM	2019 FY Actual	837,202	Page 179 of 187
DIST. S/S ANNUAL - DM	2019 FY Budget	749,948	
DIST. S/S ANNUAL - DM	2020 FY Actual	971,716	
DIST. S/S ANNUAL - DM	2020 FY Budget	745,594	
DIST. S/S ANNUAL - DM	2021 FY Actual	172,834	
DIST. S/S ANNUAL - DM	2021 FY Budget	(0)	
DIST. S/S ANNUAL - DM	2022 FY Actual	333,928	
DIST. S/S ANNUAL - DM	2023 FY Actual	12,544	
DIST. S/S ANNUAL - DM	2021 FY Actual	266,093	
DIST. S/S ANNUAL - DM	2021 FY Budget	765,000	
DIST. S/S ANNUAL - DM	2022 FY Actual	222,756	
DIST. S/S ANNUAL - DM	2023 FY Actual	6,585	
DIST S/S ANNUAL - P&C	2019 FY Actual	2,427	
DIST S/S ANNUAL - P&C	2022 FY Actual	7	
SUBSTATION ANNUAL-SUBSTATION	2019 FY Actual	933,860.68	
SUBSTATION ANNUAL-SUBSTATION	2019 FY Budget	1,000,015	
SUBSTATION ANNUAL-SUBSTATION	2020 FY Actual	351,916.38	
SUBSTATION ANNUAL-SUBSTATION	2020 FY Budget	699,026.33	
SUBSTATION ANNUAL-SUBSTATION	2021 FY Actual	103,766.99	
SUBSTATION ANNUAL-SUBSTATION	2021 FY Budget	(0.26)	
SUBSTATION ANNUAL-SUBSTATION	2022 FY Actual	(69,831.07)	
SUBSTATION ANNUAL-SUBSTATION	2023 FY Actual	74,762.05	
SUBSTATION ANNUAL-SUBSTATION	2021 FY Actual	11,616.42	
SUBSTATION ANNUAL-SUBSTATION	2021 FY Budget	999,999.85	
SUBSTATION ANNUAL-SUBSTATION	2022 FY Actual	17,050.96	
SUBSTATION ANNUAL-SUBSTATION	2023 FY Actual	(34.06)	
2022 NH D SS Planned Annual (Eng.)	2022 FY Actual	130,321.77	
2022 NH D SS Planned Annual (Eng.)	2022 FY Budget	695,000.00	
2022 NH D SS Planned Annual (Eng.)	2023 FY Actual	277,657.53	
2023 NH D SS Planned Annual (Eng)	2023 FY Actual	287,595.96	
2023 NH D SS Planned Annual (Eng)	2023 FY Budget	500,000.00	
2022 NH D SS Planned Annual (Ops)	2022 FY Actual	433,354.74	
2022 NH D SS Planned Annual (Ops)	2022 FY Budget	200,000.00	
2022 NH D SS Planned Annual (Ops)	2023 FY Actual	134,925.09	
2023 NH D SS Planned Annual (Ops)	2023 FY Actual	105,809.12	
2023 NH D SS Planned Annual (Ops)	2023 FY Budget	255,000.00	
Electromechanical Relay Replacement	2023 FY Budget	1,400,000.00	
BES BATTERY MONITOR INSTALL PROGRAM	2022 FY Actual	68,664.23	
BES BATTERY MONITOR INSTALL PROGRAM	2022 FY Budget	38,162.80	
BES BATTERY MONITOR INSTALL PROGRAM	2023 FY Actual	69,559.94	
BES Battery Monitoring Madbury SS	2022 FY Actual	78,609.65	
BES Battery Monitoring Madbury SS	2023 FY Actual	6,126.90	
BES Battery Monitor Ocean Rd SS	2022 FY Actual	910.67	
BES Battery Monitor Ocean Rd SS	2023 FY Actual	85,118.76	
BES Battery Monitor Huse Road SS	2022 FY Actual	118,219.34	
BES Battery Monitor Huse Road SS	2023 FY Actual	5,058.35	

BES Battery Monitor Lawrence Rd SS	2022 FY Actual	113,908.41
BES Battery Monitor Lawrence Rd SS	2023 FY Actual	8,506.12
BES Battery Monitor Oak Hill SS	2023 FY Actual	85,331.18
CAPSWITCHER REPLACEMENT	2019 FY Budget	800,080.06
NH DMS	2023 FY Actual	582,943.44
NH DMS	2023 FY Budget	1,000,000.00
316 LINE DAVIT ARM & STRUCTURE REPL	2023 FY Actual	623.43
DIRECT BURIED CABLE REPLACEMENT	2019 FY Actual	(40,023.62)
DIRECT BURIED CABLE REPLACEMENT	2020 FY Actual	(1,838.87)
DIRECT BURIED CABLE REPLACEMENT	2021 FY Actual	33,211.28
DIRECT BURIED CABLE REPLACEMENT	2022 FY Actual	43,945.15
REPLACED FAILED CABLE - POST TESTED	2019 FY Actual	199,201.51
REPLACED FAILED CABLE - POST TESTED	2020 FY Actual	114,288.50
REPLACED FAILED CABLE - POST TESTED	2022 FY Actual	(4,804.99)
DIRECT BURIED CABLE INJECTION	2019 FY Actual	(1,819.71)
DIRECT BURIED CABLE INJECTION	2020 FY Actual	(1,177.09)
DIRECT BURIED CABLE INJECTION	2021 FY Actual	41.52
BOUCHARD ST RPL CBL & SWTCHGR	2020 FY Actual	426,854.14
BOUCHARD ST RPL CBL & SWTCHGR	2020 FY Budget	450,300.89
BOUCHARD ST RPL CBL & SWTCHGR	2021 FY Actual	75,326.49
BOUCHARD ST RPL CBL & SWTCHGR	2022 FY Actual	(10,090.71)
MANCHESTER NETWORK CABLE REPLACEMEN	2023 FY Actual	7,641.93
FOUNDRY PLACE SWITCHGEAR	2020 FY Actual	310,998.96
FOUNDRY PLACE SWITCHGEAR	2021 FY Actual	62,248.12
FOUNDRY PLACE SWITCHGEAR	2022 FY Actual	(19,675.66)
DB CBLE REPLACE MAPLE HILL ACREA	2020 FY Actual	1,066,613.67
DB CBLE REPLACE MAPLE HILL ACREA	2020 FY Budget	1,300,106.92
DB CBLE REPLACE MAPLE HILL ACREA	2021 FY Actual	(714.00)
DB CBLE REPLACE MAPLE HILL ACREA	2022 FY Actual	(4,355.38)
CIRCUIT 3138 RIVERWAY PL CABLE REPL	2021 FY Actual	367,594.95
CIRCUIT 3138 RIVERWAY PL CABLE REPL	2022 FY Actual	9,441.07
1275 MAPLEWOOD AVE DB CABLE REPL	2021 FY Actual	153,700.58
1275 MAPLEWOOD AVE DB CABLE REPL	2022 FY Actual	9,326.94
REBUILD APPLE TREE CINEMA URD	2021 FY Actual	347,684.85
REBUILD APPLE TREE CINEMA URD	2021 FY Budget	399,999.54
REBUILD APPLE TREE CINEMA URD	2022 FY Actual	99,894.63
REPLACE PINE ISLE DRIVE URD	2021 FY Actual	536,205.09
REPLACE PINE ISLE DRIVE URD	2021 FY Budget	350,000.27
REPLACE PINE ISLE DRIVE URD	2022 FY Actual	68,609.56
REPLACE PINE ISLE DRIVE URD	2023 FY Actual	248.38
Manchester Network Cable Repl Ph 2	2022 FY Actual	1,617,922.30
Manchester Network Cable Repl Ph 2	2022 FY Budget	2,535,889.85
Manchester Network Cable Repl Ph 2	2023 FY Actual	168,211.71
Manchester Network Cable Repl Ph 2	2023 FY Budget	35,562.10
Manchester Network Cable Repl Ph 3	2023 FY Actual	1,260,089.69
Submarine Cable Repair	2023 FY Budget	50,000.00
Manchester Network Cable Ph 4	2023 FY Actual	21,912.15

**PROGRAM SUMMARY
PSNH ELECTRIC OPERATIONS**

		2019	2020	2021	2022	2023	5-Year Total
DISTRIBUTION							
NEW CUSTOMER	BUDGET	11,250.4	11,508.3	14,738.0	11,269.9	14,981.6	63,748.3
	ACTUAL	13,661.2	13,942.9	29,614.0	24,025.7	29,356.2	110,600.0
	VARIANCE	2,410.8	2,434.6	14,876.0	12,755.8	14,374.5	46,851.8
BASIC BUSINESS	BUDGET	29,589.3	28,751.2	31,006.0	33,222.3	43,052.5	165,621.4
	ACTUAL	33,857.6	34,416.8	44,018.3	48,502.2	65,469.8	226,264.6
	VARIANCE	4,268.3	5,665.6	13,012.3	15,279.8	22,417.2	60,643.2
RELIABILITY	BUDGET	87,667.3	83,028.7	78,901.2	71,521.3	102,883.6	424,002.1
	ACTUAL	90,352.9	77,708.7	63,756.3	60,102.2	86,298.8	378,218.9
	VARIANCE	2,685.5	-5,320.0	-15,144.8	-11,419.1	-16,584.9	-45,783.3
REGULATORY COMMITMENTS	BUDGET	1,259.3	3,098.7	4,600.0	11,403.4	0.0	20,361.4
	ACTUAL	390.4	2,501.2	3,896.7	10,707.3	48.6	17,544.2
	VARIANCE	-869.0	-597.5	-703.3	-696.1	48.6	-2,817.2
PEAK LOAD / CAPACITY	BUDGET	6,930.6	5,892.1	5,096.4	6,509.4	22,278.5	46,707.1
	ACTUAL	3,133.9	7,351.5	7,502.7	7,287.3	7,807.5	33,082.9
	VARIANCE	-3,796.8	1,459.4	2,406.3	777.8	-14,471.1	-13,624.3
NH OPERATIONS DISTRIBUTION	BUDGET	136,697.1	132,279.0	134,341.6	133,926.4	183,196.4	720,440.4
	ACTUAL	141,395.9	135,921.2	148,788.1	150,624.6	188,980.8	765,710.6
	VARIANCE	4,698.8	3,642.2	14,446.4	16,698.2	5,784.5	45,270.2

BUDGET PROGRAM SUMMARY
As of YTD December 2019

		2019 BUDGET	JAN 2019	FEB 2019	MAR 2019	APR 2019	MAY 2019	JUN 2019	JUL 2019	AUG 2019	SEP 2019	OCT 2019	NOV 2019	DEC 2019	YTD 2019	YEP
DISTRIBUTION																
	BUDGET	11,250.4	915.2	911.0	908.5	910.3	912.2	1,045.2	916.1	917.9	919.8	921.6	1,054.6	917.9	11,250.4	
	PROJECTION	13,661.2	809.8	1,547.5	1,054.7	69.7	678.0	1,511.9	537.6	1,466.6	1,294.2	783.7	1,768.6	2,138.7		
NEW CUSTOMER	ACTUAL		809.8	1,547.5	1,054.7	69.7	678.0	1,511.9	537.6	1,466.6	1,294.2	783.7	1,768.6	2,138.7	13,661.2	13,661.2
	VARIANCE		-105.4	636.5	146.2	-840.6	-234.2	466.7	-378.6	548.7	374.4	-137.9	714.0	1,220.8	2,410.8	2,410.8
	BUDGET	29,589.3	3,351.5	2,531.5	2,143.7	1,764.7	2,471.0	3,190.2	2,291.7	2,523.1	2,604.8	2,254.2	2,264.5	2,198.4	29,589.3	
	PROJECTION	33,857.6	2,959.6	1,799.2	2,599.9	3,782.0	1,980.8	2,875.7	2,877.9	2,850.3	2,553.1	2,735.2	3,695.4	3,148.4		
BASIC BUSINESS	ACTUAL		2,959.6	1,799.2	2,599.9	3,782.0	1,980.8	2,875.7	2,877.9	2,850.3	2,553.1	2,735.2	3,695.4	3,148.4	33,857.6	33,857.6
	VARIANCE		-391.9	-732.2	456.2	2,017.4	-490.2	-314.5	586.2	327.2	-51.7	481.0	1,430.9	950.0	4,268.3	4,268.3
	BUDGET	87,667.3	6,858.8	5,665.1	9,361.0	7,433.3	7,639.2	11,018.6	8,680.7	7,868.6	4,810.5	7,190.6	6,733.3	4,407.8	87,667.3	
	PROJECTION	90,352.9	6,348.5	8,870.3	10,055.7	11,233.3	7,425.9	8,487.7	6,889.3	7,445.6	7,688.3	4,272.9	5,601.5	6,046.5		
RELIABILITY	ACTUAL		6,348.5	8,865.5	10,055.2	11,230.0	7,425.9	8,493.0	6,889.2	7,445.0	7,688.3	4,272.9	5,592.9	6,046.5	90,352.9	90,352.9
	VARIANCE		-510.3	3,200.5	694.2	3,796.7	-213.3	-2,525.6	-1,791.5	-423.6	2,877.8	-2,917.7	-1,140.4	1,638.7	2,685.5	2,685.5
	BUDGET	1,259.3	104.2	0.5	0.5	206.6	214.3	270.0	209.0	193.4	4.3	4.3	48.0	4.4	1,259.3	
	PROJECTION	390.4	744.6	-223.0	-351.0	-251.6	393.8	-38.4	-1.1	5.6	-24.9	127.9	-12.5	21.1		
REGULATORY COMMITMENTS	ACTUAL		744.6	-223.0	-351.0	-251.6	393.8	-38.4	-1.1	5.6	-24.9	127.9	-12.5	21.1	390.4	390.4
	VARIANCE		640.4	-223.5	-351.4	-458.2	179.6	-308.5	-210.1	-187.9	-29.2	123.6	-60.5	16.7	-869.0	-869.0
	BUDGET	6,930.6	285.5	261.1	187.9	817.6	170.2	313.2	603.5	922.0	820.7	698.7	526.3	1,324.0	6,930.6	
	PROJECTION	3,133.9	171.6	130.9	127.8	200.1	392.6	428.9	441.9	202.0	74.5	425.5	202.8	335.3		
PEAK LOAD / CAPACITY	ACTUAL		171.6	130.9	127.8	200.1	392.6	428.9	441.9	202.0	74.5	425.5	202.8	335.3	3,133.9	3,133.9
	VARIANCE		-113.8	-130.2	-60.1	-617.6	222.4	115.7	-161.6	-719.9	-746.2	-273.2	-323.6	-988.7	-3,796.8	-3,796.8
	BUDGET	136,697.1	11,515.2	9,369.1	12,601.5	11,132.5	11,406.8	15,837.3	12,701.0	12,425.0	9,159.9	11,069.4	10,626.8	8,852.5	136,697.1	
	PROJECTION	141,395.9	11,034.1	12,125.0	13,487.1	15,033.5	10,871.1	13,265.9	10,745.6	11,970.1	11,585.1	8,345.2	11,255.8	11,690.0		
NH OPERATIONS DISTRIBUTION (D01)	ACTUAL		11,034.1	12,120.2	13,486.6	15,030.2	10,871.1	13,271.1	10,745.5	11,969.5	11,585.1	8,345.2	11,247.2	11,690.0	141,395.9	141,395.9
	VARIANCE		-481.1	2,751.0	885.1	3,897.6	-535.7	-2,566.1	-1,955.5	-455.5	2,425.2	-2,724.2	620.4	2,837.6	4,698.8	4,698.8

BUDGET PROGRAM SUMMARY
As of YTD December 2020

		2020 BUDGET	JAN 2020	FEB 2020	MAR 2020	APR 2020	MAY 2020	JUN 2020	JUL 2020	AUG 2020	SEP 2020	OCT 2020	NOV 2020	DEC 2020	YTD 2020	YEP
DISTRIBUTION																
	BUDGET	11,508.3	1,113.0	1,113.6	1,114.1	1,114.2	1,114.4	1,190.7	1,190.9	1,191.4	1,192.0	1,007.6	1,116.0	-949.6	11,508.3	
	PROJECTION	13,942.9	787.4	871.2	307.3	378.8	1,146.7	1,235.2	1,911.3	845.0	1,276.7	1,378.4	569.2	3,235.9		
NEW CUSTOMER	ACTUAL		787.4	871.2	307.3	378.8	1,146.7	1,235.2	1,911.3	845.0	1,276.7	1,378.4	569.2	3,235.9	13,942.9	13,942.9
	VARIANCE		-325.6	-242.5	-806.8	-735.5	32.3	44.5	720.4	-346.4	84.7	370.8	-546.7	4,185.4	2,434.6	2,434.6
	BUDGET	28,751.2	2,758.2	2,450.6	2,605.6	2,883.9	2,871.5	3,221.0	2,836.5	2,882.0	2,786.3	2,603.2	2,459.0	-1,606.5	28,751.2	
	PROJECTION	34,416.8	1,537.8	2,267.7	4,450.7	2,980.9	2,240.9	4,128.5	3,238.3	2,567.0	3,342.0	2,403.3	2,309.0	3,178.8		
BASIC BUSINESS	ACTUAL		1,537.8	2,267.7	4,450.7	2,980.9	2,240.9	4,128.5	3,238.3	2,567.0	3,342.0	2,403.3	2,395.1	2,864.7	34,416.8	34,416.8
	VARIANCE		-1,220.4	-182.9	1,845.2	97.0	-630.6	907.5	401.8	-315.0	555.8	-200.0	-63.9	4,471.3	5,665.6	5,665.6
	BUDGET	83,028.7	8,769.2	6,655.4	8,867.1	10,134.8	9,848.8	8,697.3	5,608.0	5,738.1	5,285.4	5,010.6	5,404.5	3,009.6	83,028.7	
	PROJECTION	77,708.7	8,208.5	9,403.4	4,560.3	11,616.5	5,518.9	5,280.7	4,444.9	4,372.6	4,483.9	7,113.8	6,444.6	8,651.2		
RELIABILITY	ACTUAL		8,208.5	9,403.4	4,562.0	11,622.4	5,518.7	5,280.7	4,444.3	4,372.6	4,483.9	7,113.8	6,150.4	6,548.0	77,708.7	77,708.7
	VARIANCE		-560.7	2,748.0	-4,305.1	1,487.6	-4,330.1	-3,416.6	-1,163.7	-1,365.5	-801.6	2,103.2	745.9	3,538.4	-5,320.0	-5,320.0
	BUDGET	3,098.7	0.0	0.0	11.6	11.6	11.6	11.6	458.3	548.2	549.0	549.8	502.4	444.5	3,098.7	
	PROJECTION	2,501.2	52.6	24.4	292.0	85.4	3.0	6.0	3.2	2.8	373.2	206.7	110.7	1,341.3		
REGULATORY COMMITMENTS	ACTUAL		52.6	24.4	292.0	85.4	3.0	6.0	3.2	2.8	373.2	206.7	110.7	1,341.3	2,501.2	2,501.2
	VARIANCE		52.6	24.4	280.4	73.8	-8.6	-5.6	-455.0	-545.4	-175.8	-343.2	-391.7	896.8	-597.5	-597.5
	BUDGET	5,892.1	519.8	366.7	964.7	708.9	869.2	476.7	476.6	523.3	414.3	362.3	203.6	6.1	5,892.1	
	PROJECTION	7,351.5	493.5	203.9	394.7	871.1	660.6	746.2	935.8	634.8	880.2	654.3	648.3	228.0		
PEAK LOAD / CAPACITY	ACTUAL		493.5	203.9	394.7	871.1	660.6	746.2	935.8	634.8	880.2	654.3	648.3	228.0	7,351.5	7,351.5
	VARIANCE		-26.3	-162.8	-570.0	162.2	-208.6	269.6	459.2	111.5	465.9	292.0	444.7	221.9	1,459.4	1,459.4
	BUDGET	135,217.5	13,160.1	10,586.3	13,563.0	14,853.5	14,715.4	13,597.3	10,570.2	10,883.0	10,227.0	9,533.7	10,175.2	904.0	132,279.0	
	PROJECTION	135,921.2	11,079.8	12,770.5	10,004.9	15,932.6	9,570.1	11,396.6	10,533.5	8,422.3	10,356.0	11,756.5	9,873.8	16,635.1		
NH OPERATIONS DISTRIBUTION (D01)	ACTUAL		11,079.8	12,770.5	10,006.6	15,938.5	9,569.9	11,396.6	10,532.9	8,422.3	10,356.0	11,756.5	9,873.8	14,217.9	135,921.2	135,921.2
	VARIANCE		-2,080.4	2,184.2	-3,556.4	1,085.0	-5,145.6	-2,200.7	-37.4	-2,460.7	129.0	2,222.9	301.4	13,313.8	3,642.2	-101.2

BUDGET PROGRAM SUMMARY
As of YTD Dec 2021

		2021 BUDGET	JAN 2021	FEB 2021	MAR 2021	APR 2021	MAY 2021	JUN 2021	JUL 2021	AUG 2021	SEP 2021	OCT 2021	NOV 2021	DEC 2021	YTD 2021	YEP
DISTRIBUTION																
	BUDGET	14,738.0	1,316.0	1,316.0	1,326.0	1,326.0	1,619.2	1,326.0	1,326.0	1,619.2	1,619.2	1,326.0	1,619.2	-1,000.6	14,738.0	
	PROJECTION	29,614.0	2,593.9	1,994.6	1,703.5	225.0	2,164.7	2,704.7	1,350.2	2,315.0	3,186.8	2,716.9	1,612.2	7,046.4		
NEW CUSTOMER	ACTUAL		2,593.9	1,994.6	1,703.5	225.0	2,164.7	2,704.7	1,350.2	2,315.0	3,186.8	2,716.9	1,612.2	7,046.4	29,614.0	29,614.0
	VARIANCE		1,277.9	678.6	377.5	-1,101.0	545.5	1,378.7	24.2	695.9	1,567.7	1,390.9	-7.0	8,047.0	14,876.0	14,876.0
	BUDGET	31,006.0	2,890.9	2,506.3	3,149.4	3,399.8	2,581.5	2,953.4	3,338.3	3,211.8	2,771.3	2,746.5	2,558.8	-1,102.1	31,006.0	
	PROJECTION	44,018.3	2,531.0	4,981.5	3,469.2	2,827.0	3,610.3	4,662.6	3,172.9	3,196.5	3,204.9	4,078.7	3,130.9	5,152.8		
BASIC BUSINESS	ACTUAL		2,531.0	4,981.5	3,469.2	2,827.0	3,610.3	4,662.6	3,172.9	3,196.5	3,204.9	4,078.7	3,130.9	5,152.8	44,018.3	44,018.3
	VARIANCE		-359.9	2,475.2	319.8	-572.8	1,028.8	1,709.2	-165.4	-15.3	433.6	1,332.2	572.1	6,254.9	13,012.3	13,012.3
	BUDGET	78,901.2	3,560.8	4,706.8	6,536.8	6,356.2	7,372.0	5,506.8	6,437.3	7,686.7	7,220.6	6,499.0	10,582.5	6,435.6	78,901.2	
	PROJECTION	63,756.3	6,252.4	7,176.5	6,440.8	4,454.4	4,885.9	3,355.1	2,758.8	2,043.7	4,440.0	6,047.8	7,537.0	8,364.0		
RELIABILITY	ACTUAL		6,252.6	7,176.5	6,440.8	4,454.4	4,885.9	3,355.1	2,758.8	2,043.7	4,440.0	6,047.8	7,537.0	8,364.0	63,756.3	63,756.3
	VARIANCE		2,691.8	2,469.6	-96.0	-1,901.9	-2,486.2	-2,151.7	-3,678.5	-5,643.0	-2,780.6	-451.2	-3,045.5	1,928.4	-15,144.8	-15,144.8
	BUDGET	4,600.0	428.1	428.1	1,083.8	418.3	418.3	418.3	948.4	1,125.1	418.3	418.3	369.2	-1,874.5	4,600.0	
	PROJECTION	3,896.7	-413.7	-88.4	139.7	158.6	362.3	427.1	915.1	418.3	604.9	310.2	132.8	929.9		
REGULATORY COMMITMENTS	ACTUAL		-413.7	-88.4	139.7	158.6	362.3	427.1	915.1	418.3	604.9	310.2	132.8	929.9	3,896.7	3,896.7
	VARIANCE		-841.8	-516.6	-944.1	-259.8	-56.1	8.8	-33.4	-706.9	186.6	-108.1	-236.4	2,804.4	-703.3	-703.3
	BUDGET	5,096.4	244.5	101.2	183.0	1,857.2	1,978.9	733.3	199.5	174.5	570.4	535.5	185.2	-1,666.7	5,096.4	
	PROJECTION	7,502.7	765.3	343.0	330.8	292.1	682.6	1,026.6	472.1	566.1	826.2	959.0	-432.0	1,671.0		
PEAK LOAD / CAPACITY	ACTUAL		765.3	343.0	330.8	292.1	682.6	1,026.6	472.1	566.1	826.2	959.0	-432.0	1,671.0	7,502.7	7,502.7
	VARIANCE		520.8	241.8	147.8	-1,565.1	-1,296.3	293.3	272.6	391.6	255.9	423.5	-617.2	3,337.6	2,406.3	2,406.3
	BUDGET	134,341.6	8,440.3	9,058.5	12,279.0	13,357.5	13,970.0	10,937.8	12,249.5	13,817.3	12,599.8	11,525.3	15,314.8	791.8	134,341.6	
	PROJECTION	148,788.1	11,728.9	14,407.2	12,084.0	7,957.0	11,705.8	12,176.1	8,669.1	8,539.6	12,262.9	14,112.5	11,980.8	23,164.1		
NH OPERATIONS DISTRIBUTION (D01)	ACTUAL		11,729.0	14,407.2	12,084.0	7,957.0	11,705.8	12,176.1	8,669.1	8,539.6	12,262.9	14,112.5	11,980.8	23,164.1	148,788.1	148,788.1
	VARIANCE		3,288.7	5,348.7	-195.1	-5,400.5	-2,264.2	1,238.3	-3,580.5	-5,277.8	-336.9	2,587.2	-3,334.0	22,372.3	14,446.4	14,446.4

BUDGET PROGRAM SUMMARY
As of YTD December 2022

		2022 BUDGET	JAN 2022	FEB 2022	MAR 2022	APR 2022	MAY 2022	JUN 2022	JUL 2022	AUG 2022	SEP 2022	OCT 2022	NOV 2022	DEC 2022	YTD 2022	YEP
DISTRIBUTION																
	BUDGET	11,269.9	929.0	929.0	939.0	939.0	939.0	939.0	939.0	939.0	939.0	939.0	939.0	961.5	11,269.9	
	PROJECTION	24,025.7	592.8	1,522.5	1,468.2	1,442.9	1,449.5	1,670.9	2,123.4	2,169.7	1,765.7	2,679.9	2,269.1	4,871.2	24,025.7	24,025.7
	ACTUAL		592.8	1,522.5	1,468.2	1,442.9	1,449.5	1,670.9	2,123.4	2,169.7	1,765.7	2,679.9	2,269.1	4,871.2	24,025.7	24,025.7
	VARIANCE		-336.2	593.5	529.3	503.9	510.6	732.0	1,184.5	1,230.7	826.7	1,740.9	1,330.1	3,909.8	12,755.8	12,755.8
	BUDGET	33,222.3	3,448.6	2,458.9	3,557.8	2,372.6	2,316.0	2,770.1	3,148.8	3,432.0	2,746.2	2,365.3	2,296.2	2,309.8	33,222.3	
	PROJECTION	48,502.2	2,551.6	3,727.1	5,645.1	4,585.3	4,447.5	4,506.1	2,344.2	2,532.0	2,941.1	5,188.9	5,353.2	4,680.1	48,502.2	48,502.2
	ACTUAL		2,551.6	3,727.1	5,645.1	4,585.3	4,447.5	4,506.1	2,344.2	2,532.0	2,941.1	5,188.9	5,353.2	4,680.1	48,502.2	48,502.2
	VARIANCE		-897.0	1,268.2	2,087.3	2,212.6	2,131.5	1,736.0	-804.6	-900.1	194.9	2,823.6	3,057.1	2,370.4	15,279.8	15,279.8
	BUDGET	71,521.3	4,586.6	4,556.9	9,524.3	5,815.1	5,262.0	5,611.7	7,599.1	5,319.1	6,141.6	6,615.9	5,031.7	5,457.2	71,521.3	
	PROJECTION	60,102.2	2,459.6	2,752.5	3,328.1	5,391.1	7,692.6	4,041.1	5,347.7	2,686.3	4,413.8	5,280.7	5,811.9	10,896.9	60,102.2	60,102.2
	ACTUAL		2,459.6	2,752.5	3,328.1	5,391.1	7,692.6	4,041.1	5,347.7	2,686.3	4,413.8	5,280.7	5,811.9	10,896.9	60,102.2	60,102.2
	VARIANCE		-2,127.0	-1,804.4	-6,196.3	-424.0	2,430.6	-1,570.6	-2,251.5	-2,632.7	-1,727.8	-1,335.2	780.2	5,439.6	-11,419.1	-11,419.1
	BUDGET	11,403.4	1,322.3	1,723.9	2,315.2	2,043.7	2,274.6	104.3	282.7	130.2	98.4	453.5	341.1	313.6	11,403.4	
	PROJECTION	10,707.3	1,304.0	1,097.4	1,432.5	1,850.5	992.7	740.1	344.9	733.3	244.7	337.5	500.2	1,129.5	10,707.3	10,707.3
	ACTUAL		1,304.0	1,097.4	1,432.5	1,850.5	992.7	740.1	344.9	733.3	244.7	337.5	500.2	1,129.5	10,707.3	10,707.3
	VARIANCE		-18.3	-626.4	-882.7	-193.3	-1,281.9	635.8	62.3	603.2	146.3	-116.0	159.1	815.9	-696.1	-696.1
	BUDGET	6,509.4	136.6	136.6	652.3	839.3	1,043.6	941.6	455.6	566.4	560.4	648.4	432.1	96.6	6,509.4	
	PROJECTION	7,287.3	776.4	523.7	311.6	-151.4	340.9	1,035.0	889.9	1,656.3	1,237.1	-518.3	728.0	458.2	7,287.3	7,287.3
	ACTUAL		776.4	523.7	311.6	-151.4	340.9	1,035.0	889.9	1,656.3	1,237.1	-518.3	728.0	458.2	7,287.3	7,287.3
	VARIANCE		639.8	387.2	-340.7	-990.7	-702.8	93.4	434.2	1,089.9	676.7	-1,166.7	295.9	361.6	777.8	777.8
	BUDGET	133,926.4	10,423.1	9,805.1	16,988.6	12,009.7	11,835.2	10,366.7	12,425.2	10,386.6	10,485.5	11,022.1	9,039.9	9,138.6	133,926.4	
	PROJECTION	150,624.6	7,684.4	9,623.2	12,185.4	13,118.2	14,923.2	11,993.3	11,050.1	9,777.6	10,602.4	12,968.7	14,662.3	22,035.9	150,624.6	150,624.6
	ACTUAL		7,684.4	9,623.2	12,185.4	13,118.2	14,923.2	11,993.3	11,050.1	9,777.6	10,602.4	12,968.7	14,662.3	22,035.9	150,624.6	150,624.6
	VARIANCE		-2,738.8	-182.0	-4,803.2	1,108.6	3,088.0	1,626.6	-1,375.2	-609.0	116.8	1,946.6	5,622.4	12,897.2	16,698.2	16,698.2
	BUDGET															
	PROJECTION															
	ACTUAL															
	VARIANCE															

BUDGET PROGRAM SUMMARY
As of YTD December 2023

		2023 BUDGET	JAN 2023	FEB 2023	MAR 2023	APR 2023	MAY 2023	JUN 2023	JUL 2023	AUG 2023	SEP 2023	OCT 2023	NOV 2023	DEC 2023	YTD 2023	YEP
DISTRIBUTION																
NEW CUSTOMER	BUDGET	14,981.6	1,287.4	1,311.4	1,311.4	1,333.4	1,311.4	996.4	1,238.4	1,238.4	1,238.5	1,238.5	1,238.5	1,238.5	14,981.6	
	PROJECTION	29,356.2	-543.7	1,753.0	1,383.1	3,095.8	1,436.1	2,486.2	2,338.6	1,929.0	4,029.8	1,940.4	3,378.2	6,129.7		
	ACTUAL		-543.7	1,753.0	1,383.1	3,095.8	1,436.1	2,486.2	2,338.6	1,929.0	4,029.8	1,940.4	3,378.2	6,129.7	29,356.2	29,356.2
	VARIANCE		-1,831.0	441.6	71.7	1,762.4	124.8	1,489.9	1,100.2	690.6	2,791.3	701.9	2,139.8	4,891.2	14,374.5	14,374.5
BASIC BUSINESS	BUDGET	43,052.5	3,748.9	3,613.3	3,658.4	3,436.8	3,645.2	3,593.2	3,568.0	3,593.0	3,592.6	3,517.6	3,517.6	3,567.6	43,052.5	
	PROJECTION	65,469.8	1,509.2	5,233.2	3,574.5	4,713.0	4,760.0	8,154.4	5,709.6	5,239.8	4,358.4	8,400.6	8,459.1	5,357.9		
	ACTUAL		1,509.2	5,233.2	3,574.5	4,713.0	4,760.0	8,154.4	5,709.6	5,239.8	4,358.4	8,400.6	8,459.1	5,357.9	65,469.8	65,469.8
	VARIANCE		-2,239.7	1,619.8	-83.8	1,276.2	-1,114.8	4,561.2	2,141.6	1,646.7	765.8	4,882.9	4,941.4	1,790.3	22,417.2	22,417.2
RELIABILITY	BUDGET	102,883.6	7,324.4	7,236.4	7,916.1	9,103.1	7,344.4	6,928.2	5,976.5	8,210.7	13,215.4	9,818.4	9,572.5	10,237.5	102,883.6	
	PROJECTION	86,298.8	5,301.4	5,422.2	6,064.4	8,362.8	3,868.3	11,404.7	6,937.3	11,137.7	13,893.3	6,135.1	5,574.6	2,197.0		
	ACTUAL		5,301.4	5,422.2	6,064.4	8,362.8	3,868.3	11,404.7	6,937.3	11,137.7	13,893.3	6,135.1	5,574.6	2,197.0	86,298.8	86,298.8
	VARIANCE		-2,023.0	-1,814.2	-1,812.8	-719.3	-3,493.8	4,458.9	915.2	2,749.4	500.4	-3,860.9	-4,175.4	-8,218.0	-16,584.9	-16,584.9
REGULATORY COMMITMENTS	BUDGET	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	
	PROJECTION	48.6	0.5	1.7	0.1	1.2	32.4	1.5	3.3	4.3	0.2	1.5	1.4	0.4		
	ACTUAL		0.5	1.7	0.1	1.2	32.4	1.5	3.3	4.3	0.2	1.5	1.4	0.4	48.6	48.6
	VARIANCE		0.5	1.7	0.1	1.2	32.4	1.5	3.3	4.3	0.2	1.5	1.4	0.4	48.6	48.6
PEAK LOAD / CAPACITY	BUDGET	22,278.5	827.7	696.3	652.0	831.3	836.3	918.8	724.9	2,652.5	3,244.0	3,910.6	3,650.8	3,333.5	22,278.5	
	PROJECTION	7,807.5	330.6	-73.4	271.4	553.6	317.0	807.8	838.8	928.1	1,049.2	299.4	1,736.6	748.4		
	ACTUAL		330.6	-73.4	271.4	553.6	317.0	807.8	838.8	928.1	1,049.2	299.4	1,736.6	748.4	7,807.5	7,807.5
	VARIANCE		-497.1	-769.7	-380.6	-277.7	-519.3	-111.0	113.9	-1,724.4	-2,194.8	-3,611.2	-1,914.1	-2,585.0	-14,471.1	-14,471.1
NH OPERATIONS DISTRIBUTION (D01)	BUDGET	183,196.4	13,188.4	12,857.4	13,537.8	14,704.5	13,137.4	12,436.6	11,507.8	15,694.6	21,290.5	18,485.1	17,979.3	18,377.0	183,196.4	
	PROJECTION	188,980.8	6,598.1	12,336.7	11,293.5	16,726.3	10,413.9	22,854.7	15,827.6	19,238.8	23,330.8	16,776.9	19,150.0	14,433.5		
	ACTUAL		6,598.1	12,336.7	11,293.5	16,726.3	10,413.9	22,854.7	15,827.6	19,238.8	23,330.8	16,776.9	19,150.0	14,433.5	188,980.8	188,980.8
	VARIANCE		-6,590.3	-520.7	-2,205.3	2,042.8	-2,741.2	10,400.5	4,274.2	3,366.7	1,862.8	-1,885.7	993.1	-4,121.0	5,784.5	5,784.5

Basic Business-ED
Third Party/Joint Owner Work
Basic Business - Other
Insurance Claim/Keep Cost
Line Relocations/Act of Public Authority
Pre-Cap Line Transformers
Lighting
Emergent Equipment Failures - Line
Emergent Equipment Failures - Substation
Environmental
Capital Tool Purchases
New Customer-ED
Distributed Generation
Customer Driven
Peak Load / Capacity
Distribution Line Capacity
Substation Capacity
Regulatory Commitments
Regulatory Commitments-Other
Reliability
Distribution Automation
Distribution Line Reliability
Distribution ROW Line Reliability
Substation Reliability
CCI Reject Pole Replacement
Total Distribution

Budget Category	Budget Sub-Category	Project #	Project Title	2025 (\$1,000)	2026 (\$1,000)	2027 (\$1,000)	2028 (\$1,000)	2029 (\$1,000)	Description
New Customer	Customer Driven	DN9R	DN9R - NEW/EXISTING CUSTOMERS - PSNH	25,209	25,966	26,744	27,547	28,373	
New Customer	Customer Driven	DV9R	SERVICES - PSNH	4,141	4,265	4,393	4,525	4,660	
Totals ==>				29,350	30,230	31,137	32,071	33,034	

Budget Category	Budget Sub-Category	Project #	Project Title	2025 (\$1,000)	2026 (\$1,000)	2027 (\$1,000)	2028 (\$1,000)	2029 (\$1,000)	Description
Basic Business	3rd Party/Joint Owner Work	C03CTV	CABLE TV PROJECTS ANNUAL	5,150	5,305	5,464	5,628	5,796	
Basic Business	3rd Party/Joint Owner Work	C03TEL	TELEPHONE PROJECTS ANNUAL	52	53	55	56	58	
Basic Business	3rd Party/Joint Owner Work	C01SPA01	Joint Pole	52	53	55	56	58	
Basic Business	Line Relocations/Act of Public Authority	C03DOT	NHDOT PROJECT ANNUAL	1,576	1,623	1,672	1,672	1,774	
Basic Business	Line Relocations/Act of Public Authority		NHDOT Route 106		2,000				
Basic Business	Line Relocations/Act of Public Authority	DH9R	LINE RELOCATIONS	2,126	2,190	2,255	2,255	2,393	
Basic Business	Environmental	CO1PCB	PCB Transformer Replacements	412	424	437	450	464	
Basic Business	Lighting	DA9R	NON-ROADWAY LIGHTING	1,257	1,294	1,000	1,350	1,414	
Basic Business	Lighting	HPS9R	HPS ADDS/CHNGS	278	286	295	304	313	
Basic Business	Basic Business - Other	GF9R	GEN OFF FURN/EQUIP - ED	105	108	111	115	118	
Basic Business	Basic Business - Other	PT9R	Temporary Work	341	351	362	373	384	
Basic Business	Basic Business - Other	PW9R	Private Work	119	123	127	131	134	
Basic Business	Capital Tool Purchases	GM9R23	Tools and Equipment- 1250	420	433	446	459	473	
Basic Business	Capital Tool Purchases	GT9R	Tools and Equipment- Troubleshooters	525	541	557	574	591	
Basic Business	Capital Tool Purchases	GX9R	TOOLS/EQUIPMENT CONSTRUCTION - E	1,051	1,082	1,115	1,148	1,182	

Budget Category	Budget Sub-Category	Project #	Project Title	2025 (\$1,000)	2026 (\$1,000)	2027 (\$1,000)	2028 (\$1,000)	2029 (\$1,000)	Description
Basic Business	Insurance Claim/Keep Cost	INSOH9R	Claims OH, UG, DB	1,442	1,485	1,530	1,576	1,623	
Basic Business	Emergent Equipment Failures - Line	DQ9R	DQ (Double Poles)	1,751	1,804	1,858	1,913	1,971	
Basic Business	Emergent Equipment Failures - Line	DQ9R	DQ (Split By Region for 2024)	23,820	24,534	25,270	26,029	26,809	
Basic Business	Emergent Equipment Failures - Line	MINOR9RDS9RE	ROW DQ	1,313	1,353	1,393	1,435	1,478	
Basic Business	Emergent Equipment Failures - Line	MINOR9RDS9RE	MINOR STORM WORK - VARIOUS AWC'S	1,576	1,623	1,672	1,722	1,774	
Basic Business	Emergent Equipment Failures - Line	STORMCAP	STORM CAPITALIZATION	2,943	3,031	3,122	3,216	3,312	
Basic Business	Pre-Cap Line Transformers	DT7P	Transformer and Regulators Annual	23,195	23,890	24,607	25,345	26,106	
Basic Business	Capital Tool Purchases	GE9R	Tools and Equipment	1,021	1,021	1,021	1,021	1,021	Engineering tool budget
Basic Business	Emergent Equipment Failure - Substation		Power Transformer Failure	2,850	2,850	2,850	2,850	2,850	
Totals ==>				73,374	77,459	77,273	79,677	82,097	

Reliability	Substation Reliability	34.5kV OCB Breaker and Ancillary Equipment Replacement Program	250	2,750	2,500	3,750	4,250				
Reliability	Substation Reliability	North Road Substation Reliability Project	200	0	1,000	2,000					
Reliability	Substation Reliability	BES Battery Monitor Installation Program – Rimmon Substation Release	100	0	0	0					
Reliability	Substation Reliability	BES Battery Monitor Installation Program – Weare Substation	100	0	0	0					
Reliability	Substation Reliability	BES BMIP North Road Release	0	100							
Reliability	Substation Reliability	Chester SS Replacement Battery Prg Release IFR	0	100	0	0					
Reliability	Substation Reliability	BES BMIP Chestnut Hill Release	75								
Reliability	Substation Reliability	BES Battery Monitor Installation Program – Bedford Substation Release	50	0	0	0					
Reliability	Substation Reliability	Replacement Battery Prgm – Great Bay	50	0	0	0					
Reliability	Substation Reliability	BES BMIP Garvins Release	50	50	0						
Reliability	Substation Reliability	Foyes Corner 3202 Recloser Replacement	35	1,185	0	0					
Reliability	Substation Reliability	Lancaster Oil Recloser Replacement	30	1,285	0	0					
Reliability	Substation Reliability	Long Hill Transformer TR40 Replacement	250	1,000	1,750						
Reliability	Substation Reliability	Great Falls Upper Transformer TR122PH1 Replacement	250	3,750	8,000						
Reliability	Substation Reliability	Pittsfield 90H Replacement	0	250	1,000	3,750					
Reliability	Substation Reliability	Opechee Transformer TB9 Replacement	0	250	1,000	3,750					
Reliability	Substation Reliability	Tate Rd Transformer 42H1 Replacement	0	0		250	3,750				
Reliability	Substation Reliability	Edgeville Transformer TR16 Replacement	0	0		250	1,000				
Reliability	Substation Reliability	New Market TR13 Transformer Replacement	0	0		250	1,000				
Reliability	Substation Reliability	BES Battery Monitor Installation Program - (NH - D)	0	0	0	200					
Reliability	Substation Reliability	Garvins Reliability Project	0	700	1,300	0					
Reliability	Substation Reliability	Forecast Proj for SS Switchgear	0	1,000	6,000	3,000	3,000				
Reliability	Substation Reliability	Substation Security	0	500	1,000	1,000	1,000				
Reliability	Distribution Line Reliability	Scope To be Determined after updates Annual Worst Performing circuits list (done annually)				9,400	18,400				
Reliability	Distribution ROW Line Reliability	Scope To be Determined at later date				15,000	23,000				
Reliability	Substation Reliability	Scope To be Determined at later date			1,000		23,000				
Totals			116,402	101,950	97,312	105,257	103,330				

Budget Category	Budget Sub-Category	Project Title	2025 (\$1,000)	2026 (\$1,000)	2027 (\$1,000)	2028 (\$1,000)	2029 (\$1,000)	FERC Account	Company Accounting Account #	Financing Expectations
Totals ==>			34,684	47,217	45,246	36,000	38,000			

Public Service of NH
Grid Mod Costs 2021-2023

Field Work	Project #	Description	2023	2022	2021
Distribution Automation Projects	A23DA/A22DA/A21DA	2023 Pole top DA	5,630,151		
Distribution Automation Projects	A22DA/A21DA/A20DA/A18DA	2022 Pole top DA		7,994,241	
Distribution Automation Projects	A21DA/A20DA/A19DA/A18DA	2021 Pole top DA			6,413,424
		SubTotal Field	\$ 5,630,151	\$ 7,994,241	\$ 6,413,424
IT Projects					
Distribution Management System	A20X21	DMS		7,106,869	
Aclara	A21LS/A22LS/A23LS	Aclara	152,502	597,732	283,543
	KMOP61C1/DOPP61C1/DOUT61				
Outage Management System	C1/NMSP61C2/OUAP61C2/DOAC				
	61C2	OMS	5,520,757	12,960,042	936,319
Synergi	IT20455	Synergi		873,996	
Power Clerk	IT22447	Power Clerk	3,343,362		
		SubTotal IT	\$ 9,016,621	\$ 21,538,639	\$ 1,219,862
		Grand Total	\$ 14,646,772	\$ 29,532,880	\$ 7,633,286
		Total Capital Additions	\$ 196,732,930	\$ 168,147,249	\$ 148,185,878
		Grid Mod Percent	7%	18%	5%

Public Service of NH
Grid Mod Costs 2021-2023

Field Work	Project #	Description	2023	2022	2021
Distribution Automation Projects	A23DA/A22DA/A21DA	2023 Pole top DA	5,630,151		
Distribution Automation Projects	A22DA/A21DA/A20DA/A18DA	2022 Pole top DA		7,994,241	
Distribution Automation Projects	A21DA/A20DA/A19DA/A18DA	2021 Pole top DA			6,413,424
		SubTotal Field	\$ 5,630,151	\$ 7,994,241	\$ 6,413,424
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Aclara	A21LS/A22LS/A23LS	Aclara	152,502	597,732	283,543
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		Total Capital Additions	\$ 196,732,930	\$ 168,147,249	\$ 148,185,878
		Grid Mod Percent	7%	18%	5%

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

K-BAR ELIGIBLE CAPITAL
Attachment ES-DPH-2 including Grid Enhancement Programs

('000s)

	Forecast			Total	Reference
	Year 2025	Year 2026	Year 2027	2025-2027	
DISTRIBUTION CAPITAL EXPENDITURES					
Operations Distribution					
Peak Load Growth and New Business	\$ 64,163	\$ 77,347	\$ 76,399	\$ 217,909	
Basic Business Requirements	73,358	77,441	77,587	228,386	
Aging Infrastructure	122,222	104,511	96,667	323,400	
Total Operations - Distribution	\$ 259,743	\$ 259,299	\$ 250,653	\$ 769,695	Sum of Lines 13 through 15
Other Distribution					
Operation Services	\$ 15,133	\$ 15,429	\$ 15,291	\$ 45,853	
Engineering	6,518	6,920	14,620	28,058	
Facilities	14,500	21,000	7,800	43,300	
Information Technology	7,411	1,800	3,248	12,459	
Customer and All Other Shared Services	7,677	6,462	6,734	20,872	
Total Other Distribution	\$ 51,239	\$ 51,611	\$ 47,692	\$ 150,542	Sum of Lines 21 through 25
TOTAL CORE DISTRIBUTION CAPITAL EXPENDITURES	\$ 310,982	\$ 310,910	\$ 298,345	\$ 920,237	Line 17 + Line 26
INCREMENTAL PROGRAMS - GRID ENHANCEMENTS					
Grid Modernization/VVO	\$ 5,000	\$ 6,000	\$ 5,000	\$ 16,000	
Resiliency	10,000	15,000	15,000	40,000	
TOTAL INCREMENTAL PROGRAMS	\$ 15,000	\$ 21,000	\$ 20,000	\$ 56,000	Line 31 + Line 32
TOTAL K-BAR ELIGIBLE CAPITAL	325,982	331,910	318,345	976,237	Line 28 + Line 34
K-BAR ELIGIBLE CAPITAL CALCULATION:					
Total K-Bar Eligible Distribution Capital Expenditures	\$ 325,982	\$ 331,910	\$ 318,345	\$ 976,237	Line 36
Cumulative K-Bar Eligible Distribution Capital Expenditures	325,982	657,893	976,237	976,237	Sum of 2025 thru Current CY Line 40
10% Capital Constraint	32,598	65,789	97,624	97,624	Line 42 * 10%
Total Capital Allowed for K-Bar Adjustment	\$ 358,581	\$ 723,682	\$ 1,073,861	\$ 1,073,861	Line 42 + Line 44
Actual K-Bar Capital Investment In-Service (incl. COR)	\$ 284,952	\$ 310,184	\$ 317,000	\$ 912,136	Exh. ES-DPH-1 at 4 and 5, Column (A) Lines 10-12; CY Additions + CY COR
Cumulative K-Bar Capital Investment (incl. COR)	\$ 284,952	\$ 595,136	\$ 912,136	\$ 912,136	Sum of 2025 thru CY Line 48
Actuals Higher Than Spending Constraint	NO	NO	NO	NO	YES if Line 50 > Line 46
Investment Above Cap	\$ -	\$ -	\$ -	\$ -	Line 48 - Line 46 if cap is reached
TOTAL ALLOWABLE K-BAR CAPITAL (CAPPED)	\$ 284,952	\$ 310,184	\$ 317,000	\$ 912,136	Line 48 - Line 54
NOTE: For Informational Purposes Only					
Total Actual K-Bar Eligible Distribution Capital Expenditures	\$ -	\$ -	\$ -	\$ -	To be updated in Annual PBRA Filings
Total Forecast K-Bar Eligible Distribution Capital Expenditures	\$ 325,982	\$ 331,910	\$ 318,345	\$ 976,237	Line 40
Difference	\$ (325,982)	\$ (331,910)	\$ (318,345)	\$ (976,237)	Line 56 - Line 57

NOTE: Numbers may not add due to rounding.

Comparative Analysis of PSNH’s Proposal with PBR Plans in Massachusetts¹

Company/Element	I Factor	X Factor	Consumer Dividend	Exogenous Z Factor	K Factor	ESM	Term/Stay Out
PSNH Proposed	GDP-PI	Zero	0.15 % when inflation exceeds 2 %	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = \$1.5M	K-Bar with rolling three year average base K-Bar amount adjusted to current dollars and capped at 10% above the company’s capital forecast for that year. Major co-optimization projects recoverable when they exceed the 10% K-Factor cap	Asymmetrical ESM with 25 BP deadband above authorized ROE. Gains shared 75 % ratepayers / 25 % company. with no sharing of losses	5 year stay out and 4 year PBR term with an option for an additional 5 year stay out
NSTAR PBR ²	GDP-PI	-1.56 %	0.25 % when inflation exceeds 2 %	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the	No K-Factor but mandated grid modernization program (GMP) investments recoverable outside the price cap.	Asymmetrical ESM with 200 BP deadband above authorized ROE. Gains shared 75 % ratepayers / 25 % company and no sharing of losses	5 years

¹ All of the sample PBR Plans set going in rates based on historical test years adjusted for known and measurable changes. None of the plans include a growth factor, a Y factor, or a re-opener provision.

² D.P.U. 17-05

				relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$5M adjusted by GDP-PI annually			
NSTAR GAS PBR1 ³	GDP-PI	-1.18 %	0.15 %	Positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. ⁴ Threshold = 0.001253 times total operating revenues =	No K Factor	Asymmetric deadband of 100 BP above & 150 BP below authorized ROE. Gains shared 75 % ratepayers / 25 % company. Losses up to 200 BP shared 50/50 Losses over 200 BP shared 75 % ratepayers / 25 % company.	10 years

³ D.P.U. 19-120

⁴ The Department accepted an additional exogenous event due to certain pipeline safety requirements

				\$700,000 adjusted by GDP-PI annually			
NSTAR PBR2 ⁵	GDP-PI	Zero	0.25 % when inflation exceeds 2 %	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$5M adjusted by GDP-PI annually	K-Bar with rolling five year average base K-Bar amount adjusted to current dollars and capped at 10% above the company's capital forecast for that year.	Asymmetrical ESM with 200 BP deadband above authorized ROE. Gains shared 75 % ratepayers / 25 % company and no sharing of losses	5 years with an option for an additional 5 years
Unitil Electric PBR1 ⁶	GDP-PI	Zero	0.25 % when inflation exceeds 2 %	Includes but not limited to positive or negative cost changes from (1) changes in tax laws that uniquely affect the relevant	K-Bar with rolling five year average base K-Bar amount adjusted to current dollars and capped at 10% above the	Asymmetrical ESM with 100 BP deadband above authorized ROE. Gains shared 75 % ratepayers / 25 % company and	5 years

⁵ D.P.U. 22-22

⁶ D.P.U. 23-80

				industry; (2) accounting changes unique to the relevant industry; and (3) regulatory, judicial, or legislative changes uniquely affecting the industry. Threshold = 0.001253 times total operating revenues = \$110,000 adjusted by GDP-PI annually	company's capital forecast for that year.	no sharing of losses	
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Eversource New Hampshire Distribution System Assessment

5/28/2021

Prepared For:

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TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	ii
2. INTRODUCTION	1
2.1 Project Background	1
2.1.1 Prior Reliability-Focused Investments and Historical Performance	3
2.2 Objectives of the Distribution System Assessment	6
2.3 System Assessment Methodology	6
2.4 Organization of the Distribution System Assessment	9
3. REVIEW OF INDUSTRY PRACTICES FOR RELIABILITY AND RESILIENCY INVESTMENT PLANNING	10
3.1 Resiliency, Grid Hardening, and State interest in Integrated Distribution and Resilience Planning Initiatives	11
3.2 Resiliency and Hardening Planning Frameworks	13
3.3 Estimating Cost Effectiveness of Resilience	16
3.4 Regulatory Review of Hardening Initiatives	17
3.5 Implications for Eversource Hardening Activities	19
4. DISTRIBUTION SYSTEM AGE AND CONDITION ASSESSMENT	20
4.1 Pole and Equipment Age Analysis:	22
4.1.1 Pole Loading Assessment of Existing Poles	23
4.1.2 Pole Maintenance and Capital Programs	27
4.1.3 Pole Assessment Summary and Recommendations	29
4.2 Substation Transformers & Breakers	30
5. EVERSOURCE DISTRIBUTION SYSTEM ASSESSMENT PRACTICES, FINDINGS, AND RECOMMENDATIONS	33
5.1 Distribution Engineering Materials and Equipment	33
5.1.1 Steel Poles	33
5.1.2 Class 2 Wood Poles	39
5.1.3 Spacer Cable	44
5.1.4 Fiberglass Crossarms	52
5.2 Vegetation Management	59
5.3 Substation Transformers	80
5.4 Distribution Planning	87
6. CONCLUSION AND SUMMARY OF RECOMMENDATIONS	102
6.1 Summary of Findings	102
6.2 Recommendations	105

1. Executive Summary

Over the last eight years, The Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) has updated planning processes, enhanced standards, and increased investments aimed at improving system reliability for customers and hardening its distribution system for greater resiliency in light of increasingly recurring major weather events observed since at least 2008. These activities were highlighted in the Company’s 2019 Request for Permanent Rates, through which parties requested that Eversource better justify increased expenditures associated with these system resiliency investments.

TRC has conducted this distribution system assessment to satisfy the requirements of Section 11 of the Settlement Agreement filed between Eversource and parties in that rate filing, Docket DE 19-057. As part of this assessment, TRC has reviewed the use of the following materials and activities for reliability and resiliency improvements:

- Use of distribution-class steel poles as a standard in off-road right-of-way
- Use of Class 2 wood poles as a standard in road-side primary distribution lines
- Use of spacer cable as a standard for overhead conductor
- Use of fiberglass crossarms
- Planning methods for line relocation and reconductoring activities
- Vegetation management activities, including Enhanced Tree Trimming, Enhanced Tree Removal, and Right-Of-Way Clearing, in addition to Scheduled Maintenance Trimming
- Substation transformer and circuit breaker replacement processes

To assess these standards and practices, TRC reviewed Eversource’s current practices for each of the above topic areas and identified typical usage and installation procedures for equipment and materials. TRC surveyed industry research to identify common practices across peer utilities and develop a business case of the benefits for each engineering decision or activity. Finally, TRC conducted a cost analysis, where applicable, to identify lifecycle costs of proposed or alternative equipment or materials, factoring in upfront costs and ongoing maintenance and replacement costs, in addition to escalation over assets’ expected life. Based on these research activities, TRC proposed recommendations for future standards or activities within each topic area.

Additionally, TRC reviewed more broadly the current state of utility planning for resiliency and grid hardening measures around the country to identify trends or best practices for how peer utilities approach resiliency investments. This industry research, which included a literature review and expert interviews, found that utilities and regulators across multiple regions of the U.S. are renewing their interest and planning processes for resiliency both in reaction to recent severe weather events that cause widespread outages and in recognition of future risks anticipated due to climate change. Utilities in New York and Florida provide two templates for how to plan for and prioritize enhanced distribution system resiliency. In both cases, utilities have identified and prioritized the risks inherent to their distribution system architecture, developed tailored solutions to address those risks, estimated the costs, and implemented

resiliency measures to address those risks. Despite the increased planning and investment across the country, research and experts point to a lack of any accepted approach for determining cost effectiveness of resiliency investments. The severe events that grid hardening aims to guard against, low-frequency yet high-impact, make it difficult to measure how hardening mitigations may or may not perform.

TRC’s findings and recommendations relevant to each of the study topic areas are listed below:

Figure ES-1-1. Summary of Key Findings and Recommendations by Study Topic Area

Topic Area	Key Findings	Recommendations
System Condition	<ul style="list-style-type: none"> • The distribution system has many components that are beyond their expected life and require replacement to maintain system reliability and resiliency. • Substantial numbers of wood poles, circuits of primary conductor, substation breakers and substation transformers are at the end of life. • Wood poles are structurally overloaded due to their age and number of attachments. • Many circuit lines in the ROW are inaccessible due to location and difficult to maintain. • Trees and canopy are in close proximity to distribution system making the lines vulnerable to outages. 	<ul style="list-style-type: none"> • Accelerate replacement of aged equipment (poles, conductor, substation breakers & transformers), with a systematic plan (defined in sections 3 & 4) for each equipment type, based on system criticality and age. • Replace wood poles that are structurally overloaded 90% or more, with the properly sized poles in the next 10 years. • Identify candidate lines for relocation to roadside and develop 5-year plan to rebuild. • Increase vegetation management and spacer cable installation for vulnerable lines. • Consolidate current resiliency/hardening efforts into an overarching program following the decision framework outlined by the Department of Energy.
Steel Poles	<ul style="list-style-type: none"> • Benefits of steel poles include improved strength, reduced likelihood of catastrophic failure, and lower maintenance costs. • Steel poles have twice the expected useful life of an equivalent wood pole. 	<ul style="list-style-type: none"> • Given lower lifecycle costs and difficulty in patrolling and replacing remote right-of-way assets in the event of a failure, continue to use steel poles as the standard in these environments.

Topic Area	Key Findings	Recommendations
	<ul style="list-style-type: none"> While upfront costs are higher, the improved longevity of steel yields a lower total lifecycle cost compared to wood poles. 	<ul style="list-style-type: none"> Establish a proactive program to identify and replace five circuit miles/year of wood poles in the ROW with steel, in areas susceptible to damage or failure.
Class 2 Wood Poles	<ul style="list-style-type: none"> Class 2 wood poles can withstand 60% greater force than smaller-diameter class 4 poles, improving outcomes during tree strikes or high winds. Class 2 wood poles have marginally (2-4%) higher costs than equivalent Class 3 poles. At current failure rates, if 8-9 poles (~5%) did not fail due to use of stronger Class 2 poles, incremental costs would be negated. 	<ul style="list-style-type: none"> Continue use of Class 2 wood poles due to low additional costs and strength improvements in severe weather scenarios.
Spacer Cable	<ul style="list-style-type: none"> Spacer cable is the Eversource standard for new and rebuilt three phase distribution lines. Spacer cable is designed to reduce faults from tree and animal contacts and can survive larger tree strikes, compared to open-wire designs. Spacer cable is more compact, requiring less ROW clearance. Spacer cable is approximately double the cost of open wire. 	<ul style="list-style-type: none"> Follow the Eversource 2016 Resiliency Guidelines for spacer cable. Develop 5-year plan to replace open-wire circuits with spacer cable in vulnerable areas. Work in conjunction with the inaccessible line relocations to the roadside and steel pole installation projects.
Fiberglass Crossarms	<ul style="list-style-type: none"> Fiberglass crossarms are the Eversource standard for new and replacement crossarm construction. Fiberglass crossarms yield improved longevity, strength, material predictability, and installation compared to wood. Fiberglass crossarms pass the heaviest ice loading, heavy-tree contact, and high-wind simulations where wood crossarms failed. 	<ul style="list-style-type: none"> Continue to use fiberglass crossarms as specified. Lower lifecycle costs and improved strength in severe weather are main advantages.

Topic Area	Key Findings	Recommendations
	<ul style="list-style-type: none"> Fiberglass crossarms pair well with steel poles due to the extended lifecycle of both. Total lifecycle costs of fiberglass crossarms are 38-44% of the total for wood crossarms. 	
Vegetation Management	<ul style="list-style-type: none"> A portfolio approach to vegetation management (SMT, ETT, ETR, and ROW clearing) has led to reductions in tree related SAIFI and SAIDI scores, improving customer reliability. Inside-zone tree reliability metrics have improved dramatically over the last decade, while outside-zone metrics show a slight downward trend. Deferring scheduled maintenance cycles or reducing annual investments in vegetation management can lead to disproportionately negative impacts, as additional vegetation growth during those periods increases per-mile costs for management in the future and reduces the Company's ability to maintain regular cycles. 	<ul style="list-style-type: none"> For SMT, address an average 2,440 miles annually to follow the 60-month clearing cycle. Accelerate ETT to 80 miles per year to address the remaining 500 miles of the backbone circuits within the next seven years. Continue ROW clearing at the current pace to allow for the restoration of the full original easement where vegetation has encroached. For ETR, target approximately 19,000 hazard tree removals annually following the current identification and prioritization practice.
Substation Transformers	<ul style="list-style-type: none"> Standardizing substation transformer sizes can provide benefits for streamlining inventory and reducing event response time. 	<ul style="list-style-type: none"> Standardize substation transformer sizes wherever possible based on voltage class to allow for greater efficiency in maintaining stock of fewer transformer sizes and flexibility in responding to contingency events and coordination with neighboring state service areas. Continue to assess to determine when circuit breakers should be used in place of circuit switchers for operational and reliability benefits.

Topic Area	Key Findings	Recommendations
Distribution Planning	<ul style="list-style-type: none"> • Eversource conducts distribution planning to maintain system operations within established operating criteria. • Engineers develop solutions to address capacity, power quality, and reliability concerns based on historical performance data and forward-looking forecasts. • Line relocation and reconductoring are two options to address reliability issues. 	<ul style="list-style-type: none"> • Establish a tracking program to compare historical outage data for line segments for 3-5 years (as data is available) and then report annually on that segment post-improvement. Such a system will document the improved reliability and resiliency delivered by relocation and reconductoring projects. • Reduce the number of feeders without tie capability to allow for circuit reconfiguration and load pickup throughout the system. • Maintain awareness for distribution project cost increases that may arise as projects are delayed.

2. Introduction

This section provides a summary of the project's background and TRC's methodology for undertaking the study and associated engineering analysis.

2.1 Project Background

TRC conducted this distribution infrastructure condition assessment study to satisfy the requirements of Section 11 of the Settlement Agreement filed between Eversource and parties in Docket DE 19-057. Below is a summary of the regulatory history preceding the settlement agreement.

In Eversource's 2019 Request for Permanent Rates,¹ the Company identified a set of initiatives intended to improve the performance and resiliency of the distribution system. Like many electric utilities around the country², Eversource is increasing its capital spending for distribution system investments to add automation and replace aging or "substandard" equipment to maintain and improve reliability and to develop better system resiliency. At the time of the rate filing, most of Eversource's capital budget was directed toward investments in reliability improvements – nearly two-thirds of the \$137 million planned for 2019. As part of this capital plan, Eversource intended to address relocations of lines in rights-of-way, line reconstruction and equipment replacement, and asset condition replacements. The Company uses these replacement opportunities to increase the strength, intelligence, and resiliency capabilities of plant and assets, where an incremental benefit may be gained for the benefit of the system and does not simply replacing assets "like for like."

Although the Company has recorded improvements in the duration and number of customers experiencing outages as a result of its increased investments, Eversource has also experienced an increase in the number of outages at the same time. This trend is driven by both improved granularity of data, and an increase in significant weather events that cause widespread outages. Over the past 12 years, the Company has experienced five storm events with an impact to more than 40% of customers, including the 2008 ice storm, or an extreme event nearly every two years, on average. The recurrence of these weather events has prompted Eversource to revisit the materials composition, size, construction, and accessibility of overhead distribution poles, crossarms, circuits, and substation equipment. These strategies include:

- Use of Class 2 wooden poles in place of 40-foot class 4 poles for standard construction
- Use of light-duty steel poles in off-road rights-of-way

¹ Public Service Company of New Hampshire (Eversource), Testimony of Joseph A. Purington and Lee G. Lajoie - Docket No. DE 19-057, May 2019. https://www.puc.nh.gov/Regulatory/Docketbk/2019/19-057/INITIAL%20FILING%20-%20PETITION/19-057_2019-05-28_EVERSOURCE_DTESTIMONY_PURINGTON_LAJOIE.PDF

² See Chapter 3 of this report for a detailed look at industry trends relating to distribution system planning and investments for reliability and resiliency.

- Use of fiberglass cross-arms
- Reconstruction or relocation of older, 34.5-kV distribution lines in off-road rights-of-way
- Upgrades of undersized wire in off-road rights-of-way and use of covered conductor or spacer cable for off-road lines
- Upgrades of roadside three-phase lines by reconductoring, including use of spacer cable, stronger poles, and shorter spans
- Use of vacuum circuit breakers in place of oil circuit breakers in substations

Additionally, outside of the Company's capital distribution planning, Eversource conducts a range of vegetation management activities to maintain reliability of its system. Tree-related incidents are by far the leading cause of outages, 3 to 4 times greater than the next closest categories, as shown in Figure 5-22. These vegetation management activities include Scheduled Maintenance Trimming, Enhanced Tree Trimming, Full-width Right-of-Way Clearing, and Enhanced Hazard Tree Removal.

On top of these base activities, Eversource sought to obtain authorization for investments in resiliency and projects needed to prepare the grid for integration of future advanced energy solutions. Eversource referred to this incremental investment plan as the "Grid Transformation and Enablement Program" (GTEP), which was designed to enable accelerated asset replacements above the pace of the traditional, base capital plans described above. Following discussion with parties throughout the proceeding, Eversource withdrew the GTEP proposal for resubmission in a separate docket, outside of DE 19-057.

In response to Eversource's proposal, Commission staff raised concerns with several of the asset replacement and upgrade activities described in the base capital plan. Specifically, Staff indicated that Eversource had not properly demonstrated the need for these higher standards of investments or replacements of infrastructure.³

For both the pole and crossarm standards and right-of-way/reconductoring initiatives, Staff's view was that there was insufficient analysis or understanding of the value provided to customers through the proposed investments. To support the additional cost, a "cost-benefit analysis" or business case would be needed to quantify the benefits of such investments. For the substation oil circuit breaker replacement initiative, Staff's view was that the existing breakers have not reached the end of expected useful life or caused issues related to outages, environmental damage, or maintenance costs.

Staff also viewed metrics in relation to current and proposed vegetation management practices. Eversource requested \$15M for base O&M vegetation management activities in 2019, with annual escalation of 2-3% through 2023. Eversource also requested \$5M for Enhanced Tree

³ For example, Staff Testimony stated that the "Company has the burden of justifying the increased expenditure that provides little to no measurable benefits, even if the Company cites a standardization requirement." See Direct Testimony of Kurt Demmer, Docket DE 19-057, December 20, 2019. https://www.puc.nh.gov/regulatory/Docketbk/2019/19-057/TESTIMONY/19-057_2019-12-23_STAFF_TESTIMONY_DEMMER.PDF

Trimming (ETT), \$10M for Enhanced Hazard Tree Removal (ETR), and \$2M for Right-of-Way (ROW) clearing. Staff concluded there was “little to no evidence of overall SAIFI or SAIDI performance as the ETT activity progressed,” noting high costs of ETT compared to scheduled maintenance trimming. Staff recommended no funding for ETT, limited (\$2.5M) funding for ETR, and the full \$2M for ROW clearing.

As part of the settlement of the proceeding, Eversource agreed to engage an expert distribution engineering firm to conduct an assessment of Eversource distribution system infrastructure “to provide recommendations related to the Company’s short and long-term system needs consistent with the requirements of least-cost integrated resource planning.” The assessment was stipulated to include a review of the cost effectiveness of using or conducting:

- Steel poles in right-of-way
- Class 2 poles as a standard pole
- Fiberglass cross arms
- Relocated ROW facilities
- Spacer cable and tree wire
- Reconductoring of under-sized wire
- Enhanced Tree Trimming and Hazard Tree Removal activities

Eversource engaged TRC to conduct the distribution system assessment and related scope as outlined in Section 2.1 herein.

2.1.1 Prior Reliability-Focused Investments and Historical Performance

Eversource established a Reliability Enhancement Plan (REP) in its 2006 rate case, funding capital and O&M spending to improve system reliability. The plan has been extended numerous times since its launch in 2007, including a bridge to the most recent rate case described in the above section, DE 19-057.⁴ In its latest Report to the New Hampshire Public Utilities Commission on the REP program, the Company noted that:

“Since the REP was implemented, the trend from 2006 onward has been improved reliability on a weather normalized basis. Eversource’s customers continue to see benefits from the REP activities. REP programs are preventing problems from occurring (improving SAIFI) and reducing outage times (improving SAIDI) and reducing the number of customers impacted by outages which do occur. The REP activities have proven to be a critical component to improving reliability and have been important in concert with Eversource’s continued efforts to maintain and improve the system in the normal course of business.”

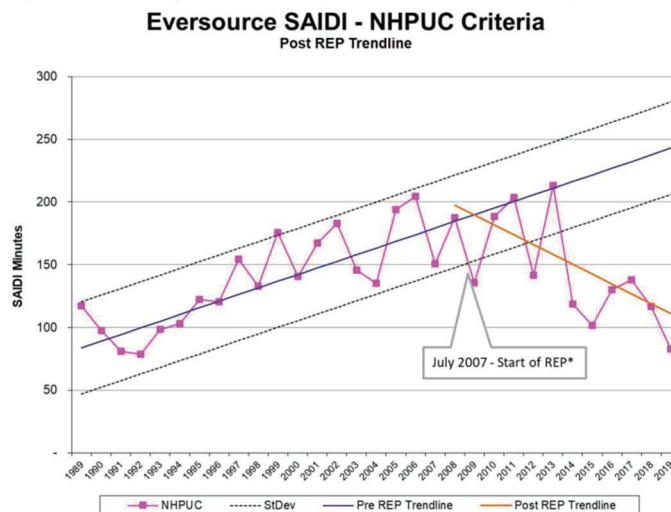
⁴ Eversource, Proposal to Extend Reliability Enhancement Program, De 17-196, November 2018. https://www.puc.nh.gov/Regulatory/Docketbk/2018/18-177/INITIAL%20FILING%20-%20PETITION/18-177_2018-11-16_EVERSOURCE_PETITION_CONTINUATION_REP.PDF

For 2018, the REP program expenditures totaled \$10.4M for O&M activities and \$5.2M for capital expenditures.⁵ In 2019, O&M increased to \$25.3M, and capital expenditures decreased to \$3.5M,⁶ and included the following activities:

- Reject pole replacement
- Direct buried cable replacement
- Regular and enhanced vegetation management
- National Electrical Safety Code inspections
- Switch and recloser maintenance
- Partial funding of the troubleshooter organization.

As of the 2019 REP report, Eversource reported a decrease in SAIDI – the number of average minutes customers were without power – due to the investments made through the REP program. Over the period of 1989 to 2005, annual SAIDI exhibited a consistent increase in SAIDI minutes, or reduced reliability. Since REP began in 2007, Eversource’s SAIDI performance shows a multi-year trend of improved reliability performance or declining SAIDI minutes.

Figure 2-1. Comparison of Pre- and Post-REP SAIDI performance



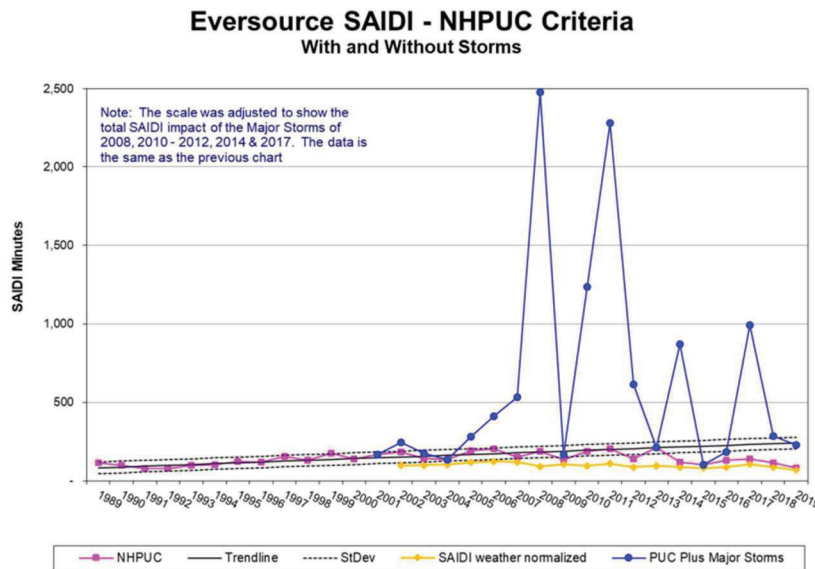
Source: Eversource Reliability Enhancement Program 2019 Report to the NHPUC

⁵ Eversource. Reliability Enhancement Program 2018 Report to the New Hampshire Public Utilities Commission. April 2019. https://www.puc.nh.gov/Regulatory/Docketbk/2018/18-177/LETTERS-MEMOS-TARIFFS/18-177_2019-05-28_EVERSOURCE_REV_2018_REP_RPT.PDF

⁶ Eversource. Reliability Enhancement Program 2019 Report to the New Hampshire Public Utilities Commission. May 2020. https://www.puc.nh.gov/Regulatory/Docketbk/2018/18-177/LETTERS-MEMOS-TARIFFS/18-177_2020-05-01_EVERSOURCE_2019_REP_RPT.PDF

Notably, Eversource also tracks SAIDI performance including Major Storms,⁷ which are removed from the weather-normalized NHPUC Criteria SAIDI results. The comparison of performance with and without Major Storms reveals the impact of these storms since data began in 2000. While some years had few or no Major Storm-related increases in SAIDI minutes, Major Storms in 2008, 2010, 2011, 2012, 2014, and 2017 significantly impacted customer outage durations.

Figure 2-2. Eversource SAIDI Performance Including Major Storms



Source: Eversource Reliability Enhancement Program 2019 Report to the NHPUC

The REP focused on asset replacement and vegetation management to improve reliability (i.e., SAIDI, SAIFI metrics). By comparison, the GTEP investments were targeted to refurbish infrastructure to create a more durable and resilient distribution system for major weather events⁸. As shown in *Figure 2-2*, the major weather events have contributed to several spikes in customer outage duration in numerous years since 2000. Five significant weather events since 2008 caused outages impacting over 200,000 customers, or more than 40 percent of the customer base.

The analysis in TRC’s System Assessment accordingly encompasses material, equipment and activities that were included within the REP and (proposed) GTEP programs.

⁷ A Major Storm is defined as an event that results in either: a) 10% or more of Eversource’s retail customers being without power in conjunction with more than 200 reported troubles; or b) more than 300 reported troubles during the event

⁸ Public Service Company of New Hampshire, Direct Testimony of Joseph A. Purington and Lee G. Lajoie - Grid Transformation and Enablement Program: Acceleration of Targeted Infrastructure Upgrades, Docket DE 19-057, 5/28/2019. https://www.puc.nh.gov/regulatory/Docketbk/2019/19-057/INITIAL%20FILING%20-%20PETITION/19-057_2019-05-28_EVERSOURCE_DTESTIMONY_PURINGTON_LAJOIE.PDF

2.2 Objectives of the Distribution System Assessment

TRC's scope of work for this assessment of the Eversource distribution system and plans included the following requirements:

- 1) Assess and evaluate the performance of the existing system at the five and ten-year planning levels, including assessment of the electric system's ability to serve projected load requirements.
- 2) Review industry best practices and challenges experience by peer utilities and stakeholders in developing and evaluating distribution system investment plans for reliability and resiliency.
- 3) Recommend improvements to focus on a broad view of the distribution system to achieve the objective of reliable, resilient, and cost-effective electric service over the ten-year planning horizon, and beyond, with a focus on:
 - a) Asset age and health
 - b) Reliability and resiliency
 - c) Ability to meet future load growth needs through the use of non-wires alternatives, including targeted energy efficiency, electric vehicles, etc.
- 4) Perform a cost-effectiveness analysis of the Company's use of certain materials for distribution line construction, substation, and vegetation management activities, including:
 - a) The use of steel poles for construction in distribution rights-of-way
 - b) The use of Class 2 poles as a standard pole
 - c) The use of fiberglass cross arms
 - d) The potential relocation right-of-way facilities to roadside
 - e) The use of spacer cable versus open wire
 - f) The proactive reconductoring of under-sized
 - g) Enhanced Tree Trimming and Hazard Tree Removal activities.
 - h) Substation transformers and breakers

2.3 System Assessment Methodology

This section details the methodology TRC employed for the Distribution System Assessment.

Introduction

TRC conducted its assessment of Eversource's distribution system in accordance with the Settlement Agreement filed in DE 19-057, dated October 9, 2020. This study provides a condition assessment of the Company's distribution infrastructure, including substations and overhead infrastructure, along with recommendations related to Eversource's short and long-term system needs consistent with the requirements of least-cost integrated resource planning. As part of the condition assessment, TRC reviewed the cost-effectiveness and benefits of utilizing the materials listed below for construction and specific vegetation management activities:

- The use of steel poles for construction in off-road distribution rights-of-way
- The use of Class 2 poles as a standard pole for roadside construction
- The use of fiberglass cross arms
- Distribution planning and potential relocation right-of-way facilities to roadside
- The use of spacer cable versus open wire
- The proactive reconductoring of under-sized wire
- Enhanced Tree Trimming and Hazard Tree Removal activities.

Planning System Assessment

TRC assessed and evaluated the performance of the existing system at the five and ten-year planning levels. The existing system analysis included an assessment of the electric system's ability to serve projected load requirements. Assessing system capacity was area based and looked at the system needs for impacted substations at a time where there is a projected capacity concern. TRC reviewed individual capital projects to evaluate their effectiveness in providing for future growth and making the system more resilient based on cost effectiveness and good engineering practices. In addition, TRC focused on a broad view of the distribution system to achieve the objective of more reliable, resilient, and cost-effective electric service over the ten-year planning horizon, and beyond. This included the following:

- Asset age, health, and condition
- Ability to meet future load growth needs using traditional wires and non-wires alternatives, including targeted energy efficiency
- Reliability and resiliency
- Overall capability of distribution circuits for carrying the load, physical integrity, and ability to recover from outages to minimize the impact on service reliability

Eversource Current Practices

TRC performed a preliminary review of the data and guidelines set forth by Eversource as described in the Direct Testimony of Joseph A. Purington and Lee G Lajoie on May 28, 2019 (current/proposed maintenance programs), and discussions held with subject matter experts to gather contextual information regarding current engineering practices. These discussions included:

- Specific operating problem areas
- Engineering and operating challenges and/or concerns
- Capital project execution including planned or ongoing construction
- Areas of focus for the field assessments per interviews with Eversource's staff

Physical/Visual Inspection of Assets

TRC performed visual inspection of representative portions of the Company's distribution system, both roadside and Right of Way (ROW). Representative portions were determined from

the review of circuit performance data, mapping information, and local utility knowledge. ROW inspections were conducted by helicopter patrol and roadside inspections by motor vehicle to document data and incorporate the results into a formal report.

- **Vegetation:** TRC created a map that shows all line and pole data with aerial imagery superimposed. TRC flagged areas that are suspect to trees that are approximately 13ft from center of the pole.
- **Roadside:** TRC selected and visually inspected several worst performing feeders to view vegetation and condition of the lines. This was done via vehicle and walking in select areas.
- **ROW:** TRC selected and visually inspected a sampling of circuits to see vegetation around the lines, condition, and access issues.
- **Substation:** TRC selected and visually inspected several recently completed improvement projects and planned projects for substation improvement.

Review of Industry and Other Utility Practices

TRC researched regarding best practices and the challenges utilities face evaluating distribution system investments for reliability, resiliency, and hardening. The research assessed varying perspectives, including other utilities, regulators, and industry experts. The data collection activities included:

- Literature review of industry documentation and research regarding best practices for resiliency and system hardening.
- In-depth interviews with three experts from industry organizations and peer utilities, conducted via virtual meetings.

The literature review and interviews collected around several key themes:

- Planning strategies around equipment standards and practices identified
- Utilities demonstration of capital expenditures for distribution system investments
 - Use of benefit-cost analysis and calculation methods
- Future issues impacting distribution system investments: resilience, electrification, and smart distribution systems
 - Concerns around overbuilding systems
 - Deferral and non-wires alternatives
- Regulatory processes and stakeholder views
 - Venues under which utilities propose resiliency investments
 - Coordination with broader distribution system planning activities

TRC analyzed findings from these data collection activities and summarized trends and findings.
Cost-Effectiveness Analysis

TRC performed an analysis relating to the cost-effective use of materials for distribution line construction, substation, and vegetation management. These analyses include:

- Total lifecycle costs of the current or proposed standards or practices compared to an alternative or previous practice.
- Present worth analysis of the practices, where applicable.
- Avoided cost savings by using the new materials.

Methods applied are dependent on the applicability for each new standard or practice. The total lifecycle analysis compared the current or proposed standards or practices total ownership cost, to an alternative or previous practice for the anticipated in-service life for each of the components or practices. Equipment in-service useful life was acquired from industry data or Eversource historical information. Built into the lifecycle cost model were the following assumptions:

- Labor, material, and overhead costs to install the equipment
- Escalation rates of labor and materials provided by Eversource
- Maintenance costs (escalated) over the life of the equipment. Specific rates are included in each cost analysis assumptions.
- Other assumptions applicable to the equipment or practice.

The present worth analysis includes the assumptions listed above for the lifecycle analyses with carrying charge and discount rate provided by the Company. Present worth analysis is not applicable to all scenarios.

Avoided cost analysis calculates the incremental cost not incurred by using a current or proposed standard. This method is used in the larger class wood poles scenario.

2.4 Organization of the Distribution System Assessment

The remaining sections detail the results of TRC's research and analysis. They are organized as follows:

- Chapter 3 reviews the industry findings from the literature review and expert interviews.
- Chapter 4 provides an assessment of the age and condition of various distribution system elements, with focus on the impact of each equipment type and work practice used to support the system. Also included is an overall assessment of the system, to provide a broader picture of areas where additional investment may be needed.
- Chapter 4.0 details the assessment results for distribution line, substation, and vegetation management materials and practices. In each section TRC reviews current practices, typical usage and installation parameters, industry findings, details of the business case and cost analysis, and recommendations.
- Chapter 6 provides a summary of findings and recommendations.

3. Review of Industry Practices for Reliability and Resiliency Investment Planning

Utility activities for resiliency planning and investment have accelerated across the country over the last two decades, spurred by several factors, including 1) increases in extreme weather events, 2) customer desire for shorter and less frequent power interruptions, and 3) new or improved technologies. Responding to these factors, utilities are upgrading and updating their systems to enable harder, smarter grids that can better withstand, react to, and recover from outages.

While many resiliency investments are similar or even identical to distribution system and reliability-related investments utilities have made for decades, they are designed to prevent a different category of risk than historical distribution system investments. As a result, utility and regulatory methods for valuing and evaluating these types of investments are less well developed than those made for traditional reliability outcomes.

This chapter reviews practices among utilities and regulators around the country to plan for and assess investments to improve resiliency through system hardening efforts. As part of this research, TRC conducted a literature review of published studies and utility documentation related to resiliency planning and interviewed experts on current trends and best practices. The sections below detail findings related to:

- Growing interest and activity around resiliency and grid hardening
- Frameworks for utility resiliency planning
- Evaluating cost-effectiveness for resiliency and hardening investments
- Regulatory and stakeholder input
- Implications for Eversource

Key findings from the literature review and expert interviews include:

- 1) Increased resiliency and hardening investment and planning activity across the majority of states is driven by an increase in severe weather events that can significantly impact outage durations.
- 2) Resiliency planning frameworks stress assessment of local climate risks to identify tailored solutions for each utility.
- 3) Evaluating cost-effectiveness of resiliency investments remains a critical challenge for utilities and regulators, as the benefits are difficult to monetize.
- 4) Shifts in the traditional utility business model are impacting investment decisions. The move away from a cost-plus ratemaking approach and moving to a performance-based structure (e.g., New York and Massachusetts) has allowed regulators to incorporate metrics around grid hardening and provides greater flexibility to utilities in their system investment.

- 5) Cost recovery remains central to the ongoing industry debate. This research identifies various approaches currently being advanced, presented later in this chapter. These approaches demonstrate the range in considerations and fragmented nature of the responses across the country.

3.1 Resiliency, Grid Hardening, and State interest in Integrated Distribution and Resilience Planning Initiatives

Over the last two decades, investor-owned utility spending on distribution system investments has grown over 2.5 times, from \$14 billion in 1999 to nearly \$40 billion in 2019. An estimated two-thirds of that capital spend in 2019 is driven by emergency repairs, aging infrastructure replacement, reliability improvements, or resiliency. The 2019 spend on aging infrastructure replacement, reliability and resiliency alone is greater than the total distribution system investment from the 20 years prior. As the scale of these investments has grown, states are increasingly looking to integrated planning initiatives for distribution and resiliency. The Department of Energy counted 29 states and territories where regulatory commissions have begun such an effort as of 2019.⁹

Resiliency includes the ability to harden the power system against, and quickly recover from, high-impact, low-frequency events.¹⁰ Such events can threaten lives, disable communities, and devastate generation, transmission, and distribution systems. Included are severe weather or natural events such as:

- Hurricanes and consequent flooding,
- Severe wind events
- Earthquakes and consequent tsunamis
- Wildfires
- Ice storms

Reliability is the adequacy of the system to provide customers a continuous supply of electricity at the proper voltage and frequency, virtually all of the time. The system needs to withstand sudden, unexpected disturbances such as short circuits and unexpected loss of system elements due to natural or man-made causes. There are three commonly used standard industry performance measures for reliability:

- System Average Interruption Frequency Index (SAIFI)
- Customer Average Interruption Duration Index (CAIDI)
- System Average Interruption Duration Index (SAIDI)

⁹ U.S. Department of Energy, Resiliency Decision Framework – Presentation to NARUC 2019 Annual Meeting, November 20, 2019. <https://pubs.naruc.org/pub/6A146D0E-B6A2-89F8-1469-484C2B6E8FFE>

¹⁰ ELECTRIC POWER SYSTEM RESILIENCY: CHALLENGES AND OPPORTUNITIES, February 2016

Both resiliency and reliability are affected by various factors such as the age and condition of assets, vegetation, and severe events.

In many cases it is difficult to delineate investments for reliability, aging infrastructure replacement, emergency repairs, and resiliency. However, the literature makes clear that, unlike general reliability, resiliency is specifically targeted at major events, typically those causing outages of 24 hours or longer. These events are unexpected, infrequent, and their impacts are widespread.¹¹ Typical measures of reliability—system average interruption frequency and duration indexes (SAIFI and SAIDI)—are designed to factor out these major events given their unpredictability. As shown in Figure 3-1 below, when major events are included, the frequency index only increases by 17%, but the duration index with major events factored in is 74% longer than without major events.

Figure 3-1. EIA-reported SAIDI and SAIFI performance for 137 Investor-Owned Utilities in 2015

IEEE Standard 1366	Investor-Owned Utility 2015 Reliability Reporting	% Difference with Major Events
SAIFI without major events	1.2	
SAIFI with major events	1.4	+17%
SAIDI without major events	136	
SAIDI with major events	237	+74%

SOURCE: LAWRENCE BERKELEY NATIONAL LABORATORY

Discussions with industry experts suggest that the increased interest in resiliency in many states is most often prompted after a widespread or extended outage, such as a major weather event. However, after such an external event, “there’s a lot of activity, a lot of grandstanding,” but only in some cases, do states and energy providers follow through with investments in system hardening. An expert noted that Texas faced a significant winter storm in 2011 that pointed to the need to winterize assets, but a similar significant winter storm in 2021 revealed little had been done to address system deficiencies that were identified 10 years earlier.

Florida and New York, by contrast, made significant investments in hardening their systems after weather events caused major interruptions. Following hurricanes in 2004-2005, Florida regulators in 2006 instituted requirements for storm-hardening plans on a three-year cycle, along with a set of 10 initiatives for inspection, hardening and local collaboration to reduce impacts of future storms. Similarly, following the 2012 impacts of Superstorm Sandy in New York, regulators created a resiliency collaborative, and Con Edison developed a resilience enhancement plan with estimated incremental costs. Once approved, this began a multi-year system-hardening initiative that included asset relocation, strengthening, and improved flexibility

¹¹ Lawrence Berkeley National Laboratory, Reliability Metrics and Reliability Value-Based Planning, March 2019. https://eta-publications.lbl.gov/sites/default/files/6_eto_reliability_metrics_and_rvbp.pdf

using advanced controls to reduce the impacts of potential flooding or high winds.¹² While the outcomes are similar, some states, such as Florida, have not specifically described these investments under a “resiliency” frame, while other states are more explicit about outlining planning and investments as “resiliency.”

The Electric Power Research Institute (EPRI) characterizes resiliency within three categories:¹³

- **Damage Prevention:** the application of engineering designs and advanced technologies that harden the power system to limit damage.
- **System Recovery:** the use of tools and techniques to restore service as soon as practicable.
- **Survivability:** the use of innovative technologies to aid consumers, communities, and institutions in continuing some level of normal function without complete access to their normal power sources.

Damage prevention, often referred to as hardening, helps reduce the frequency of these events; system recovery aims to address the duration; survivability acknowledges that, as one expert interview noted, there is no perfect level of system reliability in practice. Given the focus of this assessment, this chapter primarily focuses on findings related to distribution grid hardening activities. These types of activities include vegetation management and enhancing or reinforcing the physical strength and security of distribution facilities against storms or attacks. Though not a focus of this assessment, one area of significant recent research, due to increasing severity of storms and wildfires, is the undergrounding of distribution and transmission circuits.¹⁴

3.2 Resiliency and Hardening Planning Frameworks

The Department of Energy notes that, despite the increased interest across much of the country, resiliency “planning methods and tools are largely immature or non-existent” today.¹⁵ Several of the studies reviewed pointed to the significant uncertainty of climate and resiliency needs leading to difficulty determining the appropriate timing and level of investment. Lawrence Berkeley National Lab (LBNL) points out there is “no actuarial basis to establish a likelihood of occurrence” of significant weather or outage events.¹⁶ A white paper from consultancy ICF, which works with utilities on integrated grid planning and climate analysis, notes that “lack of insight into the degree of infrastructure exposure” and “the complexity around how to measure

¹² Lawrence Berkeley National Lab, Case Studies of the Economic Impacts of Power Interruptions and Damage to Electricity System Infrastructure from Extreme Events, November 2020. https://eta-publications.lbl.gov/sites/default/files/impacts_case_studies_final_30nov2020.pdf

¹³ EPRI, Electric Power System Resiliency: Challenges and Opportunities, February 2016. <https://www.epri.com/research/products/000000003002007376>

¹⁴ Larsen, Severe Weather, Power Outages, and A Decision to Improve Electric Utility Reliability, March 2016. <http://purl.stanford.edu/sc466vy9575>

¹⁵ U.S. Department of Energy.

¹⁶ LBNL (Reliability Metrics and Reliability Value-Based Planning)

vulnerabilities, hazards, and stressors” make planning for resiliency investments challenging.¹⁷ This uncertainty also makes it difficult to value those investments’ costs and benefits. This topic is further addressed in Section 3.4.

Industry experts noted utilities’ current reliance on the Interruption Cost Estimate (ICE) Calculator developed by LBNL and Nexant.¹⁸ Funded by the Department of Energy, this tool can be used to help estimate direct societal costs of power interruptions to assess investments in reliability by understanding the avoided costs for customers from outages. However, the tool’s accuracy and usefulness degrade for outage events longer than 24 hours, as the inputs used for modeling were not designed around these types of major events. For example, the costs of a shorter, typical outage are generally contained within a utilities’ service area. But a longer, multi-day outage has the potential to have national impacts as supply chains and other interstate systems are halted until power is restored. Because the costs of long-duration outages are less well understood at present, they are often not factored into utility planning decisions as completely as short-duration outages.¹⁹

Nonetheless, several utilities have taken more structured approaches to resiliency planning. Examples from Con Edison and Florida Power and Light are detailed below. In many cases these planning exercises are compelled by state regulators or legislatures, prompted by one or multiple significant outage events. The Department of Energy proposes that utilities need to begin transitioning from reactive resiliency investments to those that are proactive, anticipating future impacts as new hazards emerge.²⁰

Industry Example: Con Edison

Con Edison recently published a Climate Change Vulnerability Study²¹ that addresses resiliency planning through better understanding of the risks to operations and assets from climate change. First, the utility characterizes each of the major threats to the utility’s energy system, including heat and temperature, precipitation, flooding and sea-level rise, and extreme and multi-hazard events. Next, based on a better understanding of climate science and projections for extreme weather, Con Edison can assess and prioritize the risks these threats pose to operations, planning and assets, evaluate costs and benefits of mitigations, and then prioritize paths to improve resiliency. Stemming from the Vulnerability Study, Con Edison will complete a

¹⁷ ICF, Resilient Power: How Utilities Can Identify and Effectively Prepare for Increasing Climate Risks, March 2021. <https://www.icf.com/insights/energy/resilient-power-utilities-prepare-climate-risks#>

¹⁸ See: <https://www.icecalculator.com/home>

¹⁹ Lawrence Berkeley National Laboratory, A Hybrid Approach to Estimating the Economic Value of Enhanced Power Resilience, February 2021. https://eta-publications.lbl.gov/sites/default/files/hybrid_paper_final_22feb2021.pdf

²⁰ U.S. Department of Energy – Office of Electricity, North American Energy Resilience Model, July 2019. https://www.energy.gov/sites/default/files/2019/07/f65/NAERM_Report_public_version_072219_508.pdf

²¹ ConEdison, Climate Change Vulnerability Study, December 2019. <https://www.coned.com/-/media/files/coned/documents/our-energy-future/our-energy-projects/climate-change-resiliency-plan/climate-change-vulnerability-study.pdf?la=en>

Climate Change Implementation Plan with a timeline for risk mitigation measures, scope, and costs for 5-, 10-, and 20-year plans.

Regarding proactivity, Con Edison notes that, “the key to designing resilient infrastructure is to update design standards, specifications, and ratings to account for likely changes in climate over the life cycle of the infrastructure.” Standards should not be based solely on historical impacts, but on expected needs over the asset’s expected useful life. In other words, while historical asset performance may be one indicator of investment needs, it should not be the only factor considered. Con Edison also highlights the need to remain flexible as future conditions change. In a review of studies on grid hardening, the Edison Electric Institute further noted that while storm response creates a natural opportunity for replacing assets with harder equipment, hardening activities or replacements should also be included with regular maintenance.²²

Industry Example: Florida Power and Light

Florida Power and Light (FPL) has 15 years of planning for storm hardening, a requirement that began in 2006 following significant hurricanes in previous years. The state legislature in 2019 extended requirements for utilities to file Storm Protection Plans every three years, with a 10-year planning horizon. The 2020-2029 plan²³ includes elements divided among distribution, transmission, and substation, with a focus on pole/structure inspection, circuit hardening and undergrounding, and vegetation management.

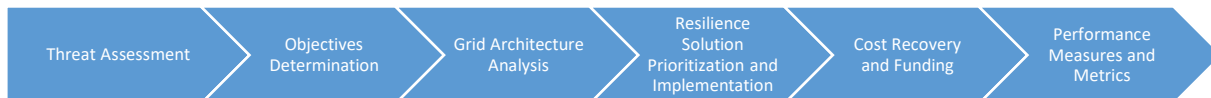
For the distribution feeder hardening initiative, FPL upgrades existing feeders and certain critical distribution poles—and designs new lines—to meet “extreme wind loading” criteria established by the National Electric Safety Code. The utility is targeting this hardening or undergrounding of all distribution feeders by 2024. FPL conducted forensic analyses of prior storm events to find that wind was the primary cause of pole breakage, and that performance of assets built to the extreme wind loading standard was sufficient. Before conducting work on a specific circuit, FPL conducts a field survey of the facilities in place to determine what is needed to meet the required wind ratings for that region. The utility also relies on a toolkit of designs to harden circuits, including storm guying, equipment relocation, adding intermediate poles, upgrading pole classes, and undergrounding facilities. FPL also prioritizes these activities based on spreading projects throughout the service territory, historical performance, areas with restoration difficulties, and coordination with ongoing or municipal projects. While FPL estimates the cost of the program (roughly \$500-650 million/year between 2017 and 2025), its estimation of benefits is mostly qualitative, primarily citing the improved reliability of feeders that have been hardened to meet new standards (benefits to customers), in comparison to feeders that have not yet been hardened. FPL also notes the reduction in additional restoration costs. FPL conducted analyses to estimate these restoration cost savings based on the magnitude of damage from previous observed hurricanes.

²² Edison Electric Institute, Before and After the Storm, March 2014.
<https://www.energy.gov/sites/prod/files/2015/03/f20/Edison%20Electric%20Institue%20Comments%20and%20Resources-%20QER%20-%20Enhancing%20Infrastructure%20Resiliency%20FINAL.pdf>

²³ Florida Power and Light’s 2020-2029 Storm Protection Plan, Exhibit MJ-1.

The above examples demonstrate an important point from the literature: utilities must develop and tailor plans that are specific to the unique risks to their region and the sensitivities of their own assets.²⁴ Mitigation strategies designed for areas prone to wildfires in the West may not be appropriate to address hurricanes in the Southeast, ice storms in the Northeast, or wind in the Midwest. The utilities above also generally follow the Resilience Decision Framework proposed by the Department of Energy, which is shown Figure 3-2 below.

Figure 3-2. Resilience Decision Framework Development Process



Source: U.S. Department of Energy, Office of Electricity

One expert noted in an interview that ideally, hardening initiatives are not just planned around climatic threats, but future distribution system planning as well. For example, severe weather risk may point to a potential need for stronger distribution poles in the near term. But stronger poles may be needed in the medium-to-long term due to expected load growth necessitating reconductoring, or anticipated increases in attachments to the pole as more smart equipment is added. The Department of Energy’s Decision Framework also advocates for this “whole grid view”²⁵ to enable greater understanding of implications and coordination. This more holistic view can also help improve analysis of cost-benefit, as resiliency measures are aligned with greater overall system needs and future trends for beneficial electrification and growth in electric vehicles.

3.3 Estimating Cost Effectiveness of Resilience

Perhaps the greatest barrier to making needed improvements for resiliency is the difficulty in valuing the benefits of these plans and investments. Without accurate ways to account for these benefits, utilities, regulators, and their stakeholders have difficulty determining which activities to pursue, how much of a given activity is the right amount, or how resilient a new asset should be. These types of investments are not able to be valued as easily as reliability improvements that lead to reductions in SAIFI and SAIDI—or demand response, energy efficiency, or generation investments. While the industry does not have a standard protocol for valuing the benefits and costs of resiliency investment, research is ongoing in this area with a recognition that there is a risk to simply wait until there is a proven process before making investment decisions.

Expert interviews indicate there are three primary ways utilities have described the value proposition of investments in resiliency, each problematic in its own way: First, some utilities simply state that they can’t quantify dollar values and point to qualitative benefits instead. Second, utilities may use the ICE calculator (described above) and extrapolate values out

²⁴ ICF.

²⁵ U.S. Department of Energy.

beyond 24 hours, though the tool is not designed for this use. Third, utilities may attempt to quantify cost-benefit, instead of cost-effectiveness, leaving the monetary value of those benefits undetermined.

Further complicating the cost-effectiveness picture is the infrequent but extreme nature of resiliency events that make their impacts highly uncertain. In turn, it is difficult to accurately assign costs to these low-probability, variable events.²⁶ Despite these challenges, regulators still want to know “what works best and how to direct ratepayer money to the most effective solutions.”²⁷

From the examples in Florida and New York noted above, FPL has been able to justify its investments and quantify avoided costs due to years of similar storms and over a decade pursuing resiliency investments and activities.²⁸

3.4 Regulatory Review of Hardening Initiatives

Increased spending on distribution system investments for asset replacement, hardening, and resiliency has prompted increased interest and review by regulators and stakeholders working to ensure utility investments are made in customers’ best interests. Whether reacting to previous extreme events or reviewing proactive proposals, regulators face competing priorities in evaluating such investments. Discussions with experts (including former state regulators) point to the need to balance affordable rates for customers while also ensuring high levels of reliability amidst increasingly severe weather events.

Further confounding regulatory processes is the challenge of understanding the cost-effectiveness of resiliency investments. This makes it difficult for utilities to prove their proposals are prudent, despite a perceived need prompted by increasing large-scale outage events. LBNL found in interviews with regulatory staff that generally there was little distinction between reliability and resilience among economic regulators in how they evaluate proposed investments. However, as noted in the previous sections, while related, these two concepts have differences in the types of events they seek to address, and the metrics to measure their performance are increasingly different (in fact, research into determining appropriate resiliency metrics is still ongoing).²⁹

Research indicates that hardening activities are often proposed and considered within general rate cases, as these types of investments align with the proceedings where “classic asset

²⁶ EPRI.

²⁷ National Association of Regulatory Utility Commissioners, State Commission Staff “Surge” call: Evaluating Reliability Investments.
<https://www.naruc.org/default/assets/File/Surge%20grid%20hardening%20summary%20051418-final.pdf>

²⁸ ICF.

²⁹ Lawrence Berkeley National Laboratory, Evaluating Proposed Investments in Power System Reliability and Resilience: Preliminary Results from Interviews with Public Utility Commission Staff, January 2017.
<https://eta-publications.lbl.gov/sites/default/files/lbnl-1006971.pdf>

management” activities are typically reviewed. A 2018 discussion among state regulatory staff pointed out that including these investments in general rate cases can make it difficult for staff to separate those investments and weigh them against the benefits of reduced interruptions.³⁰ Increasingly, resiliency activities are proposed and coordinated in separate proceedings, where they can be reviewed in conjunction with other grid modernization activities and long-term planning.

Utilities and regulators are also beginning to look toward new methods for cost-recovery of resiliency and hardening investments. The Edison Electric Institute points to examples in eight states and territories³¹, including:

- Financial penalties in Connecticut, Massachusetts, and Illinois for non-compliance with increased performance standards and metrics from grid modernization plans, tree trimming and hardening measures.
- Financing via public bonds to support undergrounding in Washington, D.C.
- Performance-based formula rates for investments in transmission and distribution systems in Illinois.
- Performance and outcome-based incentives in New York to achieve objectives of reliability and resiliency.
- New rate adjustment mechanisms in Indiana, Pennsylvania, and Texas to allow for cost-recovery of distribution investments between rate cases.

The example of undergrounding funded via public-private partnership in Washington, D.C., highlights another issue raised by experts. As previously noted, resiliency investments provide benefits that may be regional or national, as long-duration outage events can indirectly impact customers outside of a given utility’s service area. As a result, non-utility funding, either from local, state, or federal sources, can be appropriate, given the wider scope of these indirect impacts and benefits.

Finally, research indicates that equity can be an increasing issue of importance in planning and review of resiliency investments. This can come into consideration for prioritization of projects, where utilities may overlay historical outage performance with areas of disadvantaged or low-income communities to identify if that performance disproportionately impacted “socially vulnerable” customers. The utility can then prioritize projects in those areas to ensure benefits of resiliency and hardening accrue to those most impacted. Existing tools for estimating outage impacts and costs (i.e., the ICE calculator) may not sufficiently factor these equity-focused issues into their inputs and analyses.

³⁰ NARUC.

³¹ Edison Electric Institute.

3.5 Implications for Eversource Hardening Activities

The Company's practices and plans to increase standards and activities for system hardening align with trends observed in utilities across the country responding to increases in severe weather and long-duration outage events, improvements in technologies, and higher customer reliability standards. Typically, these changes are prompted by one or repeated widespread, long-duration outage events, and often utility and regulatory activity is spurred by legislative action after these events.

The Company is taking a more proactive, rather than reactive, approach updating standards and practices for distribution system resiliency without significant prompting. TRC recommends that the utility consolidate its current resiliency/hardening efforts into an overarching program following the decision framework outlined by the Department of Energy in Figure 3-2 in assessing threats posed by climate or other external factors, identifying resiliency objectives, and then tailoring and prioritizing solutions based on the data and goals defined. Con Edison's Climate Change Vulnerability Study provides a template for this future-looking threat assessment. Florida Power and Light's Storm Protection Plan also exemplifies targeted solutions tailored to individual project conditions but built to meet a specific and defined standard against wind hazards.

As detailed in Section 3.3, identifying the values of avoided costs resulting from resiliency investments is particularly difficult given the rare nature of severe events, and indirect, widespread impacts that these events have. As a result, traditional measures of cost-effectiveness are likely insufficient at truly capturing the value of the increased standards or enhanced hardening practices that Eversource has proposed. To the extent the Company can quantify or qualify the benefits from increased hardening activities and investments, it may provide regulators and stakeholders more context around these investments, in lieu of difficulties calculating traditional cost-effectiveness.

Further, identifying areas of crossover or co-benefits between distribution hardening activities and other grid modernization initiatives and investments may help ensure that choices being made today for reliability or resiliency also support future plans or customer needs. For example, decisions to strengthen pole standards today for storm hardening may also align with anticipated growth in needs to support additional utility or non-utility attachments over the life of that pole. Updates to substations might consider if significant new or critical loads may be expected to be served by that asset, and the implications of its failure with more customers served in the future.

Finally, it is standard practice to consider the grid hardening investments evaluated within this assessment as part of a general rate case. Eversource should continue to track the performance of these assets and circuits in comparison to those that have not been hardened so that the utility, regulators, and stakeholders can understand the reliability and resiliency benefits that these activities support.

4. Distribution System Age and Condition Assessment

This section provides an assessment of the age and condition of various distribution system elements, with focus on the impact of each equipment type and work practice used to support the system. Also included is an overall assessment of the system, to provide a broader picture of areas where additional investment may be needed.

The Company's electric distribution system in New Hampshire consists of approximately 12,200 miles of overhead distribution circuits, including approximately 3,000 miles of roadside, three-phase distribution circuits and 600 miles of distribution lines within off-road rights-of-way. Approximately 17% of the distribution system is considered backbone and the remaining 83% consists of overhead laterals stemming off backbone circuits.

The distribution system is dynamic and constantly changing with upgrades, new line extensions, relocations, removals, and maintenance activities. The distribution facilities reviewed ranged in age from equipment that was installed in the early 1900's to equipment that will be installed in 2021. Information pertaining to the age, condition and in-service dates are not always available to assess the remaining servicing capabilities and make specific recommendations for each individual piece of equipment. However, the data available shows that there are significant numbers of distribution equipment still in service, that are beyond their expected life expectancy.

The equipment attributes evaluated were provided from the Company's GIS and other data sources to the extent possible. The in-service records for distribution poles and substation transformers were readily available and the data is analyzed in this report to draw conclusions and provide recommendations as to the funding levels, maintenance intervals and equipment replacement strategy to build and maintain a resilient distribution system. Other equipment, such as primary conductors, do not have specific aging information and are generally addressed as part of the overall Distribution Poles and Equipment Assessment. TRC's experience has been the primary conductor typically stays with the original pole line installation and is replaced when the line is re-conducted and the older facilities retired. There is still a strong possibility that older primary conductor remains in service when poles are replaced due to damage or failing the pole inspection program and these older primary lines are to be considered for re-conducting as part of the aged facility assessment.

Transformers, reclosers and other distribution equipment attached to the poles are independent of the pole installation and their in-service dates vary greatly depending on the customer requirements and operational needs. The impact of this equipment age and condition on the overall system should be addressed separately to assess the service capabilities. The exception is the third-party attachments as they affect the pole structural load carrying ability that cause premature pole failure due to overloading. The impact of the third-party attachments is addressed in the Pole Loading Assessment of Existing Eversource Poles.

New Hampshire is ranked second in the United States for forest cover, with an estimated 84% covered in timberland.³² Most of the overhead distribution lines are in forested areas and subject to vegetation management. Tree canopy has matured over the years and in many cases, towers over the existing distribution system. Mature trees, commonly reaching 100 ft. in height, are outside of the rights of way, making power lines vulnerable to trees well outside of the maintained rights of way. Information on the Vegetation Management program is also readily available and a detailed evaluation, impact of changing the existing practices and recommendations, are provided and present a clear direction to the program. The data and evaluations tools available for this specific program offer a defined link between the expenditures and impact to the customers and reliability of the system.

The substation transformer and breaker assessment focus on those specific pieces of equipment. The remainder of the substation equipment (buss work, structures, and protective equipment) are not part of the evaluation. These elements should be evaluated separately as their serving capabilities are independent of the substation transformers and breakers.

The Company develops a 5-year plan for capital expenditures to provide adequate capacity for serving customer load and providing reliable service. Similar to other utilities that TRC has worked with, aging assets, higher customer expectations and resilience of the system have become emerging considerations. The capital budget plan addresses these issues in a timely manner, incorporating financial prudence and sound engineering judgement. There are multiple factors considered by distribution planners that affect different stakeholders, each with varying priorities. These include:

- Public and employee safety
- Circuit reliability data
- Age of assets
- Operations experience
- System hardening needs
- Capital funding availability
- System planning criteria and capacity requirements
- Customer impact
- Regulatory requirements

Selecting the projects for the budget plans takes into account many of these factors in conjunction with discussions between the various disciplines within the Company leadership. Capital plans contain line items for individual projects and programs for annual funding to address ongoing work related to maintenance, replacement of assets and reliability

³² USDA - Forest Inventory and Analysis Fiscal Year 2016 Business Report. Page 71-72. Table B-11. Land and forest area and FIA annualized implementation status by State and region, FY 2016. (Percentages for states derived by dividing third column by second column.) Data for territories: Page 70: Table B-10. Status of FIA special project areas excluded from annualized inventory. Retrieved January 8, 2019

improvements. Examples include pole inspection and replacements, reliability projects under \$100,000 and distribution automation. These programs address both known and emerging issues that engineering, operations, and other stake holders identify.

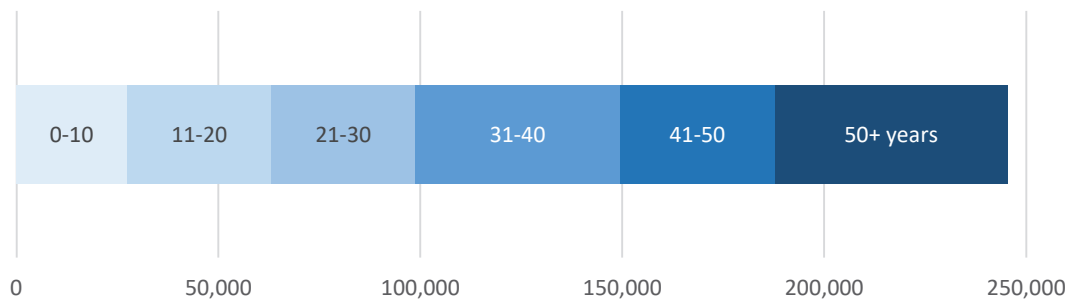
Distribution Poles and Equipment Assessment

The Company has maintenance responsibility for 276,000 distribution poles and has distribution facilities attached to approximately 455,000 poles that are either jointly or solely owned by the Company.³³ Upon reviewing the pole data provided from the GIS database, two concerns are emergent: the age of the poles and the structural load placed on the poles with attached equipment.

4.1 Pole and Equipment Age Analysis

The overhead distribution system is currently comprised of a large proportion of older, outmoded utility poles originally built to serve smaller electrical loads. Currently, 39% of the distribution poles owned and maintained by PSNH are over 40 years old, with more than 57,500, or nearly one-quarter of poles, exceeding 50 years. This is beyond the estimated useful life of 45 years for a wood distribution pole. Figure 4-1, below, shows the age groupings of the Company's distribution pole inventory taken from the GIS data.

Figure 4-1. Age of Distribution Poles by Year Grouping



Source: Eversource GIS, 2019

Wood poles can remain in service for longer than 50 years when regularly inspected and treated as necessary. However, as wood poles age beyond their expected useful life, they experience a loss of strength from the natural degradation of the wood due to structural wear and decay from fungus, insects, and animals. One analysis of wood pole decay rates indicates strong evidence that the probability of pole degradation accelerates rapidly in poles over 50 years old.³⁴

Typically, the Eversource equipment (framing, conductors, down guys, etc.) attached to the older poles are of the same vintage as the poles and will also need to be replaced along with the pole. In TRC's experience, it is a common and good utility practice, to inspect/maintain poles, and replace them prior to failure. The Company conducts a wood pole inspection

³³ Eversource system data

³⁴ Timing of Wood Pole Replacement Based on Lifetime Estimation, Steiner Refsnaes, Lars Rollfseng, Eivind Solvang and Jorn Heggset, July 2006

program to identify and replace failing wood poles, but the pace of replacement of the older poles is not adequate to address all aged wood poles in a timely manner.

Aging poles may also be structurally overloaded and not be able to carry the load of conductors, transformers, reclosers, third-party attachments, etc. in an NESC Heavy Loading Zone. The NESC initially added wind and ice loading criteria in 1940, and the most recent specifications were published in 2017. An analysis of the structural strength of the poles, compared to existing poles that have been analyzed is addressed in the Pole Loading Assessment below. Pole aging and the loss of pole strength are closely linked and need to be addressed together when pole assessments are performed.

4.1.1 Pole Loading Assessment of Existing Poles

TRC conducted an analysis on the ability of the existing poles to withstand the structural wind and ice loads that are experienced in the New Hampshire NESC Heavy Loading Zone³⁵. Specifically, the 2017 NESC requires that all distribution facilities be designed to withstand a 40 MPH wind with ½" of ice on the line at 15° F. Requirements are also in place for the facilities to withstand a 95 MPH wind at 60° F. This analysis focuses on the first design criteria of the Heavy Loading wind and ice requirement.

TRC did not have individual pole loading information for the Company's NH service territory; instead, this analysis relied on a proxy dataset of loading for 41,000 poles from a representative utility that uses similar construction. TRC then applied the results of that analysis to the Company's pole population as an aggregated group, to identify the average pole loading and number of poles that may be overloaded.

The analysis of the representative utility data calculated the strength of poles installed in the field and in the same NESC Heavy Loading Zone. Actual pole loading data was not extensively available for the Company's poles. Poles were analyzed by pole class, with all primary conductor types and a varied number of third-party attachments. TRC used the SPIDAcac analysis tool to determine the average pole loading and the percentage of poles that are structurally overloaded. The assumptions for the representative utility pole calculations are listed below. Poles in this data set are in the field with known class, attachments, and span lengths.

- Pole loading is the average of all poles with those attributes (primary conductors and third-party attachments).
- % Overload is the percentage of locations where the poles are overloaded.
- Only situations with 6 primary wires (each primary line on a tangent pole is modeled as two wires for calculation purposes) or three phase lines.
- Includes all primary conductor sizes.

³⁵ 2017 National Electric Safety Code

- Heavy–Grade B Loading
- All representative utility field data was collected with a Hastings Hotstick and TruPulse laser.
- Structural analysis was performed using SPIDA Software’s SPIDAcalc application.
- The data used for this analysis spans from 2009 to 2021 and includes a total of 41,314 locations.

For purposes of this report, the poles analyzed were the most common three phase poles in service today utilized by Eversource. These are the 40 and 45-foot poles in classes 1, 2, 3, 4 and 5. The data are presented below in Figure 4-2 as the Percentage of Poles Overloaded by Class and Attachments of the representative utility.

Figure 4-2. Percentage of 40 and 45-foot Poles Overloaded by Class and Attachments (Representative Utility Data)

Pole Size (ft) & Class	Number of attachments							
	0	1	2	3	4	5	6	7
40-1	0.00%	12.00%	0.00%	60.00%				
40-2	3.13%	7.57%	11.76%	26.67%	25.32%	26.09%		
40-3	7.14%	8.79%	19.40%	32.14%	12.50%	100.00%		
40-4	14.45%	25.55%	30.96%	37.56%	46.15%	66.67%	75.00%	
40-5	33.33%	45.77%	48.15%	40.00%	80.00%	50.00%	100.00%	
45-1	0.00%	7.02%	7.50%	25.00%	17.86%	16.00%		
45-2	5.34%	8.59%	15.59%	20.87%	18.85%	29.12%	28.89%	25.00%
45-3	13.33%	25.23%	22.61%	35.38%	52.17%	37.50%	100.00%	
45-4	21.10%	27.25%	38.62%	37.50%	48.42%	33.33%	66.67%	60.00%
45-5	40.00%	56.41%	58.33%	0.00%				

Source: TRC analysis of Representative Utility data

Pole data provided from Eversource are shown in Figure 4-3 below. There are 148,988 40-foot and 30,500 45-foot poles which were recorded in the GIS system without the class designation. Based on TRC’s discussions with Eversource SME’s, these are likely older poles that were installed and not recorded with the same attributes as the GIS captures today. Eversource indicated that prior to the 1980’s, Class 4 was the standard for 40 and 45 ft. poles. It is likely the majority of the 40 and 45 ft poles are Class 4. For analysis purposes, TRC conservatively assumed that these unclassified poles are Class 3. As of 2016, Class 2 poles are the standard and are shown in the chart below. It is noted that the pole data includes all poles that Eversource has facilities attached, not just the poles the Company owns and maintains. The 40-foot and 45-foot poles were chosen because they will typically be used for construction of the three phase facilities.

Figure 4-3. Eversource 40 and 45-foot Poles by Length and Class

Pole Length	Pole Class	# Poles
40 Foot	Unknown	148,988
	1	113
	2	19,847
	3	20,545
	4	459
45 Foot	Unknown	30,533
	1	647
	2	15,317
	3	3,137
	4	9

Source: Eversource GIS

The Company's SMEs estimated that there is an average of two attachments by third-party companies on each pole with many poles having more. Looking at the number of 45-foot Class 3 poles, as an example, and using the 23% of poles overloaded from the Representative Utility data analysis in Figure 4-2, we can conclude that there are potentially 7,700 (15% of 45-foot poles) overloaded and could fail during a heavy loading event. The number of poles subject to failure is shown in Figure 4-4, below. Availability of specific pole size, class, conductor, and third-party attachments data would be needed to provide information to assess each individual pole.

Figure 4-4. Estimated Percent of Eversource Poles Overloaded by Class

Pole Length and Class	# Poles	Avg Pole Loading w/2 Attachments	# Poles Overloaded
40 (Assume Class 3)	148,988	19%	28,904
40, 1	113	0%	0
40, 2	19,847	12%	2,332
40, 3	20,545	19%	3,986
40, 4	459	31%	142
45 (Assume Class 3)	30,533	23%	7,023
45, 1	647	8%	52
45, 2	15,317	16%	2,388
45, 3	3,137	23%	709
45, 4	9	39%	3

The data shows that there are over 45,000 40-foot and 45-foot wood poles in the distribution system that are potentially structurally overloaded due to the pole attachments. The pole failures will be more common with the older poles in the system.

Figure 4-5 is a 40-foot, Class 4 pole set in 1979. Based on the pole size and number of attachments, TRC believes this pole is structurally overloaded and should be replaced with a standard wood pole.

Figure 4-5. Structurally Overloaded Eversource Class 4 Wood Distribution Pole



Source: Eversource

Figure 4-6 is a 30-foot pole set in 1938. The pole brand could not be found, so the class is unknown and likely to be Class 4 or smaller. Based on pole age and number of attachments, TRC believes this pole is structurally overloaded and should be replaced with a standard wood pole.

Figure 4-6. Structurally Overloaded 80+ year-old Eversource Wood Distribution Pole



Source: Eversource

4.1.2 Pole Maintenance and Capital Programs

The Eversource Maintenance Program – 5.61 Wood Poles, provides the procedure for the inspection, treatment (further explained in the Section 5.1.2), restoration and replacement of wood distribution poles that are owned and maintained by Eversource. It defines the schedule, inspection method, and reporting requirements for these poles. All Eversource NH poles are to be inspected at least every 10 years while they are in service. The procedure uses a pole type and age method to determine the inspection type performed, as shown in Figure 4-7 below.

Figure 4-7. Eversource Wood Distribution Pole Inspection Types

Inspection Type	Creosote, Penta, all others	CCA
Visual	0 to 9 years old	0 to 19 years old
Sound & Bore	10 to 14 years old	20 years old and older
Ground Line Excavate	15 years old and older	If decay is indicated by Sound & Bore

Source: Eversource Maintenance Program

Results of the distribution pole inspection program over the last 11 years are shown below in Figure 4-8 and indicate that the reject rate averages 2% per year. Reject poles are placed in either a normal or priority reject designation based on the criteria in the Eversource Maintenance Program –6.61 Wood Pole Inspection document. Priority reject poles are to be made safe within 10 days. The rate is in line with industry averages, but it includes all poles in the fleet that are at least 15 years old; the poles that are younger are less prone to inspection failure since they have not been in service as long. Data on the reject rate by age of pole is not available.

Figure 4-8. Eversource Wood Distribution Pole Inspection Results

Year	Poles Inspected	Reject Count	Reject Rate
2011	24,209	203	0.80%
2012	24,008	247	1.00%
2013	27,145	570	2.10%
2014	25,666	440	1.70%
2015	15,681	327	2.10%
2016	51,758	1,487	2.90%
2017	32,916	549	1.70%
2018	21,964	558	2.50%
2019	16,857	403	2.40%
2020	16,668	380	2.30%
Totals	256,872	5,164	2.01%

Source: Eversource

Based on the United States Department of Agriculture Rural Utility Services (RUS) Bulletin 1730B-121, Wood Pole Inspection and Maintenance³⁶ and other common utility practices in the same decay zone, the inspection interval should be between 10-12 years for each pole for Decay Zone 2. Figure 4-9 below shows the recommended intervals by the RUS bulletin and although Eversource meets the industry accepted wood inspection cycle, the Company does not address the issue of the aging poles.

³⁶ United States Department of Agriculture Rural Utility Services, RUS Bulletin 1730B-121, Wood Pole Inspection and Maintenance, 2013

Figure 4-9. RUS Wood Pole Inspection Program

Decay Zone	Initial Inspection	Subsequent Re-Inspection	Percent of Total Poles Inspected Each Year
1	12-15 Years	12 Years	8.3
2 and 3	10-12 Years	10 Years	10
4 and 5	8-10 Years	8 Years	12.5

Source: U.S. Department of Agriculture.

With over one-third of Eversource’s poles aged at 40 years, the inspection program should focus on older poles and include a more aggressive sound and bore or groundline excavation inspection cycle for those poles.

4.1.3 Pole Assessment Summary and Recommendations

The data above indicates two related issues regarding their wood pole plant and the equipment attached to the poles. Many of the poles (over one-third) are reaching the end of expected useful life or already beyond it and there is a greater potential for pole failure as they continue to age. While the company has experienced roughly 200 pole failures per year in recent years, this number could accelerate as the wood pole population continues to age without replacement at the same rate. While the Company has experienced roughly 200 pole failures per year in recent years, this number could accelerate as the wood pole population continues to age without replacement at the same rate. Compounding the older poles and equipment, many poles are likely structurally overloaded based on the NESC Heavy Loading Criteria and susceptible to failure during ½” ice with 40 MPH winds and other extreme weather events. This played out during Hurricane Isaias in August 2020 when Eversource lost more than 2,000 poles.

To minimize the impact of these events on system reliability, TRC recommends the following.

- 1) Establish a systematic asset replacement program to replace wood poles on an age basis, that support three phase lines, over the next 5 years. Beginning with poles 70 years and older poles, with priority on the smaller class 4, 5 and below, then address the 60- and 50-year-old poles using the same class criteria. There are about 42,000 wood poles aged 50 years and older that will need to be identified and prioritized for replacement. It is estimated that 20% (8,400) of those poles support three phase lines, requiring approximately 1,700 poles/year of the poles in this age group be replaced in conjunction with the other pole replacement efforts.
- 2) TRC recommends poles that are identified as structurally loaded at 90% or greater, be replaced with the correct sized poles to carry the mechanical load under the mandated NESC design conditions. To accomplish this, TRC also recommends that 10% (approx. 4,500) of the overloaded poles, be replaced on an annual basis. Priority should be given to the poles that are overloaded by the greatest amount and/or most critical to the system. It is also essential that all new poles that are installed have pole loading analysis completed to ensure the design criteria is met. Individual pole loading analysis will need

to be performed on all angle, tap and dead-end poles. Typical tangent pole analysis can be modeled to promote efficient design.

- 3) Continue the practice to use a minimum of Class 2 wood poles for all applications and ensure that NESC pole loading requirements are met for both the heavy loading and extreme wind scenarios. Based on analysis of the representative data, Class 2 wood poles are half as likely to be overloaded with attachments compared to Class 3 poles.

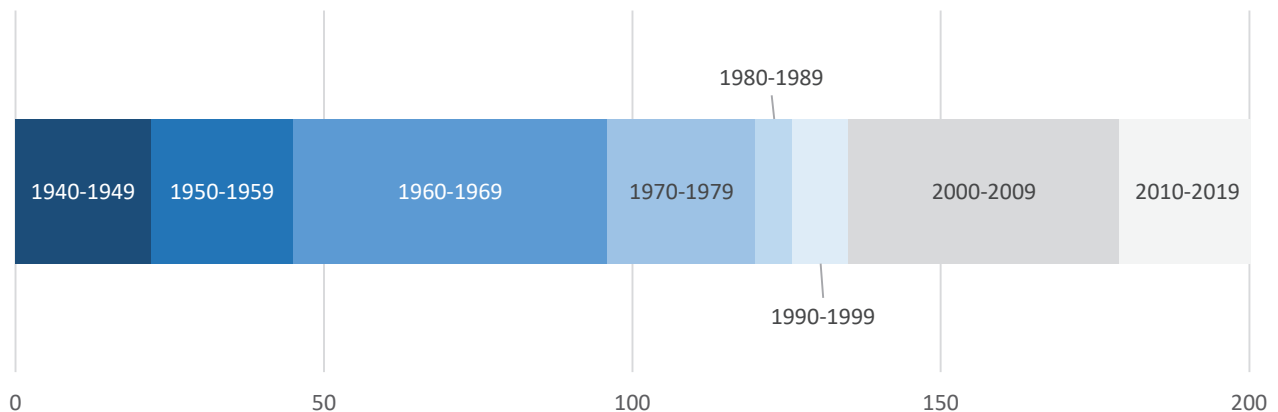
4.2 Substation Transformers & Breakers

Eversource operates 124 distribution substations across its New Hampshire service territory, serving a total of approximately 528,000 customers. Each substation typically contains 1-2 transformers, with 207 distribution power transformers across the system in total. Their system across New Hampshire also contains 523 distribution circuit breakers.

Substation Transformer Assessment

These substations represent another critical portion of system infrastructure with a growing number of aging assets. Figure 3-8 below shows the distribution of substation transformers within the distribution system based on the decade manufactured. The system currently includes 45 transformers (22%) that are over 60 years old, and 51 transformers (25%) between 50 and 60 years in age. Transformer loading is typically the primary driver for station transformer replacement, although transformer age and condition should be considered too, as shown in Figure 5-43 and discussed further in Section 5.3.

Figure 4-10. Eversource Substation Transformers by Decade Manufactured



Source: Eversource New Hampshire Substation Transformer Database

Aging transformers can pose a risk to reliability if they are not properly maintained and have been overloaded over the years. Transformers have a typical design life of 25-40 years.³⁷ There

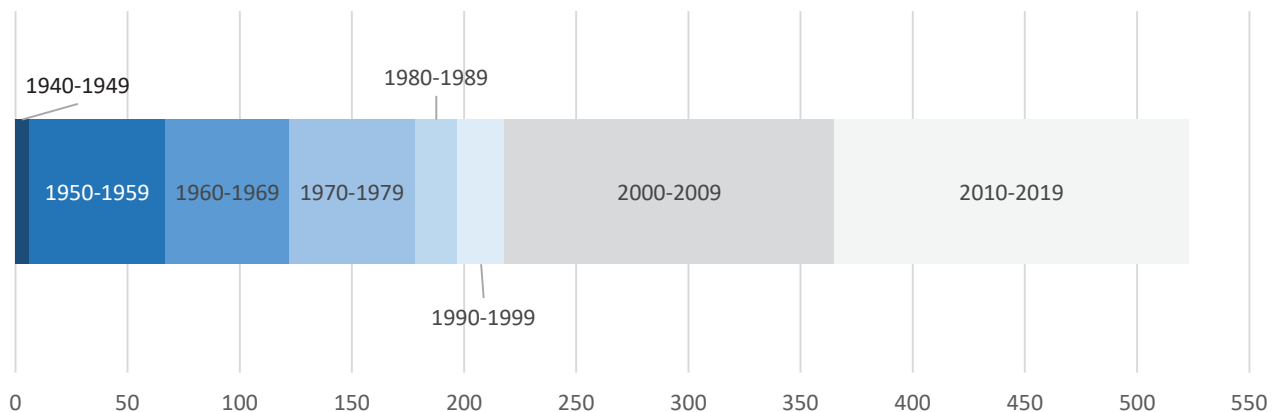
³⁷ IEEE, Standard for General Requirements for Liquid-Immersed Distribution, Power, and Regulating Transformers (C57).

are 120 transformers within the system that are exceeding the maximum typical design life of 40 years. Though some transformers operate effectively without any significant signs of a replacement being needed beyond the design life, it is necessary to maintain them properly. There are also 45 transformers over the age of 60 years and another 55 transformers that will be reaching that age in the next 10 years. TEPCO has established a life expectancy of 65 years for extra-high voltage/HV transformers and 75 years for distribution transformers, as these are the time periods when winding clamping force begins to decrease, causing a marked influence on mechanical performance. However, as the life expectancy of a transformer subject to rapidly decreasing degree of polymerization because of high-water content in the paper insulation or where the risk of failure has been established, premature replacement of the transformer is necessary.³⁸

Substation Breaker Assessment

Substation breakers are generally newer than transformers, with almost 60% manufactured since 2000 breaker assets across the distribution system. Only 13%, or 67 substation breakers date prior to 1960. Figure 4-11 below provides additional detail regarding the manufacture date of substation breakers.

Figure 4-11. Eversource Substation Breakers by Decade Manufactured



Source: Eversource New Hampshire Substation Breaker and Recloser Database

Eversource’s substations use four different types of breakers. Approximately 50% of the 523 breakers in the system use current standard vacuum (VCB) technology. The remainder of the breakers are comprised of primarily oil (OCBs) and air circuit breakers (ACBs). Figure 4-12 below represents the number of breakers within the system by equipment type:

³⁸ Shimomugi, Kojiro, et al. “How Transformers Age.” *T&DWorld*, 21 Feb. 2019, www.tdworld.com/substations/article/20972255/how-transformers-age.

Figure 4-12. Eversource Substation Breakers by Type

Vacuum	SF6	Oil	Air
244	67	90	88

Source: Eversource New Hampshire Substation Breaker and Recloser Database

Since 2005, 221 VCB’s have been installed across New Hampshire. VCB’s have been used to replace aging and obsolete assets such as Oil Circuit Breakers (OCB) and air circuit breakers (ACB). These older oil and air breakers are becoming obsolete due to availability of replacement parts as well as not being able to upgrade to new control systems within some substations. If an aging breaker is experiencing issues with operation or is unable to be maintained properly, it will warrant a replacement. Breakers are mainly replaced in conjunction with other major projects that are going on within a substation.

Substation Assessment Summary and Recommendations

TRC recommends analyzing aging station transformers and breakers. The Company should follow the transformer system violation ranking as shown in Figure 5-43 but the quantity of aging transformers needs to be taken into consideration. Age should still not be the sole driving factor for a replacement, but any transformer that has seen a larger load and use during its life should be higher on the priority list. A transformer replacement program is recommended that addresses the aging assets in conjunction with future loading projections.

TRC recommends breakers be replaced due to age if they are becoming obsolete or test results are showing excessive internal degradation. Obsolete breakers create issues with maintenance, inventory of spare parts, as well as integration with new controls. Failure of oil circuit breakers will lead to both reliability and environmental issues, so replacing these with the current standard vacuum circuit breakers is recommended. If the breakers are not posing an immediate threat to reliability, it is recommended to address breaker replacements in coordination with other station upgrade projects.

5. Eversource Distribution System Assessment Practices, Findings, and Recommendations

This section details the findings of TRC's assessments of distribution engineering materials and equipment, substations, and vegetation management practices. For each area of focus, the section reviews current practices, typical usage and installation, industry research findings, business case and cost analysis, and recommendations.

5.1 Distribution Engineering Materials and Equipment

5.1.1 Steel Poles

Current Practices

Prior to 2019, Eversource's distribution engineering standards specified the use of wood poles for all distribution line construction and maintenance. In October 2019, the Company reviewed its distribution engineering standards for distribution poles and implemented distribution class weathering steel poles as the new standard for all new and rebuilt distribution line construction in the off-road Right-Of-Way (ROW), from 4kV up to 34.5kV.

The Overhead Distribution Standards³⁹ specify requirements for the design and construction of distribution class steel poles. The poles are to be installed in the off-road ROW when a wood pole for three phase circuits is replaced at end of life or due to failure. Steel poles are not specified for single phase circuits or service poles. The Company has installed 189 steel poles for new or rebuilt distribution lines since 2018. It should be noted that steel distribution structures have been used in the ROW applications as cost beneficial alternatives for over 100 years.

During interviews with TRC, the Company's SMEs indicated the decision to update this standard was driven by a variety of advantages steel poles provide over wood poles alternatives. These advantages include:

- Greater longevity
- Ease of construction due to less weight
- Superior material design characteristic predictability
- Differing failure mode resulting in reduced catastrophic failures
- Improved reliability in severe weather events
- Lower maintenance cost

This change to the pole standard was also precipitated by an increase in severe weather events since 2008. Severe weather events have led to a sustained level of pole failures due to

³⁹ Eversource, Overhead Distribution Standards Section 10, DTRs 10.620-642.

vegetation falling into the lines, the physical overloading of poles brought on by ice loading, and windstorms resulting in 689 pole failures since 2018.⁴⁰ Given the incidence of replacements required by these failures and the difficulties of replacing these poles in remote off-road ROW settings, the standards were updated to reduce the number of pole replacements due to failure. To date, no known failures of the distribution steel poles have occurred on the Company's distribution system.

Typical Usage and Installation Practices

Distribution class steel poles are available in Class 1, H1, H9⁴¹ and used for three phase circuits. Steel poles are drilled and prepared in the field to accommodate framing, equipment, and guying holes per the design standard. Poles are accessed from bucket trucks, if that option is available, but they do accommodate removable climbing steps to be used as needed. The standards allow for reclosers, risers and other devices to be installed on the steel poles. The pole lines in the ROW can be in rough terrain that is inaccessible by vehicle and pose unique construction and maintenance design and access issues. Outages on these lines can be longer because of these access and construction challenges. Benefits and disadvantages will be addressed in the Industry and Other Utility Findings section below.

Figure 5-1. Eversource Structure Replacement, Circuit 3614



Source: Eversource

⁴⁰ Eversource NH Storm Data

⁴¹ Sabre Industries Wood Pole Equivalents

Industry Findings

Wood poles have been the standard distribution system support structure for over 100 years. They provide a readily available resource to build, maintain and operate the system. Over the past 25 years, new innovations in distribution pole types have led to an increase in standards specifying steel (and fiberglass) poles instead of wood poles. While steel poles have a higher initial cost, they provide greater durability, strength, predictability, and require less ongoing maintenance⁴². In addition, from an installation perspective, steel poles are lighter and easier to construct than wood poles.

Light duty distribution class steel poles have been the most prevalent standard distribution pole in the West and Southwestern regions of the USA over the last 20 years. These poles are specified to provide line hardening capabilities to combat high winds, wildfires and extreme ice loading conditions that have increased in frequency. Light duty steel poles are the standard distribution pole for utilities such as APS, Dominion Virginia Power, TEP, San Diego Gas and Electric, Austin Energy, and several Cooperatives throughout the USA. These utilities have experienced improvements in their construction and maintenance costs and system resiliency⁴³ as outlined in the business case below.

There have also been reports, including one from prepared by the President's Council of Economic Advisors and the U.S. Department of Energy's Office of Electricity Delivery and Energy Reliability, advocating for upgraded poles and structures with stronger materials as a primary strategy. This study specifically states⁴⁴:

"For distribution systems, this usually involves upgrading wooden poles to concrete, steel or a composite material and installing support wires and other structural supports."

Steel poles are recognized by the industry as a key component to building a robust and resilient distribution system.

Business Case

Considerations for the standard use of steel poles compared to wood poles is outlined below:

- **Longevity:** Steel poles are proven to have a longer life than wood poles due to the inherent nature of the materials. Wood poles degrade and lose strength at a much higher rate due to the susceptibility to failure from decay, insects, and animals. Based on industry information, the projected life of a wood pole is 30 to 45 years or more depending on the installation environment. Steel poles have a projected life of 90 years

⁴² Michigan Technological University, Age-Dependent Fragility and Life-Cycle Cost Analysis of Timber and Steel Distribution Poles Subjected to Hurricanes, Salman 2014.

<https://digitalcommons.mtu.edu/cgi/viewcontent.cgi?article=1779&context=etds>

⁴³ Steel Utility Pole Coalition, Case Studies. <https://steelpowerpoles.com/library/case-studies/>

⁴⁴ Economic Benefits of Increasing Electric Grid Resiliency to Weather Outages -Executive Office of the President, August 2013 Page 13

https://www.energy.gov/sites/prod/files/2013/08/f2/Grid%20Resiliency%20Report_FINAL.pdf

and likewise remain in service longer depending on the installation environment. Steel poles are also susceptible to degradation due to corrosion and galvanic losses. This degradation occurs at a slower rate can be mitigated by pole coatings.⁴⁵

- **Constructability:** Steel poles are lighter in weight, easier to handle and can cost less to install. Steel poles are 50 to 70% lighter⁴⁶ than equivalent class wood poles allowing for lighter duty equipment to perform handling and construction activities. It is a common practice for manufacturers to pre-drill holes for typical framing, equipment, and down guy configurations, thereby eliminating the time required to drill holes in the field, if that option is chosen. In Eversource's off-road installation environment, the installation of the steel and wood poles is the same. In remote areas that have limited or no vehicle access, helicopter pole sets are required. The weight advantage of steel poles includes the flexibility to utilize lighter duty helicopters to perform the pole sets that are less costly and increase the speed of the pole set.
- **Material Characteristic Predictability:** Steel, as a material, has more predictable design parameters than wood. For design purposes, the National Electric Safety Code (NESC)⁴⁷ accounts for the greater variability of wood pole composition by using higher design safety factors than are used for steel poles. Wood pole strength safety factors are 0.65 (Grade B) and 0.85 (Grade C) as compared to 1.0 (Grade B & C) for steel. Because wood strength declines significantly over time, this degradation has to be accounted for when performing pole loading analysis for future attachments and modifications.
- **Failure Mode:** In TRC's experience, steel poles do not typically fail catastrophically. They maintain form and lean over based on the causal factor. If a tree falls onto a steel pole line, the poles typically kink and/or bend and can remain in service, unless other components (crossarms, conductor, insulator, etc.) fail as well.⁴⁸ The same holds true with steel poles that fail due to excessive wind or ice load, where the poles typically lean but do not go to ground. Wood poles can, and often do fail catastrophically. Wood poles typically break at the point of pressure or the pole's weak point, and if the damage is severe enough, go completely to the ground with all attachments, causing service interruption and potentially endangering persons and property in the area due to downed lines. The Company's steel poles standards in the ROW reduces both the chance of catastrophic failure and related safety concerns.

⁴⁵ Salam, Age-Dependent Fragility and Life-Cycle Cost Analysis of Timber and Steel Distribution Poles Subjected to Hurricanes

⁴⁶ Eversource Wood and Steel Pole Standards

⁴⁷ 2017 National Electric Safety Code Section 250, General Loading Requirements and Maps

⁴⁸ UC Synergetic, Structural Analysis of Distribution Designs Northeast Utilities – Final Report. December 30, 2013

Figure 5-2. Illustrative example of wood pole failure due to ice loading



Source: Courtesy of Intelli-pole.com

- Reliability:** Distribution lines are designed to meet the regional requirements dictated by the NESC for poles, attachments, wind, ice, equipment, clearances, etc. Designs for steel distribution lines in New Hampshire also must take into consideration forested areas and the potential for trees to fall onto energized lines. These events can cause long outages due to limited or difficult access to the outage event. One study conducted by UC Synergetic found that often the pole failure is the weak link causing extended outage durations. This study found that specifying Class 1 poles would reduce these events.⁴⁹ Furthermore, steel poles would reduce the risk of catastrophic failure as described in the Failure Mode bullet above. The standardized implementation of steel poles has been in place for over two years and limits the ability to measure any impacts to distribution system performance.

The primary drawback of steel poles is their higher initial cost compared to an equivalent wood pole. Individual steel pole generally cost 2.5 to 4 times the cost of wood poles. However, the total installed cost for construction of lines with steel poles tends to be less than similar construction using wood poles due to the weight difference between the poles. These costs and savings will be further detailed in the Cost Analysis section below.

Cost Analysis

The cost analysis is based on life cycle costs. This method accounts for the initial cost to build the poles and any cost to maintain and replace them based on the equipment's useful life. The following parameters are built into the cost analysis model for the steel pole evaluation:

⁴⁹ UC Synergetic, Structural Analysis of Distribution Designs Northeast Utilities – Final

- 45'- Class 2 Wood pole life 45 years (2 wood poles will be modeled)
- 45'- Class 1 Weathering Steel pole life 90 years⁵⁰
- Wood Pole Visual, Sound and Bore or Partial Excavation Maintenance at 10-year intervals @\$13.29/test
- Steel Pole Visual inspection at 10-year intervals @ \$5.36/inspection
- Escalation costs 3% labor and materials annually
- Escalate 4% annually for wood products based on lumber index over last 40 years
- Installation in off-road ROW location

Eversource follows a 10-year visual, sound and bore, or partial excavation wood pole inspection program for all poles including the poles in the off-road ROW. Inspections are visual only up to 9 years and require a sound and bore test or partial excavation at year 10 and every 10-year interval thereafter. Steel poles do not have an equivalent intrusive inspection and only require a visual inspection as part of the line patrol. The escalated cost to maintain the 10-year maintenance cycle for both the steel and wood poles is included in the model.

Figure 5-3. Total lifecycle cost Analysis of 45-foot steel and wood poles

Project	Initial Cost	Year 10	Year 20	Year 30	Year 40	Wood Pole Replacement (45 years)	Year 50	Year 60	Year 70	Year 80	Lifecycle Total	Present Worth
45-1 Steel Pole Hendrix	\$ 6,924.36	\$ 7.20	\$ 9.68	\$ 13.01	\$ 17.48	\$ -	\$ 23.50	\$ 31.58	\$ 42.44	\$ 57.04	\$ 7,126.29	\$ 25,935.62
Labor	\$ 2,262.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,262.00	
Materials	\$ 2,401.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,401.00	
Overhead	\$ 2,256.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,256.00	
Maintenance	\$ 5.36	\$ 7.20	\$ 9.68	\$ 13.01	\$ 17.48	\$ -	\$ 23.50	\$ 31.58	\$ 42.44	\$ 57.04	\$ 207.29	
45-2 Wood Pole Hendrix	\$ 5,189.94	\$ 42.92	\$ 57.69	\$ 77.53	\$ 104.19	\$ 20,419.49	\$ 140.02	\$ 188.18	\$ 252.90	\$ 339.87	\$ 26,812.72	\$ 19,260.36
Labor	\$ 2,262.00	\$ -	\$ -	\$ -	\$ -	\$ 8,553.97	\$ -	\$ -	\$ -	\$ -	\$ 10,815.97	
Materials	\$ 934.00	\$ -	\$ -	\$ -	\$ -	\$ 4,325.24	\$ -	\$ -	\$ -	\$ -	\$ 5,259.24	
Overhead	\$ 1,962.00	\$ -	\$ -	\$ -	\$ -	\$ 7,419.49	\$ -	\$ -	\$ -	\$ -	\$ 9,381.49	
Maintenance	\$ 31.94	\$ 42.92	\$ 57.69	\$ 77.53	\$ 104.19	\$ 120.78	\$ 140.02	\$ 188.18	\$ 252.90	\$ 339.87	\$ 1,356.02	

Results show the cost of the steel poles are more cost effective than similar wood poles when longevity and maintenance costs are considered in the total lifecycle of the pole. It should be noted that the Net Present Worth Analysis was performed using the same input data and the results showed that the steel pole has a 35% greater present worth than the wood pole over the life of the pole.

Recommendations

Poles are a major infrastructure investment. Life cycle cost analysis offers a broader perspective of costs over time. Based on the above analysis, industry and environmental trends, steel distribution poles are an investment that provide a long-term solution for safe, reliable, and cost-effective service to the customer. This investment is one component of improved distribution line resiliency. Steel poles used in off-road right-of-way settings provide additional resiliency benefits to guard against what would be a longer duration outage, given the difficulty in patrolling and replacing these more remote assets in the event of a failure during a severe

⁵⁰ Eversource has steel transmission structures that have been in service for over 100 years.

weather event. EPRI notes that this type of selective equipment application is often the most appropriate for grid hardening investments:⁵¹

“There is no ‘silver bullet’ that enables utilities to substantially eliminate interruptions during severe weather events. Utilities need to identify potential resiliency solutions, determine the costs, and added value associated with each solution, and then select a combination of solutions that best serves all stakeholders. Hardening solutions, with the possible exception of vegetation management solutions, are generally not cost effective for universal application throughout a utility’s electric system. Hardening options need to be selectively applied based on careful consideration of the costs and benefits expected for each utility system, regional demographics, environmental characteristics, and other factors.”

The combination of steel poles in off-road ROW applications along with larger class standard wood poles, spacer cable and fiberglass crossarms are together distribution equipment hardening solutions that provide greater reliability and resiliency. The current practice installs steel poles in the ROW to replace existing wood poles or obsolete steel lattice towers (such as circuit 3178X3) that are either damaged or at end of life.

TRC recommends adding a proactive program to replace wood poles or obsolete steel lattice towers in the ROW on a planned basis in addition to the current practice. The plan should include a minimum of five circuit miles of off-road ROW, three phase rebuilds, including rebuilds that are part of the inaccessible line relocation projects. Line projects need to be prioritized by reliability performance and susceptibility to damage or failure from trees.

5.1.2 Class 2 Wood Poles

Current Practices

Eversource historically stocked and specified Class 3 or 4 wood poles for distribution line construction and maintenance of facilities. In 2016, Eversource changed the pole standard to Class 2 wood poles as the minimum class pole for all primary poles installed. This change was precipitated by a need to provide enhanced storm hardening capabilities⁵² and to gain consistency with standards for wood poles.

As with the ROW installed steel poles, spacer cable and fiberglass crossarms, the system hardening needs were driven by an increase in severe weather events since 2008, as shown in the Eversource NH Major Storm Events report. These types of events have led to a sustained level of pole failures (689 pole failures since 2018, roughly 200 per year) due to vegetation falling into the lines and the physical overloading of poles brought on by ice loading and windstorms. Given the persistent pole replacements brought on by these failures, the standards were updated to Class 2 poles to reduce the number of failures causing outages and emergency replacement.

⁵¹ Electric Power Research Institute, Distribution Grid Resiliency: Prioritization of Options, 2015. <https://www.epri.com/research/products/3002006668>

⁵² UC Synergetic, Structural Analysis of Distribution Designs Northeast Utilities – Final Report

Typical Usage and Installation Practices

Eversource Overhead Distribution Standards⁵³ specify standards for the design, construction, and maintenance of distribution poles. The Distribution System Engineering Guide (Eversource Section 02.50 Reliability- Storm Resiliency Guidelines)⁵⁴ provides the instructions and guidelines to implement storm hardening practices. There has been a total of 12,941 Class 2 Chromated Copper Arsenate (CCA) treated wood poles installed in the Eversource system since 2018, ranging in length from 35' to 55'. The CCA Class 2 wood poles were installed in roadside applications as new and replacement poles for distribution voltages ranging from 34.5kV three phase to service voltages. A 45' Class 2 pole is the minimum class for three phase circuits and a 40' Class 2 pole is the minimum class for single phase circuits. Additionally, the Storm Resiliency Guidelines specifies that all junction poles are to be a minimum of a Class 1 wood pole.

The Class 2 and Class 1 (junction poles) size poles are the minimum classes to be specified in the roadside installations. If the pole application requires a larger class pole, as determined by Pole Loading Analysis (PLA) software, then a pole designed for that installation shall be specified. The PLA tool models two scenarios and uses the worst case as the final design criteria. The criteria are designed as follows:

- 1) 95 MPH Wind at 60° C with No Ice
- 2) 40 MPH Wind at 15° C with ¾" Ice

The first design criteria are based on the Extreme Wind Loading criteria as specified by 2017 NESC Rule 250C.⁵⁵ Design criteria 2 represents the Extreme Ice with Concurrent Wind Loading as specified by the 2017 NESC Rule 250D⁵⁶. Both scenarios are relevant to the Eversource system as they were experienced with Hurricane Irene and Storm Alfred in 2011.

Industry Findings

As stated in the Distribution Class Steel Pole section of the report, wood poles have been the standard distribution system support structure for life of the distribution industry. Wood poles are relatively inexpensive compared to other alternatives (steel, concrete, fiberglass) but are prone to unseen imperfections and deterioration due to insects, animals and fungus making the design and longevity less predictable than other alternatives.⁵⁷ Eversource has distribution facility attachments to about 455,000 distribution poles with maintenance responsibility for about 276,000 of those poles⁵⁸ making up their distribution pole fleet. The wood pole integrity and strength play a pivotal role in reducing the number and duration of outages on the distribution system.

⁵³ Eversource, Overhead Distribution Standards, Section L3-OH05, DTRs 101-309.

⁵⁴ Eversource, Reliability – Storm Resiliency Guidelines, 2016.

⁵⁵ 2017 National Electric Safety Code, Section 250C.

⁵⁶ 2017 National Electric Safety Code, Section 250D.

⁵⁷ Salam, Age-Dependent Fragility and Life-Cycle Cost Analysis of Timber and Steel Distribution Poles Subjected to Hurricanes

⁵⁸ Direct Testimony of Purington and Lajoie)

The increase of significant storm events in the USA and specifically in the Northeast has prompted utilities to look for ways to determine optimal designs for storm resiliency for the distribution system. Two comprehensive studies were conducted in 2013 and 2015 that address recommended practices regarding the larger class wood poles in addition to other system improvements (insulators, crossarms, spacer cable, etc.) that can be implemented to reduce the impact of the storms and improve reliability overall.

The first study conducted in 2015 by the Electric Power Research Institute, titled *Distribution Grid Resiliency: Overhead Structures*⁵⁹, was a three-year, multi-deliverable research project, addressing methods to evaluate hardening solutions to improve distribution grid performance related to major weather events. The study had participation and input from 27 electric utilities throughout the USA and included field testing of actual structures (poles, trees, or other structural load) falling or structurally imposed on distribution pole lines to measure the impact on the withstand capabilities of the poles, conductors, crossarms, down guys and other equipment installed on the distribution poles. The EPRI report provides detailed findings associated with each component scenario tested. A summary of the study results concluded that the pole top circumference was the largest determining factor for the performance of the poles subject to dynamic stresses, such as tree impacts on distribution lines. Performance in terms of energy increases as a function of the top circumference to at least the fourth power. In the case of a 40' Class 4 pole (31.5" circum.) versus a 40' Class 2 (38.5" circum.) pole, the Class 2 pole impact force withstand capability will be approximately 60% greater than the Class 4 pole.

The second study was conducted by UC Synergetic in 2013 and titled *Structural Analysis of Distribution Designs – Northeast Utilities*.⁶⁰ The overview states that the study is to perform structural analysis on a variety of distribution wood pole structure designs so that a quantitative analysis can be developed to optimize designs for storm resiliency. This study also looked at the impact of trees falling on lines and the ability to withstand ice loading. All analysis was based on PLS-CADD™ models for all components of a distribution line including poles, conductor, crossarms, insulators and other structural supports. The analysis modeled simulations of trees falling onto distribution lines for the following scenarios:

- NESC Heavy Loading (1/2" Ice at 40 MPH Wind)
- 1/2" Ice at 0°C
- 3/4" Ice at 15°C
- 95 MPH wind at 60°C

These parameters fit very closely to the Eversource Storm Resiliency Guidelines. Conclusions are as summarized.

⁵⁹ EPRI, *Distribution Grid Resiliency: Overhead Structures*, December 2015.
<https://www.epri.com/research/products/000000003002006780>

⁶⁰ Salam, *Age-Dependent Fragility and Life-Cycle Cost Analysis of Timber and Steel Distribution Poles Subjected to Hurricanes*

- Class 3 poles failed in all NESC Heavy Loading cases
- Class 2 poles passed the light tree (1,500 lbs.) simulation but failed in the heavy tree (3,840 lbs.) simulation
- Class 2 and 3 poles passed in the light and heavy tree simulations for ½” and ¾” ice
- Class 3 poles failed in 95 MPH simulation

It should be noted that during a storm event (or any outage event on a distribution line), a pole failure is the least desirable outcome, as pole replacements are typically the most difficult and costly to repair compared to replacing conductors or crossarms. Splicing conductors, replacing crossarms or insulators would be preferable to reduce costs and outage durations.

The results of the two studies present both an in-the-field and a calculated example of the benefit of larger class poles to prevent distribution line outages from trees falling on distribution lines and extreme ice and wind loading. The study’s findings complemented each and bear out that the decision by Eversource to change to a minimum of Class 2 wood poles will reduce distribution line outages.

Business Case/Cost Analysis

The information contained in the two studies constitutes the majority of the business case for the specification of a Class 2 wood pole as the minimum size, with the exception of the financial consideration. The table below shows the installed cost of the typically used pole sizes comparing the Class 3 with the Class 2, provided by Eversource.

Figure 5-4. Comparison of wood pole installed costs by size and class

Pole Size (Southern yellow pine, CCA treated)	Class 3 Installed Cost	Class 2 Installed Cost	Class 2 Cost Differential
40 ft length	\$1,403	\$1,440	+2.6% (\$37)
45 ft length	\$1,475	\$1,540	+4.4% (\$65)
50 ft length	\$1,554	\$1,586	+2.1% (\$32)

Source: Eversource internal data

The installed cost difference between Class 3 and Class 2 poles is relatively small and the improvement in reliability (SAIFI and SAIDI) realized by using the stronger Class 2 poles coupled with the avoided cost of broken pole replacement, should quickly offset the incremental cost difference. In the case of Eversource, during 2018 storm events, the Company replaced 175 poles. The cost increase for using Class 2, 45-ft poles in these events would be \$11,375. If just eight poles, or 5%, had not failed due to use of the stronger Class 2 poles, the cost savings would be justified.

Figure 5-5. Eversource count of broken poles caused by storms from 2018-2021

Storm Year	Replaced Poles
2018	175
2019	255
2020	180
2021-Q1	58

Source: Eversource internal data

From an operational perspective, reducing the number of pole classes needed in inventory by specifying a minimum of Class 2 poles provides the opportunity for better purchase prices, less warehousing costs, and the ability to share pole resources across distribution networks depending on localized needs.

Figure 5-6 below shows an example of a 45' Class 2 wood pole installed in 2018 with a three-phase line and multiple third-party attachments.

Figure 5-6. Example of Class 2 wood pole with fiberglass crossarm



Source: Eversource

Recommendations

The use of higher-class poles (Class 2) has been shown to prevent and reduce the outage impacts brought on by trees falling on distribution lines, heavy ice loading, and extreme wind situations experienced throughout the United States. The Company has seen a regular occurrence of major event outages causing greater chances for prolonged outages since 2008. Using Class 2 wood poles as a minimum size can reduce the number and severity of the outages with a minimal cost difference over Class 3 poles.

Based on the review of Eversource's pole standards, cost analysis and industry information, standardizing road-side distribution construction and emergency replacement utilizing Class 2 poles, within the PSNH service territory, is sound engineering judgement and within good utility practices.

5.1.3 *Spacer Cable*

Current Practices

Eversource has been using spacer cable for several decades and made it the standard overhead conductor in 2015.⁶¹ Since 2015, the Company has installed approximately 386 miles of 35 kV spacer cable. Although there are no formal plans to replace all open wire bare conductor with spacer cable, current design guidelines established in 2016 specify the use of spacer cable for all new three-phase primary distribution lines. Spacer cable continues to be used to replace open-wire bare primary on a case-by-case basis to improve performance and reliability of specific areas. Tree wire is used on a limited basis for single phase laterals and will not be addressed in this report.

The implementation of the Eversource Storm Resiliency Guidelines in 2016 was a strategic response to outages due to an increase in severe weather events that occurred prior to 2016. These events, comprised of wind and ice storms, had led to an increase in widespread tree related outages, and in many cases, severe damage. The guideline recommendations covered the increased use of steel poles, Class 2 wood poles, spacer cable, fiberglass crossarms, and other solutions covered in this report.

Eversource staff indicated the 2016 design guidelines, that expanded the use of spacer cable, were driven by a variety of advantages over the use of open wire bare conductor designs. These advantages include:

- Minimized temporary faults due to tree branches and incidental animal contact
- Ability to survive larger tree and limb falls while remaining in-service
- Less space required on the pole than an open wire design, minimizing ROW requirements
- Smaller tree trimming envelopes

⁶¹ Interview with Eversource Standards Group, March 18, 2021

- NESC Rule 230D, Covered Conductors⁶² compliant

Typical Usage and Installation Practices

Eversource has standardized the following spacer cable sizes. Each of these insulated cables are covered in a rugged polymer jacket:⁶³

- 795 mcm AAC (all aluminum conductor) 35 kV and 15 kV (Standard)
- 556 AAC 25/30 kV
- 477 mcm AAC 35 kV and 15 kV (Standard)
- 336 mcm AAC 25/30 kV
- 1/0 ACSR/AW (aluminum cable, steel reinforced with an Alumoweld core) 35 kV, 25/30 kV and 15 kV (Standard)

The Company purchased several high-strength messenger wire types, but the 052 AWA is the most used. The 052 AWA is a bare wire, and the description indicates it is a 7-strand wire having 5 strands of Alumoweld wire and 2 strands of aluminum wire. The combined cable is electrically equivalent to 1/0 aluminum. The messenger wire is the system neutral, except in rare situations that may require a separate neutral wire.

The spacers and the anti-sway bracket are made of track resistant UV protected polymer. The spacers have four integral clamps for the cables and messenger wire. The clamps can be opened and closed if needed to temporarily remove a cable from the spacer to allow for repairs or for splicing.

⁶² 2017 National Electric Safety Code Section 230D

⁶³ Eversource Energy Material Standards MAT C-2

Figure 5-7. 35 kV MGY and Below – Spacer Cable Construction Tangent and Small Corner

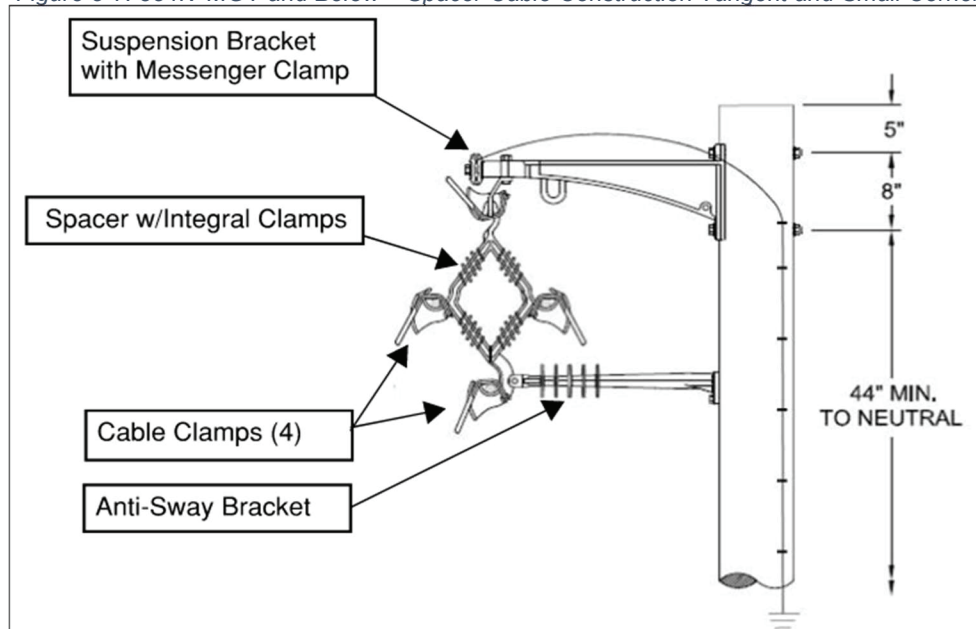


Figure 5-7 above from Standard DTR 10-738 illustrates a 35 kV three phase spacer cable tangent pole and components. The three 35 kV cables are clamped into their positions on the spacer and the spacer is suspended from the messenger wire. The messenger is then installed and secured to the metal suspension bracket. The anti-sway bracket is used to restrict the movement of the spacer cable assembly and is not used on every pole.

Industry and Utility Findings

Spacer cable was invented in the 1950's and has been in use industry-wide for several decades. It is an established, readily available component used to enhance system resiliency and reliability.⁶⁴ According to Hendrix - Kerite Wire and Power Cable, spacer cable is used by over 50 investor-owned utilities, such as National Grid, Avangrid, AEP, Georgia Power, PG&E, Entergy, and over 75 Cooperatives and Municipals throughout the USA and is commonly reflected in their distribution standards. TRC has direct design experience with many of the utilities that specify spacer cable for their distribution system.

Spacer cable installations have been the most prevalent in forested areas throughout the USA. They are specified to enhance the system to combat tree related outages resulting from high winds and ice loading conditions. It is also used in congested alley ways and along busy streets to improve clearances to buildings, signs, and other structures. Spacer cable is not limited to short span situations. River crossings in excess of 1500 feet have used spacer cable to provide clearance over water for sail boats and commercial river traffic.

⁶⁴ EPRI, Distribution Grid Resiliency: Overhead Structures.

Business Case

As noted above, spacer cable has several important benefits compared to open wire bare conductor designs. The first two directly address tree-related outages, which is the leading cause of outages at Eversource. The Company has seen a decrease in both SAIFI and SAIDI over the ten-year period ending in 2020. It is not possible at this time to determine how much of that decline is attributed specifically to spacer cable, but it is a component of the overall resiliency program along with other equipment addressed in this report.

For additional information on spacer cable and other active resiliency/reliability methods and metrics, refer to the IEEE Report PES TR83 “Resiliency Framework, Methods, and Metrics for the Electricity Sector” published in 2020⁶⁵, see especially Section 6.1 on page 22.

Benefits associated with spacer cable are:

- **Spacer cable minimizes temporary faults due to tree and incidental animal contact.** Spacer cable is an insulated cable constructed with a thick UV protected polymer jacket; tree branches, twigs, etc. that fall across phases do not result in recloser operations or sustained outages. The same holds true for branches laying across the messenger and phase. Animal related outages, those due to metalized balloons, vandalism, etc. are also minimized for the same reason. Furthermore, these objects can be removed during normal working hours thus avoiding an overtime callout. In some cases, a bucket truck is not needed, just a line mechanic with hook stick. Figure 5-8 below shows outages with bare wire compared to spacer cable installations for Northeast Utilities over a five-year period. Overall, spacer cable has been attributed to a 75% outage reduction for this study.
- **Spacer cable has a demonstrated ability to survive larger tree and limb falls⁶⁶⁶⁷.** Spacer cable does have its limits and there are trees and limbs heavy enough to break the messenger, poles, etc. However, as illustrated in Figure 5-9 and Figure 5-10 below, spacer cable has a higher tolerance for such events. These images show a substantial tree limb has broken away and come to rest on an Eversource spacer cable segment, without resulting in an outage. Details of trees on conductor testing are included in the referenced EPRI report.
- **Spacer cable requires a smaller tree trimming envelope.** Since the cables are insulated and resistant to physical damage from tree branches, etc., tree trimming corridors along the line offer the potential of being reduced in width. Figure 5-11 below shows the Eversource 8 Foot clearance zone spec. Note that with a 10 ft. crossarm, the clearance envelope is 26 ft. If spacer cable is used, the trimming zone is reduced to about 19 ft.
- **Spacer cable can be used to solve encroachment problems by eliminating the overhanging of energized conductors over private property.** Some property owners refuse to have trees trimmed, and spacer cable can be a solution. Figure 5-12 below is

⁶⁵ IEEE Report PES TR83 “Resiliency Framework, Methods, and Metrics for the Electricity Sector”

⁶⁶ EPRI, Distribution Grid Resiliency: Overhead Structures.

⁶⁷ UC Synergetic.

an Eversource photo showing a situation where the customer refused to allow tree trimming. This is a good example of where space cable could be utilized to reduce the risk of an outage event.



- **A spacer cable circuit occupies less space on the pole than an open wire design.** This translates into more efficient use of existing poles. For example, in Figure 5-13 below, an additional circuit was installed adjacent to the existing one using the same bolt-holes, thus avoiding a pole change-out.
- **Spacer cable is NESC Rule 230D⁶⁸ compliant.** Rule 230D allows the use of spacer cable and states the clearance between conductors of the same or different circuits, including grounded conductors, may be reduced below the requirements for open conductors when the conductor covering provides sufficient dielectric strength to limit the likelihood of a short circuit in case of momentary contact between conductors or between conductors and the grounded neutral. Intermediate spacers may be used to maintain conductor clearance and support. (See Figure 5-13)

The following photos and graphics illustrate some of the benefits of spacer cable described above:

Figure 5-8. Outages based on 100 circuit miles/year over Five years

Cause of Outage	Bare Wire		Spacer Cable	% Reduction
Tree Related	17.6		1.8	90
Animals	12.1		2.9	76
Lightning	3.4		1.0	71
Unknown	5.9		1.0	83
All Other	11.3		5.9	48
Total	50.3		12.5	75

Northeast Utilities 5 Year Statistics
Based on 100 circuit miles per year

Source: Hendrix Aerial Cable Systems

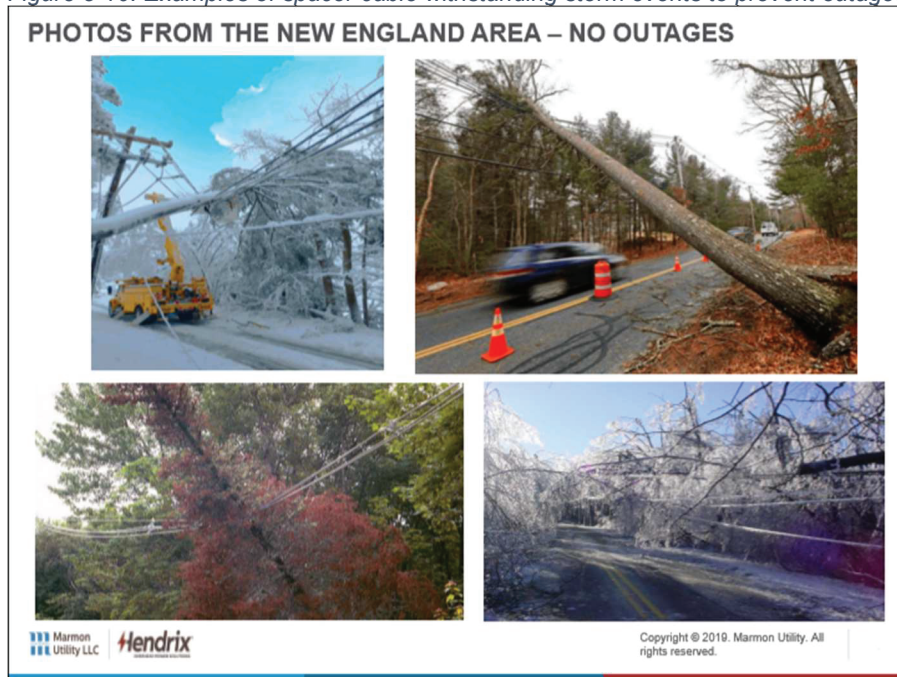
⁶⁸ 2017 National Electric Safety Code Section 230D

Figure 5-9. Photo of a tree incursion on an Eversource line using spacer cable that remained intact



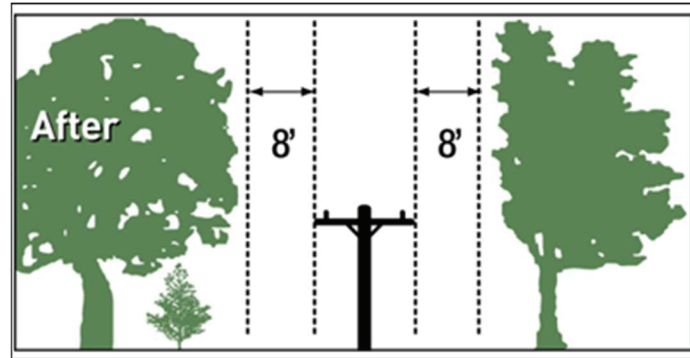
Source: Eversource

Figure 5-10. Examples of spacer cable withstanding storm events to prevent outages



Source: Marmon/Hendrix (used with permission)

Figure 5-11. Example of enhanced tree trimming clearances needed for a typical mainline circuit; less clearance is needed for spacer cable installations due to lower profile of installations.



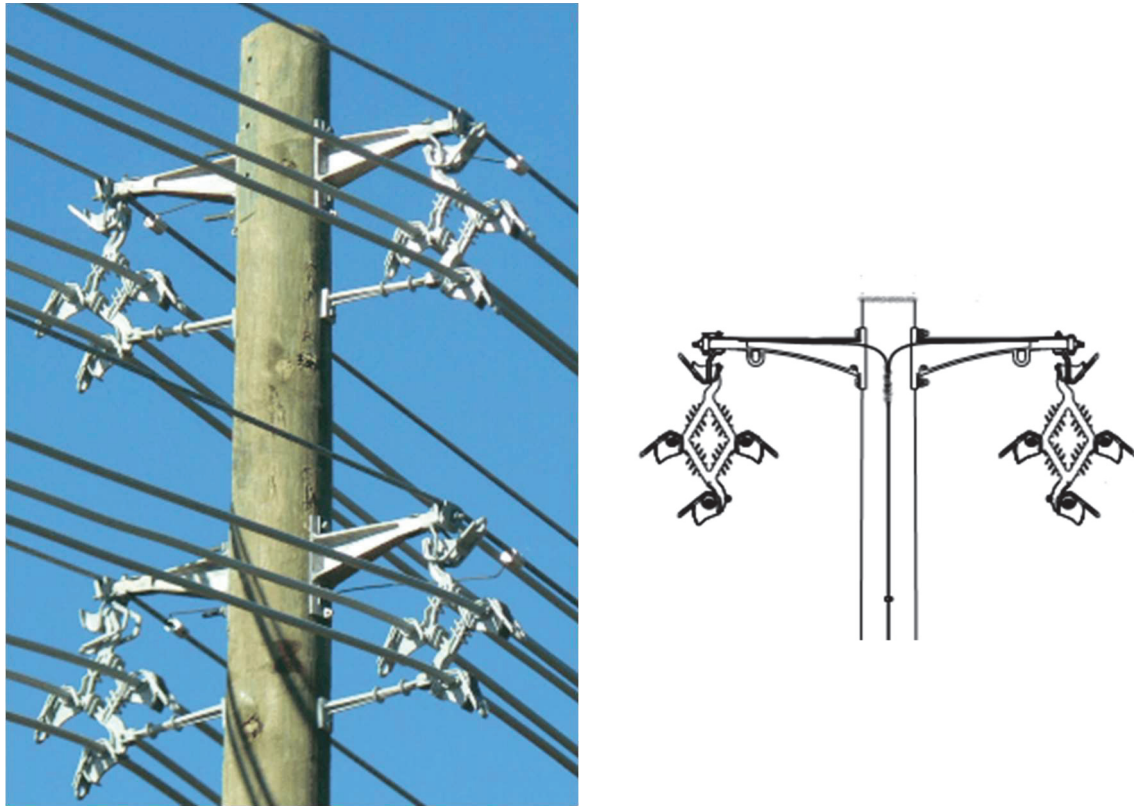
Source: Eversource ETT Specifications

Figure 5-12. Example of an open-wire cable distribution line with vegetation encroachment due to a customer's refusal to allow tree trimming.



Source: TRC Field Inspection

Figure 5-13. Image and graphic of spacer cable design showing compact nature of installations



Source: Marmon/Hendrix and TRC

Cost Analysis

Spacer cable construction requires a greater upfront cost than open bare wire conductor. The two scenarios in Figure 5-14 represent the Company's estimated costs to construct a mile of a three-phase open wire bare conductor line and a mile-long spacer cable line. Both scenarios have the same periodic inspection costs for circuits built using wood pole construction. Based on TRC's experience, the total cost difference is generally consistent with vendor information and other utilities.

- 1) The benefits of using spacer cable can be attributed to directly improving system reliability and resiliency. The cost savings, as described earlier in this report, remains a critical challenge for utilities and regulators, as the benefits are difficult to monetize. Avoided costs include those incurred due to outages and maintenance and construction.

Figure 5-14. Estimate Cost per Mile of Three-Phase Open Wire Bare Conductor and Spacer Cable

	Labor	Materials	Overheads	Total
Open Wire Bare Conductor	\$24,167	\$31,238	\$47,043	\$102,448
Spacer Cable	\$44,954	\$66,684	\$93,760	\$205,398

Source: Eversource internal data

Recommendations

Spacer cable is an essential component to a comprehensive resiliency and reliability program that will also include expanded use of steel poles, stronger wood poles, fiberglass crossarms, and a robust ROW vegetation clearing program. Tree contacts remain the leading cause of outages. Despite these measures, trees will continue to fall over, and limbs and branches will continue to break, some of which are light enough to be taken by the wind into the wires. Utilities are required to obtain authorization from property owners to trim trees, and some property owners are unwilling to grant the necessary authorization. Spacer cable prevents or minimizes those tree-related outages that occur regardless of a robust ROW clearing program. Spacer cable can reduce or eliminate outages due to animals, vandalism, etc. Overtime callouts to correct these and tree related situations can be reduced.

TRC recommends the following:

- Continue the spacer cable program as outlined in the Eversource’s 2016 Resiliency Guidelines.
- As part of the capital planning process, accelerate the rebuilding/reconducting of the open wire, three phase lines that are the most susceptible to outages in heavily treed and narrow ROW areas over the next 5-years. Work in conjunction with the inaccessible line relocations to the roadside and steel pole installation projects in the steel pole section.

5.1.4 Fiberglass Crossarms

Current Practices

Eversource has been using fiberglass crossarms for approximately five years beginning around the third quarter of 2016; fiberglass crossarms were integrated into their standards at the same time.

Although there are no formal plans to replace all existing wood crossarms with fiberglass, current design guidelines in 2016⁶⁹ specify their use for all new construction and on an as-needed basis resulting from pole inspections and observations.

⁶⁹ Eversource, Reliability – Storm Resiliency Guidelines.

The implementation of the 2016 design guidelines was a comprehensive response to outages due to an increase in severe weather events that occurred prior to 2016. These events, comprised of wind and ice storms, led to an increase in tree related outages, and in many cases, severe damage. Eversource SMEs indicated the decision to update their standards to use fiberglass crossarms was driven by a variety of perceived advantages over wood arms. These advantages include:

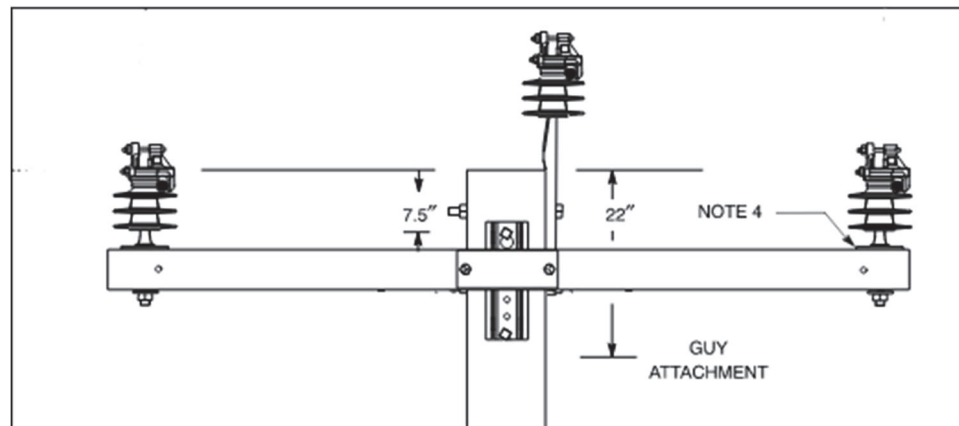
- Improved Longevity
- Ease of Installation
- Greater Material Uniformity and Consistency
- Improved Reliability

Typical Usage and Installation Practices

The Company standardized on several fiberglass cross arm sizes. This report will focus on the 10-foot tangent and 10-foot dead-end arm, the most used size.

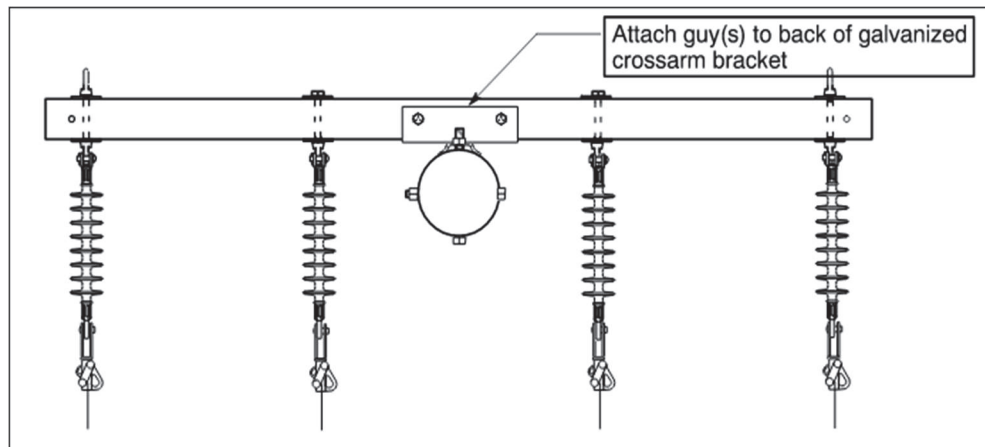
Fiberglass arms do not require braces as wood arms do; they are delivered with 2-hole metal mounting brackets as can be seen in Figure 5-15 and Figure 5-16 below.

Figure 5-15. 27.6kV Fiberglass Crossarm Construction, Three-Phase Small Angle/Tangent Pole



Source: Eversource Energy Construction Standard DTR 11.211

Figure 5-16. 27.6 kV Fiberglass Crossarm Construction, Three-Phase Dead-end Pole



Source: Eversource Energy Construction Standard DTR 11.219

Industry and Utility Findings

The use of fiberglass crossarms began in the early 1990's; fiberglass is not new to the electric energy industry. Because fiberglass is a good electrical insulator, it has been used in products since the late 1950's such as bucket truck booms, and later, in electrical products such as guy insulators. Vendors began shipping crossarms in the early 1990's and two of the larger manufacturers claim to have delivered over 7 million crossarms since then. Many IOUs and others are now using fiberglass arms including National Grid, Avangrid, AEP, Georgia Power, PG&E, Entergy, and many Cooperatives and Municipals throughout the USA. One of the important applications is on distribution steel poles and to support distribution lines on steel transmission structures. The longevity of fiberglass arms is a good match to the longevity of steel poles.

Business Case

As noted above, fiberglass crossarms have several important benefits when compared to wood. Benefits associated with fiberglass crossarms are:

- **Improved Longevity:** Fiberglass crossarms are not susceptible to decay, insect, or woodpecker damage. Fiberglass crossarms are constructed with integral UV protection, not just in the surface coating, and are considered to have a life expectancy of 60+ years according to manufacturers such as PUPI. Because of this longevity, fiberglass arms are a good match for installation on steel poles.
- **Withstanding splitting and decay:** Wood crossarms are susceptible to longitudinal and end splitting, allowing moisture to collect and remain in the wood, thus promoting decay. Wood arms are often damaged by woodpeckers, insects, and weathering. Figure 5-17 below illustrates the problem, although both insects and decay were probably involved. Note that a visual inspection from the ground most likely would not have caught this.
- **Ease of Installation:** Fiberglass crossarms are lighter and easier to handle, weighing just up to 1/3 the weight of wood arms. They typically do not need braces, which are necessary with comparable wood arms. Fiberglass crossarms, both tangent and dead-end, include an installed two-hole metal mounting bracket, and therefore take less time

to install on poles. The mounting bracket on the dead-end arms also includes guy attachment points, which is an advantage.

- **Greater Material Predictability:** Fiberglass crossarms are an engineered, manufactured product using controlled processes and materials that offer a uniform product with consistency. Conversely, wood is a highly variable material. Even newly processed wood crossarms can have naturally occurring internal voids and defects. This variability is compensated for by applying load factors, as outlined in the NESC 253, when making strength calculations. The amount of wood preservative retained in the wood, typically pentachlorophenol (PCP)⁷⁰, lessens with time. As a result, the strength of wood crossarms degrade over time. Figure 5-18 shows the components of a typical fiberglass crossarm.

These benefits translate into improved resiliency and reliability of fiberglass cross arms compared to wood.

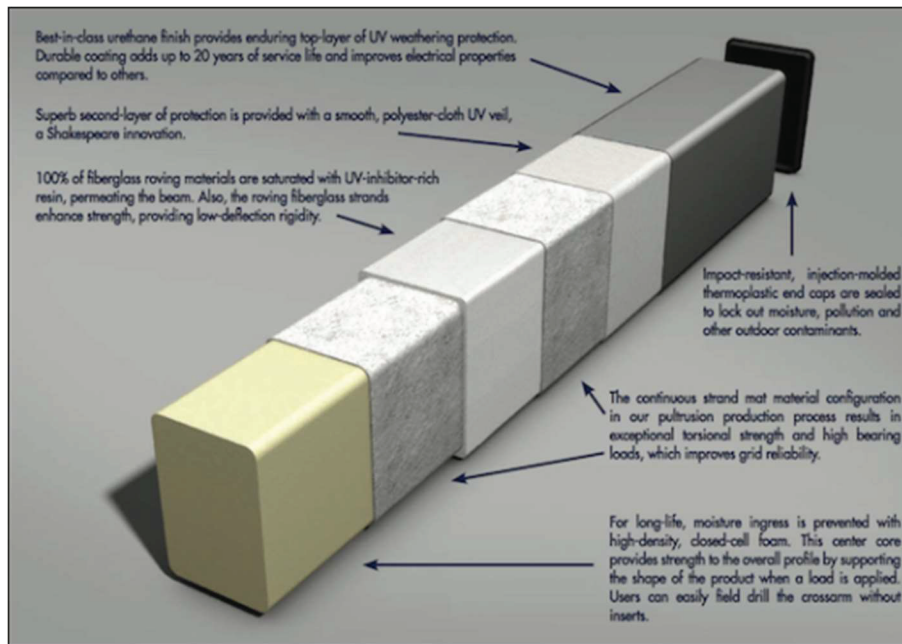
Figure 5-17. Insect Damage on an Eversource Wood Crossarm



Source: Eversource Photo

⁷⁰ In a March 9, 2021 article in the Chemical & Engineering News (C&EN) a publication of the American Chemical Society “The End of Pentachlorophenol is Near”, the Environmental Protection Agency (EPA) is considering banning the use of PCP as a health risk. This comes on the heels of an announcement from the only producer of PCP in North America that it was shutting down its PCP production.

Figure 5-18. Fiberglass Crossarm Composition Drawing



Source: Valmont/Shakespeare

Longevity and strength are the keys to reliability. As noted earlier, fiberglass crossarms have exceptional longevity, 60+ years. According to a report by Electric Power Research Institute titled *Distribution Grid Resiliency: Overhead Structures*⁷¹, fiberglass crossarms are approximately 30% stronger than wood and have superior electrical properties. This study notes that their use is now considered a common industry practice.

One study conducted to optimize designs for storm resiliency looked at a variety of distribution wood pole structure designs, as well as the impact of trees falling on lines and the ability of these structures to withstand ice and wind loading.⁷² All analysis was based on PLS-CAD™ models for all components of a distribution line, including poles, conductor, crossarms, insulators and other structural supports. The analysis modeled simulations of trees falling onto distribution lines for the following scenarios:

- NESC Heavy Loading (1/2" Ice, wind at 40 MPH)
- 1/2" Ice at 0°C and 3/4" ice at 15°C
- 95 MPH wind at 60°C

The simulations included 8 ft. and 10 ft. fiberglass and wood crossarms and found:

⁷¹ EPRI *Distribution Grid Resiliency: Overhead Structures*

⁷² UC Synergetic, *Structural Analysis of Distribution Designs – Northeast Utilities*

- For the NESC Heavy Loading case, fiberglass crossarms passed all cases, including the heavy tree simulation (3,840 lbs.). Wood crossarms failed the heavy tree simulation.
- For the ½” and ¾” icing cases, wood and fiberglass arms passed the light tree (1500 lbs.) simulation.
- For the 95 mph. wind test, fiberglass arms passed all cases, while wood arms failed in several.
- The simulations that focused on dead-end structures showed that wood crossarms were utilized to more than 80% of capacity. Fiberglass arms showed a capacity 5 times greater than wood arms.

It should be noted that during storm events, broken poles present the most challenging problems, with crossarms a close second. In some cases, special equipment, such as dozers or cranes, are needed just to deliver the normal equipment and materials to the damage site. However, replacing crossarms, installing conductor splices, pins or insulators can be less dependent on specialized equipment. In some cases, with fewer broken large components, the repair work can be accomplished by line personnel utilizing their climbing skills.

Cost Analysis

The cost analysis model below looks at both the lifecycle and present worth costs to install 10 ft. fiberglass and wood tangent arms, as well as dead-end arms, on wood poles. Additional assumptions for this analysis include:

- The life of the wood pole is assumed to be 45 years.
- Wood crossarms are expected to be replaced at 25 to 30 years.
- Fiberglass crossarms do not require replacement for the life of the pole.
- The periodic maintenance cost of \$2.14 is for a visual inspection of the installed cross arms (wood and fiberglass), which is assumed to be conducted concurrently with the periodic pole inspection.

The life-cycle cost analysis with a wood crossarm replacement midway through the life of the wood pole shows the fiberglass crossarm is a better investment over the life of the pole.

Figure 5-19. Wood and Fiberglass Crossarm Lifecycle & Present Worth Costs

Project	Initial Cost	Year 10	Year 20	Wood Arm Replacement (25-30 years)	Year 30	Year 40	Year 50	Year 60	Life Cycle Cost	Present Worth Cost
Fiberglass arm, Tangent	\$ 170.23	\$ 2.88	\$ 3.87	\$ -	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 211.14	\$ 538.05
Labor	\$ 12.15	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12.15	
Materials	\$ 122.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 122.00	
Overhead	\$ 33.94	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 33.94	
Maintenance	\$ 2.14	\$ 2.88	\$ 3.87	\$ -	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 43.05	
Wood arm, Tangent	\$ 96.83	\$ 2.88	\$ 3.87	\$ 337.70	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 475.43	\$ 318.62
Labor	\$ 18.25	\$ -	\$ -	\$ 38.21	\$ -	\$ -	\$ -	\$ -	\$ 56.46	
Materials	\$ 51.77	\$ -	\$ -	\$ 239.74	\$ -	\$ -	\$ -	\$ -	\$ 291.51	
Overhead	\$ 24.67	\$ -	\$ -	\$ 51.65	\$ -	\$ -	\$ -	\$ -	\$ 76.32	
Maintenance	\$ 2.14	\$ 2.88	\$ 3.87	\$ 8.09	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 51.14	
Fiberglass arm, Deadend	\$ 335.53	\$ 2.88	\$ 3.87	\$ -	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 376.44	\$ 1,049.28
Labor	\$ 12.15	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12.15	
Materials	\$ 260.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 260.00	
Overhead	\$ 61.24	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 61.24	
Maintenance	\$ 2.14	\$ 2.88	\$ 3.87	\$ -	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 43.05	
Wood arm, Deadend Dbl	\$ 223.62	\$ 2.88	\$ 3.87	\$ 734.51	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 999.04	\$ 662.69
Labor	\$ 54.71	\$ -	\$ -	\$ 114.55	\$ -	\$ -	\$ -	\$ -	\$ 169.26	
Materials	\$ 103.54	\$ -	\$ -	\$ 479.48	\$ -	\$ -	\$ -	\$ -	\$ 583.02	
Overhead	\$ 63.23	\$ -	\$ -	\$ 132.39	\$ -	\$ -	\$ -	\$ -	\$ 195.62	
Maintenance	\$ 2.14	\$ 2.88	\$ 3.87	\$ 8.09	\$ 5.19	\$ 6.98	\$ 9.38	\$ 12.61	\$ 51.14	

Recommendations

Fiberglass crossarms are an essential component to any system hardening and resiliency program. Benefits include:

- The longevity of fiberglass crossarms, and consistency maintained by the manufacturing process. Fiberglass crossarms are stronger than wood arms of similar dimensions and have superior electrical properties. Their use is now considered a common industry practice.
- Fiberglass arms are stronger and more predictable than their wood counterparts
- Fiberglass arms are easier to install because they are lighter than wood. They are typically delivered with mounting hardware installed and predrilled holes.
- Fiberglass crossarms are cost effective based on the lifecycle cost.

TRC recommends continuing the use of fiberglass crossarms instead of wood crossarms for all new line construction, line rebuild projects and replacement of existing crossarms for maintenance. Crossarm inspection and replacements should also continue to be part of the pole inspection program to identify failing crossarms.

5.2 Vegetation Management

Current Practices

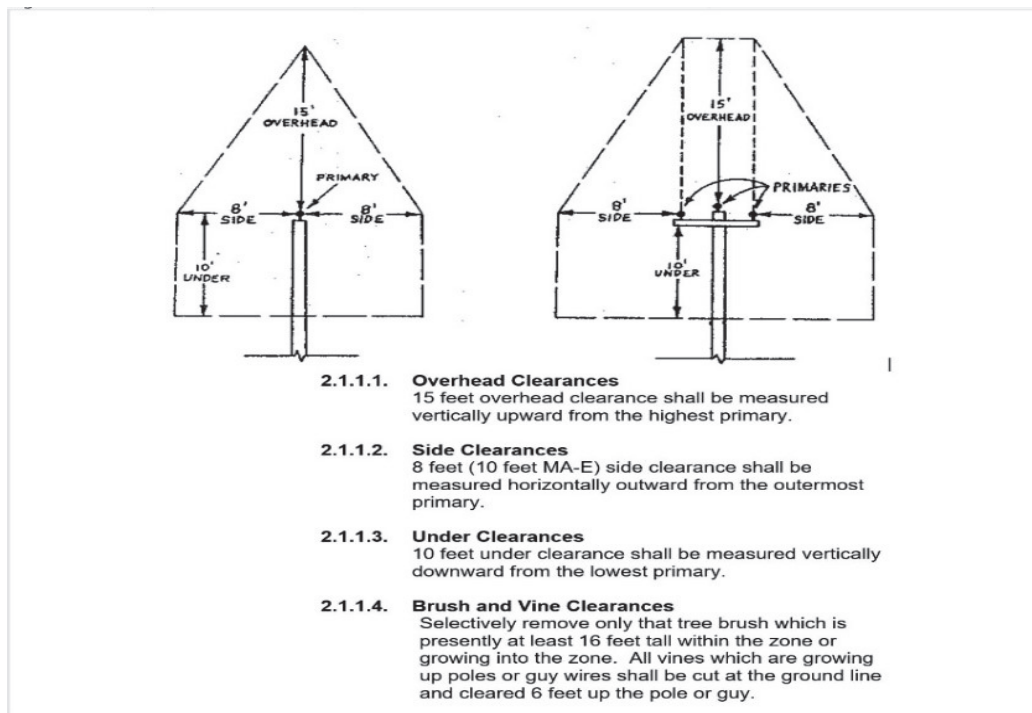
New Hampshire is ranked second in the United States for forest cover, with an estimated 84% timberland, according to the U. S. Department of Agriculture Forest Service.⁷³ Eversource has approximately 12,200 miles of overhead distribution lines in New Hampshire which are subject to vegetation management. Presently, Eversource implements four vegetation management methods: Scheduled Maintenance Trimming (SMT), Enhanced Tree Trimming (ETT), Full width ROW clearing (ROW), and Enhanced Hazard Tree Removal (ETR), which are detailed below.

SMT: Eversource is within the New Hampshire Public Utility Commission's mandate of a 60-month cycle schedule for SMT. Eversource currently follows this trim cycle targeting approximately 2,400 miles per year. Eversource has attempted to reduce the cycle length to 4.5 years by addressing additional mileage when possible. The Eversource Specification for both single phase and three phase construction calls for the following, as shown in Figure 5-20:

- 15 feet of overhead clearance measured vertically from the highest primary conductor.
- 8 feet side clearances measured horizontally outward from the outermost primary conductors.
- 10 feet under clearance measured vertically downward from the lowest primary conductor.
- Selective removal for brush and vine clearance; only the tree brush which is presently at least 16 feet tall within the removal zone should be removed. All vines growing up poles or guy wires should be cut at the ground line and cleared 6 feet up the pole or guy.

⁷³ USDA, Forest Inventory and Analysis Fiscal Year 2016 Business Report. Page 71-72. Table B-11. Land and forest area and FIA annualized implementation status by State and region, FY 2016. (Percentages for states derived by dividing third column by second column.) Data for territories: Page 70: Table B-10. Status of FIA special project areas excluded from annualized inventory. Retrieved January 8, 2019

Figure 5-20. Eversource SMT Specifications



ETT: For 2021, ETT is scheduled to be performed on approximately 50 miles of backbone or mainline circuits and on some poorer performing circuits selected from Eversource reliability data and other performance factors. In 2020, 49 miles were addressed. The average mileage over between 2014 and 2020 was approximately 80 miles annually. To date, approximately 1,100 miles of the 1,600 miles of backbone mainline have been completed. The ETT specifications call for 8 feet side clearances, measured horizontally outward from the outermost primary conductor to either side of the utility poles and primary conductor from the ground up. This includes removal of:

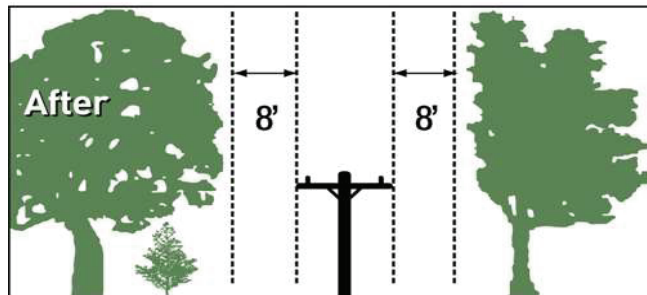
- All overhanging limbs. If overhanging limbs cannot be 100% removed, the tree should be considered for removal. If greater than 1/3 of the tree is to be trimmed to meet the overhang requirement, then the entire tree is to be removed.
- All brush and all trees within the clearance zone.
- All vegetation 10 feet around poles and guying systems.

Additionally, specifications state that:

- Consent forms and details about tree work will be delivered to each property owner in advance of any work performed. Property owner consent is required in writing. Any refusal will be documented and submitted to Eversource weekly.
- Arborist will field verify the completed work.

ETT is only performed on a backbone portion of a circuit one time. Future vegetation management is performed with SMT.

Figure 5-21. Eversource ETT Specifications



Full-Width ROW Clearing: ROW clearing allows an easement that has been encroached upon with vegetation to be fully cleared and restored to the full easement width from when the line was originally constructed. Once restored, future vegetation management will be performed with SMT.

ETR: ETR involves the identification, and complete removal of trees determined to be a reliability impact to the distribution lines, both within and outside standard trimming zones. During the SMT cycle,⁷⁴ trees are identified that may fail or are a threat to electrical facilities or public safety. These trees are inspected by arborists in the fall zone (i.e., the area outside of the roadside clearance zone where an uprooted tree could strike the conductor and cause an outage).

Trees identified for removal in the fall zone will be approved by the property owner or their representative prior to removal. If consent is denied, the tree will remain as a hazard.

The following contingencies are considered:

- If greater than 1/3 of the tree is to be trimmed via SMT, ETT, or ROW clearing, the tree should be removed as an in-zone removal.
- If a tree is not a hazard at present, but a customer wants it removed regardless, the tree should be removed after being approved by the Owner's Representative. Tree species and form, future maintenance costs, and aesthetics should be considered.

The Company's SMEs indicated that the majority of their customers live among trees. When SMT is performed, hazard trees are identified on three-phase lines and in heavy customer areas; the entire 3-phase line is looked at during SMT. A list of hazard trees is provided to the arborists, who then evaluate the trees to make the determination of which to remove. Once identified, the hazard trees are generally removed within several weeks.

⁷⁴ Since hazard trees are identified during the SMT cycle, Eversource is not likely to revisit a circuit for four to five years.

Industry and Utility Findings

Vegetation management is performed in accordance with the Vegetation Management Document Number 5.60, Rev 2, which states, “Work is performed in compliance with OSHA 1910.269 and ANSI Z133.1 safety standards, ANSI A300 Pruning Standards, International Society of Arboriculture Best Management Practices for Utility Pruning and Eversource’s Specification for Distribution Line Clearance Tree and Brush Work.” The document further states “Property owner consent for tree pruning or removal is required along public roads and on private property.”

Hazard tree removal follows the guide from The International Society of Arboriculture (ISA)’s Handbook of Hazard Tree Evaluation for Utility Arborists. Hazard trees in the fall zone are evaluated based on soil type, depth, drainage and wind susceptibility, tree growth, species, form, insect infestation and tree defects such as: cavities, nesting holes, decay conks, old wounds, 'V' crotches, poor rooting, and poor basal flare.

An article from the Transmission & Distribution World publication in June 2012⁷⁵ references the ANSI standard A300 (Part 9) for Tree Risk Assessment. The article states:

“Utility vegetation management programs have traditionally focused on preventing tree-line contact by obtaining specified clearances. While such programs certainly reduce tree-line contact and prevent some interruptions, many outages are caused by tree and branch failures that originate from outside the specified [vegetation management] scope of work. To improve system performance, utilities are increasingly focusing resources on hazard tree abatement, or, more accurately, tree risk management. Utilities can increase the value of their vegetation management investment by systematically concentrating on trees that pose the highest level of risk. Completely mitigating the risk posed by trees would require utilities to specify pruning or removing any tree with the potential to strike a utility line. Of course, this would be cost prohibitive and raise customer acceptance concerns. More importantly, it would be quite unnecessary since many trees in close proximity to utility lines pose relatively low risk. The key to improving the effectiveness of vegetation management efforts is for utilities to determine the relative level of risk posed, allocate resources to benefit the greatest number of customers, and establish written specifications that clearly define the scope of work for contracted personnel.”

⁷⁵ Transmission & Distribution World, “ANSI Standard Helps Utilities,” June 2012.
<https://www.tdworld.com/vegetation-management/article/20963624/ansi-standard-helps-utilities-manage-risk>

Business Case

One study conducted by Eversource in Connecticut, and summarized in the Journal of Environmental Management, evaluated and compared outage rates for tree related causes on backbone and lateral conductors that received ETT and lateral conductors that had not received ETT to evaluate the effectiveness of ETT on reducing tree related power outages during storm events.⁷⁶ The study, which covered the Eversource system across the entire state of Connecticut for the period 2005-2007,⁷⁷ found ETT-treated conductors had storm outage rates that ranged from 35-180% lower than the service-area's average annual outage rate for untreated conductors. Further, it found a "35-45% reduction in annual storm-related outage rates for backbone lines in storm-damaged areas, when compared to untreated laterals lines: this result is consistent with Eversource's internal performance review which attributed a 35-40% reduction in outage rates to ETT for backbone lines during major storms."⁷⁸ Additionally, the study provided empirical information to support the claim that ETT treatment has an impact on reducing power outage rates during storm conditions and referenced other industry reports that supported this claim.

Lastly, the study referenced a report that found "hazardous tree removal and "storm proof" trimming reduced outage rates by 20–30% for an electric utility in Massachusetts."⁷⁹ The findings of this study and the others referenced clearly support ETT as an effective practice to reduce outages caused by trees, particularly during storm events.

Reliability

There are two reliability measurements that are most impacted by vegetation management: The System Average Interruption Frequency Index (SAIFI) and the System Average Interruption Duration Index (SAIDI).

SAIFI: SAIFI is the average number of sustained interruptions per consumer during the year. It is the ratio of the annual number of interruptions to the total number of customers served. Figure 5-22 shows overall SAIFI by various outage cause categories between 2011 and 2020 in Eversource's New Hampshire territory. It is evident that tree related outages have been the leading cause of outage events during this time.

⁷⁶ From Journal of Environmental Management 241 (2019) 397–406 Research article "An analysis of enhanced tree trimming effectiveness on reducing power outages".

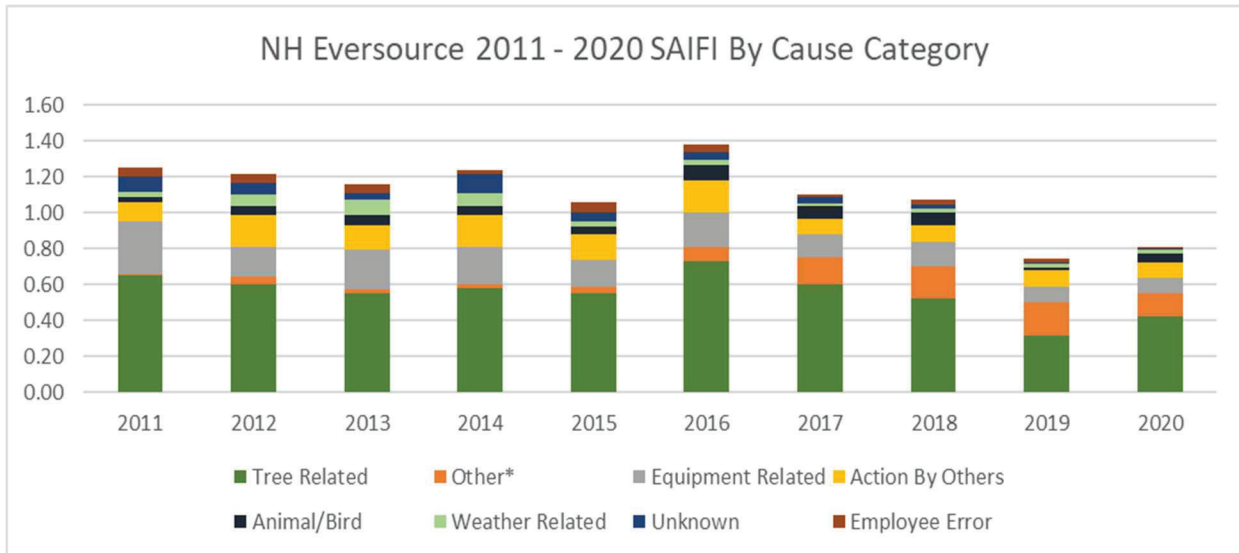
Jason R. Parent*, Thomas H. Meyer, John C. Volin, Robert T. Fahey, Chandi Witharana P398

⁷⁷ The variations for weather, tree cover, and wire type were controlled by pairing ETT-treated zones with nearby untreated zones.

⁷⁸ Journal of Environmental Management. "An analysis of enhanced tree trimming effectiveness on reducing power outages."

⁷⁹ Journal of Environmental Management. "An analysis of enhanced tree trimming effectiveness on reducing power outages."

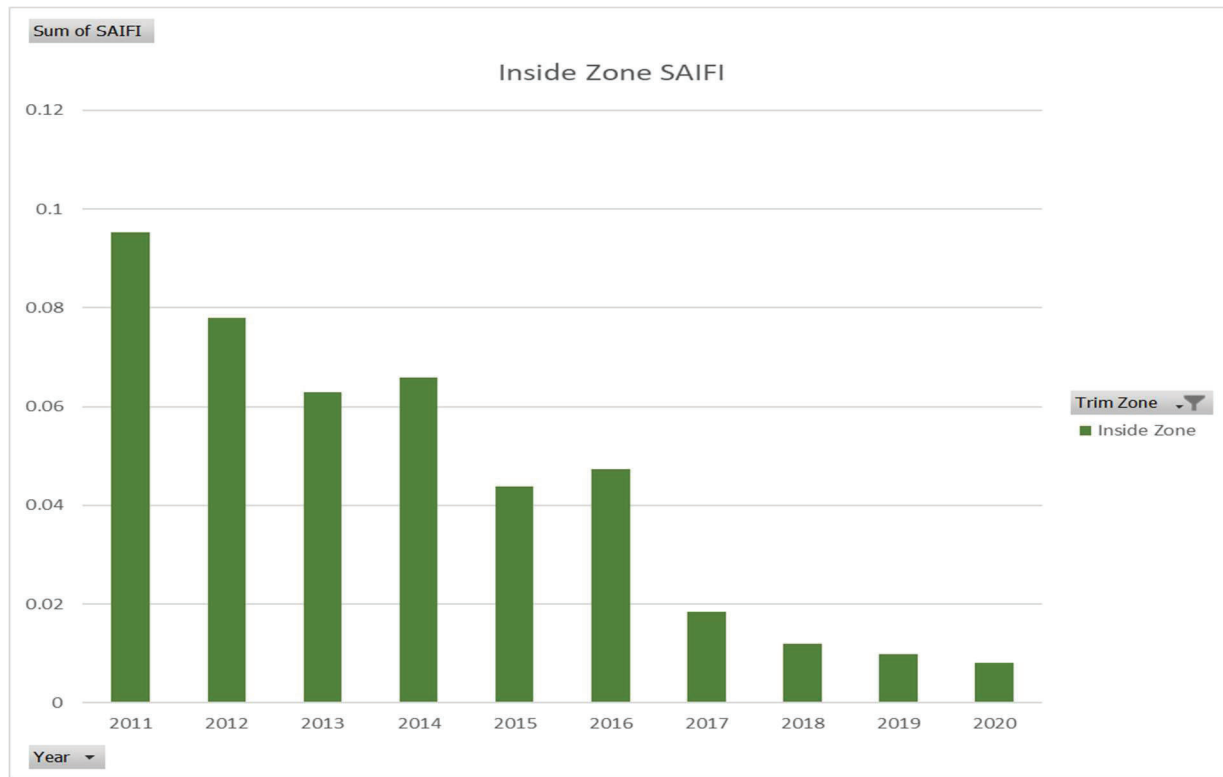
Figure 5-22. SAIFI By Causal Category



SAIFI is a common measure for tree related performance since it is impact-based rather than time-based. Reduction in SAIFI better reflects a reduction in the number of outage events.

SMT, ETT, and ROW typically affect Trees Inside Zone events. ETR involves the removal of trees both within and outside standard trimming zones and therefore affects both Trees Inside Zone and Trees Outside Zone caused outage events. Since 2011, there has been a significant reduction in SAIFI related to tree inside zone outages due to SMT, ETT and ROW as seen in Figure 5-23.

Figure 5-23. SAIFI for Tree Inside Zone Caused Outages



The eventual leveling off for SAIFI, as shown in the above figure, is expected as the zone around the primary lines are cleared and maintained. Since ETT and ROW are typically applied one time on a given distribution line as described previously, it becomes necessary to continue the current SMT program to maintain that level of SAIFI for tree inside zone caused outages.

Figure 5-24 shows vegetation growth on a single-phase distribution transformer pole that SMT will remove.

Figure 5-24. Vegetation on Distribution Transformer Pole



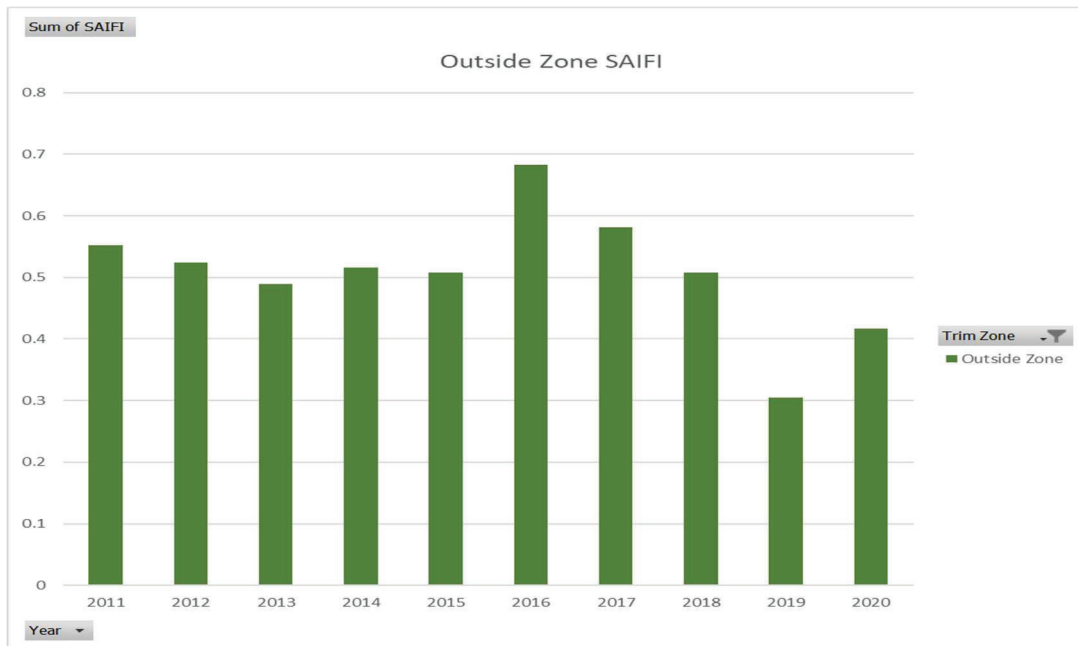
Source: TRC Field Inspections

Since 2016, there has been a downward trend in SAIFI related to tree outside zone outages as seen in Figure 5-25. The Company has direct control over the trees inside the zone due to their right to clear vegetation in the easements. For trees outside the zone, two challenges exist:

- It is difficult to identify all the trees which are either a hazard to the line either from branches breaking or trees falling into the line.
- It is not always possible to acquire permission from the property owner, which is required before trees outside the zone can be trimmed or removed.

For these reasons, the SAIFI for trees Outside Zone will not be as low as Inside Zone.

Figure 5-25. SAIFI for Tree Outside Zone Caused Outages



Trees identified by Eversource as ones that may fail and fall into a distribution primary line are removed. However, not all trees that are hazards can be identified. During the time between SMT, trees outside the zone can develop into hazards due to insect infestation, decay or other factors and cause outages.

TRC conducted visual site inspections of distribution circuits located both along roadsides and off-road in ROW. In these locations, vegetation management had been completed via SMT or ETT, with ROW clear. However, it was evident in a number of locations that there were a significant number of trees outside the zone that were more than two times the height of the distribution line. An undetected hazard tree that fails and falls toward the line would likely damage the primary and or poles. Due to the sample number of locations observed and the amount of vegetation existing outside the easement, it is unlikely that the amount of Tree Outside Zone caused outages would continue to reduce in the same manner the Trees Inside Zone metric has in recent years.

Figure 5-26 and Figure 5-27 show a portion of circuits that have been cleared with trees outside the zone.

Figure 5-26. Trees Outside Zone in Right-of-Way



Source: TRC Field Inspections

Figure 5-27. Trees Outside Zone Along Roadside



Source: TRC Field Inspections

Figure 5-28 and Figure 5-29 show a portion of a circuit before and after ETT and ETR clearing was performed. Trees on the right side are encroaching on the line including several potential hazard trees.

Figure 5-28. Eversource circuit prior to ETT clearing



Source: Eversource

Figure 5-29. Eversource circuit after ETT clearing



Source: Eversource

Figure 5-30 and Figure 5-31 show a distribution line before and after ROW clearing was performed.

Figure 5-30. Eversource circuit prior to ROW clearing



Source: Eversource

Figure 5-31. Eversource Circuit following ROW clearing



Source: Eversource

Figure 5-32 and Figure 5-33 show a before and after ROW clearing was performed to remove trees and vegetation encroaching on the right-of-way and mitigate the potential for tree contact.

Figure 5-32. Eversource circuit prior to ROW clearing



Source: Eversource

Figure 5-33. Eversource circuit after ROW clearing



Source: Eversource

The impacts of the extended times between trim cycles or reducing the annual miles to be trimmed may have a significant negative effect on reliability. One study conducted to evaluate the impact of deferring vegetation clearing on distribution lines found that the cost to clear the line after one year of deferral required a significant increase in labor and cost to bring the line clearance in line with specifications.⁸⁰ The study was conducted on three electric utility properties in the U.S. by Environmental Consultants, Inc. Field data was collected and used in a predictive model looking at labor requirements, cost impacts and biomass disposal resulting from deferred maintenance. As shown in Figure 5-34, labor time and cost both increase when SMT is deferred. The study also projected that biomass (chipped debris) could double with one year of trimming deferral which would increase the cost for removal.

⁸⁰ The Economic Impacts of Deferring Electric Utility Tree Maintenance, by D. Mark Browning and Harry V. Wiant, from Journal of Arboriculture 23(3): May 1997. pp 106 – 111. https://www.eci-consulting.com/wp-content/uploads/2017/10/Deferring-Electric-Utility-Tree-Maintenance_JOA.pdf

Figure 5-34. Impact of Deferring SMT

Number of Years Trimming is Deferred	Average Labor Time Increase	Average Relative Cost Increase
1 Year	21%	20%
2 Years	38%	37%
3 Years	52%	51%
4 Years	62%	60%

Source: Journal of Arboriculture

The study also modeled a 20 percent decrease in annual funding for a cycle-based maintenance program. Although it would seem that a 5-year cycle would increase to 6.25 years with a 20 percent decrease in annual funding, in reality, the cycle is extended much longer – to 9 years, due to the additional years’ growth beyond what would have to be managed in a 5-year cycle. This study did not account for the impact on the deferred trimming on reliability or the additional off cycle maintenance costs.

SAIDI: SAIDI is the average duration of interruptions per customer during the year, measured in minutes. It is the ratio of the annual duration of sustained interruptions to the total number of customers served.

An NHPUC Utility Analyst notes that while SAIDI is an appropriate second level decision tool for tree-based reliability enhancements, care should be taken to ensure inputs are uniform:⁸¹

“...unless the resource and geographic parameters are uniform, the SAIDI data can inflate or reduce a circuits tree performance. This is due to crew response which can be largely dictated by time of day, day of the week, number of crews that are on the property that day, or if there are concurrent outages occurring at the same time. The same location may experience different crew restoration times and therefore change the SAIDI of the tree related event month to month or year to year.”

There has been a significant reduction in SAIDI related to tree inside zone outages since 2011 as seen in Figure 5-35 and a slight downward trend in SAIDI related to tree outside zone outages since 2016 as shown in Figure 5-36.

⁸¹ Direct Testimony Kurt Demmer, Utility Analyst NHPUC, December 20, 2019, page 21.

Figure 5-35. SAIDI for Tree Inside Zone Caused Outages

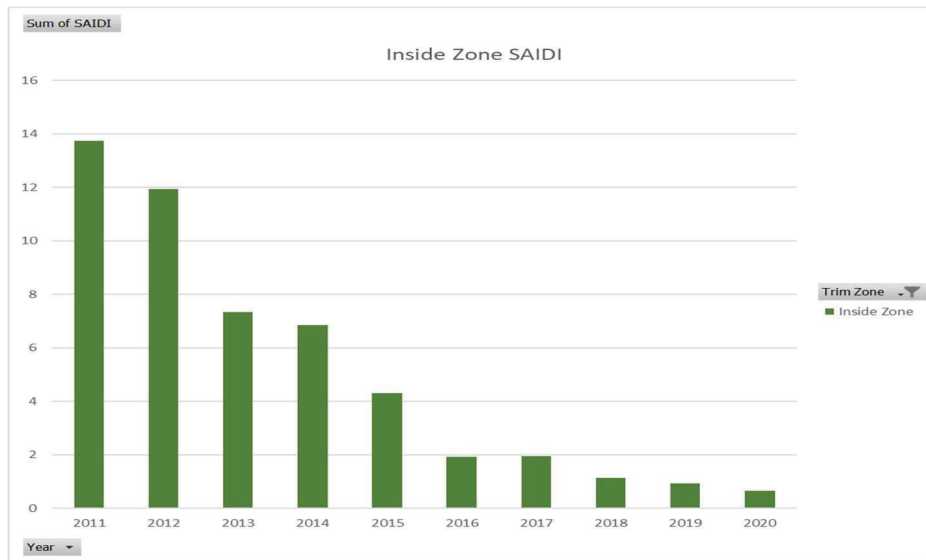
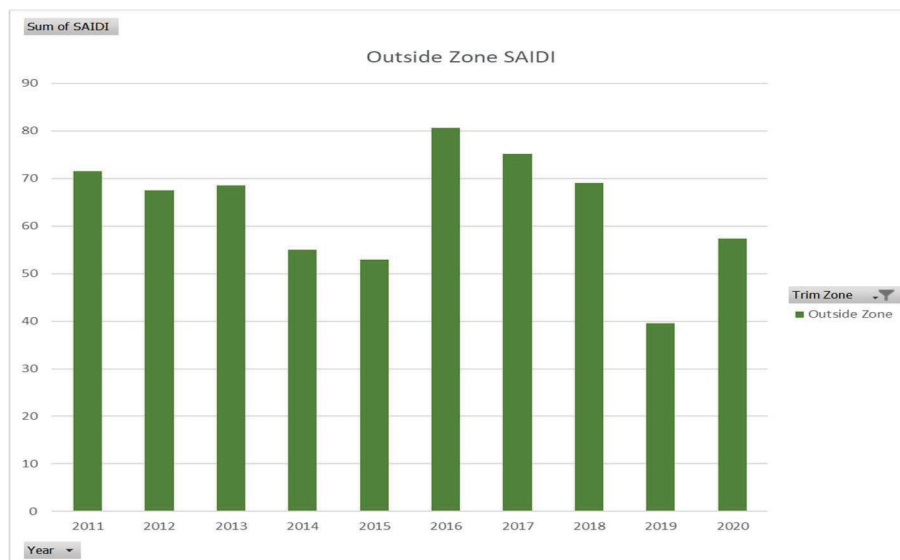


Figure 5-36. SAIDI for Tree Outside Zone Caused Outages



The SMT, ETT and ROW programs have addressed Inside Zone trees, resulting in significantly fewer outages. Outages from Outside Zone trees tend to result in more severe damage from trees falling into the line, which can increase in the amount of time spent on service restoration. Although service restoration is not a vegetation management expense, it is an operational expense that can be directly related to vegetation conditions and should therefore be considered.

Cost Analysis

Eversource has budgeted \$27.1M for vegetation management in 2021, more than half of which is designated for SMT.⁸² The breakout of activities is shown below in Figure 5-376.

Figure 5-37. Eversource 2021 Vegetation Management Portfolio Budget

Vegetation Management Activity	2021 Budget (\$M)
SMT	\$14.0
ETT & ETR	\$11.6
ROW	\$1.5

Source: Eversource Direct Testimony

As noted in Figure 5-23 and Figure 5-35, both SAIFI and SAIDI for Inside Zone tree-caused outages have shown reductions over the last decade and appear to have leveled off. SMT will now be an ongoing program that will mitigate mostly Tree Inside Zone caused outages. To maintain the current level of reliability with SMT and comply with New Hampshire Public Utility Commission’s mandate of a 60-month cycle schedule, the Company would need to maintain an average of 2,440 miles annually, or 20% of the system.

Eversource’s current vegetation management contract for SMT covers the 4-year period from January 1, 2021 through December 31, 2024. The estimated cost for SMT in 2021 is approximately \$7,000 per mile, which is up from \$6,000 per mile in 2020 and from \$5,235 per mile between 2016 and 2018.⁸³ The increase is attributed to market conditions, as contractors have been challenged with the availability of skilled and experienced tree resource labor and an increase in areas expecting more significant traffic control, such as a police detail instead of flaggers. The cost increases will likely continue through the remainder of the current contract due to these prevailing conditions. Based on the current \$7,000 per mile, Eversource would require \$17.1 million, more than \$3 million more than budgeted, to complete SMT for the average 2,440 miles annually. This gap will continue to widen if per mile costs increase over the contract period.

At current per-mile costs and the present funding level of \$14.0 million, Eversource would be able to maintain approximately 2,000 miles in 2021, approximately 82% of the amount required under the 60-month schedule. Figure 5-38 illustrates the impact of deferring SMT in additional cost and labor. A one-year deferral in SMT would increase the cost from \$7,000 to \$8,400 per mile deferred. Sustaining the 2021 budget level of \$14 million for SMT would lead to increasing deferrals and escalating average costs per mile. As shown in Figure 5-387, by 2024, almost all of Eversource’s SMT activities would be addressing miles that were deferred in the previous year – at a higher cost per mile. By 2025, some miles would begin to be deferred by two years,

⁸² Public Service Company of New Hampshire, Direct Testimony of Joseph A. Purington and Lee G. Lajoie - Grid Transformation and Enablement Program: Acceleration of Targeted Infrastructure Upgrades, Docket DE 19-057, 5/28/2019. https://www.puc.nh.gov/regulatory/Docketbk/2019/19-057/INITIAL%20FILING%20-%20PETITION/19-057_2019-05-28_EVERSOURCE_DTESTIMONY_PURINGTON_LAJOIE.PDF

⁸³ New Hampshire Public Utilities Commission, Direct Testimony of Kurt Demmer, Docket DE 19-057 December 20, 2019

further increasing costs-per-mile (to nearly \$9,600), and this spiraling of average costs would continue until investment levels are increased to return to a five-year schedule or market conditions changed to reduce costs for vegetation management resources.

Figure 5-38. Cost increases resulting from under-investment in vegetation management

	2021	2022	2023	2024
Budget	\$14,000,000	\$14,000,000	\$14,000,000	\$14,000,000
Base cost-per-mile	\$7,000	\$7,000	\$7,000	\$7,000
Deferred cost per mile (1 year)		\$8,400	\$8,400	\$8,400
Previous year deferred miles		440	968	1,602
Budget used to address deferral		\$3,696,000	\$8,131,200	\$13,453,440
Remaining budget for base SMT		\$10,304,000	\$5,868,800	\$546,560
Base miles maintained	2,000	1,472	838	78
Average Cost per Mile	\$7,000	\$7,322	\$7,750	\$8,335

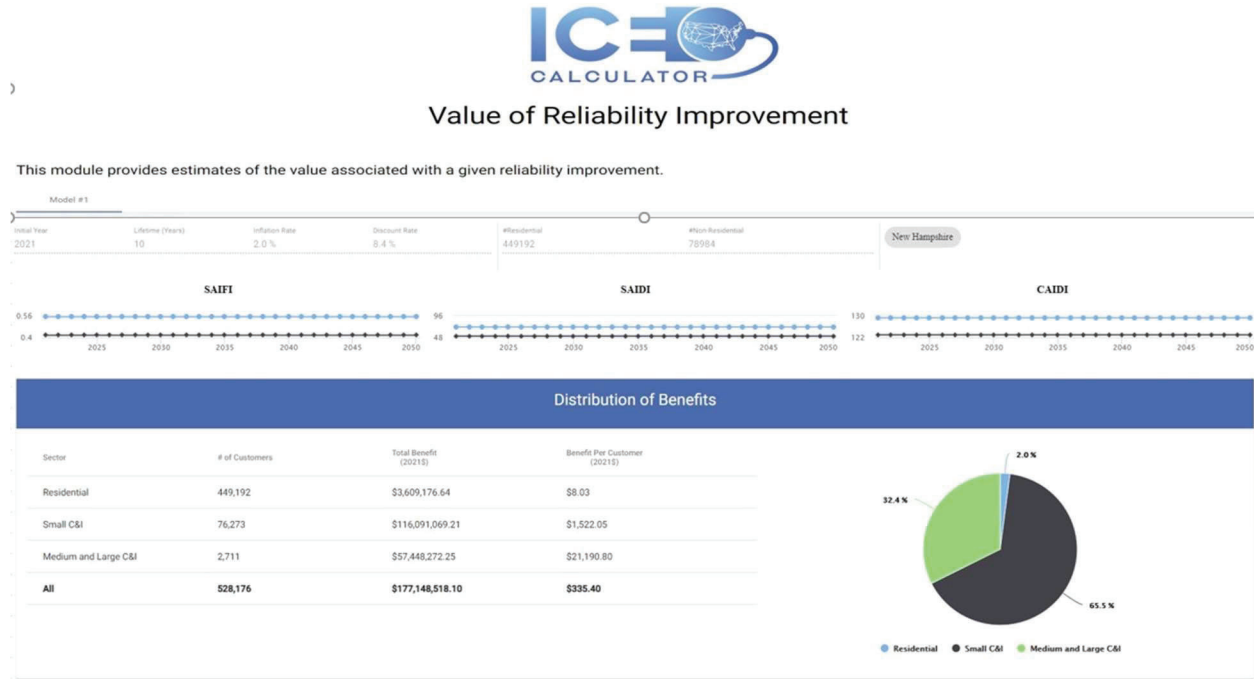
Notably, the modeling above is conservative in that it does not reflect expected cost increases per mile as described above due to market conditions; if these were factored in, the trends would be further exacerbated. The increasing rate of deferred miles modeled above would lead to a regression in the reliability metric improvements noted above. In total, Eversource would see both increasing costs per mile and decreasing reliability benefits at the same time if this underinvestment in SMT persists. As a result, TRC recommends the SMT budget be increased to \$17.1 million for 2021 to maintain the 5-year maintenance schedule. Future year budgets should be adjusted as necessary to account for increasing labor resource costs.

Since SMT targets Tree Inside Zone-caused outages, ETT, ETR and ROW will primarily address the Tree Outside Zone caused outages. The 2021 budget for these programs is \$13.1 million. During the past 5 years, the average ETT spend was \$5.1 million, ETR was \$10.2, and combined ETT/ETR spend \$15.3 million. If a portion of this budget were repurposed to address the shortfall in SMT described above, TRC expects that the progress in Tree Outside-Zone caused outages would be reversed as fewer resources are available to address these hazards.

TRC analyzed overall vegetation management costs and benefits using the Department of Energy’s Interruption Cost Estimate (ICE) Calculator.⁸⁴ This tool was designed for electric utility reliability planners, government organizations or other entities to help estimate interruption costs and/or the benefits associated with reliability improvements in the United States. Looking at the SAIFI and SAIDI improvements for Tree-caused outages between 2011 and 2020, the tool shows a reliability benefit per customer of \$335 over a ten-year period. See Figure 5-39 below.

⁸⁴ U.S. Department of Energy Office of Electricity, Interruption Cost Estimate (ICE) Calculator, accessed 5/3/21. <https://www.icecalculator.com/home>

Figure 5-39. ICE Calculator Value of Reliability Improvement for Eversource 2011-2020 Vegetation Management



Source: U.S. DOE ICE Calculator

On an annual basis, this reliability benefit equates to \$33.50 per customer. Based on the current level of spend for the non-SMT vegetation management of \$13.1 million, the annual average cost per customer is \$24.77, which results in a net benefit of nearly \$9 per customer. The annual average benefit of \$33.50 would support an increased budget of up to approximately \$17.7 million annually for the combined ETT, ETR and ROW programs, before costs would outweigh these customer benefits.

ETT has averaged over 80 miles of backbone circuit per year between 2014 and 2020. The target is 50 miles in 2021.

TRC performed a second, more targeted cost effectiveness analysis for ETT using 11 circuits which had most, if not all the backbone trimmed to ETT specifications. In this analysis, TRC compared the circuit reliability for SAIFI and Customer Average Interruption Duration Index (CAIDI) for the years 2011 through the year ETT was completed against the metrics for years after ETT was conducted. There was an observed 58% decrease in SAIFI between the pre- and post-ETT years and a decrease of 5% in CAIDI of 5% for these circuits following the ETT clearing, as seen in Figure 5-40 and Figure 5-41.

Figure 5-40. Pre- and Post-ETT SAIFI for 11 Analyzed

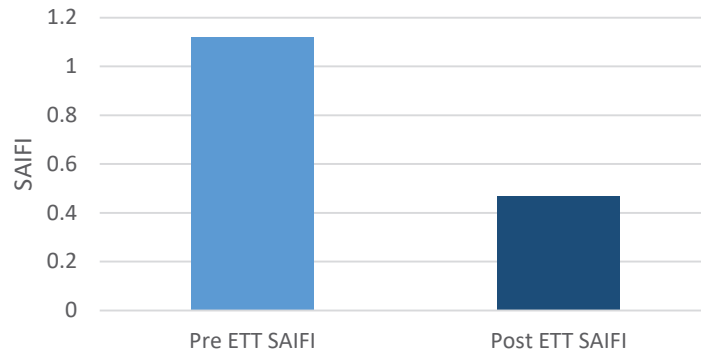
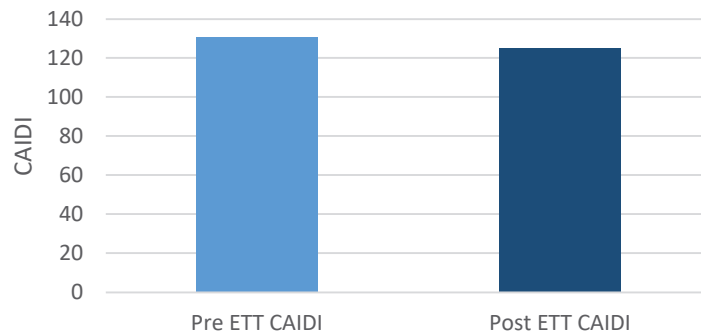


Figure 5-41. Pre- and Post-ETT CAIDI for 11 Analyzed Circuits



This group of circuits shows improvement in reliability when comparing reliability before ETT and after ETT was performed. This information was then applied in the Interruption Cost Estimate (ICE) Calculator tool focusing at the SAIFI and CAIDI improvements for Tree caused outages between 2011 and 2019, as shown in Figure 5-42.

Figure 5-42. ICE Calculator Value of Reliability Improvement for Eversource 2011-2020 Vegetation Management – Pre- and Post-ETT on 11 Circuits



Source: U.S. DOE ICE Calculator

The tool shows a reliability benefit per customer of \$1,510 over a ten-year period. This is the benefit gained for these entire circuits where ETT has been performed on the backbone. Using the total mileage of ETT performed on these 11 circuits, average costs per year when they were performed, and number of customers served by each circuit, the average cost per customer for these ETT activities was \$371, significantly less than the total reliability benefit per customer of \$1,510. Based on these findings, we conclude the ETT activities to be highly cost effective for the value of reliability benefits according to the ICE calculator.

During the past 3 years, ETR has been performed under unit pricing. The cost per removal was based on the negotiated amount by tree diameter size. Between 2018 and 2020, an average of 18,900 trees were removed annually at an average cost of \$680 each.

Recommendations

Based on the cost-effectiveness findings of the ICE calculator tool, TRC recommends continuing with Scheduled Maintenance Trimming (SMT), Enhanced Tree Trimming (ETT), Full width ROW clearing (ROW), and Enhanced Hazard Tree Removal (ETR), and funding these efforts to avoid incurring escalating costs from deferred maintenance. TRC recommends the following:

- **SMT:** Address an average 2,440 miles annually to follow the 60-month clearing cycle. This will focus on the Inside Zone vegetation and maintain the level of tree caused outages at current levels as indicated by Figure 5-23. Deferral of this work for a year or more will risk erasing the progress on tree-related reliability improvements achieved over the last decade and lead to increasing costs per mile and physical resource needs. This will likely have an impact on the budget. Based on the Company's estimate of \$7,000 per mile for 2021, it would cost \$17.1 million to complete SMT for this year. Budget adjustments may be necessary in subsequent years to maintain this pace.
- **ETT:** Accelerate ETT to 80 miles per year to address the remaining 500 miles of the backbone circuits within the next seven years. This will likely have an impact on the budget and be subject to availability of physical resources.
- **ROW:** Continue clearing at the current pace to allow for the restoration of the full original easement where vegetation has encroached.
- **ETR:** Target approximately 19,000 hazard tree removals annually following the current identification and prioritization practice. The cost for this will be subject to the size of the trees removed. Evaluate additional strategies to drive improvements in outside-zone tree-related outage performance.

5.3 Substation Transformers

Current Practices

Eversource Distribution System Planning Guide defines the design criteria for the sizing of a distribution power transformer. Any facility that operates at a voltage of 100kV or higher is considered part of the Bulk Electric System (BES).⁸⁵ The loading of bulk transformers under normal operation (N-0) system conditions are not to exceed 95% of the normal rating. Any loading beyond this will increase the risk of equipment failure and reduce customer reliability when exposed to a single contingency operation (N-1). The loading of non-bulk transformers varies slightly from that of bulk transformers. Non-bulk transformers planned loading shall not exceed 100% of the normal rating under (N-0) system conditions. Under (N-1) conditions for non-bulk transformers, the loading of the transformer is to be reduced below the long-term emergency (LTE) rating.

The criteria above are set to provide proper pre-loading conditions to allow the transformers to operate effectively below LTE, short-term emergency (STE), and drastic action limit (DAL) ratings. The condition rating percentages do not restrict the actual operation of the transformer. All transmission owners in New England are required to provide their own set ratings and duration times for these categories per ISO-NE PP-7 section 2.3⁸⁶. These include durations for both summer and winter loading. Eversource utilizes the following durations for contingency

⁸⁵ NERC. *NERC Review of Bulk Electric System Definition Thresholds*. Mar. 2013, www.nerc.com/pa/Stand/Project%20201017%20Proposed%20Definition%20of%20Bulk%20Electri/bes_p_hase2_pc_report_final_20130306.pdf.

⁸⁶ ISO NEW ENGLAND PLANNING PROCEDURE NO.7. ISO New England, 7 Nov. 2014, www.iso-ne.com/static-assets/documents/rules_proceeds/isone_plan/pp07/pp7_final.pdf.

analysis:

- Normal Ratings – Continuous
- Winter LTE (W LTE) – 4 hours
- Summer LTE (S LTE) – 12 hours
- Winter STE (W STE) – 30 minutes
- Summer STE (S STE) – 30 minutes
- Drastic Action Limits (DAL) - Equal to the STE for summer and winter ratings

To maximize the substation output, Eversource bulk distribution stations are designed to consider the loss of the largest distribution element during an (N-1) contingency, in addition to the load that can be transferred out of the station post contingency. Dispatcher initiated load transfers are to be available to keep transformer winding loads below the LTE rating within the set time frame detailed below:

- The initial post-event assessment period for dispatchers to identify/assess the event shall be 10 minutes.
- The time to implement each load transfer is 5 minutes.
- All load transfers are sequential, when more than one is needed:
 - Two transfers take 10 minutes.
 - Three transfers take 15 minutes.
- Where possible, there should be at least one extra load transfer available if one of the primary load transfers cannot be accomplished.

Following the loss of a non-bulk transformer, if distribution switching cannot restore customers within 24 hours, it will be required to position a mobile substation to restore service. For restoration of a bulk transformer, restoration capacity is required within the distribution system to ensure no loss of service. Eversource is required to perform annual tests and regularly schedule maintenance in accordance with Eversource Maintenance plan chapters 5.58 and 6.58 to maintain reliability.

Typical Usage and Installation Practices

Eversource is required to make transformer and substation upgrades to mitigate any risks to capacity, power quality, and reliability. Various strategic criteria are assessed when deciding to make substation upgrades. The upgrades to bulk distribution substations are based on the following order when addressing criteria violations:

- 1) Highest to lowest overloads under normal (N-0) and (N-1) contingency conditions.
- 2) Load loss under first contingency (N-1) conditions.
- 3) Highest to lowest number of customers impacted during contingency conditions.
 - a) Associated risk evaluation of substation based on individual components (Asset condition). The asset condition criteria do not include equipment with asset

conditions deemed a safety hazard, those should be prioritized and resolved under emergency conditions.

These steps help prioritize reliability driven replacements to provide reduced outage time to those that may be affected by power outages. Individual substations are then assessed by distribution system planning for violations and then ranked based on Figure 5-43 below.

Figure 5-43. System Violation Ranking

Priority Number	Violation Type	Description
1.	Capacity	Bulk Distribution Substation Overloads
2.	Capacity	Non-Bulk Distribution Substation Overload
3.	Reliability	Single Contingency (N-1) load loss
4.	Reliability Power Quality	Substations with higher risk of equipment failure, due to asset condition or power quality violations, supplying High Load Density Areas
5.	Reliability Power Quality	Substations with higher risk of equipment failure, due to asset condition or power quality violations, supplying Low Load Density Areas
6.	Power Quality	Power quality Violations such as Harmonics, TOV, ROI
7.	Reliability	Non-Standard Substation Design

Source: Section 2.9 of the Eversource Distribution System Planning Guide

Once a distribution transformer is identified for replacement at a substation, the sizing of that transformer is based on the respective substation voltage class. Figure 5-44 shows Eversource transformer sizes based on recent completed projects and proposed future upgrades.

Figure 5-44. Eversource Bulk Transformer Sizing

Substation Voltage (kV)	Transformer Size (MVA)
34.5	62.5
12.48	30
4.16	10

Source: Eversource interviews

Figure 5-45. New 62.5 MVA Transformer at Pemigewasset Substation



Source: TRC Field Inspections

Per Eversource interviews, the standard high side point of disconnect for a station power transformer is currently a circuit switcher. The amperage rating of the circuit switcher is based on the size of the transformer. The key driver for the addition of a new circuit switcher would be to increase reliability from stations that rely on disconnect switches as the point of disconnect on the high side of the transformer. A circuit switcher would also need to be replaced to support a transformer addition if the current circuit switcher is not rated properly for the increase in size. If the fault current is too large, the circuit switcher would be unable to trip, leading to reliance on remote breakers and slowing the switching scheme. Eversource typically interrupts faults on the low side of the transformer, which is why circuit switchers are the current installation standard. The addition of a vacuum circuit breaker on the high side of the transformer provides more reliability for transformer differential currents and over-current protection than a circuit switcher.

Feeder breakers within distribution yards are used to provide protection for incoming feeder lines. The typical standard breakers used for new feeder installs are 1200-amp outdoor circuit breakers. A breaker replacement is typically triggered by the age of the breaker; there is no set number of years that will trigger a replacement, but age is the main factor that determines what breakers to replace. Equipment failure can lead to replacements as well. If a certain breaker is experiencing repeated maintenance over time, this could trigger a breaker replacement project.

Industry and Other Utility Findings

Changes in electricity usage and risks to the electric grid across the country are driving new investments in substations to build a more resilient electric system at these critical nodes. The US Energy Information Administration projects electricity usage will continue to grow at approximately 1% per year through 2050.⁸⁷ In addition to severe weather, these risks include cyber threats, physical threats, an increasingly renewable and intermittent generation portfolio, and the growing interdependencies of natural gas and water usage. The insufficient integration of natural gas and water into the electric grid opens the door to threats such as vulnerability to cyber threats and severe weather. Utilities and the U.S. Department of Energy are pushing for transformer upgrades across the grid to increase customer resiliency.⁸⁸

One program designed to address challenges associated with power transformers is the Transformer Resilience and Advanced Components (TRAC) program,⁸⁹ which promotes transformer upgrades. This program supports the research and development (R&D) activities to advance technologies and approaches that maximize the value and lifetimes of existing grid components. The goal is to accelerate grid modernization by addressing deficiencies of large power transformers, Solid State Power Substations, and other critical grid hardware components. Also, to increase the resilience of aging assets and identify new requirements for future grid components.⁹⁰ The program has increased its scope and funding since 2016 to pinpoint the industry's critical application needs and technology challenges.

Other Utilities within the Northeast are focusing on transformer upgrades to increase resiliency as well. These utilities are focusing on standardizing their transformers to not only provide a more reliable service, but to increase efficiencies and operational consistency. This leads to more spare power transformers across the system, reduces the amount of maintenance required, and provides access to replacement parts.

Business Case

Eversource's planning criteria calls for restoring service within established criteria, with in-place capacity. To standardize transformer(s) it is important to consider the loss of the largest element during an N-1 contingency condition in addition to the load that can be transferred out of the station post contingency. Firm and Load Carrying Capability (LCC) ratings are used to account for both of these limits. Firm Capacity is defined as the total LTE rating of the remaining transformer(s) after the loss of the largest transformer (refer to Section 6.1 of Guide for full

⁸⁷ U.S. Energy Information Administration, Annual Energy Outlook 2021, February 2021, <https://www.eia.gov/outlooks/aeo/electricity/sub-topic-01.php>

⁸⁸ U.S DOE Office of Electricity, Solid State Power Substation Technology Roadmap, June 2020, www.energy.gov/sites/default/files/2020/07/f76/2020%20Solid%20State%20Power%20Substation%20Technology%20Roadmap.pdf.

⁸⁹ U.S DOE Office of Electricity, Transformer Resilience and Advanced Components (TRAC) Program. www.energy.gov/oe/transformer-resilience-and-advanced-components-trac-program.

⁹⁰ U.S DOE Office of Electricity, 2019 Transformer Resilience and Advanced Components Program Review. <https://www.energy.gov/oe/2019-transformer-resilience-and-advanced-components-program-review>

definition). LCC is defined as the Firm Capacity plus Distribution Transfer Switching Capacity. Distribution Transfer Switching Capacity is calculated by assuming successful transfers of load to other stations is completed within 30 minutes.

The 30-minute STE limit used for Distribution Transfer Capacity is driven by constraints under various operational conditions. The Portsmouth Substation – Second Transformer project serves as an example of these constraints. Here, Eversource determined that additional capacity was needed in the area. To meet the planning criteria, the selected plan called for replacing the existing 44 MVA transformer at Portsmouth station with a 62.5 MVA unit and adding a second 62.5 MVA unit, enabling the planning criteria to be met. An alternative, adding a 62.5 MVA transformer along with the existing 44.8 MVA unit, would not provide adequate capacity to meet the planning criteria under the LTE rating. If the 44.8 MVA transformer was the standard, a third 44.8 MVA transformer would need to be installed. This would likely require additional bus work on the 115 kV source side, additional transformer protection and additional work to integrate the distribution bus work. The differential cost between the 62.5 MVA and 44.8 MVA transformers would be far exceeded by the cost of this additional work.⁹¹ The standard size transformer strategy supports timely load carry or transfer for event-based response, resulting in less dependency on mobile substations. A lesser, but notable benefit is a more consistent and streamlined spare parts inventory.

Cost Analysis

Per Eversource interviews, power transformers are typically custom made, with lead times of up to a year or more to deliver; parts across size and manufacturer are not readily interchangeable. Per Eversource, Hyosung Corporation states it is difficult to compare historical costs of transformers as they vary greatly based on the markets. Standardizing transformer sizing could reduce costs by having a more consistent replacement parts inventory and increase efficiencies through engineering, procurement, installation, maintenance, and testing.

The 115-34.5 kV power transformer is the most common distribution transformer within Eversource NH. It is beneficial to look at the costs of upgrading these from the typical 44.8MVA transformer to the new 62.5 MVA transformer. Per Eversource interviews, it is typically around an 8-10% increase in price to go from a 44.8 MVA transformer to a 62.5 MVA transformer. This would be about an \$85,000-\$110,000 increase in cost. The current pricing for a 62.5 MVA transformer is around \$1.1 million. Standard size transformers are essential to planning guide compliance. The incremental cost of any of the transformers is a small portion of the typical project cost needed to install them.

The Company has decided to right-size new equipment to comply with the established reliability planning criteria, which is an event-based system reconfiguration required to maintain the level

⁹¹ Dispatcher initiated load transfers (using distribution automation capabilities, manual switching is not used for this purpose) must be available to lower transformer winding loads to below the LTE rating, within the time frame given below. When distribution load transfers are used for reducing transformer winding loads to below the LTE rating, following the time frames as described in section 1 (Eversource Practices).

of reliability specified by the Eversource Distribution System Planning Guide. Continued use of smaller transformers would not support the outlined planning criteria and lead to longer outage times.

When looking into the point of isolation on the high side of the transformer, the 115kV circuit switcher and 115kV circuit breaker are to be compared. Per Eversource interviews, a 115kV circuit breaker cost is around \$63,800. The breaker has current transformers which allow for a smaller protection zone, so when attached to the bus it can be wired into different schemes. The cost of a circuit switcher would be around \$112,800. The relay and control wiring cost for the breaker is larger than the differential in material cost between the breaker and circuit switcher. The foundation and steel requirements are similar in comparison. Overall, the total install cost for a circuit breaker is around 10% more than that of the circuit switcher.

Recommendations

Transformer resiliency is a significant issue today which leads to increased outages, outage duration, and loss of service for customers. The criteria for replacing transformers internally within Eversource sets strict guidelines that capture the need to replace transformers under certain criteria and address specific areas of concern.

Networking feeds will decrease the need for mobile substation readiness and relying solely on mobile substations to pick up load. The install and maintenance of mobile stations is a burden among field personnel and maintenance crews. Per Eversource, since a mobile substation consists of a transformer and supporting device to support simplified installation during an event, the typical maintenance of a mobile substation is three weeks as compared to that of a regular transformer of one week. Eversource needs to ensure that all mobile substations are adequately sized and can restore load due to the increase in standard 115-34.5kV transformer sizes.

TRC recommends following Eversource guidelines of standardizing transformer sizes throughout the system based on voltage class. Standardization will lead to more consistency, efficiency, and potentially reducing spare transformer stock and will benefit as follows:

- Standardized replacement parts would result in a more consistent and streamlined parts inventory. This could help reduce event response time, especially if it reduces the need for a mobile substation.
- This will reduce the cost of engineering across standardized vendor drawings. The internal review process of standardized transformers will be more reliable and efficient, reducing the overall procurement cycle.

Any transformer that is removed from service due to a substation improvement project could be redeployed elsewhere on the system where practical. Strategically retain any reliable non-standard sized transformers that was removed from service under the planning guide for future use as an emergency replacement in kind.

TRC recommends continuation of the standard sized transformer implementation strategy.

5.4 Distribution Planning

Eversource Standard Planning Practices:

The Eversource Distribution System Planning Guide (Guide) states that

Distribution Feeder design is intended to provide safe, reliable service within allowed voltage limits at a reasonable cost. Reliability generally addresses interruptions of service for both the number and length of interruption duration. Eversource uses three reliability measures adopted by the utility industry: System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAFI), and Customer Average Interruption Duration Index (CAIDI), refer to Distribution System Engineering Manual (DSEM), Reliability Section 02.11. There are limits as to what degree of reliability is practical or achievable, depending on the investment cost and rates permitted by regulatory authorities. To evaluate the effectiveness of reliability projects and determine the most cost-effective solution, Eversource follows DSEM 03.30.⁹²

Eversource utilizes the following solutions to maintain approved regulatory reliability indices where reliability improvements are needed:

- Add automatic sectionalizing devices to limit exposure to 500 customers or less per switchable zone. Refer to DSEM 02.30, DSEM 06.51, and DSEM 10.42.
- Eliminate or reconfigure triple circuit pole lines to minimize customer exposure for single emergency events that result in more than 1000 customers out of service
- Reconfigure double circuit pole lines where both the normal and alternate source supply the same group of customers resulting in more than 1000 customers out of service.
- Arranging distribution feeders in order to give the best possible load balance on the system, by identifying feeders where load imbalance exceeds 50 amps between phases and considering improvements to reduce imbalance to less than 50 amps. (Guide page 7)
- Adding automatic sectionalizing devices to limit exposure to 500 customers or less per switchable zone. (Guide page 10)
- Using Age/Asset Health indexes in determining reliability risk for prioritizing upgrades. (Guide page 39)

Options on further improving reliability include:

- Consider options on creating and expanding system redundancy
- Improving on existing system redundancy for resiliency
- Examine and review feeder length

⁹² Eversource, Distribution System Engineering Guide, page 10

- Reduce existing and potential equipment materials vulnerability to nature

Eversource Distribution Planning Engineers follow the Guide for study procedures and project justifications. This document was last updated in 2020. Planning objectives outlined in the Guide include:⁹³

- Build sufficient capacity to meet instantaneous demand
- Satisfy power quality/voltage requirements within applicable standards
- Provide adequate availability to meet customer requirements
- Deliver power with required frequency
- Reach all customers wherever they exist

Planning and Operating Criteria

Conductor Loading: The Guide provides loading and voltage criteria with respect to applicable seasonal (Summer/Winter) ratings. Loading criteria for conductors are:

- Normal Rating - the maximum loading without incurring loss of life above the design-loading limit, and system changes are developed when limits are expected to exceed 100% during normal operation or 100% of cables during contingent operation (Guide page 6-7).
 - Feeder upgrades are required in the event that feeder ratings are being exceeded (Guide page 13).
- Emergency Rating – the maximum loading of overhead wires during contingent operation.

The Company's service territory comprises a range of both rural and urban areas that vary in electric supply characteristics and requirements. Electric distribution substations are diversified in size and redundancy in matching the difference in ratio between rural and urban areas. To maintain adequate levels of reserve capacity, power quality, and reliability, Bulk Distribution Substations are designed to sustain any Single Contingency (N-1) with no Load Loss. Specific transmission and distribution system considerations include:

- **Transmission System Considerations:** The transmission system supplying distribution bulk substations shall be designed so that the outcome of any single contingency event at the transmission side does not result in a condition greater than a Single Contingency (N-1) at the distribution bulk substation.
- **Distribution System Considerations:** The distribution system shall be designed so that any feeder outage does not result in thermal or voltage violation above design criteria.⁹⁴

⁹³ Eversource, Distribution System Engineering Manual, p. 4

⁹⁴ Eversource, Distribution System Engineering Manual, Sections 2.2 and 2.4., p. 10

Continuous development in reliability can result in system trade-offs. For instance, the overall cost for improvement may take several years to see the return in investment. Upgrading a line voltage could reduce line loss, but at the cost of increasing sensitivity to momentary interruptions and outages due to contact with vegetation.

Reliability Statistics offer methods for self-evaluation. Metrics defined in the IEEE 1366 include measurement for long-term performance of a system. These metrics include SAIFI, SAIDI and CAIDI. Metrics currently used by Eversource include SAIFI, SAIDI, CAIDI, Contribution to System SAIDI, and SAIDI minutes, which are defined below:

- SAIFI is the average number of sustained interruptions (defined by IEEE 1366 as an interruption lasting 5 minutes or more) per consumer during the year. It is the ratio of the annual number of interruptions to the total number of customers served.⁹⁵
- SAIDI indicates the total duration of interruption for the average customer during a predefined period of time (measured either in minutes or hours).⁹⁶
- CAIDI is expressed in minutes. It is the average time required (or experienced) to restore service to the average customer per sustained interruption CAIDI is the average restoration time. As with SAIDI, CAIDI can be used to calculate for different groups of customers from the whole system to parts of a feeder.⁹⁷
- Contribution to System SAIDI is the portion of SAIDI attributable to the customer–minutes of outage time that occurred on a particular part of the system (usually a circuit or a portion of a circuit) divided by the total number of customers served by the entire company (usually per state).⁹⁸
- SAIDI Minutes is the contribution to the SAIDI of a given unit (say a feeder or a district) contributed by a particular outage. It is the customer–minutes interrupted for the outage divided by the total number of customers in the given unit.⁹⁹

Figure 5-46 below shows that between 2011 through 2020, an overall reduction trend in SAIFI is a reflection of an overall reduction in outage events. Since 2011, there has been a significant reduction in SAIFI related to conductor/conductor equipment outages.

⁹⁵ IEEE, Standard 1366-2012 – IEE Guide for Electric Power Distribution Reliability Indices, 2012. <https://standards.ieee.org/standard/1366-2012.html>

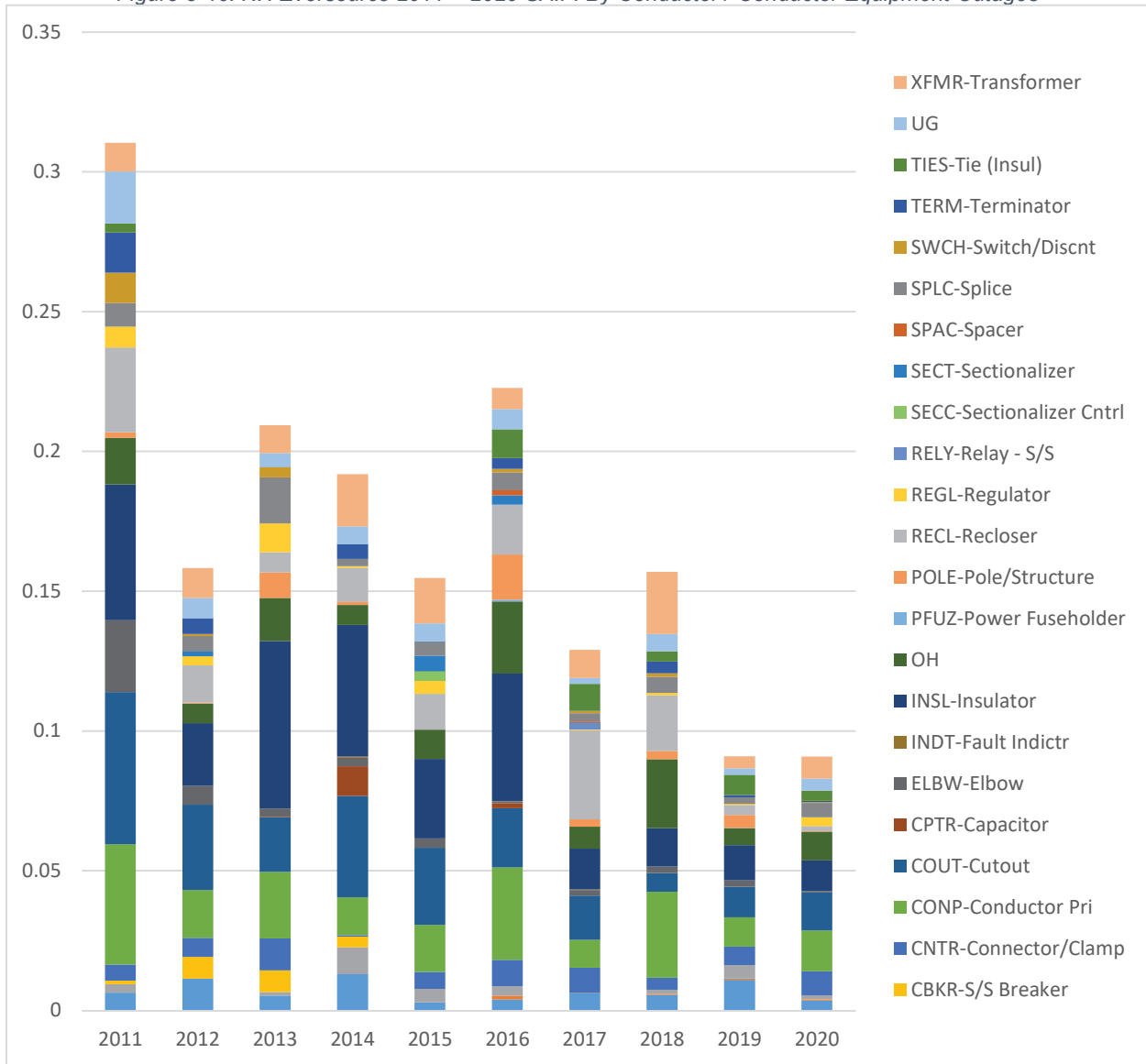
⁹⁶ Ibid.

⁹⁷ Eversource, Distribution System Engineering Manual, Section 02.11

⁹⁸ Ibid.

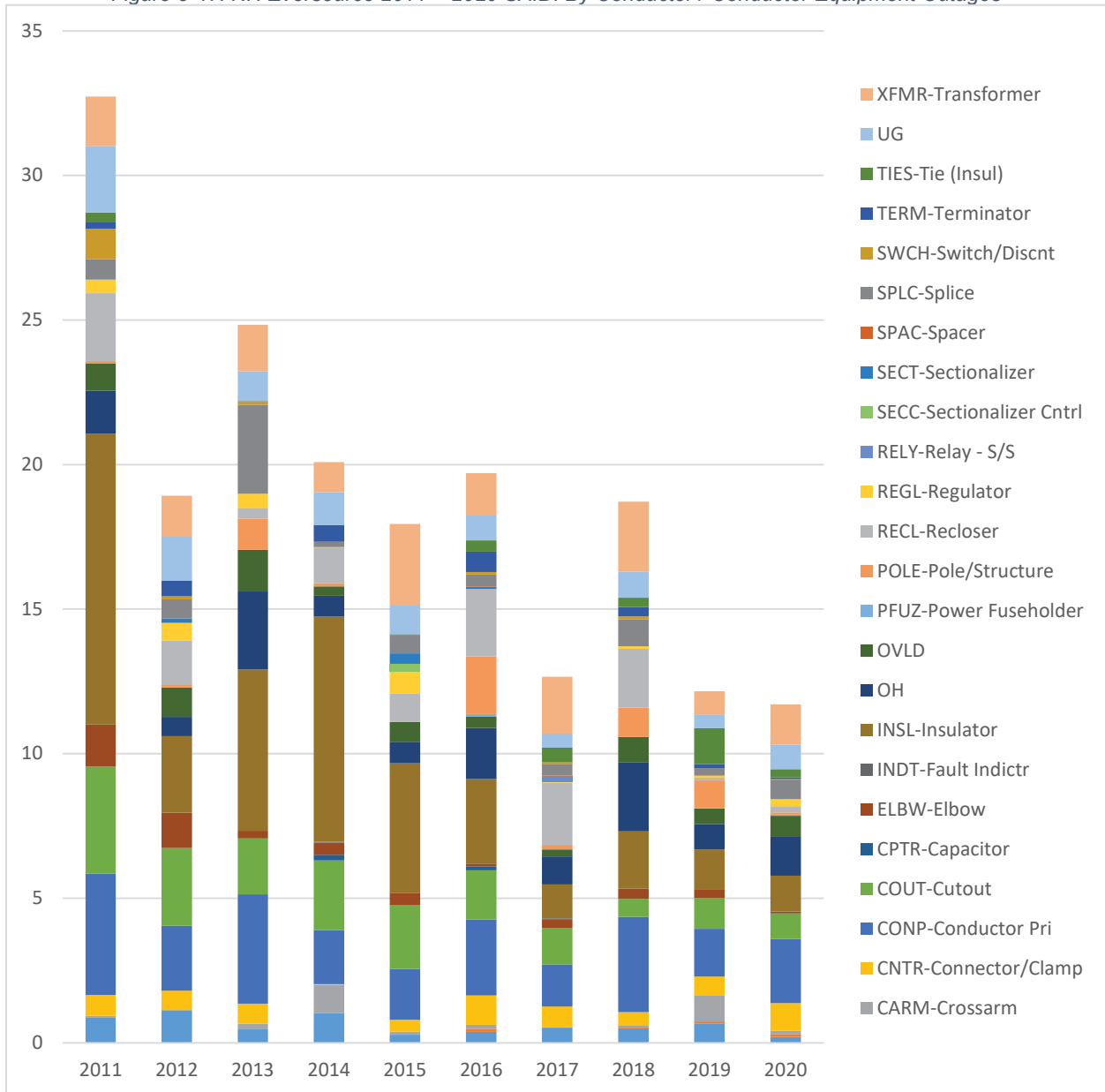
⁹⁹ Ibid.

Figure 5-46. NH Eversource 2011 – 2020 SAIFI By Conductor / Conductor Equipment Outages



Source: Eversource internal data

Figure 5-47. NH Eversource 2011 – 2020 SAIDI By Conductor / Conductor Equipment Outages



Source: Eversource internal data

When using SAIDI in calculating average duration for major events and catastrophic days (such as hurricanes and ice storms), this will lead to high SAIDI values since these types of events being that these are considered catastrophic events and therefore have a low probability of occurring. Large SAIDI values associated to these types of events can linger in a dataset for years causing an upshift in reliability metric trends (IEEE 1366-2012 page 19).

These metrics are designed to measure in seeing if a system is improving (or not improving) over time. They can also be used in recording major events or planned events separately, be

applied to specific equipment for a further insight on areas in need of consideration and can be used for comparing specific areas (system wide, feeder level, substation, etc.) for further insight on areas potentially in need of attention. Overall, the use of metrics administers a better understanding of the overall system health and performance.

The IEEE standard 1366-2012 explains that daily SAIDI values are preferred to daily SAIFI values because SAIDI values are a better measure of the total cost of reliability events, including utility repair costs and customer losses. The total cost of unreliability would be a better measure of the size of a major event, but collection of this data is not practical. (IEEE 1366-2012 page 22)

Duration-related costs of outages are higher than initial costs, especially for major events, which typically have long duration outages. Thus, a duration-related index will be a better indicator of total costs than a frequency-related index like SAIFI or MAIFI. Because CAIDI is a value per customer, it does not reflect the size of outage events. Therefore, SAIDI best reflects the customer cost of unreliability, and is the index used to identify Major Event Definitions (MEDs). SAIDI in minutes/day is the random variable used for MEDs. (IEEE 1366-2012 page 24).

Mitigations to Lower SAIDI/SAIFI

To mitigate the circuits with high SAIDI/SAIFI values, reconductoring or relocating a circuit can be considered. Eversource engineers have developed a data base for all circuits so that troublesome circuits can be addressed. Reconductoring should be with standard spacer cable construction. Other actions may include moving the circuits from forested areas in ROW to roadside when feasible.

Investments made towards relocating circuits to more accessible areas may create safer working conditions and allow the opportunity for updating aged facilities to current construction standards. In either case where relocation results in parallel to roadway or road-side construction, this allows for rapid restoration, straight forward trouble shooting, and simplified maintenance. This will improve resiliency, save time, money, and reduce overall length of outages. Overall expenditures in relocating facilities will develop a more robust and secure system that outweighs the potential costs and repercussions of operating and managing an aged system.

Analysis of the data in Figure 5-46 and Figure 5-47 allow for targeting existing problem areas in tracking improvements related to conductor and conductor equipment failures over a timespan where replacements may be made and further addressed wherever possible. The overall intention is to address equipment replacement where the most cost-effective impact can be made and continuing the trend until replacement based on cost effectiveness has been maximized.

Other reconductoring can be recommended due to increase loading when the load grows as found during annual studies. Reconductoring is also justified to increase capacity and to reduce line losses. Costs need to be considered to when providing this option as the cost can outweigh the benefit.

Conductor Size Selection

The conductor size selection problem involves determining the optimal conductor configuration for the distribution system, using a set of types of conductors. The objective is selection of conductor's size from the available size in each branch of the system which minimizes the sum of depreciation on capital investment and cost of energy losses and reliability while maintaining the voltages at different buses within the limits. Eversource has developed standard conductor sizes and types per General Section 05.131.

Outage Prevention

TRC recognizes Eversource is already in line with many good utility and industry operational and outage prevention practices. These include:

- Regular inspections and maintenance
- Veg management/tree trimming
- Animal guards
- Incorporating L/A's
- Thermal imaging inspection
- Use of Insulated wire (spacer or tree wire)
- Designing for proper transformer loading

System Operation

The way a system is built and operated can also have an impact on system reliability. This can include the types of equipment used for indicating faults, relay and recloser settings (duration or number of operations to close), fusing philosophy (fuse save, fuse blow, or hybrid) maintenance programs, and regular testing,

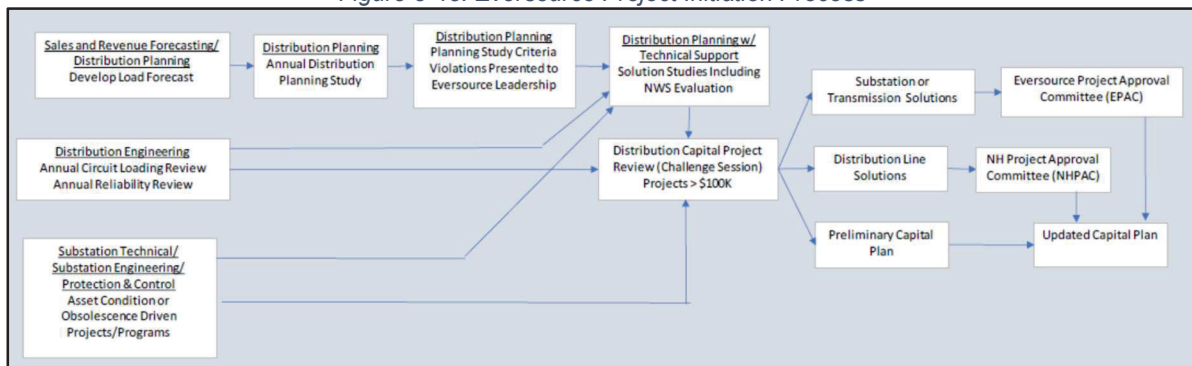
ROW and Maintenance

Having the ability to exercise and maintain rights-of-way and utility easements can further increase the effects of reliability, to include:

- Right to construct, maintain, operate, replace, upgrade, or rebuild pole lines or underground cable and appurtenances thereto
- Right of ingress and egress
- Right to trim and remove all trees on or adjacent easement necessary to maintain proper service
- Right to keep easement free of any structure or obstacle which deems a hazard to the line
- Right to prohibit excavation within 5 feet of any buried cable, or any change of grade which interferes with the cable

As engineers start their study process, they follow the Project Initiation Process below and develop their study models.

Figure 5-48. Eversource Project Initiation Process



Source: Eversource

Model Development is a critical piece in the study process. Required models include summer or shoulder period minimum and peak load, as well as winter period minimum and peak load. The loads are extracted from GIS or other sources to get the loads for the substation or substations under study. Additionally, because of growing DER within the Eversource service area, engineers must factor in the Gross Load and DER on the system during the model development process. The Guide describes this in detail. From here, a Peak Forecast Load Model, Minimum Forecast Model, and Scenario Forecasts are developed for up to 10 years out.

Eversource historically produces both a ‘normal’ and an ‘extreme’ peak load forecast for each operating company. The normal peak load is based on average historical weather data, and the extreme peak is based on the 90th percentile of that historical weather data. The extreme peak is also referred to as a 90/10 forecast and it assumes a 10% chance that the peak load would be exceeded. Put another way, the forecast will be exceeded on average only once every 10 years.

After loads are determined, the Planning Model is developed using the GIS extraction and the study software to develop the load flow model with the current topology for the substation feeders. This includes the base case, probabilistic and standard load models, and 5- and 10-year yearly increase models.

Eversource conducts these studies on an annual basis for possible reporting to New Hampshire’s PUC. During the study, the engineer examines the following for each scenario.

- Substation Normal and Contingency
 - Distribution System Planning will use the Appropriate model to identify violations affecting Distribution Bulk Substations and backbone feeder sections involved in the calculation of the Substation Load Carrying Capability (LCC):
 - To identify violations under Normal (N-0) system conditions the Planning Base Case models will be used to verify that all substation transformers and backbone feeder sections operate under normal thermal ratings, voltage limits, and acceptable load phase balance, as per Section 2.2 of the Guide.

- To identify violations under Contingency (N-1) conditions the Planning Base Case models will be used, together with the guidance provided in Section 4.6 below to verify that all substation transformers and backbone feeders' sections operate under the appropriate Thermal Loading criteria specified in Section 2.2 of the Guide.
- Substation LCC Capability:
 - Distribution load transfer schemes used in the calculation of the LCC, will be modeled and verified by Distribution System Planning for Bulk Distribution Substations that fall within the following criteria:
 - Above 95% of nameplate under normal (N-0) conditions within the next 5 years
 - Above 95% of LCC under emergency (N-1) conditions within the next 5 years
- Contingency Conditions (N-1) Operational Assessment is conducted to determine if any criteria violations are found.
- Contingency Analysis
 - For Distribution Station in which LCC is equal to Firm:
 - For distribution stations where a single event at the transmission level corresponds to a single event at the distribution station, not exceeding N-1 conditions:
 - An N-1 contingency can be modeled at the distribution station by taking the largest transformer out of service and closing the appropriate bus breaker to transfer the load to the remaining transformers.
 - For distribution stations where a single event at the transmission level corresponds to an event at the distribution station that exceeds N-1 conditions:
 - The Distribution station contingency shall be modeled based on the transmission contingency that results in the worst contingency condition for the Distribution Station.
 - For Distribution Station in which LCC is not equal to Firm:
 - For distribution stations where a single event at the transmission level corresponds to a single event at the distribution station, not exceeding N-1 conditions. An N-1 contingency can be modeled at the distribution station by taking the largest transformer out of service and closing the appropriate bus breaker to transfer the load to the remaining transformers.
 - For distribution stations where a single event at the transmission level corresponds to an event at the distribution station that exceeds N-1 conditions. The Distribution station contingency shall be modeled based on the transmission contingency that results in the worst contingency condition for the Distribution Station.

Allowed System Adjustments to Mitigate Capacity and Power Quality Violations

Upon performing the study process, the probability for encountering criteria violations at the substation and feeder backbone level may include thermal, phase imbalance, and voltage, as outlined in Section 2.4 of the Guide. System improvements for addressing violations may include:

- Thermal violations:
 - Reduce load by load transfers or non-wires solution (as per Section 4.8 of the Guide).
 - Increase system capacity by upgrading existing equipment or installing new equipment.
 - Phase load imbalance: reduce phase loading by distribution circuit reconfiguration
 - Substation Secondary bus load thermal violations: reduce load by load transfer, or increase equipment capacity
 - Voltage Violation:
 - Reduce load by load transfers or non-wires solutions
 - Applying capacitor or voltage regulation.
 - Upgrading or installing new equipment

Finally, the engineer documents any system constraints with a detailed study report with the study findings. The report considers:

- The substation current configuration/capacity along with transformer ratings
- The historical peak and actual loads, actual/planned load transfers and most recent 10-year load forecast
- Assessment of DG connected to each transformer's feeders and any load adjustments made because of these facilities
- System Review Summary, including:
 - Identification of Non-Standard Bulk Distribution Substations and associated violations
 - Non-Bulk Distribution Substation configuration/capacity and potential violations
 - System reinforcements or mitigating measures to plan or investigate further

Based on the violation type (Capacity, Power Quality, and Reliability) the System Planning report should include:

- Substation name
- Substation Summary
- Description of Problem (if applicable)

- Description of Violation (if applicable)
- Substation Equipment Rating and Limit
- Actual Peak Load (Observed year)
- System Review Summary
- Possible Mitigation Actions

Solution Development

When the system capability does not meet forecasted loads, Planning Engineers must resolve projected violations prior to the violation year as per Section 4.8. Once a list of violations is compiled, Distribution System Planning engineers will identify potential solutions to address those violations affecting:

- Bulk Distribution Substations
- Non-Bulk Distribution Substation
- Feeder Backbone Sections required for substation LCC capacity

The solution development method adopted by Eversource is a complex and iterative process which addresses the system needs in conjunction with the capital budget. This approach balances the safe and reliable service provided by the Company with the need to control cost for their customers. The solutions may include the following:

- Distribution Bulk Substation Solution Development
- Distribution Feeder and Non-Bulk Substation Solution Development
- Application of Non-Wires Solutions (NWS)
 - The process for identifying NWS is complicated and the steps are listed in the Guide.

Planned and Proposed Upgrades

During the annual development of the transmission and distribution capacity and power quality plans, Eversource shall design long term solutions (Traditional and NWS) that will address capacity and resiliency needs of all distribution substations. Planned projects, identified in the Low Load and Medium Load Planning Scenarios, that address immediate substation capacity and resiliency needs shall be designed and prioritized to be included in the 5-year capital plan as approved projects. Proposed projects, identified in the Long-Term Planning Scenario, that address long term capacity and resilience needs shall be developed but not submitted for approval. Figure 5-49 provides a high-level breakdown for an ideal project planning schedule.

Figure 5-49. Eversource Project Planning Schedule

Constraint Type	Timeframe	Status	Planning Scenario
Planned	1-5 years	Full development & approval	Low and Medium Load Growth
Planned	5 -10 years	Partially developed	Medium and High Load Growth
Proposed	10 years and above	Conceptual Design	Medium and High Load Growth

Relocation Project Example:

Newport Circuit 317/3410 was originally built in 1937 and has maintained many of its original poles, crossarms, insulators, and conductor. A large portion of 317/3410 has been budgeted for 2021-2025 to remove the line from its existing ROW and relocated adjacent to the roadside with construction starting in 2021. Approximate cost is \$1M/mi to rebuild with steel poles and spacer cable. Figure 5-50 shows the line as is today in standing water.

Figure 5-50. Eversource Line 317 Line Relocation



Source: TRC Field Inspection

Reconductoring with spacer cable example

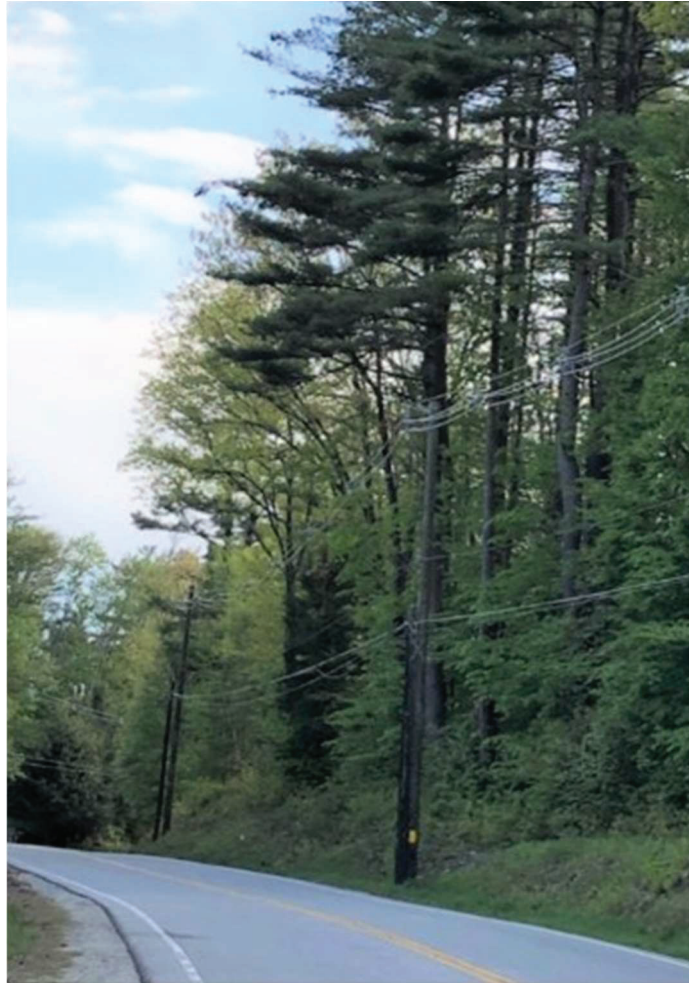
Circuit 3139X had multiple tree related outage and was a poor performing circuit. A capital project was implemented to improve the circuit backbone which included upgrading 3.5 miles of open wire conductor in Heather-lite configuration to covered spacer cable along Highway 63. There were six distribution automation devices installed, all with single phase tripping. There was also a distribution automation device installed just outside of Chestnut Hill Substation to create single phase tripping capability. Following the completion of this work, circuit reliability improved. Figure 5-51 displays a completed segment of the circuit backbone.

Figure 5-51. Eversource Line Reconductored to Spacer Cable



Source: Eversource

Figure 5-52. Eversource Line Reconductored to Spacer Cable



Source: Eversource

Cost Analysis

TRC evaluated the Eversource project justification processes listed in the Guide’s references in section 1, which notes that “Projects that are required within the next 6 years of the Observed Year should be fully developed and approved using the latest version of the Capital Project Approval Process, refer to Section 7.1. A Distribution System Planning Substation Review form should be completed by the responsible System Planning Engineer.”

TRC found the project costs to be within industry standards, and from the documentation presented, TRC did not observe evidence of project scope changes due to consecutive reviews.

Recommendations

TRC recommends Eversource set up a tracking program to compare historical outage data for line segments for 3-5 years (as data is available) and then report annually on that segment post-

improvement. Such a system will document the improved reliability and resiliency delivered by relocation and reconductoring projects. TRC recommends reducing the number of radial feeds to allow for increased networking and load pickup throughout the system. Eversource should also maintain awareness for project cost increases that may arise as projects are delayed.

6. Conclusion and Summary of Recommendations

This section summarizes TRC's findings for the Eversource distribution system assessment and aggregates the study recommendations across the topic areas surveyed in this research. Finally, TRC presents areas for potential future research based on the research and findings.

6.1 Summary of Findings

Eversource's recent or proposed enhanced standards and activities for distribution system hardening have been designed to maintain and improve the reliability and resiliency of the distribution system. These changes are driven by an increased recurrence of major storm events since 2008 that have caused prolonged and widespread outages, at times impacting over 40% of customers. The proposed investments in a more resilient system align with a growing trend among utilities around the country that have faced similar weather (or other external) threats to their operations. It is important to not view individual standards or activities targeted toward resiliency or reliability in isolation, but rather as a package of tools that can be deployed when rebuilding or when making targeted improvements to the system.

Below are key findings related to each of the components of this distribution system assessment research:

Industry Resiliency Planning

As noted above, the utility industry is grappling with the need for accelerated planning and investments in resiliency, driven by climate-change induced increases in severe weather events. Despite the increase in interest and planning around resiliency, few utilities or regulators have developed a clear path to plan for costs and benefits, given the low-frequency, high-impact nature of resiliency-focused major events. These and other key findings include:

- Increased resiliency and hardening investment and planning activity across most states is driven by an increase in severe weather events that can significantly impact outage durations.
- Resiliency planning frameworks stress assessment of local climate risks to identify tailored solutions for each utility.
- Evaluating cost-effectiveness of resiliency investments remains a critical challenge for utilities and regulators, as the benefits are difficult to monetize.
- Shifts in the traditional utility business model are impacting investment decisions. The move away from a cost-plus ratemaking approach and moving to a performance-based structure (e.g., New York and Massachusetts) has allowed regulators to incorporate metrics around grid hardening and provides greater flexibility to utilities in their system investment.
- Cost recovery remains central to the ongoing industry debate. This research identifies various approaches currently being advanced, presented later in this chapter. These approaches demonstrate the range in considerations and fragmented nature of the responses across the country.

System Condition

Key findings related to the overall condition of Eversource New Hampshire's electric distribution system include:

- A substantial number of wood poles, primary conductor circuits, substation breakers and substation transformers are at the end of their useful life.
- Wood poles are physically overloaded due to their age and number of attachments.
- Many circuit lines in the ROW are inaccessible, due to their locations, and difficult to maintain.
- Trees and canopy are in close proximity to the distribution system, making the lines vulnerable.

Steel Poles

Eversource has specified the use of steel poles in the off-road right-of-way due to the difficulties in accessing these line sections in the event of a failure. Steel poles are stronger, less prone to catastrophic failure, lighter and thus easier to deploy, and require less maintenance than their wood counterparts. Key findings include:

- A number of utilities, including several in the South and West have implemented steel poles as the standard for distribution construction. Eversource has used steel structures in the ROW for many years.
- The useful lifespan of a steel pole is estimated to be twice as long as a wood pole.
- While upfront costs can be 250-400% higher for steel poles, the total lifecycle cost of steel poles is lower due to the escalation in material and installation costs of wood poles that must be replaced sooner than a steel pole.

Class 2 Wood Poles

Eversource has implemented a standard of using stronger Class 2 wood poles, instead of Class 3 or 4, for distribution primary poles due to the ability to better withstand wind, ice, and other severe weather events. Eversource designed its stands to meet NESC guidelines for severe wind and ice loading. Key findings include:

- Pole failure is the least desirable outcome in an outage event due to the cost and complexity in repairing (compared to failure of conductor, crossarms, or other components).
- Class 2 wood poles, with a wider circumference, can withstand 60% greater force than smaller, Class 4 poles.
- Installed costs of Class 2 wood poles are marginally (2-4%) higher than the cost of a comparable Class 3 wood pole.

Spacer Cable

Eversource has made spacer cable its standard for three-phase primary distribution as part of resiliency guidelines to reduce faults from tree and animal contact and survive larger tree strike. Key findings include:

- In addition to ability to withstand tree and animal interference, spacer cable requires less clearance than open wire, reducing ROWs and vegetation management requirements.
- Spacer cable costs approximately 200% more than open wire per mile installed, with higher costs equally driven by labor, materials, and overhead costs.

Fiberglass Crossarms

Similar to the components listed above, Eversource has standardized the use of fiberglass crossarms for new construction or replacements as needed. This standardization was driven by the improved longevity, strength, and predictability of fiberglass components considering increasing severe weather events.

Key findings include:

- Modeling shows that fiberglass cross arms pass the heaviest ice loading with heavy tree contact and high wind test simulations where wood crossarms failed.
- Fiberglass crossarms are commonly paired with steel distribution poles, given both have superior longevity to wood material equipment.
- Fiberglass crossarms weigh one-third as much as equivalent wood cross arms and do not require braces, making installation of fiberglass crossarms easier.
- The lifecycle costs of dead-end and tangent fiberglass crossarms are 38-44% of the total lifecycle costs of wood crossarms, due to the need for replacing a wood crossarm at 25-30 years.

Vegetation Management

Eversource operates a portfolio of vegetation management activities designed to reduce high-risk vegetation around lines (ETT, ETR, and ROW) and then maintain improved clearances through regular 5-year maintenance (SMT). Key findings include:

- Vegetation management activities since 2011 have led to a significant improvement in tree related SAIFI and SAIDI performance. Inside-zone caused outages have been reduced tenfold for both SAIDI and SAIFI, while outside-zone caused outages have trended slightly downward over the last decade.
- Modeling shows that reductions in vegetation management spending can lead to a disproportionate increase in cycle-time to return to each circuit. For example, a 20% reduction in spending can nearly double the cycle from 5 to 9 years.
- Similarly, deferring SMT can lead to increased costs per mile. A 1-year delay can increase per-mile costs by 20%, while a 3-year deferral can increase costs by 51%.

Substation Transformers

Eversource has designed criteria for designing substation components to minimize length and impacts of outages during contingency events. Key findings include:

- Standardizing substation transformer sizes can provide benefits for streamlining inventory and reducing event response time.

Distribution Planning

Eversource conducts distribution planning to maintain system operations within established operating criteria. Key findings include:

- Engineers develop solutions to address capacity, power quality, and reliability concerns based on historical performance data and forward-looking forecasts.
- Line relocation and reconductoring are two options to address reliability issues.

6.2 Recommendations

TRC recommends the following practices, based on the research and findings of this assessment:

- 1) Consolidate current resiliency/hardening efforts into an overarching program following the decision framework outlined by the Department of Energy.
- 2) Establish a systematic asset replacement program to replace wood poles on an age basis, that support three phase lines, over the next 5 years. Beginning with poles 70 years and older poles, with priority on the smaller class 4, 5 and below, then address the 60- and 50-year-old poles. There are about 42,000 wood poles aged 50 years and older that will need to be identified and prioritized for replacement. It is estimated that 20% (8,400) of those poles support three phase lines, requiring approximately 1,700 poles/year of the poles in this age group be replaced in conjunction with the other pole replacement efforts.
- 3) Poles that are identified as structurally loaded at 90% or greater, be replaced with the correct sized poles to carry the mechanical load under the mandated NESC design conditions. To accomplish this, TRC also recommends that 10% (approx. 4,500) of the overloaded poles, be replaced on an annual basis. Priority should be given to the poles that are overloaded by the greatest amount and/or most critical to the system. It is also essential that all new poles that are installed have pole loading analysis completed to ensure the design criteria is met. Individual pole loading analysis will need to be performed on all new and replacement corner, junction, and dead-end poles. Typical tangent pole analysis can be modeled to promote efficient design.
- 4) Continue the practice to use a minimum of Class 2 wood poles for all applications and ensure that NESC pole loading requirements are met for both the heavy loading and extreme wind scenarios. Based on analysis of the representative data, Class 2 wood poles are half as likely to be overloaded with attachments compared to Class 3 poles.
- 5) Identify candidate lines for ROW line relocation to roadside and develop a multi-year plan to address the most critical and least accessible lines. The plan needs to coordinate with efforts to reconductor open wire to spacer cable and the overloaded and aged pole projects.
- 6) Increase vegetation management and spacer cable installation for vulnerable lines.

- 7) For distribution engineering materials and equipment, Eversource should continue to plan reliability and hardening standards and investments from a system perspective, rather than a series of individual components:
 - a) Given lower lifecycle costs and difficulty patrolling and replacing more remote ROW assets in the event of a failure, continue to use steel poles as the standard in these environments when not able to move roadside.
 - b) Continue to use Class 2 wood distribution poles for the added strength in high wind and ice loading scenarios. Perform pole loading analysis on all new and replacement corner, junction, and dead-end poles, to ensure the design criteria is met.
 - c) TRC recommends adding a proactive program to replace wood poles or obsolete steel lattice towers in the ROW with steel poles on a planned basis. The plan should include a minimum of five circuit-miles of off-road ROW, three phase rebuilds, including rebuilds that are part of the inaccessible line relocation projects. Line projects need to be prioritized by reliability performance and susceptibility to damage or failure from trees.
 - d) Follow the spacer cable program as outlined in the Eversource 2016 Resiliency Guidelines. As part of the capital planning process, accelerate the rebuilding/reconductoring of the open wire, three phase lines that are the most susceptible to outages in heavily treed and narrow ROW areas over the next 5-years. Work in conjunction with the inaccessible line relocations to the roadside and steel pole installation projects in the steel pole section.
 - e) Continue to use fiberglass crossarms as specified, given their longevity, improved strength, and resulting lower lifecycle costs. These components also pair better with the proposed use of steel poles due to similar useful lives.
- 8) Vegetation Management:
 - a) For SMT, address an average 2,440 miles annually to follow the 60-month clearing cycle. This will focus on the Inside Zone vegetation and maintain the level of tree caused outages at current levels as indicated by Figure 5-23. Deferral of this work for a year or more will risk erasing the progress on tree-related reliability improvements achieved over the last decade and lead to increasing costs per mile and physical resource needs. This will likely have an impact on the budget.
 - b) Accelerate ETT to 80 miles per year to address the remaining 500 miles of the backbone circuits within the next seven years. This will likely have an impact on the budget and be subject to availability of physical resources.
 - c) Continue ROW clearing at the current pace to allow for the restoration of the full original easement where vegetation has encroached.
 - d) For ETR, target approximately 19,000 hazard tree removals annually following the current identification and prioritization practice. Evaluate additional strategies to drive improvements in outside-zone tree-related outage performance.
- 9) Standardize substation transformer sizes wherever possible based on voltage class to allow for greater efficiency in maintaining stock of fewer transformer sizes and flexibility in responding to contingency events and coordination with neighboring state service areas.

- 10) Establish a tracking program to compare historical outage data for line segments for 3-5 years (as data is available) and then report annually on that segment post-improvement. Such a system will document the improved reliability and resiliency delivered by relocation and reconductoring projects.
- 11) Continue to reduce the number of radial feeds to allow for increased networking and load pickup throughout the system.
- 12) Maintain awareness for distribution project cost increases that may arise as projects are delayed.

BUSINESS PROCESS AUDIT
OF
EVERSOURCE
&
Public Service Company of New Hampshire
DISTRIBUTION CAPITAL PROJECTS

JULY

2023

FOR

THE NEW HAMPSHIRE
DEPARTMENT OF ENERGY
DIVISION OF REGULATORY SUPPORT
ELECTRIC DIVISION

PREPARED BY

RIVER CONSULTING GROUP, INC.

Table of Contents

Executive Summary..... 4

Introduction 10

Project Management Processes..... 14

Internal Management Oversight 20

Engineering Capital Project Approval Process..... 32

Engineering and Systems Analysis Functions 42

System Reliability Performance 97

Third-Party Claims.....117

List of Exhibits

Exhibit 1 - RCG CapEx Model15
Exhibit 2 – Project Estimate to Actuals18
Exhibit 3 - Life Cycle and Improvements29
Exhibit 4 - High-Level CapEx Project Approval.....32
Exhibit 5 - Substation Project Approval Process35
Exhibit 6 - NH Distribution Line Project Approval Process37
Exhibit 7 - CapEx Project Process Oversight40
Exhibit 8 - Standardized Engineering Process Flow Chart for Substation Projects48
Exhibit 9 - Enhanced Engineering Process Flow Chart for Substation Projects49
Exhibit 10 - Standardized Process Flow Chart for Project Controls52
Exhibit 11 - System Planning Criteria – Comparison of Old vs. New DSPG 202059
Exhibit 12 - Bus Tie Example60
Exhibit 13 - T&D Engineering Standards Bookshelf - Contents.....63
Exhibit 14 - Pole Inspection Criteria74
Exhibit 15 - Historical Pole Inspection Targets and Actuals75
Exhibit 16 - Annual Rejected Poles & Replacements75
Exhibit 17 - Inventory of Mobile Transformers82
Exhibit 18 - 2020 Design Violations Summary Report - Xfmr Replacement Projects83
Exhibit 19 - 2020 Design Violations Summary Report - All Projects84
Exhibit 20 - Miles of Distribution Lines by Type.....87
Exhibit 21 - Project Evaluation/Selection Flow Chart, including NWA's92
Exhibit 22 - Residential, Industrial, and Commercial 2020 Load Totals for NH95
Exhibit 23 - PSNH Distribution System Components97
Exhibit 24 - PSNH Major Distribution Systems Map98
Exhibit 25 - NH Reliability Statistics 2011-2021 – ALL Events102
Exhibit 26 - NH Reliability Statistics 2011-2021 – excludes MEDs102
Exhibit 27 - NH Reliability Statistics 2011-2021 – includes only MEDs103
Exhibit 28 - PSNH Reportable Criteria104
Exhibit 29 - PSNH Quartile Performance – MBI104
Exhibit 30 - NH – ES Reportable Criteria – Quartile Performance with PI & MED105
Exhibit 31 - Reliability Targets for NH, CT, and MA106
Exhibit 32 - New Hampshire Ops Performance Scorecard Jan-Nov 2021.....107
Exhibit 33 - Annual Number of Events and the Number of Identified Offenders.....119

Executive Summary

The business process audit of Eversource's PSNH distribution capital project (CapEx) processes was procured by the New Hampshire Department of Energy's Division of Regulatory Support - Electric Division (Division), pursuant to the terms of a rate case Settlement Agreement approved by the New Hampshire Public Utilities Commission (PUC or Commission) in Docket No. DE 19-057, Order No. 26,433 dated December 15, 2020.

RCG understands that the genesis of this action involved communication concerns expressed by the Division covering PSNH's approach to project planning and management and the submittal of detailed Capital Projects information in the rate case.

As part of the recent PSNH rate case in Docket DE 19-057, the Division requested documentation for all distribution capital projects and associated estimates. PSNH delivered to the Division the requested information but did not provide complete and clear definitions for the multiple individual project estimates.

In this business process audit, RCG witnessed some communication issues with PSNH. RCG experienced communication issues resulting from PSNH responses to RCG data requests (DRs) including data provided in a format different from what was requested. Based on our process audit experience, RCG recognizes some DRs can take up to a month to prepare but taking three or more months is beyond the norm. Eversource did not notify RCG when response times were expected to exceed the agreed upon response time.

DRs are designed to obtain and facilitate the review of standard information that a well-managed utility will use in its ordinary course of business. Specifically, the policies, processes, and procedures should be in place to create the information for successfully managing CapEx projects and tracking them for accounting, engineering, and regulatory purposes. The quality of internal or external communications is often indicative of systemic management control issues that are not part of a typical business process review and will require further efforts on the part of Eversource (see the discussion below).

As part of this audit assignment, RCG undertook an extensive interview process of PSNH and Eversource management personnel and we can report that PSNH arranged interviews consistent with RCG's expectations and appeared to be forthcoming in answering all questions.

A utility's capital planning process is expected to answer the following high-level question: "How much distribution system reinforcement is essential to provide the expected reliability and system resilience?" This question seems straightforward but is incredibly complex, with many variables impacting the final answer.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

PSNH is part of a tri-state operation (New Hampshire, Massachusetts, and Connecticut) with different circuit configurations and voltages in each state. PSNH's distribution system is reasonably complex with three primary voltages (34.5kV, 12kV, and 4kV). Notably, some of the critical distribution equipment is older and, in some cases, potentially near the end of its life.

RCG reviewed Eversource/PSNH's functions that impacted the CapEx project process, including accounting and management policies and processes. In addition, RCG conducted a review of engineering policies and practices applicable to load forecasting, system planning, study methods, engineering tools, decision processes, and standards. The results are documented as they apply to core management and engineering functions: organization, engineering project control processes, energy forecasting, system planning criteria, system planning studies, reliability analysis, and the impact of distributed energy resources (DER). In RCG's opinion, these engineering functions, including their attendant processes, are well designed, but their execution, in some cases, was found to need improvement. This conclusion also applies to the policies and processes used to track individual projects.

RCG identified recommendations for the most significant improvement opportunities:

- **Communications** – The most significant issue is written and verbal communications, and consistent application of certain terms used by Eversource/PSNH to describe documents and processes. RCG believes Eversource generally understands the terminology, but outside entities may not. For example, some of the terms and definitions used by PSNH, which appear to have common usage, are used, and interpreted differently by other Eversource functional areas, for example “Supplemental” for an additional funding request or “Total” in a Projects’ Excel spreadsheet. Communication issues also exist in the CapEx engineering processes, and in the language used in responses to data requests. Also, delays in providing requested information in data requests is a related issue; and
- **Project management oversight** – certain project plans as originally designed, were not effective during construction, as design flaws were discovered during troubleshooting and quality control phases of construction and rose to the attention of the Division during the rate case.

Another area reviewed by RCG involved “Third-Party Claims” costs associated with capital projects resulting from third-party damage to the distribution system. PSNH has no control over when third-party damages occur, which puts PSNH in a reactive situation.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

While PSNH has formal Third-Party Claims collection policies and processes in place, the pace of collection is partially out of PSNH's control due to the state's lack of a mandatory auto insurance requirement and the inability of entities to promptly repay the repair costs. Third-Party Claims are included in this Business Process Audit because they represent a component of capital project total annual costs, and this issue was specifically highlighted for review by the Division.

RCG's review of the CapEx processes resulted in recommendations designed to improve communications and various processes to improve the overall flow of information within PSNH and for external stakeholders:

Capital Project Processing, Documentation, and Oversight

- R.1 RCG recommends the Company retain and document higher cost and/or infeasible alternatives that were considered that could be provided to third parties during the regulatory process to aid in explaining the Company's decisions.
- R.2 Ensure that all three Eversource oversight functions Internal Audit, Enterprise Risk Management, and Capital Budgeting annually review an appropriate sample of capital projects over \$250,000.
- R.3 Introduce formal peer reviews into the overall CapEx project development early in the process to support enhanced decisions and training for design engineers.
- R.4 Enforce proper use of the term *Supplemental* consistent with APS-1 throughout the entire CapEx project process, including engineering.
- R.5 Develop easy-to-understand examples illustrating the before-and-after impact of DSPG 2020 system planning criteria changes on system performance (reliability and resiliency) for all PSNH customer classes (residential, commercial, and industrial). The examples also need to clearly illustrate how superseded standards ED-3002 and SYSPLAN-010 will be used in conjunction with DSPG 2020.
- R.6 Develop a formal process to communicate the latest industry activities, including lessons-learned and technology advancements, between departments and potential external parties (other utilities and suppliers).
- R.7 Include person hours on all planned project work orders to support crew performance management.
- R.8 Develop and test (as a joint effort between System Planning and Distribution Engineering) detailed Synergi feeder models, taking full advantage of System Planning's familiarity with Synergi to facilitate the process.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

- R.9 Perform an in-depth/rigorous analysis of the data-checking and conversion process for new software platforms (e.g., DistriView to Synergi data sets) independent of the Grid Mod group's conversion verification process to ensure that data continuity and integrity are maintained throughout.
- R.10 Develop detailed documentation to maintain data integrity as data conversions are made from one software platform to another, e.g., DistriView to Synergi, Storms to Maximo. This is especially true for Synergi, where individual phase models for distribution circuits are being developed, i.e., converting from 3-phase balanced distribution line models to 1-phase unbalanced distribution line models.
- R.11 Investigate the potential benefits of retro-filling power transformers with the latest technology insulating fluids, e.g., extending transformer life (without compromising reliability) and deferring capital investments. Include guidelines for identifying candidate transformers.
- R.12 More clearly explain and illustrate with examples why the best overall solution alternatives are not always the least-cost solution alternatives. It is not sufficient to simply state that all criteria violations have been resolved. In addition, consistently document all alternatives considered in the formal project paperwork. Include a formal statement on NWA solution considerations (even if the statement says NWA solutions were not applicable) and reasons why.
- R.13 Compare how the traditional solution alternatives are developed and priced against how NWA solution alternatives are developed and priced. Identify areas that disadvantage NWA solutions, e.g., how projected O&M costs are treated. Document key drivers that contribute to the cost differences between traditional and NWA solutions.
- R.14 Develop and conduct in-house training programs for New Hampshire DER hosting map development engineers. Lessons learned from Eversource CT, and MA should be integral parts of this training.
- R.15 Continue to investigate Conservation Voltage Reduction (CVR) potential energy/demand savings for PSNH, given the relatively high portion of residential system load --- 44% kWh residential sales: 50% kW residential peak demand.
- R.16 Conduct a protection and coordination study in conjunction with System Planning at the distribution circuit level to better understand and anticipate how 2-way power flows can be safely accommodated.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

- R.17 Take more aggressive actions to correct chronic problem feeders by implementing one or more of the following:
- Reduce COSAIDI targets or other reliability targets to encourage more aggressive distribution automation and sectionalizing schemes; and
 - Find locations where alternate feeds can be feasibly constructed for long radial circuits, i.e., create circuit loops, not just segmented customer groups; and
 - Apply localized NWA solution options, where suitable, when looping feeders is not a feasible alternative and the solution exceeds the NWA threshold. Subsequent revisions to the NWA Framework may be required.

Third-party Claims Processing

- R.18 PSNH should develop a formal method to track the status of third-party claims in process but not yet completed at the operating center level.
- R.19 PSNH should create an accurate job description for the Administrator position that reflects the importance of the third-party claim's preparation process.
- R.20 PSNH should revise the third-party claims process to have the Claims group review incidents where no responsible party is identified or when the operating center management has closed an incident without generating a claim.
- R.21 PSNH should develop a flowchart and process narrative to define and illustrate the entire third-party claim process in one document.
- R.22 PSNH should correct the software which improperly allocates reimbursements to Account 107 instead of Account 108.

Data Request Processing

- R.23 If PSNH cannot complete a response to a data request and transmit the data response within ten business days, an estimated completion date should be formally transmitted by the tenth business day.
- R.24 In its data responses, PSNH should highlight its ongoing and planned responses to issues and the impact of third parties' actions, rather than embedding the issue within the data.
- R.25 To facilitate and clarify data requests and responses, PSNH and DOE should consider adding technical conferences before and after data requests are requested and responded to.

Communications Recommendations

Of the 25 recommendations developed by RCG, 10 recommendations focus in some manner on communications (R1, R4, R5, R6, R12, R14, R21, R23, R24, and R25). While each of these recommendations can be implemented on their own, Eversource should consider taking steps to improve its communications with external parties. These steps might include:

Eversource should convene, before the filing of Eversource's next rate case, a joint working group to understand external parties' needs and the impact of the present data transfer process on those external parties.

Eversource should develop a standard project documentation package that addresses the needs of all major parties in a rate case. One aspect would be to demonstrate the breadth of alternatives that were considered (including NWA) and why the lowest cost alternative may not have been adopted.

Eversource should ensure the terminology used in major documents such as APS-1 is sufficiently defined at a level that all parties (internal and external) consistently understand.

Eversource should host a technical session for external parties to illustrate the impact of the Distribution System Planning Guide 2020. This session would be focused on a non-engineering perspective using easy to understand terminology.

Eversource should invite external parties to regularly scheduled sessions to communicate the latest industry activities, including lessons-learned and technology advancements.

Implementation of these recommended actions will be challenging for Eversource and external parties and will require commitment from all parties to make the necessary structural and attitude changes.

Introduction

This process review of the Eversource, and its subsidiary Public Service of New Hampshire (PSNH), distribution capital project (CapEx) processes was procured by the New Hampshire Department of Energy's Department of Regulatory Support Division, Electric Division (Division) pursuant to the terms of the Settlement Agreement approved by the PUC in Docket DE 19-057. In accordance with Appendix 2 of the rate case Settlement Agreement in Docket No. DE 19-057, the following scope was adopted by RCG as the primary objective of the business process audit:

1. Review and assessment of the Company's capital planning, budgeting, approval, and management oversight, including:
 - a. Company's budgeting and approval process for capital expenditures.
 - b. Company's information systems used in work planning, tracking, and accounting.
 - c. Initial project design and development of budgets, cost estimates, revised budgets and budget variances.
 - d. Internal accounting for capital projects and administrative support.
 - e. Decision making by project managers involving design changes, engagement and hiring of outside contractors and the Company's oversight of contractors.
 - f. Decision making by project managers in addressing and controlling project costs including factors that necessitate the involvement of upper management.
 - g. Reviews by upper management of project costs and cost overruns and the application of cost controls.
 - h. Compliance of the above-listed items with good utility practices.
2. Review and evaluation of capital project documentation, including:
 - a. Compliance with documentation policies and filing requirements.
 - b. Initial project assessment and analysis in the PAF including consideration of known and foreseeable costs and risks.
 - c. Use of Supplement Requests, including root cause analysis and lessons learned.
 - d. Source documentation and supporting documentation.
 - e. Recommendations for improving and enhancing the above documentation process.
3. Selective Project Review: The consultant will select a sample of capital projects for 2020 and 2021 to be included as a part of its examination and testing involving the above listed processes.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Based upon discussions with the Division at the beginning of the engagement, it is RCG's understanding that the genesis of this portion of the settlement was the result of the Division's review of PSNH's project planning and management processes and the unintentional failure of parties to communicate clearly.

RCG's investigative process cannot give specific weight or confirmation to actions or outcomes that occurred during the rate case, as the conduct of that case was not within the scope of this business process audit.

The Division also asked RCG to review PSNH's wood pole replacement practices including the application of steel poles on the distribution system, the rebuilding of distribution lines with 34kv hardware, and distribution substation maintenance and upgrading practices. These topics are addressed within the body of the report.

The following is RCG's audit philosophy and Covid response as expressed in our proposal for this review:

- Develop an assessment through a positive process that captures the perspectives and needs of all interested parties.
- Deliver a final report that provides a clear, independent, and objective evaluation of Company processes.
- Perform this audit in a COVID-19-safe manner as agreed to with NHPUC Staff. While all RCG team members are fully vaccinated, we also expect judicious video conferencing to help manage expenses.

RCG's consistent ability to meet the commitments of its audit schedules and produce effective results relies on the following approach/steps.

- Develop a formal work plan with clearly defined deliverables.
- Use experienced professionals who possess the combination of professional maturity, specific functional utility knowledge and audit work experience.
- Use both quantitative/qualitative data and information obtained through a structured data request process to evaluate the actual performance of the capital process.
- Develop conclusions consistent with generally accepted auditing standards which require thorough documentation of stated *facts* that support the findings/conclusions. Facts will include direct statements from PSNH/EE personnel, policy and procedures, physical observations, and other relevant data.
- Understand how RCG conclusions reached in one audit area may impact other areas. Determine how overall performance is improved through a clearer understanding of these connections and interactions.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

- Use a tracking and retrieval system for work papers in a manner that supports documentation of the findings. On several assignments, the utility has had a format tracking tool that RCG will use to facilitate the smooth transfer of data and information.
- Use an editor to ensure draft and final reports are clear and consistent.
- Assure NHPUC Staff concerns are addressed.

RCG used a five-stage process that includes planning and orientation, fact-finding and analysis, conclusion and report construction, recommendation development and final report creation.

RCG brought together several disciplines to fully understand the situation, identify the root causes of identified issues, and provide an overall objective opinion of PSNH's actions relative to the state of their distribution system. Each RCG team member has over 40 years of utility or power engineering and operations experience. RCG has previously participated in other capital project development reviews and has captured what it believes to be the leading practices in this process area.

This process review of PSNH capital projects looked objectively at those engineering and management processes associated with identifying, planning, and executing distribution capital projects. RCG took a deep look into PSNH's engineering function and practices surrounding capital projects.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

RCG understands that there must be a healthy dialog between PSNH and external parties to ensure PSNH customers are adequately represented and charged a fair price for the electric services they receive now and in the future. Further, PSNH must continue to provide the expected quality and continuity of service at a reasonable cost.

The specific elements this report will address include:

- Project management process
 - Project funding approval and oversight
- Project planning and engineering
 - Capital project identification
 - Technical capital project challenges
 - Capital project execution
 - Project closeout
- Third-party damage to capital equipment and the approach to managing the treatment of the associated capital spend

Project Management Processes

Before analyzing PSNH's CapEx program, RCG will introduce our model of the CapEx process developed over similar assignments, which led to the design of this CapEx process flow. The approach focuses on the capital dollar components of CapEx, but we will introduce several other critical processes which are part of any well-thought-out utility capital program.

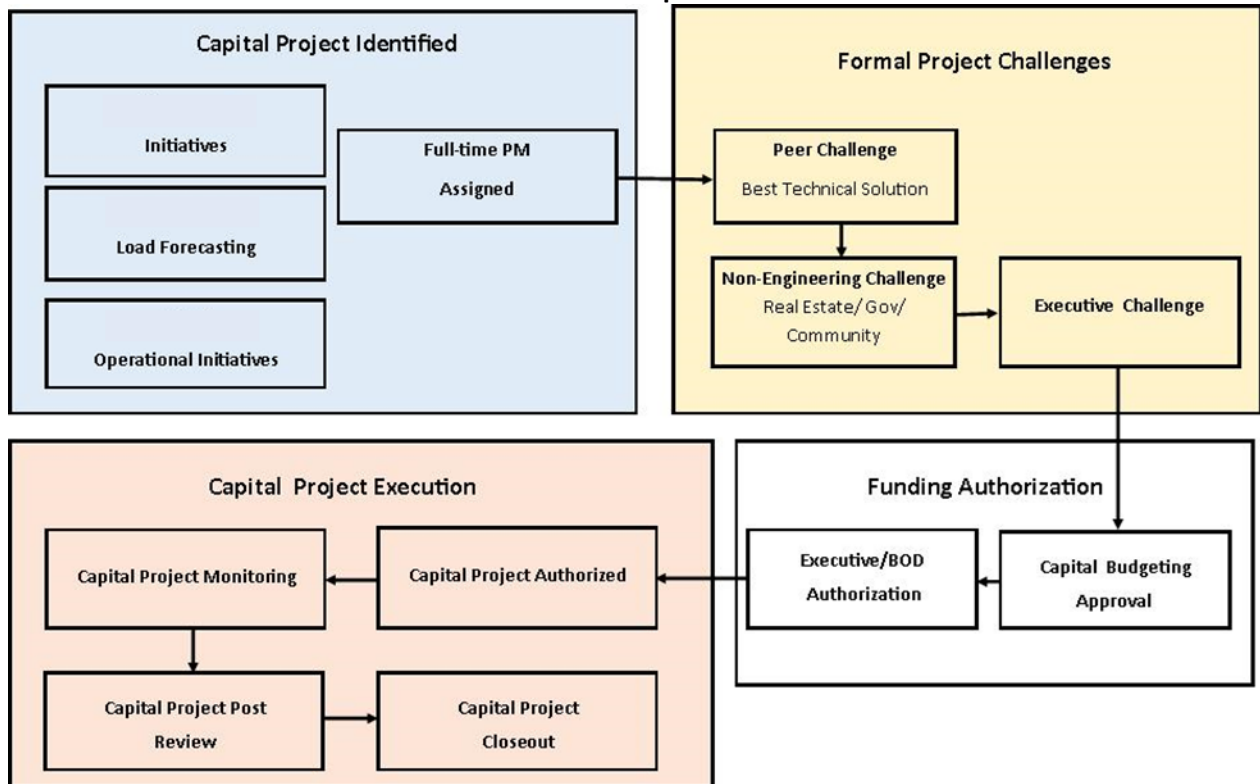
2.1. RCG developed a Capital Projects process model, incorporating leading policies and practices for CapEx project identification, design, authorization, and oversight processes in the utility space.

This high-level CapEx process model represents the leading practices used in client companies. It reflects minor modifications to streamline the flows and not unduly tax the company personnel responsible for implementing the process. Exhibit 1, on the following page, shows RCG's general process flow for CapEx projects. Notably, the model addresses the approval process, not the detailed engineering process, since that can vary between utilities. As mentioned earlier, the engineering process reviewed in the coming chapters addresses another of the Division's questions. Further, the internal oversight functions are not included in the RCG CapEx process flow but are critical to ensuring all company policies and procedures are performing as designed.

This report will review the processes and actions shown in Exhibit 1 and include other tangential elements identified as critical to the process to clearly understand PSNH/Eversource's process approach to capital projects' life cycle and the state of the NH distribution system. RCG uses the term "Projects" in this document to refer to both stand-alone CapEx projects and programs. Programs are a catalog of similar distribution and substation projects routinely performed across PSNH's service territory over several years.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Exhibit 1 - RCG CapEx Model



The blue box, *Capital Project Identified*, shows the sources of Distribution CapEx projects. The first sub-box, *Initiatives*, indicates corporate policy and standards. Here Eversource sets the guidelines for how systems will be built and maintained, along with equipment specifications and typical designs. Distribution engineering also continually evaluates the system against the standards selected by the utility while ordering system enhancements to keep the system operating within PSNH's set parameters. The second sub-box, *Load Forecasting*, identifies the future growth patterns and the impact of customer conservation activities and third-party distributed generation. Forecasting looks at peak load (kW) and energy usage (kWh) requirements to determine when and where to expand the system's capacity. As noted in the Engineering chapter, several design and policy concerns were evaluated, along with deciding if PSNH/Eversource evaluated alternatives. It is important to note here that in New Hampshire, distribution companies do not own generation other than for emergency power situations. PSNH operational initiatives deal with unique distribution system situations which will impact system performance. The final sub-box is the assignment of a non-engineer project manager to shepherd the project from inception to project closeout, where the project is moved into the company's capital base. This individual is not responsible for engineering the project but reports progress to management and is responsible for explaining any

anomalies or cost variations that might occur during the project. The project manager function provides checks and balances within the project structure with engineering and construction. This individual is the continuity link for the entire project.

The yellow box, *Formal Project Challenges*, is critical to ensure a project is well thought out and prepared for unexpected contingencies. Further, it helps define the best alternative solution for the final project. In this manner, the project team considers the impact on local reliability, including reliability around the specific location, e.g., other substations and feeders, identification of potential impediments to the construction, and alternative cost comparisons. This also offers an opportunity for peer design engineers to challenge the selection of the design engineering team, which also supports learning opportunities while providing valuable insights into the project from various positions. Next, it allows non-engineering personnel to review the project from community, municipal, and state requirements that could impact the design and execution choices. Finally, the executive challenge looks at the project from a needs aspect and consistency with corporate policy.

The white box, *Funding Authorization* ranks the project against other projects competing for the same finite funding. If selected, the budget is approved, and the project moves forward. The critical point is that the project may receive capital funding over several years, or annual CapEx cycles, until completed.

The tan box, *Capital Project Execution*, specifies where the fully engineered project is built, inspected, put into service, and officially closed out from an accounting perspective. The entire process can take several years to complete for substation projects and significantly less time for some distribution line projects.

2.2. Eversource recently recognized the issues in the capital project process and made changes, however, alternative designs were deleted once management selects the most appropriate design.

It is RCG's understanding that PSNH/Eversource recognized issues in their capital project budget and estimating processes approximately four years ago and began making substantive changes in the 2017-2018 timeframe. However, an issue discovered by RCG remained unaddressed which PSNH is now addressing because of RCG's early investigation efforts during this audit assignment. RCG noted after observing a PSNH project review session, that once a decision was reached on which alternative project design would move forward, the remaining alternatives appeared to be deleted. RCG also noted that there is a certain degree of informality imbedded in PSNH's communication

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

involving language and detail that non-employees may find difficult to understand. This issue involves spoken and written formats, including a lack of consistent use of definitions and the prompt delivery of essential information as requested in regulatory proceedings. In addition, RCG found that certain project plans, as originally designed, were not effective, as design flaws were discovered during the troubleshooting and quality control phases of construction.

Eversource and PSNH appear to have the appropriate engineering and operational policies, procedures, and processes for managing and maintaining a reliable distribution network in New Hampshire. Still, the written and verbal communications encompassing these efforts are less than what RCG would expect from a company of the size and stature of PSNH/Eversource. While PSNH/Eversource personnel and the management team understand most of what is being said and written inside PSNH, external communications with parties outside the internal process, such as Division Staff, are oftentimes confusing for those parties. This review uncovered several communication issues, which confused our team of utility experts at first glance. These issues will be covered in the appropriate sections of the report and should lead the reader to the same set of conclusions RCG reached during the process review. Specifically, RCG found both written and verbal statements that, on their surface, could be interpreted differently than initially intended. Further, RCG, in performing this process review, identified several issues, which, if not explored more deeply, could lead non-PSNH/Eversource personnel in different directions if the appropriate “next” questions are not asked to achieve clarity. Specifically, RCG found:

- The length of time to respond to some of RCG’s data requests exceeded what RCG has experienced in prior process audit reviews. The Division indicated that it has experienced this same issue. This outcome led RCG to conclude that the customarily expected information is not routinely maintained and archived in some instances.
- Standard PSNH terms are not consistently applied across the processes or results. One example was using the PSNH/Eversource word “Supplemental,” which was used on several Company spreadsheets as a “total” inconsistent with its formal definition.
- Some information that should be maintained is either discarded or not documented once a design is selected. One example witnessed by RCG is the discarding of alternative solutions once there is a selected project approach. RCG does not infer anything unethical about eliminating this information but assumes it is likely attributable to an effort by PSNH to merely simplify the remaining documentation. Additionally, this action fails to recognize the future need for this solution information by other outside parties such as the Division.

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

These issues will be reviewed in the appropriate sections of the RCG report.

2.3. Eversource and PSNH have done a reasonable job of estimating projects.

Before moving into the formal review of the processes, RCG will present the results of our study of completed project’ estimates vs. actuals for 2012-2020.

Exhibit 2 – Project Estimate to Actuals

Year	Percent of Projects Under Estimated	Under Estimated >20%	Total Projects	Over Estimated >20%	Percent of Projects Over Estimated
2012	100%	1	1	0	0%
2013	33%	1	3	0	0%
2014	56%	5	9	1	11%
2015	52%	15	29	4	14%
2016	57%	13	23	4	17%
2017	29%	7	24	2	8%
2018	21%	5	24	4	17%
2019	30%	7	23	0	0%
2020	22%	5	23	4	17%

Exhibit 2 shows a reasonably balanced comparison of under- to over-estimated project costs by year. Except for 2015 and 2016, PSNH made a reasonable effort of estimating projects when compared to actual project cost. This result is essential for the following general reasons:

- Underestimating project costs could produce too many projects not being completed within the annual CapEx budget cycle due to a lack of funding. Consistent underestimating could indicate challenging estimating practices or an inadequate effort to assess project risk factors.
- Overestimating project costs can produce an annual plan with fewer projects due to funding limits. If most projects are overestimated, RCG would be concerned about the potential to pad projects to meet estimating goals. This is not the case here as there are few projects by percentage in this category.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

From Exhibit 2, PSNH has more difficulty under-estimating CapEx for projects than overestimating. Although in the last four years, PSNH appears to be doing a better job of estimating. Overestimating seems to be less of an issue for PSNH. Recent efforts appear reasonable when considering the pandemic and its negative impact on the supply chain.

The industry standard is to accept projects completed based on the budget if they are within plus or minus ten percent, which is PSNH's target. RCG has moved the target to twenty percent (20%) to account for recent supply chain issues.

Exhibit 2 indicates a reasonable balance between the over/underestimating except for two years.

Recommendations

- R.1 RCG recommends the Company retain and document higher cost and/or infeasible alternatives that were considered that could be provided to third parties during the regulatory process to aid in explaining the Company's decisions.**

Internal Management Oversight

3.1. Three separate functions provide independent internal oversight.

The three different functions providing independent internal oversight essential to managing corporate processes are Internal Auditing, Enterprise Risk Management, and Capital Budgeting; however, at PSNH, the first two are conspicuously limited from the PSNH Distribution Capital Line Projects due to Company threshold guidelines.

The internal and independent oversight of all PSNH/Eversource-approved CapEx processes is essential to monitor the integrity of all company processes. Having an internal oversight function of the distribution CapEx process (separate and apart from the engineering/operations function) allows for independent validation of the procedures and policies application. This instills confidence in the processes and attendant outcomes. Within Eversource, internal but independent reviews are performed for substation projects via three separate functions:

- *Internal Auditing (IA)* – Looks at the Company's process controls and in specific projects to ensure compliance with Eversource policies and procedures or where management has concerns over project outcomes for projects. Audit of specific projects generally consist of large dollar/complex risk projects generally over \$50,000,000. From an accounting perspective, the oversight of the capital approvals and management is a critical, required set of activities.
- *Enterprise Risk Management (ERM)* – ERM participates during the early development of all substation projects to ensure that all reasonable potential risks are identified. It also impacts the final *Pre-Constructability Estimate and schedule*. Participation is limited to projects greater than \$25,000,000.¹
- *Capital Budgeting* – begins with project development and design. The PowerPlan tool tracks the project's initial conceptual engineering estimate through the development of additional engineering "building block" estimates. Project post-completion responsibility is to compare the total actual engineering and construction costs against the authorized final *Pre-Constructability Estimate*. It is the final estimate in a series of evolving estimates that reflect the project's engineering development stages. Eversource engineering prefers this approach to tracking engineering CapEx distribution projects so that all engineering parties and management can understand the evolution of the project's final *Pre-Constructability Estimate*. The *Pre-Constructability Estimate* once approved becomes the *Full Funding* amount for the specific project. The last and consequential *Pre-*

¹ Interview #35

Constructability Estimate is used in the Company's formal capital budgeting process to communicate between the parties as defined in the APS-01 process. The APS-01 is Eversource's project authorization policy. Until January 1, 2022, APS-01 required the estimators to use only direct labor and material costs, omitting the indirect costs associated with labor, supervision, and administration, when determining if a supplemental authorization request was necessary if actual (total) project costs were expected to exceed authorized (total) project cost estimates. This prior approach would generally guarantee that the final (total) project cost would be off by the value of the indirect adders, which could have been in excess of an acceptable threshold. This was changed as of the first day of 2022 and will lead to more projects being evaluated on whether a supplemental cost authorization form is needed when all actual costs are compared to all cost estimates to determine if they exceed the acceptable threshold.

3.2. Internal Auditing (IA) works with an annual audit target of fifty audits/reviews for their official annual auditing plan across Eversource businesses. This yearly plan's number of audits driven by IA staff size precludes IA from evaluating lower risk/value projects and therefore limits the number of New Hampshire business audits, including the New Hampshire distribution line function.²

The Institute of Internal Auditors defines internal auditing as "an independent, objective assurance and consulting activity designed to add value and improve an organization's operations." IA helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluating and improving financial risk management, process controls, and governance processes.

RCG only evaluated IA's function concerning its ability to provide adequate independent oversight of the NH Eversource distribution capital processes. IA is tangential to the CapEx Process but critical to monitoring the process from a control perspective. RCG conducted two interviews on IA organizational structure and reporting lines, responsibilities, experience, training, audit planning and execution, post-audit follow-up, and best practices. We are not commenting on the function but only on its support of the PSNH Distribution CapEx projects.

IA is positioned correctly within Eversource to provide independent assessments of selective Eversource's processes and controls. It appears to be professionally staffed with individuals who meet the requirements of IA auditors. The audit planning process is

² Interview #10 and Interview #9

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

appropriately risk-based, and audits are identified and prioritized based on input from the organization.

Eversource's Internal Auditing has four sections³:

- The operational audit group performs process audits across:
 - Electric Distribution,
 - Gas,
 - Water, and
 - Transmission functions.
- Information technology audits, supported by contractors, and
- Sarbanes-Oxley compliance, and
- Environmental, Customer Care, and Corporate (CFO, HR, and General Counsel).

IA has a formal plan to conduct approximately fifty (50) audits annually⁴ for the entire Eversource organization. Most annual audits are pre-planned as opposed to reactive audits. The Vice President of IA is proud that when his organization is compared to other Northeast utility's IA organizations, they are slightly smaller in staffing size but achieve a significant amount of work. The annual audits are conducted by a total staff of approximately twenty (20) people, including the four managers reporting to the Vice President of Internal Audit & Security. IA's staffing design makes it challenging to conduct additional audits across all business units within the Eversource family. According to IA, of the 50 planned audits conducted annually only, 18 to 20⁵ are within Eversource operations that would include CapEx distribution projects, which would be across the entire Eversource family of operating companies.⁶ The remaining 30 plus audits include IT, Environmental, Customer Experience, Corporate Services and CFO function.

IA uses a formal risk rating system that rates all key risks categories including financial, operational, external, technical, strategic, and historical. However, the dollar amount is only tied to the physical project's cost when considering auditing CapEx projects. It does not include the potential harm/risk to Eversource financials caused by the possible rate disallowances that might occur during a rate case due to an issue with a specific project.⁷

The IA formally tracks open audit recommendations made in previously conducted audits, demonstrating that follow-through exists in IA.

³ Interview #9

⁴ Interview #9

⁵ Interview #9

⁶ Interview #9

⁷ Interview #10

The group monitors and compares itself to industry best practices. It participates in regional peer reviews⁸ and adheres to the Institute of Internal Auditors Standards and the Code of Ethics.

3.3. Enterprise Risk Management (ERM) works within a minimum project/program spend limitation of twenty-five million dollars. There are not enough resources to cover all the projects and programs, so the focus is on the high dollar efforts which preclude PSNH line distribution capital projects. It will have the most significant impact in Exhibit 1's yellow Box, *Formal Project Challenges*, as this function will test the design team's risk assessment evaluation from several different directions.

ERM is critical to supporting RCG's CPPM, as it helps identify all potential project risks outside the project's design to protect project budgets and schedules. Eversource ERM generally does not review projects valued at less than twenty-five million dollars.⁹ Specifically, in RCG's Exhibit 1, the early peer reviews involve other co-workers working in different disciplines, e.g., real estate, governmental and customer affairs, and others. Much of these are covered via ERM.

PSNH's "Regional Barns" or local operations centers, personnel appear to informally provide local knowledge of the design and unique conditions, reducing a portion of risk and allowing for additional project costs. But here, due to project size, there is no outside group evaluating the distribution design and its potential risks. It is important to note ERM has helped create lists of likely project risks based on past experiences, which are available to the designers and management.

This function will test the design's ability to withstand several risk areas, including government imposed issues, environmental and permitting, customer issues, regulatory requirements, and potential geological issues. These risks can add significant costs to the project while potentially impacting the construction schedule. In one example, RCG inspected a distribution line construction site that traversed wetlands and required a substantial level of environment mitigation using an extensive level of matting and a unique pole foundation design which increased the cost of the line installation significantly. Specifically, on this one project, PSNH had to pay for the installation, removal, and rental fees for the period the matting was installed in this marsh area. PSNH performed the necessary walk-down of the site, which allowed them to identify the wetlands, design changes, and incorporate the required additional expense into the

⁸ Interview #10

⁹ Interview #35

estimate. In the past, RCG has seen several utilities which allowed their engineers to design from their desks and this approach would have missed the need for matting. PSNH/Eversource supports engineers going to the field during the design efforts, a practice RCG supports.

RCG is always concerned, in these types of studies, that these risks can be used to cover poor estimating practices or to ensure that projects are not overestimated to prevent projects from coming in well over the estimates. Based on our review of the requested CapEx projects, this doesn't appear to be an issue. There are several overestimated projects which appear to be within acceptable parameters. In comparison, there were a much higher number of projects underestimated.

3.4. Capital Budgeting is correctly responsible for overseeing the capital budgeting for projects and adherence to Eversource's APS-01 policy and process, in addition to managing Engineering's use of PowerPlan. The group monitors and oversees a capital project's estimating, funding, and spending processes. The group ensures procedures are followed from determining the specific project capital budget through total spending on projects, including reports on the accuracy of the approved constructability estimates. This group is responsible, along with project management, for monitoring and reporting on the project financials.

A critical element to understand is that from a financial/accounting perspective, both the *PowerPlan* and *APS-01* are managed under the capital budgeting function, which allows for an independent review of capital budgeting components of a project throughout its life. The process provides for monitoring project estimates and expenses regardless of where or when they occur. *APS-01* establishes the evaluation, decision-making, and approval process of all projects -- per this policy. More importantly, it defines how PSNH will define, manage, and perform quality control of CapEx projects.

"A project is defined as a commitment by Eversource of internal and/or external resources to accomplish an initiative that will have economic impact to the Company, its customer and/or is required by policy or regulatory standards. The overall policy objective is that projects should be evaluated and approved in accordance with the DOA prior to the commitment of company resources."¹⁰

¹⁰ DR BPA-1-12, Att. B p3

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Importantly, PSNH, like other utilities, provides initial funding dollars for the physical initial scoping and engineering of the project. This early *Conceptual Estimate* should *not* be used to compare with the project's as-built final cost as the initial *Conceptual Estimate* does not contain expenses associated with equipment, construction labor, property procurement, overheads, etc.

In concert with the capital budgeting process and *ASP-01*, but integral to the approval process, the PSNH/Eversource's formal *Delegation of Authority* (DoA) policy clearly defines the management approval required for the total project value. The higher the project value, the higher up the management chain for approval is required. Ultimately this can lead to the Board of Directors' approval requirement. DoA is an accepted standard industry policy and practice allowing the appropriate management levels to oversee project approvals actively. The CFO organization is the corporate sponsor for these two policies.

Supplementing APS-01 and the DoA are the following related policies and procedures:¹¹

- *Capital Project Approval Process Job Aide*, (JA-AM-2001-A, Rev 5 6/1/2020)
- *Engineering Deliverables Administrative Procedure* (M7-EN-2000, Rev. 0, Eff. 7/1/2020)
- *Power Plan Procedures Manual and Users Guide*
- *Integrated Planning and Scheduling Process Playbook (IP&S Playbook)* (Revision: 0.1, November 30, 2017)

The *Capital Project Approval Process Job Aid* provides instructions and guidance on the process. It identifies the organizations responsible for the capital program project review and approval process following the *APS-01* policy. The *Business and Quality Assurance, Transmission Organization*, is responsible for administering the *Job Aid*. RCG found using a *Job Aid* to provide detailed instructions for creating a project is consistent with industry practices.

*Engineering Deliverables Administrative Procedure*¹² provides the detailed responsibilities and specific actions engineering personnel (PSNH/Eversource and contractors) must follow in the capital project development and approval process. Specifically, this procedure offers guidance for each design phase of a project. Additionally, it provides a complete list of deliverables to be considered by the engineer in developing the design packages for all transmission and substation projects. Most

¹¹ DR BPA-1-012

¹² DR BPA-5-007

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

importantly, it allows the project sponsor to validate the design against the need statement and the accuracy of the project estimates and budgets.

RCG found this procedure to be consistent with industry practices. However, RCG found many instances where the design packages did not include and/or retain sufficient documentation of the alternative solutions that had been considered. Additionally, one substation project designed by a contract engineering firm did not receive a good review from the project sponsor. It resulted in the need for considerable rework and additional capital costs. See specific examples in the Engineering Section of the report.

*Power Plan Procedures Manual and Users Guide*¹³ provides detailed instructions on using the *Power Plan* software in the capital budget, project development, and approval process. Included are specific instructions for developing the project funding request and creating the work order. These recently updated procedures clarified the requirements for the attachment of project documents including the *PAFs*. RCG found these procedures consistent with utility industry practices and supports the documentation filing practice improvement.

*Integrated Planning and Scheduling Process Playbook (IP&S Playbook)*¹⁴ provides detailed steps for the following:

- An annual work plan,
- The weekly “work order plan”, and
- The schedule for field and station operations, electric service, and response specialists.

The annual work plan process covers work identification, budget and resource balancing, and the development of project scope details. The work order planning process lists the prerequisites required for a work order to move into the scheduling window. Once in the scheduling window, the weekly and daily scheduling is developed. This planning results in a weekly work plan targeting 80% of the available hours, with the remaining hours focused on emergency and emergent work. However, the associated work orders for each project do not include targeted work hours to enable supervision to assess individual crew performance.

RCG found the processes and practices described in Eversource's IP&S playbook to be, with the exception noted above, consistent with utility industry practices and found it implemented consistently across PSNH.

¹³ DR BPA-11-012 Att. A and b

¹⁴ DR BPA-12-016

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The above policies and procedures are combined into PSNH's annual capital budget and project development processes.¹⁵ The PSNH Capital Budget starts with reviewing and updating the *Long-Range Plan* and associated five-year budget forecast early each year. The capital budget development for the upcoming year follows later (in the year) with the annual executive challenge session. At this session, Distribution Line Projects are discussed, including:

- Peak load and reliability-driven projects,
- Line upgrade projects associated with meeting distribution planning criteria, and
- Any distribution ROW rebuild projects, where the scope of the work is a project rather than the \$100K limited ROW annual program.

Further, projects in process, including pole-top distribution automation, oil filled circuit breaker replacements, animal protection, obsolete relay replacements, and annual projects such as transformer purchases, new services, and municipal driven work will require budget funding forecasts. Collecting all projects with forecasted estimates leads to a preliminary annual budget.

PSNH leadership then reviews the preliminary annual budget. If approved, it becomes the basis of the capital plan and is presented to Eversource Executive Leadership and the Board of Trustees for approval. Adjustments to the following year's capital budget are based on actual project costs, schedule adjustments, and emergent system needs. The decision on whether to fund a project currently unidentified in the capital budget is made monthly at the Capital Budget Review Meeting, chaired by the President of NH Electric Operations.

Since most distribution line project development takes place before the Challenge Session (described above,) preliminary design work is already underway (provided budget approval has been received.) However, the specific line projects cannot move forward to construction without first being approved by the NH Project Approval Committee (NH PAC). At this point, the *Project Approval Form* (PAF) is submitted to the NH PAC for review once the design is complete. The decision to use internal or external resources is then selected, ensuring the best estimate is available at the time of the NH PAC review. Distribution line projects are then prepared and presented by the organization that initiated the project.

¹⁵ DR BPA-8-029

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Similarly, substation projects are developed based on the priorities outlined in the annual capital budget and presented to the *Eversource Project Approval Committee* (EPAC). Since the duration of substation projects is typically longer and more complex than distribution line projects, initial funding and partial funding are requested regularly to support detailed design deliverables. Full funding authorization, approved by EPAC, is required before a substation project can move to construction. Distribution substation projects are also prepared and presented by the initiating organization.

RCG found PSNH/Eversource's capital budget and project development process consistent with industry practices. However, as previously discussed, there are limited opportunities for proposed distribution line projects to undergo peer-to-peer challenges to design alternatives.

PSNH/Eversource has updated its capital budget and project development policies and procedures during this BPA to reflect Eversource's improvements in cost estimate documentation, alternative solution development, and document retention. A number of these improvements were a direct result of interview discussions. The following exhibit reflects improvements Eversource has made in its capital business process:


Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Exhibit 3 - Life Cycle and Improvements¹⁶

Project Lifecycle & Other Process Improvements

In late 2017, a new initiative known as the "Project Lifecycle" was initiated to evaluate improvements to documentation, processes and interdisciplinary coordination.

- This initiative is managed by an executive leadership team steering committee, sponsored by the COO
- Originally focused on Tx Projects, however in 2019 was expanded to include other Major Projects (e.g., Dx substation projects)
- The Project Lifecycle Initiative is based on a continual improvement philosophy with implementation between 2018 and 2021



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 Attachment: BPA 7-004
 Page 9 of 23

People	Process	Technology & Reporting
<ul style="list-style-type: none"> ▪ Project Solutions team established to manage & QA/QC project and documentation ▪ Established Project Controls Orgs <ul style="list-style-type: none"> ▪ Engineering Project Planning and Scheduling ▪ Project Planning and Scheduling ▪ Established cross-disciplined participation expectations at approval committees ▪ Project Managers requested / assigned early ▪ Standardized which projects have PMs (Tx/SS) ▪ Established a Cost Estimating Department ▪ Lead Commissioning Engineers required for complex commissioning ▪ Supplements with a total cost over \$5M require a detailed presentation and review at the President level prior to routing in Powerplan 	<ul style="list-style-type: none"> ▪ EPAC & NH PAC Committees Established ▪ QA/QC Review Process for Project Approvals ▪ Initial Funding Initiated early <ul style="list-style-type: none"> ▪ Capture / Track early project costs ▪ Control which priorities / projects are pursued ▪ Material ordering process aligned with funding stages ▪ SDC Established to evaluate preferred solutions / alternatives ▪ Standardization of designs and equipment ▪ Standardized documentation / plan expectations <ul style="list-style-type: none"> ▪ IFRs, Programs, SSFs, PAFs (PF/FF), SRFs ▪ Estimating Documentation / Assumptions ▪ Schedules ▪ Risks & Contingency aligned with industry ▪ Constructability Review Documentation, Expectations and Qualifications ▪ Outage Coordination and SCLL Mitigations 	<ul style="list-style-type: none"> ▪ Implemented new project monitoring reports in various forums (e.g., workplans, exec meetings) <ul style="list-style-type: none"> ▪ Supplements (Actuals & Forecasts) ▪ Schedules ▪ Project Closeout Monitoring ▪ Project Approval Tracking ▪ Project Cost Sheets (new for Dx) ▪ P6 Schedule Utilization and Baselineing ▪ Standardized WBS (Work Breakdown Structure) ▪ Estimating <ul style="list-style-type: none"> ▪ Standardized Templates ▪ Maintain template assumptions ▪ Incorporate Lessons Learned ▪ Engineering Deliverables Standardization Templates and Sign-off ▪ Ebuilder to be deployed in 2022 to enhance transparency of committed costs and schedule

Safety First and Always

Note: These are examples of improvements, but not intended to be an exhaustive list

7

In 2021 changes were implemented regarding the Distribution Line Capital Project Process. The "*pre-construction final estimate*" is now the estimate that the NH PAC will approve, and the construction organization will be held accountable for delivering the project's final cost.¹⁷

However, two components of the budgeting process contribute to the confusion experienced by outside parties, in particular the Division, involving estimates and additional costs added to the original estimate.

- The term *Supplemental* funding is defined in APS-1 but has been misapplied. "*Should additional, unexpected costs to the project materialize, the formal process described as the "Supplemental" attaches those costs to the original*

¹⁶ DR BPA-7-004 Att. p9

¹⁷ DR BPA-12-014

authorized pre-constructability Estimate.¹⁸ RCG understands that *these "Supplementals"* go through a rigorous review by the engineering organization for substation projects. For line distribution projects outside the substation fence, any supplementals are approved by the Director of New Hampshire Distribution Engineering after a thorough vetting. During RCG's review of the CapEx projects data request (DR) form, the RCG team found that the term "*supplemental*" could become confused with total project cost (combining the original authorized amount with the additional supplemental dollars and called the *supplemental*.) This set of conditions could create a point of confusion for anyone not familiar with the form and the process.

- In one project, PSNH pointed out that the extra cost was due to an unforeseen change in the contractor selected and included in *the Pre-Constructability Estimate* because the work had not yet started. We agreed, subject to Eversource's accounting department approving the policy definition until the metaphorical "shovel hits the ground." These unforeseen cost changes would not be supplementals for this report but included in the *Pre-Constructability Estimate*. In Eversource's 3rd Step Adjustment filing, the term "*supplemental*" was used in the supporting spreadsheets as the heading title for the total expenditure column, including any *supplemental* funding. This approach has continued to contribute to confusion on what data PSNH is presenting and does not contribute to clear communication of the overall PSNH position.

PowerPlan may indirectly create another point of confusion for outsiders reviewing the CapEx project estimates from two aspects, the number of estimates produced during the project's development and the use of the term "*supplemental*." This issue is reviewed further in the Engineering section of this report. During a review of one of RCG's requested CapEx projects, one project led to significant discussion between RCG and several members from distribution operations. The discussion focused on when a *supplemental* is genuinely a part of the initial *Pre-Constructability Estimate* and, therefore, not treated as an additional unplanned expense. The project was not in construction, but the estimate increased due to a change in contractors. The Company argued that since the winning vendor had not been identified during the final efforts of the *Pre-Constructability Estimate*, the additional cost resulting from a change in construction contractor should not be held against the project estimator as an oversight cost. Without formal input from the Eversource accounting department, RCG would consider any additional cost as part of the *Pre-Constructability Estimate* for this process review.

¹⁸ APS-1

The first two independent oversight reviews appear to work well for those substation projects due to the high dollar value of the projects exceeding the minimum threshold. The distribution line projects are typically below this predefined value and not subject to these two oversight review processes. The reasoning behind these limits is reviewed below, along with a short definition of each function.

3.5. Many current substation capital projects under construction may not have fully benefited from the post-2018 CapEx process and policy changes.

Substation projects can span years between need identification and completion due to completing critical sub-project elements, including detailed engineering, acquiring properties, obtaining licenses and permits, conducting environmental assessments, approvals, and significant equipment production lead times. Therefore, many existing substation projects could have started five or more years ago, preceding the current policy and process changes surrounding CapEx projects.

Substation projects covering multiple years have added to the complexity of RCG's evaluation of these large capital projects against our CPPM. Eversource CapEx projects' processes and policies were changed around 2018. However, several current projects under construction were designed before 2018, meaning they were designed and engineered under the previous policies and processes, which lacked the benefits of the new process elements and potentially impacted their accuracy. In addition, some system design standards have been modified, either by policy or upgraded distribution system standards. These concerns are discussed in the engineering chapter. All of this can cause explainable and acceptable variances. Further, some projects had significant issues resulting from not having the benefits of the new policies and procedures. Several of these will also be addressed in the Engineering chapter.

Recommendations

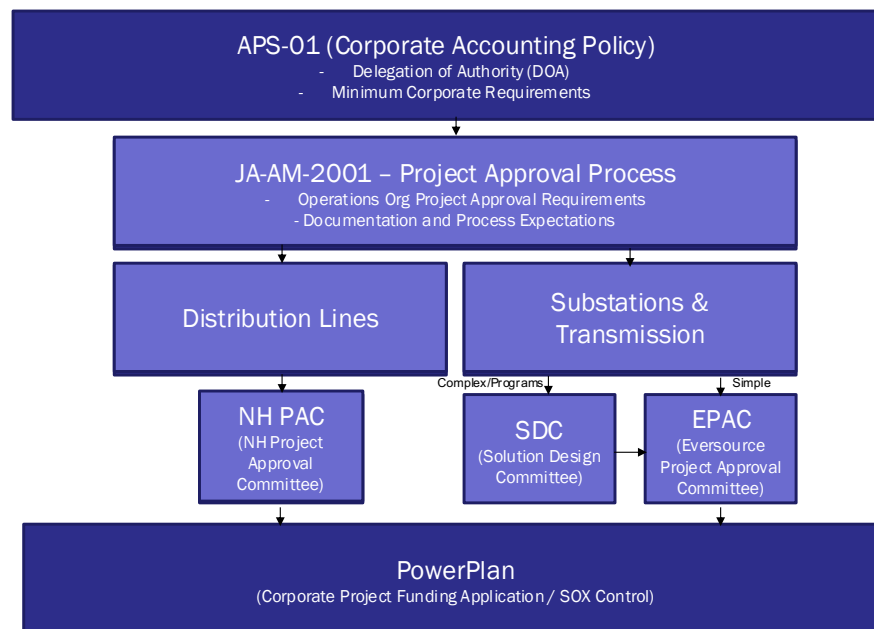
- R.2 Ensure all three Eversource oversight functions Internal Audit, Enterprise Risk Management, and Capital Budgeting review an appropriate sample of capital projects over \$250,000 annually.**
- R.3 Introduce formal peer reviews into the overall CapEx project development early in the process to support enhanced decisions and training for design engineers.**
- R.4 Enforce proper use of the term *Supplemental* consistent with APS-1 throughout the entire CapEx project process, including engineering.**

Engineering Capital Project Approval Process

4.1. The capital project approval process is well designed, but its complexity varies with the project class. Further, formal initial peer reviews are not formally included.

Exhibit 4, provided to RCG during the Kickoff session, shows the hierarchy of the capital projects approval process and the two different process versions.

Exhibit 4 - High-Level CapEx Project Approval¹⁹



APS-01 is Eversource's formal and governing accounting policy and process. This document includes the traditional definition of the *Supplemental*. *Supplemental* is additional capital funds added to the original authorized CapEx project's budget, initially referred to as the *Pre-Constructability Estimate* by Engineering after their design process is finalized. *Pre-Constructability Estimate* is critical as it signals the end of the engineering phase and becomes the number used in the *Full Funding Request* approved at the *Eversource Project Approval Committee* (EPAC) or *New Hampshire Project Approval Committee* (NHPAC). Any *Supplemental* applied to either substation or distribution line projects are formally reviewed by the appropriate leadership team.

Importantly, all substation design engineering work is managed through Eversource's Substation Engineering function regardless of whether it is for transmission

¹⁹ Capital Project Approval Process, JA-AM-2001-A, Rev 5 Job Aid

or distribution. Further, it encompasses all Eversource distribution companies regardless of distribution voltage variations. This design centralization is expected in the electric utility industry. It promotes consistent design results for specific substation types, minimizing the potential for errors while promoting design consistency across PSNH by primary voltage combinations. Further, it allows operations to better use their resources and engineering personnel across the PSNH system. The voltages may differ, but the protection and switching procedures can be the same, reducing the potential for field-induced operating errors.

RCG discovered one flaw in the CapEx estimating process; it required the project estimators or managers to consider only the direct costs associated with the project when determining whether a supplemental authorization (additional funding request) is required. RCG identified this early in our discovery effort. Since then, Eversource has changed the *APS-01* policy as of January 1, 2022, to require total cost (direct and indirect costs) be considered when determining whether an additional funding request is needed.²⁰

The *JA-AM-2001 – Project Approval Process* takes the overall Distribution CapEx project approval to a more technical and granular level of actions and approvals during the needs assessment and engineering design. It is here where a critical distinction occurs between substation and distribution Line projects. As shown in Exhibit 4, the substation projects must first go through the *Solutions Design Committee* (SDC) and, with their approval, advance on to the EPAC, which must approve the CapEx for substation and transmission projects from across the Eversource family of companies. Both committees can return the project to the designers for additional design and requirement efforts. The SDC committee, which tends to be a technical review, will work with the designers before the SDC presentation to ensure that the required forms are correctly completed and that the selected design meets the PSNH's expectations.

4.2. The Distribution Substation Approval process is detailed and permits close tracking of the project's budget development through a series of evolving estimates in *PowerPlan* that reflect Engineering's efforts. But the process appears to lack sufficient formal peer-level reviews.

The process appears to lack sufficient formal peer-level reviews that allow alternate designs to be considered earlier in the process and function as a learning tool for engineers. In addition, it provides for the use of the term *Supplemental* before an authorized capital project is designated, potentially creating a point of confusion for

²⁰ DR BPA 12-015 and Interview #43

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

outside parties', in particular the Division, not having the benefit of the list of estimates' definitions, selects and reviews the wrong estimate for comparison with the project's final installed cost. This situation is the result of the Company not providing adequate definitions on each of the different estimates prepared.

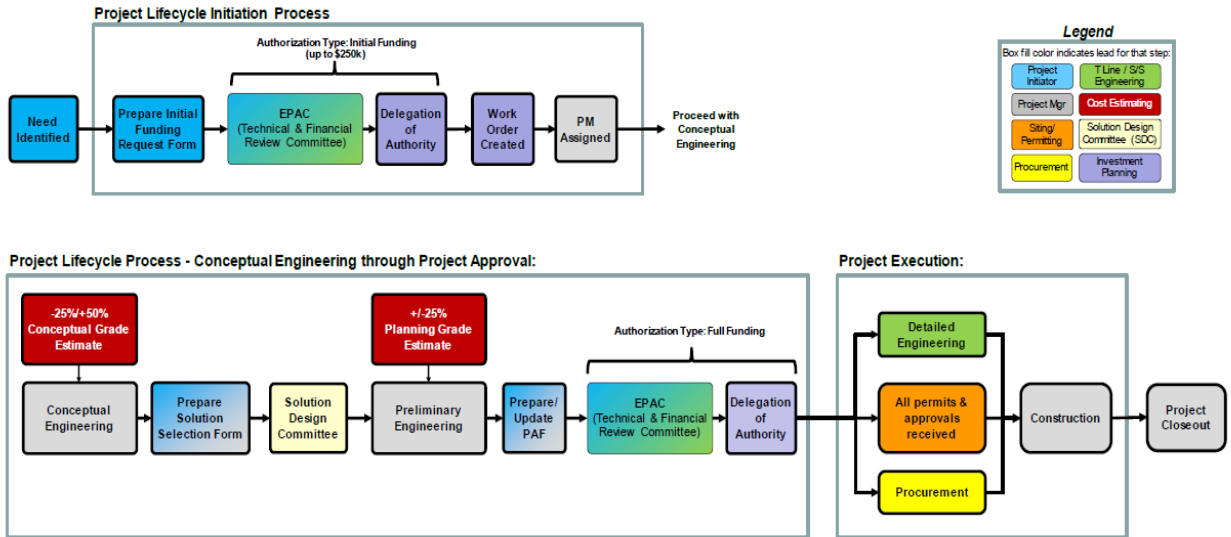
Exhibit 5 shows Eversource's Substation Project Approval process, including the Supplemental Authorization process. An important distinction is that substation engineering is positioned in Eversource for all three states. The process is complex in its flow but appears to provide Eversource with most tools RCG deems appropriate and necessary for NH Substation-type projects. It does not, to our knowledge, have a rigorous formal peer review. The reviews are performed by management in the two large-format meetings conducted twice monthly and on the same day. The EPAC session involves many participants from across the Eversource family of companies and appears to be financially focused. Several members of the SDC meeting attend the EPAC session as well.

Exhibit 5 includes a subprocess for *Supplemental* increases during the engineering efforts. This use of *Supplemental* at this project stage is one of those communications-definitional issues raised earlier. According to *APS-1*, the use of *Supplemental* is reserved for projects having *Full Funding Authorization*. In other words, they have achieved the *Pre-Constructability Estimate* status and are authorized to proceed. This use is not the case for the engineering estimates that precede this part of the process.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

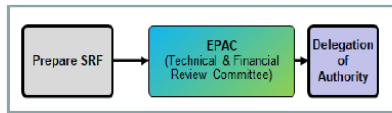
Exhibit 5 - Substation Project Approval Process

Attachment D, Transmission and Substation Project Approval Process Flow Charts



Supplemental Authorization Process

(If required per APS guidelines)



Capital Project Approval Process - JA-AM-2001-A, Rev. 5

Because of the number of participants at the EPAC meeting, 70 or more employees from across all Eversource operating companies, these meetings are held via Microsoft Teams. Given the medium, RCG could not determine the participant's level of individual engagement during the session observed by RCG. Further, the SDC meeting is held similarly without as many participants.

Our review shows that the engineering line management structure for the engineering and operations functions is dedicated to robust oversight of the Substation CapEx projects. More on this is provided in the Engineering chapter of the analysis. Further, there is a significant level of person-hours devoted to reviewing projects at multiple levels.

Based on the management interviews and observation of two formal committee sessions involving a significant number of personnel beyond voting members, this process involves a considerable time commitment to review CapEx projects and programs. The two formal bi-weekly meetings occur at the Eversource SDC and (EPAC) levels for substations and New Hampshire PAC for distribution lines. An important point here is

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

some projects will not clear these sessions and will be tabled until they meet the standard design/financial requirements. RCG did not witness extensive questioning on projects in either meeting. Given the size of the EPAC meeting and the number of projects being reviewed, this was not surprising, but RCG would be remiss if we didn't comment on this format. Having such a large forum at EPAC with an unexpectedly lower participant involvement seems counterproductive and may not be supportive of a learning exercise.

SDC reviews the substation engineering projects' technical readiness to move to the EPAC. At this committee, the primary focus is completing the PAC forms and a review of alternatives. RCG considers this to be a pre-screening activity. In addition, before this meeting, SDC team members meet with the project designers to evaluate the worthiness and the technical adequacy of the preparation of documents required by the two committees. The informal SDC pre-meetings function somewhat as an informal peer review described in RCG's CapEx Process but not entirely, since the principal effort of the pre-SDC meetings is to ensure forms are adequately completed.²¹

The purpose of these committees is to move forward those engineering projects to be included in the formal authorized capital plan for PSNH in the form of a *Full Funding Request*. Once approved, the project receives the necessary management signatures consistent with the *Delegation of Authority* policy.

Before full substation project authorization, the engineering of projects is tracked using *PowerPlan*, which follows the project's engineering development estimates through the final *Pre-Constructability Estimate*. *PowerPlan* provides management with critical insights into the formation of the final estimate. However, *PowerPlan* creates several interim "Building Block" estimates as a project moves toward the final *Pre-Constructability Estimate*. When the DOE requests all the estimates associated with a given project, PSNH/Eversource must provide those building block numbers generated from the conceptual engineering estimate through the *Pre-Constructability Estimate*. This can create another point of confusion for third-party reviewers, as PSNH must comply with the request even if the intermediate estimates are only building blocks used to achieve the *Pre-Constructability Estimate*. This situation is aggravated when the estimates provided are not accompanied by appropriately detailed documentation explaining each intermediate estimate's purpose.

²¹ Interview #34

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

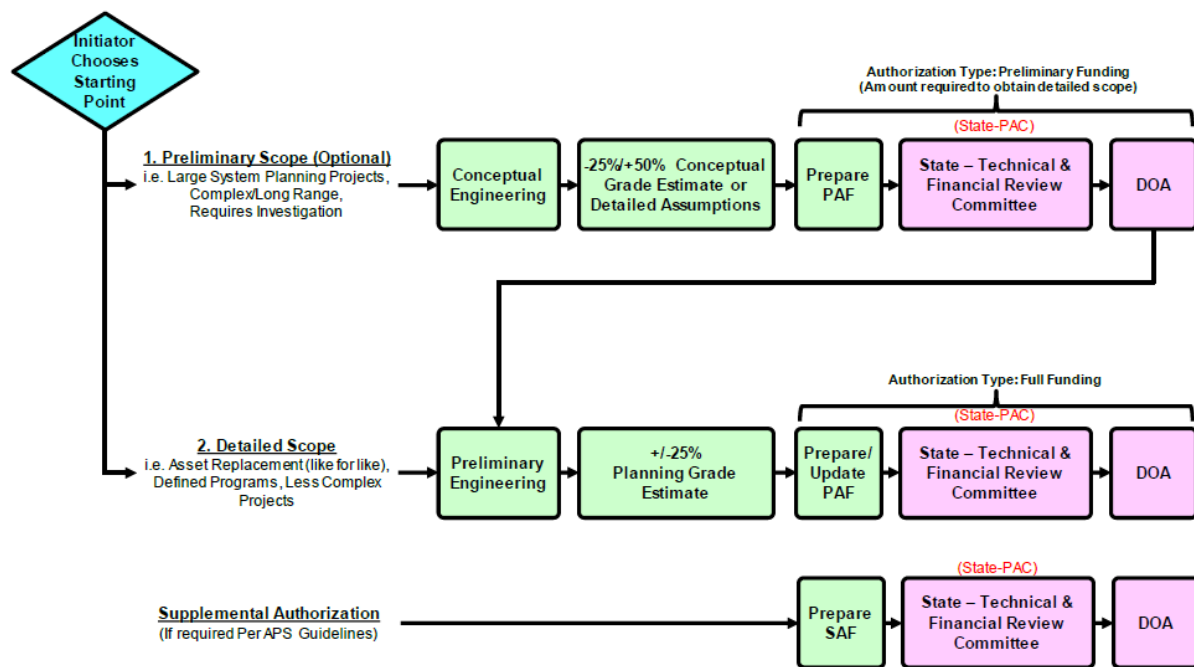
4.3. The Distribution Line projects follow a less complex process but still contain the same concerns related to clear communication and terminology definition.

The Distribution Line Projects process, Exhibit 6, only involves one approval committee, the *NH Project Approval Committee* (NHPAC). Further, the final arbiter is the Director of Distribution Engineering, who also serves on the committee. Projects can be tabled and resubmitted after the identified issues are satisfactorily addressed. RCG learned from the Director that this is a highly iterative process.

As with the substation projects' flow, Supplemental is also used in this engineering process flow. The NHPAC committee is different from the two substation approval committees in that it approves the project technically and financially.

Exhibit 6 - NH Distribution Line Project Approval Process

Attachment F, Distribution Project Approval Process Flow Chart



Capital Project Approval Process - JA-AM-2001-A, Rev. 5

Since these projects are less complex and have a significantly lower dollar value, the need for the same level of rigorous review as the substation design process is less critical. RCG agrees with this determination. Once again, the term "*Supplemental*"

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

surfaces as shown in the above Exhibit and is used similarly as with the substation approval leading to the same type of confusion if the estimate is not the *Pre-Constructability*. Regardless of the project type, either substation or distribution line, the project is managed using *PowerPlan*, which tracks the project's engineering development cost estimates through the final *Pre-Constructability Estimate*. As before, it creates another point of confusion for third-party and regulatory reviewers, even though the Company must comply with regulatory requests. This is particularly true when the estimates lack the appropriate documentation explaining each intermediate estimate's purpose.

The distribution line projects still have a risk component that should be understood and accounted for during the design. Several issues are generally reviewed before a project is approved and the final budget is incorporated into the annual PSNH capital plan. Specifically, these include:

- Soil conditions, rock ledge that could require more time, and the use of special digging equipment,
- Water table depths, where appropriate, could impact the installation process by requiring water mitigation efforts,
- Other in-ground obstacles that would potentially require the relocation of poles or trenches in the case of underground cables,
- Obtaining rights-of-way over private property,
- Tree trimming and removal can, in some locations, be complicated due in part to landowner concerns,
- Municipal roadway requirements, and
- Soil removal and disposal requirements.

Generally, line projects have fewer unique components. PSNH/Eversource has recently changed several design requirement policies to replace worn/aged equipment to improve reliability. In addition, the recent policy changes will improve the purchasing leverage of PSNH/Eversource in general, which in the coming years will lead to better management and predictability of material unit costs for line equipment. Further, it will reduce inventory carrying costs and the overall level of stores by eliminating the need to maintain many different voltage types of the same components. One line hardware component has a side benefit, moving from three other voltage class insulators to standardizing on 34.5kV units will increase the voltage creep distance customarily required for the 12kV and 4kV systems and potentially reduce the need for insulator cleaning on the two lower voltages caused by natural contamination from air-borne materials like dirt and salt.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

PSNH's tree trimming policy and approach appear adequate for the geography. Issues with tree trimming tend to surface in population centers where property owners live. They have genuine concerns regarding the impact of tree trimming on the aesthetics of their property, which could lead to a perceived lowering of property value. The issue of aesthetics is shared across the electric utility industry, and the solutions can be complicated.

The final approval for distribution line CapEx projects rests with the Director of New Hampshire Distribution Engineering (DoNHDE). The DoNHDE has the final approval and performs any necessary follow-up with the distribution designers, particularly when additional costs exceed the originally authorized CapEx dollars. These overages are tracked by a meeting with the Director to explain the overages.

A pole's typical useful life is dependent on the local climate and soil conditions. Pole loading conditions are another potential issue as well, but this can be managed by the size and type pole used. Several recent storm events brought to light the fragility of some of this inventory, so management changed the policy concerning outcomes from post-third-party inspections. Instead of repairing poles with modest ground line rot issues, the new policy requires that poles be replaced with stronger Class 2 poles. ***It is important to stress that the replacement policy is based on potential for pole failure concerns and not on a wholesale pole replacement.*** Interestingly, the Division raised the concern that several poles were replaced in one area that didn't appear to need replacement. RCG investigated the specific situation and learned that a communication company requested the pole changeout to provide better working clearances for their personnel. The communications company paid for this requested work.

Another difference between the substation and line projects is that line projects have a shorter "working" period (from engineering to completed construction). Because line materials don't require the production lead times that substation transformers need, the designs are less complex, and installation is more straightforward. However, we have found that distribution line equipment can occasionally experience supply chain issues.

The above suggests that Line CapEx projects are far simpler and lower cost than substation projects. However, independent oversight of the process and risks should be routinely performed to ensure that operations and management of distribution line projects are carefully following guidelines, and decision-making is within PSNH bandwidths. The defined term "*Supplemental*" is inappropriate for early engineering project design efforts and can create confusion for third-party and regulatory interpretations of the estimates.

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

4.4. RCG found that PSNH senior management actively monitors the NH capital budget and the individual capital project costs and schedules.

In addition to the EPAC, SDC, and NHPAC, periodic meetings focus on monitoring additional aspects of the CapEx process, as reflected in Exhibit 7.²² Further, the distribution operations organization holds a daily morning briefing to review the overnight system operational issues, switching plans for the day, and any impacts on the scheduled project work.²³ Considering PSNH's continuing improvement effort to refine their estimating process, RCG believes that the number and frequency of meetings focused on capital projects are appropriate in the short term. However, RCG thinks this level of focus could be unsustainable in the future as management shifts its focus on other pressing business issues.

Exhibit 7 - CapEx Project Process Oversight

PSNH CAPITAL PROJECT PROCESS - MEETINGS AND COMMITTEES					
<u>Committee/Meeting</u>	<u>Procedure</u>	<u># of Attendees</u>	<u>Duration</u>	<u>Frequency</u>	
		(a)	(b)		
1 Project Team	M6-PM-2001	~7	~1 hour	Weekly/Bi-Weekly	
2 Schedule Review	N/A	~20	2 hours	Weekly	
3 Outage Coordination (T&DCC)	N/A	~20	1 hour	Every 2 weeks	
4 Distribution Engineering Capital Project Status/Tracking	N/A	~16	90 min	Monthly	
5 Joint Planning/Engineering/Operations	N/A	~15	2 hours	Monthly	
6 Distribution Engineering Challenge Session	N/A	~20	2 days	Annually	
7 Capital Budget Review (CBRC)	N/A	~20	2 hours	Monthly	
8 NH Project Approval (NH PAC)	APS-01/JA-AM-2001-A	~10	2 hours	Every 2 weeks	
9 Solution Design (SDC)	JA-AM-2001-A	~15	2 hours	Every 2 weeks	
10 Eversource Project Approval (EPAC)	JA-AM-2001-A	~22	4 hours	Every 2 weeks	
(a) The number of attendees listed above are the attendees that are required to attend. The number of attendees and representatives from different areas of the organization are invited and do attend and will vary depending on the meeting and the the complexity of the agenda topics for that particular standing meeting.					
(b) The duration of the meetings listed above is the typical time allotted in the calendar invite. The duration will vary depending on the meeting and the agenda topics for that particular standing meeting. Please refer to the narrative description of each meeting for a more thorough understanding of the duration.					

²² DR BPA-13-007 Att.

²³ Interview #67

4.5. Using the term *Supplemental* before a CapEx project is fully funded and authorized adds significant confusion to non-Eversource reviewers of CapEx projects.

The term "*Supplemental*" is defined in *APS-1* as an addition to an already authorized project budget estimate (comparing actuals to the approved *Pre-Constructability Estimate*.) "*Supplemental*" can also specify a project as it moves into the CapEx management process flow with "*Full Funding*" approved. Before this stage of project development, the early estimates maintained in *PowerPlan* are still preliminary estimates that evolve as PSNH/Eversource engineering or contract engineers progress toward the final design and estimate.

RCG believes that using the term "*Supplemental*" during engineering's project development efforts may have helped lead the Division to misinterpret the provided estimates and select an earlier estimate preceding the *Pre-Constructability Estimate* when making comparisons to the actual project cost. This scenario potentially led to the Division's decision to recommend disallowing a significant portion of a rate increase, followed by the need for this process audit. The Division Staff received all the estimates without sufficient definitions, causing them to select an inappropriate early estimate to conduct their analysis, instead of using the actual final *Pre-Constructability Estimate*.

In the future, any estimate created before a *Pre-Constructability Estimate* should be marked as a ***Design Development Pre-estimate*** so that it cannot be repeated. The purpose is to eliminate confusion for the non-Eversource reader. ***Supplemental should not be applied to any of these building block estimates.***

Recommendations

There are no recommendations for this section.

Engineering and Systems Analysis Functions

5.1 PSNH/Eversource's engineering departments are structured properly to provide the appropriate level of attention to maintaining and improving the distribution system, consistent with generally accepted industry practices. However, opportunities exist to enhance these efforts.

The Division had concerns relative to PSNH's approach to developing capital projects for system improvements, customer expansion, and environmental upgrades and to changes made in PSNH's planning criteria which increased the number of potential capital projects. RCG performed a comprehensive review of engineering practices to understand better the appropriateness of policies and processes governing the Company's actions in identifying, designing, and building a robust distribution system. PSNH's engineering CapEx efforts were compared to industry standards by reviewing a subset of capital projects (Appendix D) to determine if policies and processes were consistently applied. Specific engineering designs were not evaluated as this is out of scope for this process audit.

The findings are presented in the Engineering section of this report according to the following subsections:

- *Organization* - reviews the appropriateness of the engineering function;
- *Engineering Project Control Processes* - outlines project development from identification through design-build;
- *Energy Forecasting* - predicts the growth of customers and attendant energy demand and usage;
- *System Planning Criteria* - describes the system planning criteria and technical design guidelines used to identify potential problem areas in the distribution system and associated substations; included is an assessment of the Distribution Pole Replacement Program (pole testing, selection, and replacement);
- *System Planning Studies* - explains how solution alternatives are identified and developed for projects built before and after changes in the planning criteria;
- *Reliability Analysis* - quantifies historical system performance; included is an assessment of Worst Performing Feeders (a statistical performance measure applied to distribution feeders to assist in prioritizing capital projects) and an assessment of system resiliency practices (the adequacy of future system reliability performance); and
- *Distributed Energy Resources (DERs) System Impact Studies* - evaluates the impact of integrating DER into the NH distribution system and the design, engineering, and equipment application measures taken to resolve potential reliability performance and safety issues.

The two most significant areas for improvement are communications (both written and oral) and management oversight of work being performed. The subsections below will illustrate Eversource/PSNH's work in structuring its engineering efforts, with control centered around two distinct management structures: A substation design function and a distribution line function. Both functions appear to be well designed for their respective areas of responsibility.

Communication and potential management oversight concerns will also be addressed as they apply to distribution system planning criteria, study methods, engineering tools, decision processes, and technical standards based on reliability and resiliency improvement projects. Communication was the single biggest issue throughout the CapEx engineering process.

5.2 The Engineering Organization is bifurcated between Eversource and PSNH. Complementary organizational responsibilities are accomplished at the Eversource corporate and PSNH levels that encapsulate the core functions of a robust distribution engineering group necessary to design and enhance the distribution system. A relatively new Grid Mod function has become a core part of the engineering operation.

In certain cases, the Director-level and higher management positions have three-state (CT, MA, NH) responsibilities giving managers the flexibility to assign staff where they are most needed. For processes and technologies to be successful and efficient, each must be interchangeable across all three states²⁴ (to the extent possible with state-specific voltages and other reasons, including state regulatory commission requirements) and well documented in the Distribution System Planning Guide (DSPG).²⁵

In NH, System Planning focuses on substations [distribution, bulk (115kV and above)], non-bulk substations (less than 115kV), and transmission lines (transmission is not directly part of this process review). Responsibilities end at the substation fence (except for transmission and distribution interconnections between substations used to transfer load during a station N-1 event). NH Distribution Engineering is responsible for everything outside the substation fence and works with System Planning on substation feeder connections.²⁶

²⁴ Interview #18

²⁵ LCIRP, Oct 1, 2020, Appendix D

²⁶ Interview #13

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

A *Substation Advanced Analytics Group* was formed by the VP of *Substation & Transmission Engineering* to encourage a forward-thinking atmosphere. When the need for a software tool is identified by engineering, this group will research an outside source or perform an in-house development. This group also ensures that engineers have the best tools for successfully performing their jobs.²⁷ An example is securing the Electric Power Research Institute's (EPRI) Power Transformer tool (PTX) to support Eversource's power transformer health evaluations. Another example under development is *Smart Inspect*, a machine-learning tool to anticipate pole failures or vegetation encroachment. It has been successfully used in a CT pilot program; MA will be next followed by NH (schedule TBD).²⁸

The *Protection & Control (P&C)* group is responsible for:

- All distribution of P&C equipment, application, and settings outside the substation fence (pole-top reclosers, automated switches); and
- All T&D P&C equipment and attendant device settings inside the substation fence (relays, equipment protection, *system control and data acquisition* (SCADA), capacitor bank controls and voltage regulator controls).

The P&C Group designs the protection and control scheme. The Distribution Field Engineering (DFE) group is *appropriately* responsible for managing the distribution pole-mounted voltage regulators and capacitor bank controls & settings. Further, the DFE also correctly handles the fuse sizing or TripSaver application. P&C is responsible for all protection/automation settings (anything that must coordinate), including line reclosers, automated switches, and any communications-related devices.²⁹

The *Director of NH Distribution Engineering* is responsible for the NH Distribution system and its five geographic regions. This Director has five managers . . . one for each of the five regions. Each manager has:

- Two or three engineers,
- One supervisor, and
- Eight designers (technicians) reporting to the supervisor.

²⁷ Interview #15

²⁸ Interview #15.

²⁹ Interview #34 and Interview #21

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The designers use Maximo (or Storms which Maximo is replacing) to design distribution projects. A “design” includes anything from line extensions, reconductoring for load growth, and pole-top distribution automation down to fused cut-outs. This group designs everything along the streets but is not responsible for day-to-day issues handled by Distribution and Field Engineering by using daily calls to review outages affecting more than 100 customers.

Action plans are prepared if a device has been impacted three or more times in 90 days or if the device has a high customer count.³⁰ Engineers are responsible for high-level designs, e.g., “We need to run a wire from here to there, or an underground circuit needs to happen.” It is then assigned to the designers to complete project design details.³¹

There is also a *Director of Distribution Technical Engineering* (DTE) with three-state responsibilities. Reporting to DTE:³²

- A *Resiliency Group* that coordinates Distribution Automation (DA) designs;
- Three single-state managers for *GIS* and associated standards; and
- There is one three-state Manager for *Reliability and Resiliency*. The position was vacated in July 2021 due to retirement and was filled in July 2022, which is now reporting directly to the VP of System Planning. The Director of NH Distribution Engineering handled budget and planning issues for NH in the interim, and the Director of DTE was addressing reliability (alongside the Director of NH Distribution Engineering) and resiliency issues in NH through early 2022.

The Manager of *Substation Design Engineering* (SDE) reports to the Director of Substation Design and is responsible for substation asset management in NH. While SDE is not involved with physical testing, SDE is responsible for “Asset Management” (evaluating device conditions and acting on test results). If an asset needs to be replaced, SDE is responsible for the associated design. SDE does not use Storms or Maximo like distribution line engineers and technicians but instead locate stock codes and procure equipment.³³ Asset Condition, System Planning, and SDE groups work closely together.³⁴ SDE’s key concern is having adequate capital funds to complete multi-year programs. Recognizing the capital budget is fixed, SDE competes for annual capital funds for every project and program.

³⁰ Interview #16

³¹ Interview #11

³² Interview #11

³³ Interview #61

³⁴ Interview #13

The Manager of Protection & Control Compliance, Standards and Support reports to the Director of Protection & Control Engineering and has three-state responsibilities, including standardizing P&C designs, protection schemes, philosophies, and equipment for the different primary voltages.³⁵

5.3 Although New Hampshire's Grid Mod's efforts are in the early stages, PSNH is performing needed functions to incorporate Grid Mod into the distribution system.

Grid Modernization (Grid Mod) Programs are rapidly becoming the norm across the industry. Eversource's *Grid Mod Group* was formed to implement Grid Mod programs. Unlike Massachusetts and Connecticut, New Hampshire's Grid Mod efforts are in the early stages.

Groups like PSNH's *Grid Modernization Group* are becoming popular across the electric industry as utilities need to identify better ways to gather system data through enhanced visibility on the grid and to increase automation necessary to provide reliable service in an increasingly decarbonized grid with high DER integration and rising electrification.

The *Grid Mod Group's* strategic goal is to evaluate and implement new technologies and solutions that will benefit system performance/operation, including the following responsibilities:³⁶

- *Deploying software solutions:* Collaborating with System Operations and Distribution Engineering to deploy software to control and optimize the grid, using DER to manage peak demand, reduce energy, and control voltage. These software tools establish a flexible DER platform to help facilitate adoption.³⁷
- *Facilitating the use of real-time technologies:* Collaborating with engineering to implement new real-time technologies and develop multiple use cases.

³⁵ Interview #34

³⁶ Interview #19

³⁷ Interview #19

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

In their charter for facilitating new real-time technologies, the *Grid Mod Group* is responsible for delivering the following software solutions:³⁸

- *Synergi* (a software tool for steady-state distribution planning and analysis) implementation,
- *Distribution Management System* (DMS) implementation (scheduled for completion in 2022³⁹); to add fault location intelligence,
- *Geographic Information System* (GIS) consolidation, and
- *Outage Management System* (OMS) upgrade Storms-to-Maximo.

The Grid Mod Group routinely collaborates with System Planning, Distribution Engineering, and Substation Engineering to accomplish these objectives. This Group is not responsible for system design (circuit ties or DA location/selection, NWA solutions) which is the responsibility of System Planning, Distribution Engineering and Substation Engineering.

A formal Grid Mod Program had been proposed for New Hampshire, but the PUC has yet to approve the funding. In the interim PSNH plans to work with stakeholders and the DOE to identify potential future investment opportunities.⁴⁰ So far, PSNH has identified the following program objectives:⁴¹

- Increase system efficiency and reduce demand;
- Advance penetration of DA and control to the customer meter (grid edge); and
- Facilitate integration of clean energy solutions.

High-potential projects involve the use of new technologies not currently part of PSNH's capital plan. For example, volt-var optimization (VVO) and conservation voltage reduction (CVR) programs are not part of existing PSNH capital budgets but are included in Eversource plans to improve operating efficiency, reduce costs, and enable DER.⁴²

Eversource supports grid modernization programs managed by the Grid Mod Group to justify the accelerated deployment of microprocessor relays with advanced distribution automation on primary feeders. This would facilitate more extensive use of automated controls and advanced protection schemes, enhanced use of existing resources, and reduced technical barriers to DER integration.

³⁸ DR BPA 6-004, page 2

³⁹ Interview #16

⁴⁰ DR BPA 6-004 and Interview #19

⁴¹ Id

⁴² Interview #19

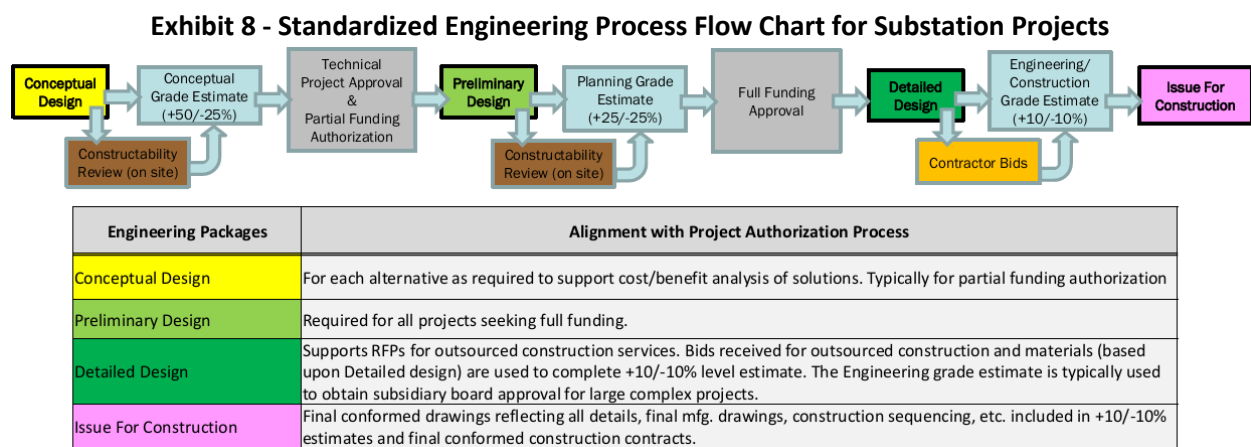
Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

5.4 Engineering and Project Control Processes are well thought out and reflect elements found in other leading utility engineering organizations.

In 2018, Eversource implemented standardized processes and controls for Connecticut, Massachusetts, and New Hampshire for project engineering and project management to improve communications between departments and to facilitate/improve the capital approval process. Eversource recognized incomplete or poorly written design documentation could lead to projects being rejected or underfunded. Section 5.7 - below will review and comment on these processes.

5.5 Eversource’s Substation Design and Engineering has a formal process for project development and design that is divided into four distinctive phases. This overall design process is excellent and consistent with industry practices.

The exhibit below shows the standardized process flow chart for substation engineering projects.⁴³



Four phases of engineering design are identified and used throughout the Capital Project Engineering process. As the design progresses, assumptions and estimates become more complete, and specific design details emerge. The four engineering design phases, descriptions, and deliverables are described below.⁴⁴

- *Conceptual Design* – Uses historical site-specific data and conservative assumptions; satellite images; typical physical design/layout drawings; existing electrical drawings; and assumed capacity requirements. Conceptual

⁴³ Eversource NH Business Process Audit Kick-off Meeting, November 4, 2021, slide 9

⁴⁴ Eversource NH Business Process Audit Kick-Off Meeting, November 4, 2021, slides 10-11

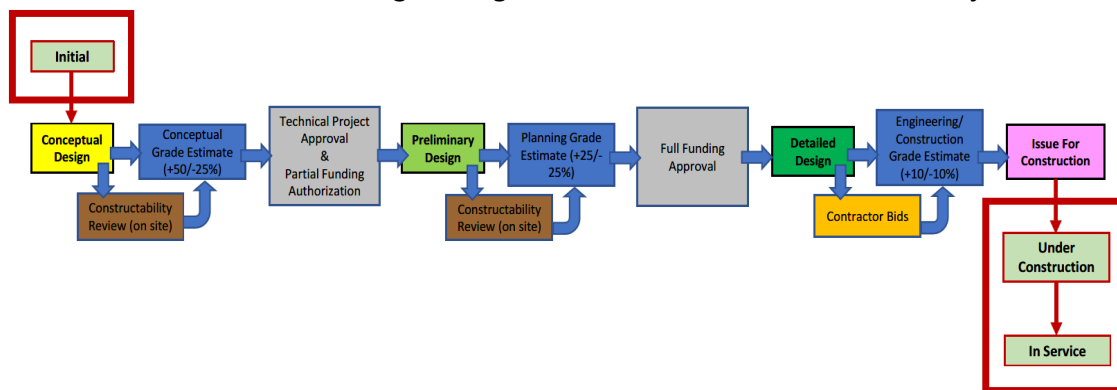
Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

constructability reviews are conducted by engineering and operations to provide initial preliminary design feedback. Conceptual layout drawings: electrical one-line diagrams and long-lead-time material lists are created.

- *Preliminary Design* – Preliminary site development requires above/below grade site-specific testing/analysis to mitigate potential cost impacts due to soil contamination, rock/ledge removal, and other unknown below-grade issues. Historical data begins to replace estimates and assumptions. Preliminary conceptual design constructability reviews are conducted by engineering and operations to provide more detailed feedback for the detailed design. These design elements include preliminary line routings, structural calculations, evaluation of DC battery system and loading impacts, AC station service analysis to produce a preliminary site and layout drawings; and major material lists.
- *Detailed Design* – Detailed final plans include physical site drawings; line routings; structural drawings; detailed bill of materials, electrical connection details; one-line metering & relaying diagrams; relay setting plans; AC and panel drawings; wiring diagrams; cable schedules; certified manufacturers drawings; construction plans; outage/energization plans; testing requirements; and site-specific constraints/risks.
- *Issue for Construction* – Final constructability review takes place; contractor bids are issued/reviewed, and drawings are issued for construction (IFC).

Three additional project phases do not appear in the above process flow chart but are added in the flow chart below and are circled in red to highlight their placement. These phases are Initial, Under Construction, and In-Service.⁴⁵

Exhibit 9 - Enhanced Engineering Process Flow Chart for Substation Projects



⁴⁵ Eversource NH Business Process Audit Kick-Off Meeting, November 4, 2021, slide 13

Systematically moving from the initial design phase to the final in-service phase produces a defensible design, replacing unknowns with actual, site-specific information. RCG believes this to be a solid approach generally followed by the industry.

5.6 The number of project cost estimates can cause confusion.

The substation CapEx process can be overly complex and potentially overwhelming to those not intimately involved, leading to misunderstandings, communication problems, and unrealistic expectations, specifically for non-Eversource entities. This is especially true when engineering produces several different cost estimates. For example, the following five phases have been given specific cost estimating guidelines:⁴⁶

- Initial Phase: -50% -to- +200%;
- Conceptual Phase: -25% -to- +50%;
- Preliminary Phase: -25% -to- +25%;
- Issue For Construction Phase: -10% -to- +10%; and
- Under Construction Phase: -10% -to- +10%.

If the cost estimates are not associated with the appropriate design phase and corresponding deliverables, miscommunications and unrealistic expectations can quickly occur. RCG suggests the following estimates could be enough:

- Initial Phase estimate;
- Preliminary Phase estimate; and
- Issue for Construction Phase (Pre-Constructability) estimate, the precursor to Full Funding Authorization.

Written communications are often unclear, e.g., "Issue for Construction" is also referred to as the "Pre-Construction Estimate." RCG believes this level of inconsistency exists within Eversource and serves to add confusion to the process and estimating practices.

The Distribution Project Approval Process is less complex than for substation projects. While the overall process is good, communications (especially terminology) both inside and outside the Company could be improved. The Distribution Project Approval Process Flow Chart and related observations are provided in earlier sections of this report.

⁴⁶ Eversource NH Business Process Audit Kick-Off Meeting, November 4, 2021, slide 12

5.7 Enhanced documentation and communication elements are needed to ensure clarity of the Standardized Process Flow Chart for Project Controls, as both are critical for a successful project.

The standardized process flow chart used by Eversource for Project Controls is summarized in the Exhibit 10 below.⁴⁷

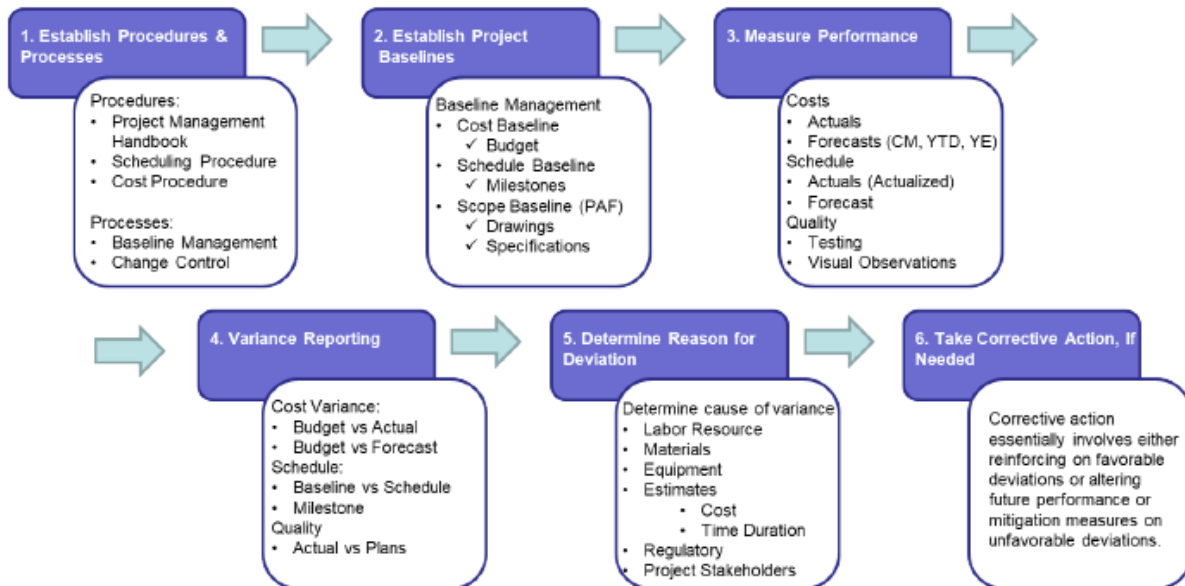
The six process elements shown are consistent with responsible actions for any project. However, the following should also be an integral part of the flow chart and prominently identified even if included in the *Project Management Handbook* (control process element 1):

- Documentation - How information is to be documented and archived for each project element.
- Communication - The approach for information flow within the PSNH/Eversource.

⁴⁷ Eversource NH Business Process Audit Kick-Off Meeting, November 4, 2021, slide 15

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Exhibit 10 - Standardized Process Flow Chart for Project Controls Control Process



5.8 Project Challenges; Executive Technical challenges documented in earlier sections of this report are central to moving projects forward. However, formal peer challenges were not obvious to RCG.

As noted in earlier sections of this report, executive challenges are well documented. However, formal peer reviews (if they do occur) are not documented. During RCG’s data-gathering efforts, especially from an interview, informal peer reviews appear to occur. The regularity of these reviews was not obvious to RCG.

5.9 Project alternatives are not maintained once management makes its final selection.

RCG attended an NH-PAC meeting on May 18, 2022, where a project was being discussed, including solution alternatives. Once the preferred solution was agreed upon, the Director of Distribution Engineering, the person keeping minutes deleted alternatives from the project documentation. While this simplifies the resulting documentation, it provides an incomplete formal record of considered alternatives. This act is transactional and not strategic and does not recognize the potential future need for defending the preferred solution. This represents a lost opportunity for improving future communications and facilitating project approvals.

5.10 PSNH's load forecast process is consistent with utility practice, the methodology for developing substation level loads is a leading practice and the results are reasonable for distribution planning purposes.

PSNH's peak load forecast methodology is consistent with standard utility practice, and its use of econometric models to establish the forecast for bulk distribution substations is a leading industry practice.

At a utility, an accurate load forecast is the foundation for effective capital planning. Contingencies, criteria violations, and other indicators of the need for changes to existing facilities or the need for additional facilities cannot be established without the load forecast. Utilities routinely produce an annual system peak demand forecast for planning and operational requirements and a sales forecast for financial needs. The utility load forecasting process uses models incorporating relevant aspects of the service territory, such as the number of customers, household income, employment, and other variables established to be relevant often by statistical analysis. End-use models, including appliance saturation and usage parameters, are sometimes relevant to a utility's load forecasts.

PSNH's econometric⁴⁸ load forecasting model uses industry-standard inputs.⁴⁹ These inputs include weather (prior 10-year information of three-day weighted THI (temperature humidity index)),⁵⁰ which is similar to ISO-NE.⁵¹ The forecast of econometric

⁴⁸ Interview #38

⁴⁹ Interview #38

⁵⁰ Interview #38

⁵¹ Interview #38

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

data inputs is obtained from an independent outside vendor (Moody's Analytics).⁵² The variables driving the model are evaluated each year and updated as required.⁵³ The underlying system peak demand forecast is developed independently from the system and distribution planners.

PSNH's load forecasting model produces a 10-year system peak demand forecast⁵⁴ and includes a Weather Normal 50/50 forecast and an Extreme 90/10 forecast, meaning one chance in ten of occurring. The system peak model is considered accurate to within 2% of the weather-adjusted peak⁵⁵.

Each bulk substation is forecasted as a portion of the system peak load using an econometric model related to that substation.⁵⁶ The bulk substation model is considered accurate to within 4% of the two-year average.⁵⁷ The Load Forecasting group works collaboratively with distribution engineers to fine-tune the bulk substation forecasts.⁵⁸ For example, load shifts between feeders are recognized in the collaborative process.⁵⁹

Additional inputs to the load forecasts include⁶⁰ energy efficiency instigated by PSNH. Account executives provide localized known changes,⁶¹ and other step load increases⁶² are incorporated within the bulk substation forecast.

The level of solar generation,⁶³ including customer scale and larger solar generation installations, is forecast with input from Distribution Planning. However, solar does not materially impact bulk substation peak load without associated storage due to timing (between solar peak and system peak) and variability (weather-related).⁶⁴ Electric vehicles⁶⁵ are estimated within the load forecasting process, although vehicles are a learning process in the current fleet (non-personal) due to the limited data available⁶⁶.

⁵² Interview #38

⁵³ Interview #38 and DR BPA 15-4

⁵⁴ Interview #38

⁵⁵ Interview #38 and DR BPA 15-5

⁵⁶ Interview #38 and DR BPA 15-8

⁵⁷ Interview #38 and DR BPA 15-6

⁵⁸ Interview #38 and DR BPA 15-9

⁵⁹ Interview #38

⁶⁰ Interview #38

⁶¹ Interview #38 and DR BPA 15-7

⁶² Interview #38

⁶³ Interview #38

⁶⁴ Interview #38

⁶⁵ Interview #38

⁶⁶ Interview #37

The peak load process starts in October after the summer peak season and is finalized by February.⁶⁷ The sales (revenue) forecast, which is financially focused, is completed by September.⁶⁸

5.11 System Planning Criteria PSNH/Eversource system planning criteria, design standards, and document control are consistent with industry practices. The Engineering Standards Bookshelf implemented by Eversource is an industry-leading practice.

Electric power systems are expected to reliably supply power to various loads under changing weather conditions. To ensure system designs meet these expectations, system planners use pre-determined performance criteria and digital models to proactively identify system abnormalities or violations (PSNH/Eversource terminology) against one or more criteria. Over the years, the industry (IEEE, EPRI, NREL, DOE, EEI, NRECA, NESA, and others) developed equipment application standards (e.g., ratings) and system metrics (e.g., reliability indices) to be used by system planners and design engineers to quantify system performance.

The *Engineering Standards Bookshelf* implemented by Eversource provides:

- A simplified approach to essential document access for all within PSNH/Eversource, and
- Ensures the latest versions are in one place and easy to access, reducing engineering design/equipment application errors and facilitating training requirements.

PSNH's system planning criteria and design standards are discussed in the following pages.

⁶⁷ Interview #38

⁶⁸ Interview #38

5.12 System planning criteria within the *Distribution System Planning Guide (DSPG)* apply to all three states while respecting state-specific voltages and system conditions. RCG believes this process to be consistent with a well-functioning engineering organization. However, having multiple documents can create a source of confusion in written communications which can be avoided by releasing a more complete (revised and combined) version of DSPG 2020.

The *Distribution System Planning Guide (DSPG 2020)*⁶⁹ is a standard for all three states to harmonize planning criteria and equipment application guidelines as much as practical. Past practices, existing practices, documentation, and industry practices are referenced in the Guide. State-specific exceptions are defined. Resource sharing is supported across all three states for processes and technologies where interchangeability is appropriate.⁷⁰ DSPG 2020 contains the following major elements:⁷¹

- Detailed system planning criteria;
- Asset rating criteria;
- Planning methodology to avoid capacity, voltage, and reliability violations:
 - Model development guidelines: Data imported from GIS; linked demand and DER data; and daily (24-hr)/yearly (8760-hr) planning scenarios;⁷²
 - Study methods/procedures;
 - DER applications including Battery Energy Storage Systems (BESS);
 - Load forecasting (reviewed in an earlier section of this report);
 - Solution development procedures/guidelines;
 - Planned and proposed system upgrades (capital planning process).

Non-Wires Alternatives/Solutions (NWAs or NWSs).

A separate, more comprehensive *DER Planning Guide* is to be published by year-end 2022.⁷³ PSNH plans to address 90% of the issues at publication time, then revise as needed.

Existing planning criteria for all three states are extensively reviewed by engineering when developing the DSPG. The goal is to reduce the risk of sizable events [single contingencies (N-1) lasting one 24-hour cycle] by making the criteria more stringent so engineers can identify reliability risks and proactively design mitigating solutions.⁷⁴ Reliability metrics are tracked on multiple timescales and reported to the NH

⁶⁹ LCIRP, October 1, 2020, Appendix D

⁷⁰ Interview #62, Interview #18, and DR BPA 13-001, page 2

⁷¹ LCIRP, October 1, 2020, Appendix D, Bates pages 106-109

⁷² LCIRP, October 1, 2020, Appendix D, Bates page 72

⁷³ Interview #62

⁷⁴ Interview #18

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

PUC frequently. The responsible reliability planning group, in collaboration with distribution engineering and operations, analyzes the data to identify potential trends and causes and develops plans to mitigate root causes and update standards and practices that improve reliability (reliability performance will be discussed in a later section of this report).

From PSNH's perspective, for the electric grid to accommodate the increased emerging electrification, it requires careful system planning and associated grid investments for reliability and resilience. Today's customers have transitioned from simple tasks such as lighting, refrigeration, cooking, and water heating to more complex and dependent energy needs.⁷⁵ Many customers are now working at home and using computers more intensely than at the turn of the century. Simple mechanical thermostats have evolved and now perform complex control of space conditioning. Typical household appliances now have computer chips that optimize how they operate. Entertainment is no longer a simple television. This evolution is expected to continue as the economy further electrifies with new uses such as electric vehicles. Consumers have a real need for a continuous, high-quality electric power supply. In many respects, this shift has been accelerated by the recent pandemic.

The ability to transfer load between substations during a system contingency is key to reliability. Having transformers not loaded to the nameplate when an event happens makes load transfer possible. For NH, (N-0) bulk transformer criteria were changed from 75% (*SYSPLAN-010*) to 95% (*DSPG 2020*) of nameplate rating, reducing the ability to accept load transfers from neighboring substations. However, this was considered an acceptable risk due to the unique nature of the PSNH system and the ability of the 34.5kV backbone distribution lines to carry the additional load.⁷⁶

In addition, legacy guidelines allowed bulk transformers to be loaded to their long-term emergency (LTE) ratings under normal (base case) (N-0) conditions. The new criteria limit loadings to 100% of the nameplate (i.e., the LTE load-ability rating was lowered), leading to more guideline violations.

The comprehensive Exhibit 11 summarizes new *DSPG* planning criteria for bulk/non-bulk transformers and distribution lines for normal (N-0) and contingency (N-1) conditions and compares them to the old criteria. *ED-3002* was issued initially on January 10, 2003, as the primary guidance document for NH system planning until *SYSPLAN-010* was created in 2014. In 2018, the three states' planning criteria were combined into a single revised *SYSPLAN-010* document that was to supersede *ED-3002*.

⁷⁵ RCG's anecdotal experience indicates customer's tolerance of outages (even during major storms) has markedly decreased over time.

⁷⁶ Interview #18

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The primary guidance document (*SYSPLAN-010*) was revised again in September 2020, creating the new *DSPG 2020* document used today. Updated system planning criteria, equipment ratings, and planning methods/guidelines are included in *DSPG 2020* which was intended to supersede *SYSPLAN-010* and *ED-3002*. However, not all items were moved to *DSPG 2020* creating the need for *SYSPLAN-010* and *ED-3002* to act as supplements (despite both being superseded) until a more comprehensive *DSPG* can be written.⁷⁷

The adoption of *DSPG 2020* coincides with the PSNH's transition to Synergi as a load flow planning tool with abilities to incorporate probabilistic simulation approaches and new DER modeling capabilities.⁷⁸ As PSNH organic DER penetration levels increase, the modeling features of this tool are expected to facilitate DER hosting/integration studies which are addressed in *DSPG 2020*.

In the NH *July 2020 Load Flow Study Report*,⁷⁹ the following violations were identified for bulk transformers and connected distribution lines:

• 2020: 3 xfmrs on N-0	3 ckts on Voltage	23 subs on N-1
• 2021: 1 xfmrs on N-0	0 ckts on Voltage	0 subs on N-1
• 2022: 0 xfmrs on N-0	0 ckts on Voltage	2 subs on N-1
• 2023: 0 xfmrs on N-0	0 ckts on Voltage	0 subs on N-1
• 2024: 0 xfmrs on N-0	0 ckts on Voltage	0 subs on N-1

While the criteria change from 75% top nameplate rating to 95% will reduce the number of transformer design violations, the considerable variation in the year 2020 compared to the years 2021-2024 can be attributed to an PSNH criterion not discussed above. Before the change, 30 MW of load could be dropped for up to 24 hours for any single contingency condition (e.g., a bulk station transformer failure).⁸⁰ Mobile transformers were then relied on to restore power within 24 hours.

In the new criteria, all loads must be immediately restored (i.e., can no longer drop 30 MW) using automatic bus switching schemes. (Note - no capital projects were initiated from 2018-2020 under *SYSPLAN-010*).⁸¹ Bus-tie breakers allow this to occur by connecting the primary bus's live section to the primary bus's dead section, restoring supply across the entire substation primary bus. This use of the bus-tie breaker scheme shows its innate

⁷⁷ DR BPA 10-005, pages 1-2

⁷⁸ DR BPA 13-001

⁷⁹ 2020 to 2029 Load Flow Study Report, July 1, 2020, LCIRP Appendix B-1

⁸⁰ ED3002

⁸¹ LCIRP, October 1 2020, p23 of 45

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

value in protecting the system. The faulted circuit or transformer is separated, via another breaker, from the bus until repaired.

Exhibit 11 - System Planning Criteria – Comparison of Old vs. New DSPG 2020⁸²

Document:	ED-3002	SYSPLAN-010	DSPG 2020
Jurisdiction:	NH	CT-MA-NH	CT-MA-NH
Primary Criteria Document:	1/10/2003-8/1/2018	8/1/2018-9/22/2020	9/22/2020-Present
Bulk Transformers (115kV and above)			
(N-0) Normal Operation (Base Case) - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Bulk Transformer Loading	115% - 150% top nameplate rating (TFRAT)	> 75% top nameplate rating	CT-MA: > 75% top nameplate rating NH: > 95% top nameplate rating
Voltage, Unregulated Load	< 97.5%	n/a	n/a
Voltage, Regulated Load	< 95%	n/a	n/a
Voltage, Service	n/a	< 95%	< 95%
Load Block Transfer Limit	n/a	n/a	n/a
Remaining Isolated Load	n/a	n/a	n/a
(N-1) Contingency - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Bulk Transformer Loading	115% - 150% top nameplate rating (TFRAT)	> 100% LTE	> 100% LTE
Bulk Substation Loading	n/a	> 100% STE _{N-1}	> 100% STE _{N-1}
Voltage, Unregulated Load	< 95%	n/a	n/a
Voltage, Regulated Load	< 92.5%	n/a	n/a
Voltage, Service	n/a	< 95%	< 92%
Load Block Transfer Limit	3	3	3
Remaining Isolated Load	30MW load out for up to 24 hrs	> 0 MW (no loss of load)	> 0 MW (no loss of load)
Transmission Supply N-1	30MW load out for up to 24 hrs	> 0 MW (no loss of load)	Single Transmission N-1 shall not cause greater than a single Distribution N-1 condition.
Non-Bulk Transformers (below 115kV)			
(N-0) Normal Operation (Base Case) - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Non-Bulk Transformer Loading	115% - 150% top nameplate rating (TFRAT)	115% - 150% top nameplate rating (LTE)	> 100% top nameplate rating
(N-1) Contingency - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Non-Bulk Transformer Loading	> LTE rating for 1 load cycle; mobile transformer to be installed within 24 hrs if circuit ties not available	> LTE rating for 1 load cycle; mobile transformer to be installed within 24 hrs if circuit ties not available	> LTE rating for 1 load cycle; mobile transformer to be installed within 24 hrs if circuit ties not available
Distribution Lines			
(N-0) Normal Operation (Base Case) - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Line Loading	> 100% normal	n/a	n/a
Line Loading, Overhead	n/a	> 100% normal	> 100% normal
Line Loading, Underground	n/a	> 100% normal	> 100% normal
(N-1) Contingency - Violations Criteria			
	ED3002	SYSPLAN-010	DSPG 2020
Line Loading	> 100% emergency	n/a	n/a
Line Loading, Overhead	n/a	> 100% emergency	CT-MA: > 100% normal NH: > 100% emergency
Line Loading, Underground	n/a	> 100% normal	> 100% normal

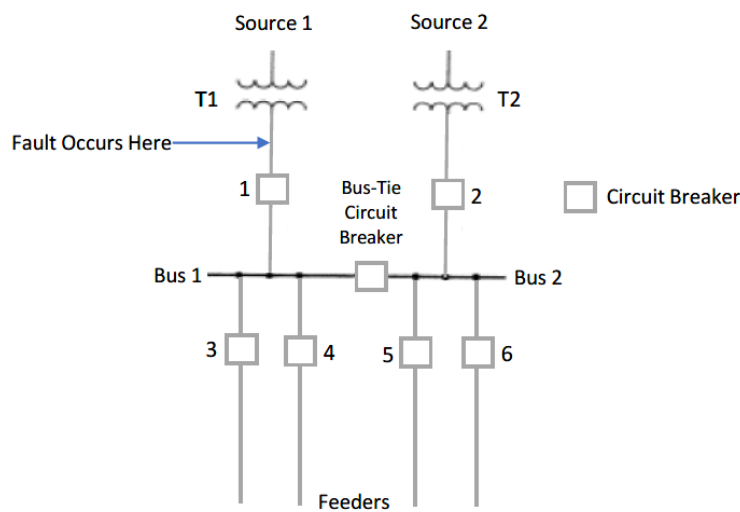
⁸² DR BPA 10-004, Attachment BPA 10-004.xls

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

In addition, PSNH added a single-contingency (N-1) transmission requirement to minimize the impact on the distribution system (i.e., shall not cause more than one distribution N-1 condition) resulting from outages on the transmission system. This policy change means a contingency condition on the transmission system shall not cause more than one contingency condition on the distribution system.

The bus fault criteria specified in *DSPG 2020* is a standard industry practice. A bus or busbar is a connection point for power systems, transmission lines, and distribution feeders. If a fault occurs electrically close to a busbar (e.g., on the T1 low voltage terminal in the exhibit below), all circuits supplying fault current (source side) to the busbar must be tripped (disconnected) to isolate the fault and prevent damage to the system (CB1).

Exhibit 12 - Bus Tie Example



A series-bus-tie breaker connects two buses (Bus 1 and Bus 2) and is normally open (for this example). This design improves reliability in that if a fault occurs on one bus (Bus 1), the normally open series-bus-tie breaker is closed (after confirmation CB1 is opened), and loads (feeders) are then transferred from the faulted bus (Bus 1) to the unfaulted bus (Bus 2), maintaining service continuity (limited only by equipment ratings). For loads that can be restored in less than five minutes, SAIDI (duration) reliability performance statistics are not impacted.

As a result of using this new criterion to perform the annual 10-year load flow study, 2020 saw the potential for an increase in violations. With forecasted load growth at only 0.38%, potential capacity violations were expected to substantially decrease in the years 2021-2024.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Despite the relatively large number of 2020 violations, only the highest priority capital projects were submitted in 2020 to avoid exceeding the total annual capital budget of \$140M.⁸³ As a result, Distribution Engineering is working with Distribution Planning to prioritize the violations and corresponding project solutions. The prioritization process considers several factors (for example, asset condition). The highest priority projects are identified in the 5-year capital plan along with the selection rationale. RCG believes this set of actions shows the Company's commitment to maintaining approved annual capital budget limits.

PSNH believes the criteria changes have created a point of disagreement and an atmosphere of distrust with the Division. PSNH is of the opinion that Division believes PSNH should take more risk, not less, to control capital dollars and resulting rate structures. PSNH also believes consumer advocates are also pushing for more risks to be taken to keep rates low.⁸⁴

From PSNH's perspective, PSNH is working on providing reliable electric service to its customers, as needed in a changing grid with electrification trends and climate change related extreme events. These two emerging trends require continuous grid investments with careful utility system planning.

5.13 PSNH's use of tree wire is appropriate. RCG supports the *selective* use of tree wire (covered wire) in areas with a high frequency of tree-wire contacts leading to outages.

PSNH strongly believes it is essential to anticipate future conditions and take proactive planning measures before reliability becomes a significant problem. An example would be the selective application of covered tree wire in areas prone to multiple faults due to tree limb contact (but not falling trees).⁸⁵ Division Staff have interpreted this use of tree wire as indicative of an overbuilt system. However, selective use of covered wire in highly treed areas with frequent tree contact issues is consistent with leading industry practices.

⁸³ Interview #20

⁸⁴ Interview #20

⁸⁵ Interview #11

5.14 PSNH's change in planning criteria should be better explained. RCG believes PSNH did not sufficiently explain the rationale behind changing the planning criteria to the Division.

Another RCG concern was the change from allowing a 30-MW load loss over 24 hours to a 0-MW load loss which was interpreted by the Division as going too far and believing more risk should be taken (i.e., some MW load loss is OK), which led to a different philosophy between PSNH and Staff.⁸⁶

This difference in philosophy leads to differing views on what qualifies as a violation. Eversource believes PSNH is "incredibly frugal" in the design and build of the distribution system⁸⁷, which is why the system is designed around a 34.5kV distribution backbone (i.e., transformed directly from 345kV transmission to 34.5kV distribution) and why projects are evaluated/prioritized on a cost-per-customer-saved-minute basis.

PSNH did include in its 2019 LCIRP filings an explanation for why criteria changes were needed.⁸⁸ A settlement agreement with Staff was reached and approved in October 2019 that included language about criteria change disagreements, stating investments made solely based on these changes could continue subject to prudence reviews. Those disagreements were ultimately settled in PSNH's subsequent rate case whereby PSNH agreed to return to less conservative criteria.

5.15 PSNH appears to be complying with industry accepted design practices.

Standard designs have been adopted across all three states as much as practical, recognizing state-specific requirements apply. Standard substation designs are modified to fit need/cost targets, e.g., more expensive breaker-and-a-half schemes will not be used if less expensive straight-bus designs satisfy design/performance criteria.⁸⁹

Most (90%) substation engineering work occurs at existing brownfield sites where standard designs typically do not apply. Instead, existing design alternatives are considered when developing solution alternatives. Selecting the preferred alternative (best overall solution) involves evaluating a matrix of weighting factors (pros/cons, criteria, maintenance costs, logistics, overall costs). Suppose the least-cost solution creates future maintenance concerns (e.g., equipment no longer supported by the

⁸⁶ Interview #20

⁸⁷ Interview #20

⁸⁸ Interview #20

⁸⁹ Interview #21

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

manufacturer) or comes with specific reliability concerns (e.g., animal protection). In that case, a higher initial-cost solution option may be selected instead.⁹⁰

Replacing old transformers at existing substations is possible, even with space limitations, because new transformer designs tend to be physically smaller. However, with older substations, there are usually other issues that need attention resulting in the need for a substation rebuild (e.g., aging equipment, obsolete technologies, eliminating equipment with hazardous fluids, and difficulty obtaining spare parts).⁹¹

Standard distribution transformer designs are included in Storms/Maximo according to the *Distribution System Engineering Manual* (DSEM). Standard substation designs, including transformers, are in the Substation Design Manual (SDM). Both DSEM and SDM are part of the *Engineering Standards Bookshelf* shown in the exhibit below. When designing distribution lines, field design engineers/technicians use DSEM-published designs. For PSNH distribution step-down transformers, for example, there are 28 unique design configurations.⁹²

Exhibit 13 - T&D Engineering Standards Bookshelf - Contents⁹³



DSEM does not address every situation. Decisions can incorporate project-specific requirements that may impact the best overall solutions, e.g., conditions set forth by state regulatory bodies.⁹⁴ DSEM contains 19 sections covering distribution system design (e.g.,

⁹⁰ Interview #21

⁹¹ Interview #73

⁹² DSEM, November 2015, Section 14.34, Table 5.

⁹³ DR BPA 15-001, Attachment BPA 15-001(a)

⁹⁴ DR BPA 9-001

reliability, power quality, overhead, underground, protection) and equipment application (e.g., conductors, arresters, capacitors, transformers, regulators). *DSEM* also addresses safety, voltage regulation, reliability, flexibility, capacity, and economics.⁹⁵ Sections are succinctly written and to be used in conjunction with other, more detailed standards (e.g., *DSPG*).

5.16 PSNH's use of substation feeder protection standards are appropriate. Substation feeder protective device application standards/guidelines, and bulk and non-bulk distribution supply transformer overcurrent protection standards/guidelines appear well written, appropriate, and complete.

Eversource uses protection standards and guidelines developed internally by the Protection & Control (P&C) Department. They describe the protection philosophy, type of protection, and applicable industry standards. Protection documents are periodically reviewed and revised as protective device technology evolves and improved protection schemes are adopted.⁹⁶ The two example documents reviewed by RCG (*Substation Feeder Protective Device Application Methodology*⁹⁷ and *Bulk and Non-Bulk Distribution Supply Transformer Overcurrent Settings*⁹⁸) appeared to be well written, appropriate, and complete from an engineering point of view.

Eversource participates in the following industry meetings/conferences: IEEE; NESC; EPRI; NATF; AEIC; IEEE Power System Relay Committee (PSRC); North American Transmission Forum Protection System Working Group; local IEEE; and NPCC. However, meeting highlights are not consistently shared within the engineering organization,⁹⁹ creating missed opportunities for professional development and pointing to another example of missed communication.

All changes to T&D procedures are controlled by TD001 in the Document Control Process managed by T&D Standards Engineering.¹⁰⁰

Hardware is standardized to increase overall efficiency when possible. For example, 34.5kV pole line hardware is also used on 12kV and 4kV systems to simplify the

⁹⁵ DR BPA 4-02, Attachment 1, DSEM link

⁹⁶ DR BPA 1-029

⁹⁷ DR BPA 1-029, Attachment A

⁹⁸ DR BPA 1-029, Attachment B

⁹⁹ Interview #61

¹⁰⁰ DR BPA 15-001, Attachment BPA 15-001(c)

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

supply chain, stocking, and construction processes.¹⁰¹ However, native voltages remain the same.

Blanket agreements are in place with suppliers to streamline supply chain issues and control costs. For example, a blanket agreement is in place to supply standard recloser controls.¹⁰²

Standard **bulk** transformer ratings:¹⁰³

- 115-34.5 kV 62.5 MVA
- 115-12.47 kV 30 MVA
- 34.5-12.47 kV 12.5 MVA
- 34.5-4.16 kV 12.5 MVA
- 115-12.47 kV 30 MVA
- 345-34.5 kV 140 MVA
- 44.8 MVA (outdated standard to be replaced with 62.5 MVA units)

Standard **non-bulk** transformer ratings:

- Included in the DSEM manual along with application guidelines.¹⁰⁴

Eversource purposely avoids deviating from equipment standard designs to prevent expensive “specials.” In all cases, IEEE standards are met or exceeded.¹⁰⁵

Eversource has adopted a relatively new (within the last two years) substation design standard: Installing metal-clad switchgear to the low side of substation transformers.¹⁰⁶ (Use of metal-clad and metal-enclosed switchgear is common in industrial /commercial facilities.) No live bus is exposed when the breaker is opened, offering an important safety feature.¹⁰⁷ Metal-clad switchgear reduces on-site installation/testing costs and engineering time since the breakers, relays, wiring, and metering are all contained in standard cubicles that lend themselves to more modular designs. The T&D Standards group developed a detailed metal-clad switchgear procurement standard (detailed specifications) in conjunction with the Substation Design Engineering group that includes comprehensive requirements and drawings¹⁰⁸ for use within the engineering organization. There was a PSNH perception that metal-clad

¹⁰¹ Interview #11

¹⁰² Interview #19

¹⁰³ Interview #61, Interview #73

¹⁰⁴ DR BPA 4-02, Attachment 1, DSEM Manual, November 2015, Section 14

¹⁰⁵ Interview #73

¹⁰⁶ Interview #73

¹⁰⁷ IR-60, page 4

¹⁰⁸ DR BPA 15-002, Attachment BPA 15-002(a)

switchgear was more expensive than open-air construction, but the perception is changing.¹⁰⁹

5.17 The supply chain is well integrated. PSNH's Supply Chain organization appropriately changed its normal procurement practices to allow for impacts associated with the international disruption in the materials, services, and contractor availability.

RCG performed a limited review of Eversource's Supply Chain practices as they relate to capital project processes. A supply chain organization is needed to support capital and maintenance requirements. The procurement and store's function must purchase necessary materials and services; store; pre-packages; and issue when needed. Customers, regulators, and shareholders expect a cost-effective and efficient process. Supply chain personnel must manage the inventory and availability of materials and ensure stocking levels are adequate and consistent with capital programs, emergency response, and future demand needs.

Eversource's supply chain personnel are an active partner in the capital project cost-control process.¹¹⁰ The corporate purchasing function is multi-state and focused on commodity buyers for substation power transformers and major substation components, distribution standard equipment, and standard step transformers. Eversource bids all purchases and services from prequalified strategic vendors referred to as "Contractor or Vendor of Choice". Strategic vendor performance is monitored, evaluated, and fed back regularly through a supplier relationship management program and a third-party vendor risk management program. Purchasing is responsible for initiating and managing warranty claims against vendors and/or suppliers. Poor contractor/supplier performance will result in their removal as a strategic partner. Purchasing seeks to have multiple sources for either contracted services or vendor-supplied materials. In rare cases where a unique service or material can only be supplied by a single source, senior management approval is required.

Purchasing creates a pre-approved list of contractors/vendors with established rates/pricing. Competitive bidding takes place using the approved Contractor or Vendor of Choice listing. This approach ensures pre-established master services agreements, terms of the contract, etc. are approved upfront so related negotiations do not adversely impact the capital project process.¹¹¹

¹⁰⁹ Interview #73

¹¹⁰ Interview #11, Interview #12, and Interview #27

¹¹¹ Interview #27

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Purchasing is proactively involved in the front-end of capital project development. Purchasing engages with strategic vendor and contractor partners to confirm material and service availability. Additionally, Purchasing seeks input from strategic partners on alternatives to current products and/or services to help identify additional design or solution options.

Purchasing decisions are made based on the “lowest lifetime cost of ownership” and not the initial price, which is a leading industry practice. For example, for power transformers, the lowest cost is a balance between the total cost of ownership, operating cost (losses), and maintenance cost (life-cycle cost). PSNH also looks at the life of the unit, purchase price, delivery, and any additional, value-added services that may be offered by the supplier. This evaluation takes place as part of the commercial and technical review process.

Purchasing has sought out and implemented additional options to expand the availability of distribution transformers, including step transformers. New vendors have been evaluated and selected to provide refurbished and certified transformers. Transformers removed from service are being tested, repaired, and refurbished in-house by the substation testing lab employees, depending on transformer conditions.

Supply disruptions/delays have caused Stores to discontinue the “just-in-time” automated delivery process. Under this former industry standard program, material and equipment inventory levels were kept to a minimum (emergency response levels). Usage, project and maintenance needs, and replenishment delivery times were monitored, adjusted, and ordered electronically. Buyers dealt with delivery time updates on an exception basis (reported electronically).

However, since COVID-related supply disruptions, replenishment delivery times have become unpredictable. Purchasing and Stores have responded by putting in place a new process, managed by the Stores personnel, that adjusts inventories based on current needs and material availability/delivery schedules. Now Stores routinely monitors material delivery lead times and recommends purchasing schedules to meet inventory requirements and project schedule and/or routine business material needs. In the case of long lead-time materials, such as power transformers, Purchasing has advanced 2023 purchases. To date, this change has been successful in meeting business needs. There has not been any identifiable impact on PSNH's ability to meet customer needs. In the short run, capital spending should not be impacted since adequate materials and equipment are on hand to satisfy the current year's capital plan. Advanced buying of power transformers has also been included in the current year's capital budget. However, it is still too early to assess the longer-term impact on capital project planning and associated spending.

5.18 PSNH's Stores function operates consistent with industry practices. PSNH's Stores operation practices are consistent with industry practices and a positive contributor to capital project construction schedules, development, and execution.

Stores participates in weekly distribution line schedule and planning meetings. Stores confirm all materials are available prior to a project being scheduled for construction. Additionally, Stores identifies operation's delivery requirements. Stores pre-packages all materials for a project and stage it for operations and/or contractor use. Due to space limitations, they do not pre-load material onto the line trucks. Where project logistics permit, Stores can pre-load materials on trailers or have material delivered directly to construction sites. Since Stores participates in the scheduling process, there have been very few construction delays resulting from material availability issues.

5.19 PSNH makes appropriate use of system planning software. Commercial software tools in use by Eversource are standard industry packages in common use by electric utility companies in the United States. Eversource supplements these software tools with in-house developed/customized software to improve internal operations. Using commercial and in-house developed/customized software tools is consistent with industry best practices.

Appendix B of this report provides a list of Eversource's in-house software. A few examples are mentioned here.

Synergi was selected as the preferred engineering software package for distribution system studies using Python scripts to automate the simulation/analysis process (e.g., load flow, short circuit, harmonics). In addition, Synergi will be used to simulate 10-year, 8760-hour operating scenarios (including DER integration impacts).¹¹²

The Grid Mod Group is responsible for implementing the transition from the DistriView engineering analysis package (in use in NH) to Synergi (first deployed in PSNH June 2021). The Grid Mod Group is also responsible for in-house software training and first-line user support.¹¹³

¹¹² Interview #13

¹¹³ Interview #19

5.20 PSNH uses compatible units in estimating work. The use of compatible units (CUs) is an industry standard, but the individual units defined for specific work need to be updated regularly to ensure the accuracy of the downstream estimates.

Compatible Units (CUs) for Maximo are developed and managed by the Standards Group. CUs are state-specific (labor rates, voltages, etc.); however, three-state standards are set whenever possible.¹¹⁴ It is worth noting that CUs have been an industry-standard practice for several decades. However, in RCG's experience, CUs require significant maintenance, including regular updating, to be an accurate cost-estimating tool (PSNH agrees). Despite the required maintenance, CU is a valuable tool if kept current.

5.21 NWA screening tools are being incorporated. The in-house NWA screening tool is a step in the right direction.

Eversource requires system-wide screening of potential NWA solutions against traditional system-upgrade solutions using an in-house developed, Excel-based, NWA Screening Tool to identify viable NWA alternatives suitable for more detailed engineering analysis by System Planning.¹¹⁵

An NWA Framework document was also developed that details all assumptions and modeling methods used by the NWA Screening Tool in the screening process.¹¹⁶

Eversource's use of the NWA Screening Tool and NWA Framework document are discussed elsewhere in this report.

¹¹⁴ Interview #11

¹¹⁵ LCIRP, March 31, 2001, Supplement, Appendix A

¹¹⁶ Ibid

5.22 Eversource customized a PTX tool. The Eversource-customized PTX tool is appropriate for tracking and evaluating transformer asset conditions and alerts Eversource to emerging power transformer issues.

The customized PTX software tool uses a rule-based expert system to assess transformer conditions using readily available asset condition data and nameplate information that provide insights into the likelihood of failure and associated causes. A *health index* is then calculated based on the following factors: overall condition, operating temperature, electrical condition, core condition, oil quality, and age.¹¹⁷

5.23 The Pole Replacement policy has been modified. PSNH's Pole Replacement Program is well documented, managed, and consistent with general industry practices. Given Eversource's annual pole purchases across all three companies, there could be savings due to volume purchasing leverage. Changing the size (diameter) of the pole from class 4 to class 2 is reasonable for PSNH.

The wooden pole has been the standard in the electric utility industry since its inception. Poles' composition, size, class, and height have and continue to be dictated by the pole's application: transmission, distribution, service, or support, and whether it will have other joint uses, such as by the local communications companies and municipalities.

Pole composition can be wood, steel, composition, or concrete. Pole diameter dictates the class of a wood pole. Pole class and height combine to dictate the strength of a wood pole. Typical distribution wood poles used for services and street lighting would be a minimum of Class 6, 30 ft pole. A wooden distribution line pole typically would be sized at a minimum of Class 4 and 35-to-40 ft. However, with the additional height and loading requirements dictated by third parties' joint use of poles, the minimum industry norm for distribution poles has increased to a Class 2, 45-or-50 ft pole. The additional height is to accommodate adequate safety clearances required by all users of the poles.

Which poles "Class" to use is determined by the Standards Group using a pole-loading-analysis program that considers wind and ice to determine the required pole class.¹¹⁸

¹¹⁷ DR BPA 8-004, pages 1-5

¹¹⁸ DSEM, Reliability Section 02.50, page 02.501, June 2021.

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

PSNH has a program (consistent with its affiliates at Eversource) of reinforcing its distribution lines to minimize the potential of future outages caused by a combination of tree, wind, and ice damage. This revised thinking is supported by a report produced by TRC, an engineering consulting firm. The study led to several PSNH distribution policy changes, including:

- Moving from Class 4 and 5 poles to stronger Class 2 poles when existing poles are deemed damaged and unsafe; and
- Replacing wooden cross arms with stronger composite cross arms; and
- Upgrading of 12kV and 4kV *pole hardware* to 34.5kV hardware.

The pole policy change was initiated by changing PSNH's long-standing maintenance policy of conducting third-party pole inspections and repairing those with minor ground line rot or replacing them with a new pole of the same class if the existing pole was beyond repair. This inspection and alternative actions practice has been an industry-standard practice for decades. PSNH's new policy affects the latter two options with a required replacement using stronger Class 2 poles, allowing the newer poles to better withstand tree limb impacts (an issue in several recent storms where pole failures occurred.)¹¹⁹

Eversource determined that standardizing pole hardware would offer cost savings and improved reliable service in several areas. Eversource reduced the number of items in inventory while improving purchasing leverage by eliminating the variety of similar distribution pole hardware. RCG has learned in recent years that the 4kV line equipment costs were rising due to most distribution line developments focusing on higher voltages, thereby reducing the demand for 4kV equipment. This trend increased the price for 4kV pole hardware. The new Eversource policy includes using 34.5kV insulators and pins on all primary distribution voltage classes and reducing truck and storeroom stocking requirements. This policy change was stated in formal testimony but written in a way that could be interpreted as converting lower primary voltages to 34.5kV voltage, not PSNH's intended position.¹²⁰

Specific to PSNH, the "*TRC System Assessment Report*"¹²¹ commissioned by PSNH in compliance with Section 11.1 of the October 9, 2020, Settlement Agreement in Docket No. DE 19-057 addressed several distribution system reliability criteria and the

¹¹⁹ Direct Testimony of Joseph A Purington and Lee G LaJoie, DOCKET NO. DE 19-057

¹²⁰ Direct Testimony of Joseph A Purington and Lee G LaJoie, DOCKET NO. DE 19-057

¹²¹ May 28, 2021, PSNH Letter Docket No. DE 19-057

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

standardization of distribution pole applications.¹²² The TRC Report's pole recommendations are listed below:

"1) Establish a systematic asset replacement program to replace wood poles on an age basis, that support three phase lines, over the next 5 years. Beginning with poles 70 years and older poles, focusing on the smaller class 4 and 5, then address the 60- and 50-year-old poles using the same class criteria. There are about 42,000 wood poles aged 50 years and older that may need to be identified and prioritized for replacement. It is estimated that 20% (8,400) of those poles support three phase lines, requiring approximately 1,700 poles/year of the poles in this age group be replaced in conjunction with the other Company pole replacement efforts.

2) TRC recommends poles that are identified as structurally loaded at 90% or greater, be replaced with the correct sized poles to carry the mechanical load under the mandated NESC design conditions. To accomplish this, TRC also recommends that 10% (approx. 4,500) of the overloaded poles, be replaced on an annual basis. Priority should be given to the poles that are overloaded by the greatest amount and/or most critical to the system. It is also essential that all new poles that are installed have pole loading analysis completed to ensure the design criteria is met. Individual pole loading analysis will need Eversource NH Distribution System Assessment 30 to be performed on all angle, tap and dead-end poles. Typical tangent pole analysis can be modeled to promote efficient design.

3) Continue the practice to use a minimum of Class 2 wood poles for all applications and ensure that NESC pole loading requirements are met for both the heavy loading and extreme wind scenarios. Based on analysis of the representative data, Class 2 wood poles are half as likely to be overloaded with attachments compared to Class 3 poles."¹²³

RCG's review of pole installations through project reviews and field observations found poles installed for new lines and replacements were consistent with the TRC recommendations. Pole inspection and replacement programs have been an industry-leading practice for decades.

¹²² Eversource's TCR System Assessment, pgs. 20-29

¹²³ Eversource's TRC System Assessment, pgs. 29

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Wood poles continue to be the predominant distribution line pole. As such, utilities inspect wooden poles for deterioration from insects, birds, ground line rot, and external damage. Current utility practice is to inspect distribution wood poles independently or in conjunction with a distribution line inspection based on a formal schedule. The inspection schedule varies based on historical inspection results and environmental factors such as climate, soil conditions, and exposure to physical damage. Typically, 10% of a utility's poles are targeted for inspection annually.

The inspection will identify poles that require further investigation, repair, or replacement. Typically, a specialized professional contractor performs analysis, assessing the extent and damage, type, and whether the deterioration can be treated with chemicals for insect infestation, reinforced at the ground line, or patched with an epoxy mixture. These measures are designed to extend the pole's useful life. However, over the past ten years, the public's reaction to environmental impacts from chemically treated poles or chemical treatments of poles, steel reinforcement of poles along roadways, and the effects to the environment from regular access to poles in wetlands has limited application of historical life-extension methods. As a result, more moderately damaged poles are replaced, and the pole material is considered based on environmental concerns (wetlands, storm exposure, ability to guy, etc.). The pole type most considered for such specialized needs are steel poles in difficult-to-access off-road RoWs (both directly buried and in conjunction with a foundation/casing) and concreted poles for storm-prone or high-congestion areas.

Eversource/PSNH recently changed its formal pole inspection and outcome approach for Class 4 and Class 5 wooden poles. If a Class 4 or Class 5 pole is found to have ground-line rot, the pole will be replaced with a new and more resilient Class 2 pole. This departure from industry practice is being done out of concern for the age of installed poles and their ability to withstand adverse weather events. Normally, RCG would have concerns with this change. However, RCG believes the change to be reasonable for the following reasons.

- Many installed Class 4 or Class 5 poles are near or at end-of-life expectancy.¹²⁴
- New Hampshire (like other New England states) experiences periods of significant ice formation, adding weight to the lines and placing additional stress on poles and pole-line hardware.
- Large limbs and tree failures can take down physically compromised poles.
- Many RCG client utilities have standardized on Class 2 poles.

¹²⁴ Direct Testimony of Joseph A. Purington and Lee G. Lajoie, DOCKET NO. DE 19-057

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

PSNH’s pole replacement policies and practices require poles to be periodically inspected, with the results dictating subsequent actions. Formal annual pole inspection programs are well defined and documented as described below:

“On average, 10% of Eversource owned poles are inspected annually by town location. Non-Eversource-owned poles in the towns identified for pole inspection also receive a visual inspection. Poles are visually inspected based upon age and type of pole preservative. Sound and bore inspections are performed on poles older than those to be visually inspected. The detailed program on Eversource owned poles is summarized in the following excerpt from Eversource’s Maintenance Program EMP 5.61 and shown in the Exhibit below.”¹²⁵

Exhibit 14 - Pole Inspection Criteria¹²⁶

Note 1 = 15 years is the minimum requirement for pole inspection. This interval may be changed due to contractual requirements with joint owners.

Note 2 = The type of inspection performed shall be determined by the age of the pole and its type of treatment, as shown in the following table:

Inspection Type	Creosote, Penta, all others	CCA
Visual	0 to 9 years old	0 to 19 years old
Sound & Bore	10 to 14 years old	20 years old and older
Ground Line Excavate	15 years old and older	If decay is indicated by Sound & Bore

Note 3 = Field supervision shall check the pole within forty eight (48) hours from identification as a “priority reject” to assess the conditions and verify there is no immediate danger to the public. The pole must be made safe within 10 calendar days or less from its identification as a “priority reject” wood pole..

Note 4 = Complete the repair or replacement within one year of determination of need following inspection

As shown in the notes above, pole inspection results fall into three categories: 1) Passed; 2) Normal reject (pole must be replaced within one year), and 3) Priority reject (field supervisor must field-check within 48 hours to ensure no immediate safety concerns). The pole must be made safe within 10 days and replaced within one year.

¹²⁵ DR BPA-6-009

¹²⁶ DR BPA-6-009. CCA = Chromated Copper Arsenate

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

The following exhibit shows the targeted and actual pole inspections for the past five years:¹²⁷

Exhibit 15 - Historical Pole Inspection Targets and Actuals

<u>Year</u>	<u>Target</u>	<u>Actual</u>
2017	25,493	31,873
2018	43,816	42,399
2019	45,666	44,097
2020	41,319	38,477
2021	47,914	42,897

Poles that fail inspection are replaced under the PSNH’s Reject Pole Replacement Project. Projects are broken down into annual work orders to improve annual budget management and control.¹²⁸

PSNH’s Pole Replacement Project results are shown in the exhibit below. Just looking at the most recent rejection rate for 2021 of 42,897 poles, only 136 were rejected, or 0.3 percent of installed poles.

This Reject Pole Replacement Project has funded pole replacements, over the past five years as follows:¹²⁹

Exhibit 16 - Annual Rejected Poles & Replacements

<u>Year</u>	<u>Reject Count</u>	<u>Completed</u>
2017	270	270
2018	514	514
2019	358	358
2020	165	165
2021	136	136

The above exhibit shows PSNH’s commitment to keeping the distribution system safe and resilient. PSNH is keeping up with both the identification and replacement of poles deemed unacceptable.

¹²⁷ DR BPA-6-009

¹²⁸ Interview #43, Power Plan Panel

¹²⁹ DR BPA-7-009

5.24 Steel poles are used judiciously.

Steel poles are a viable solution under specific circumstances. RCG reviewed PSNH's use of steel poles in non-transmission applications. PSNH has recently expanded its use of steel poles beyond transmission structures in RoWs, consistent with the following observations from the TRC report:

"... steel distribution poles are an investment that provide a long-term solution for safe, reliable, and cost-effective service to the customer. This investment is one component of improved distribution line resiliency. Steel poles used in off-road right-of-way settings provide additional resiliency benefits to guard against what would be a longer duration outage, given the difficulty in patrolling and replacing these more remote assets in the event of a failure during a severe weather event."¹³⁰

Additionally, in response to industry environmental concerns for treated wood poles in wet environments and the increasing cost of wood matting to access RoWs, the use of steel poles is specified (excerpts below) by PSNH's policy. RCG did physically inspect one location considered wetlands. The PSNH was required to temporarily install extensive matting, consisting of multiple 8x8 timbers, to protect the wetlands environment from equipment damage during line installation. When matting is temporarily installed, it adds significant expense to the project. The matting cost includes installation, removal, and a rental fee for the time it is installed. PSNH's steel pole policy follows:

"New poles installed in Eversource three phase lines in distribution Rights-of-Way are to be direct embedded self-weathering steel poles, class, and height to be determined by the Transmission Line Engineering group.

The use of steel poles in other situations, such as for single phase lines, jointly owned facilities, or other special situations, is by exception only and requires approval from managers or above in Operations and Engineering.

Steel poles shall not be used for service poles."¹³¹

Along with this wooden pole policy change was PSNH's further decision and accompanying policy change to use steel poles for more difficult-access locations in distribution rights-of-way (RoWs). This action minimizes the frequency of bringing large,

¹³⁰ Eversource's TCR System Assessment, p. 38

¹³¹ DR BPA-4-002 Att. 2

heavy line trucks into these difficult off-road locations. Internal to PSNH, some personnel initially misunderstood this policy due to inadequate communications, causing some distribution engineers to misinterpret the directive and use steel poles in locations other than the intended difficult access RoWs. PSNH identified the issue and clarified the instructions to personnel.¹³²

RCG believes the expanded use of steel poles is a reasonable policy that will provide the additional benefit of significantly extending the life expectancy of these poles while reducing the frequency of inspections.

5.25 Capital Project Hours can be more accurately specified. Capital project execution appeared to be appropriate but lacked crew project-hour targets, thereby reducing efficiency target expectations.

While RCG had limited time to evaluate field construction practices, several field crews were visited during the audit process. Crews typically include a non-union working foreman which is unique in the industry, making the foreman accountable for crew quality and productivity. As a result, crews appeared to be well informed on their work assignments.

Electronic work orders did not set time-to-perform expectations but set more macro-level expectations by scheduling 80% of a workweek, leaving 20% to cover unexpected customer needs and/or emergencies. RCG has no issue with this scheduling approach but believes setting specific project completion goals will yield tighter schedule adherence and may allow more work to be completed within the same timeframe.

RCG witnessed PSNH crews responding to a pole hit by a vehicle that took down a single-phase and neutral along a heavily trafficked road. Communication during the clearing and restoration effort was impressive. Crew personnel continually communicated with each other to rapidly clear the roadway and restore power in a safe/timely manner. This suggests crews are well-trained with strong supervision and attention to detail.

¹³² Interview #67, Field Visit

Business Process Audit of Eversource and PSNH's CapEx DE 19-057



The above pictures show some of the typical PSNH Distribution construction and a line crew replacing a pole hit by a third party. As seen in the picture, the crews must navigate the distribution pole installation around the resident tree population. PSNH schedules their crews at 80 percent of the work week on scheduled projects, the remaining 20 percent is for emergency work like what is shown in one of the pictures. An important point is since emergency work is unscheduled the actual work time may take longer than a planned project where all the logistics are planned. As a result, emergency-work wait times for several other reasons beyond the crew's control may include material delivery, public safety, clearances, traffic, etc.

Recommendations

- R.5** Develop easy-to-understand examples illustrating the before-and-after impact of *DSPG 2020* system planning criteria changes on system performance (reliability and resiliency) for all PSNH customer classes (residential, commercial, and industrial). The examples also need to clearly illustrate how superseded standards *ED-3002* and *SYSPLAN-010* will be used in conjunction with *DSPG 2020*.
- R.6** Develop a formal process to communicate the latest industry activities, including lessons-learned and technology advancements, between departments and potential external parties (other utilities and suppliers).

R.7 Include person hours on all planned project on work orders to support crew performance management.

5.26 System Planning Studies

PSNH's system planning policies, procedures, design guidelines, and processes for evaluating/selecting alternatives (when resolving planning criteria violations) are consistent with industry-standard practices. However, opportunities for improvement exist to address communication/documentation processes to mitigate confusion and misunderstandings when the PSNH interfaces with external entities like the Division.

Planning and designing an electric power system requires ongoing comprehensive analyses to evaluate system performance, determine the effectiveness of expansion alternatives, and identify and, most importantly, proactively resolve problems that might impact system reliability.

System performance projections are created using digital system planning studies based on system performance criteria defined by planning and design criteria/guidelines determined by the standards department that incorporate industry standards and best practices. Issues can be proactively resolved, and alternative solutions can be identified and tested using these digital tools (Appendix B).

As explained in later sections of this report, reliability indices are used to identify worst-performing distribution feeders based on historical outage data and asset condition assessments. System planning studies assess the ability to meet specific design criteria/guidelines. When studied together, solution alternatives can be evaluated, and the best overall alternatives (preferred alternatives) identified.

There is a distinction between a system "plan" and system "planning." A plan is the output of a planning process driven by criteria, policy, and process to develop solutions to problems. Planning is a dynamic process requiring updates to processes and procedures used to create specific plans/solutions.¹³³ Both "plans" and "planning options" are developed by System Planning.

All transmission and 34.5kV systems are studied using *PSS/E* software and balanced three-phase models.¹³⁴ Larger generators are modeled in detail. Load is allocated (not modeled in detail). If a distribution planning project involves the high side (transmission side) of a substation transformer, the Transmission Planning group will

¹³³ Interview #18

¹³⁴ Interview #16

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

assist Distribution Planning with the study.¹³⁵ RCG considers this overall approach to be consistent with industry best practices.

Starting in 2022, Synergi will become the standard software package for modeling the NH distribution system.¹³⁶ DistriView had been the standard.¹³⁷ Models will be 3-phase (individual phases) instead of the existing single-phase (assumes balanced 3-phase) when fully implemented. The critical point is that detailed load flow modeling is not currently done on 12kV and 4kV systems and will have to be developed, complicating full Synergi implementation.¹³⁸

Distribution Engineering conducts all short circuit and protection coordination studies for everything other than three-phase recloser and relayed circuit breakers done by the Protection & Control (P&C) group using the Aspen OneLiner software package. Single-phase reclosers and TripSaver (electric recloser for cutout applications) coordination studies are conducted by Field Engineering. Even though Synergi has Protection & Control (P&C) capabilities, there are no plans to migrate P&C from the more specialized Aspen OneLiner.¹³⁹

As mentioned above, detailed models of distribution feeders in Synergi do not currently exist.¹⁴⁰ RCG believes System Planning's expertise with the Synergi package can greatly benefit Distribution Engineering when scoping, modeling, and testing new individual phase distribution feeder models. Once these models are completed, full unbalanced phase modeling to the customer meter will be possible, greatly enhancing "what-if" capabilities and better positioning the PSNH to handle DER integration studies.

For substation asset condition issues (inside the fence), Substation & Transmission Engineering alerts System Planning and the seriousness and urgency for resolving the issue. System Planning then develops alternatives from which the best overall solution is selected.¹⁴¹ Distribution Engineering follows a similar process for asset condition issues outside the substation fence.

PSCAD are transient studies and generally more critical for transmission. *PSCAD* is also used in DER planning to study transients caused by DERs on the distribution system.¹⁴²

¹³⁵ Interview #62 and Interview #16

¹³⁶ Interview #62

¹³⁷ Interview #16

¹³⁸ Interview #62

¹³⁹ Interview #62

¹⁴⁰ Interview #18

¹⁴¹ Interview #61

¹⁴² Interview #62

Simulations involving 10-year, 8760-hour data sets create data “nightmares” when managing data integrity. As Eversource is moving toward multi-year time series analysis, the evaluation of simulation results becomes a challenge. To this extent, Eversource is exploring cloud storage solutions. Furthermore, as the simulation models increase in complexity, the requirement for data quality increases. Eversource has showcased this ability in its 10-year study in Cambridge, MA and is working to enable these abilities in all jurisdictions through the Modeling Team.¹⁴³ The Grid Mod group is responsible for data verification during the conversion¹⁴⁴ to maintain data integrity. RCG acknowledges the benefits of cloud storage and recognizes other utility companies have successfully used the cloud. However, in so doing, proactive cyber security measures must also be taken to ensure data security and overall system integrity. Lessons learned from the successful East Cambridge implementation should prove to be a valuable resource for this effort.

System studies are based on planning criteria/guidelines specified in the *DSPG 2020*.¹⁴⁵ “What-if” simulations identify potential violations. “What-if” simulations assess potential solutions. For example, PSNH has many substations with two transformers connected on the low side with solid, straight busbars. A disadvantage of this design is that bus faults can trip both transformers. The traditional fix (and accepted industry standard) is to insert a bus-tie breaker. Before/after System Planning conducts simulations to verify the solution. This example represents a typical system study. PSNH has submitted and approved several capital projects with this reliability fix.¹⁴⁶

PSNH has a number of aging transformers.¹⁴⁷ Age alone is only one of several factors considered by Eversource’s PTX transformer assessment tool when calculating a transformer health index.¹⁴⁸ Depending on the system need and associated transformer health index (if transformer adequacy is to be part of the solution), simulations are performed by System Planning to identify feasible solutions to meet the need.

Replacing transformers for capacity reasons is done as a last resort.¹⁴⁹ Alternative solutions include load transfer, NWA (or at least evaluating the possibility), reconfiguration, and combining substations. Sometimes, capacity cannot be met (including backup capacity) without changing or adding a transformer.¹⁵⁰ Potential transformer replacements for asset-condition reasons are summarized in the *2020 Design*

¹⁴³ Interview #13

¹⁴⁴ Interview #19

¹⁴⁵ LCIRP, October 1, 2020, Appendix D

¹⁴⁶ Interview #13

¹⁴⁷ Interview #61 and Interview #73

¹⁴⁸ Interview #15

¹⁴⁹ Interview #18

¹⁵⁰ Interview #18

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Violations Summary Report for the period 2020-2029.¹⁵¹ Results indicate very few transformers were replaced solely for health reasons. Results also indicate very few transformers were replaced solely for capacity reasons. (*Note: Projects proposed in the 2020 Design Violations Summary Report* have yet to be approved by SDC, EPAC, and NH PAC.)

Mobile transformers are available for emergency use, but logistics can be challenging. Transporting and connecting a mobile unit takes 24 hours or more¹⁵² which is too long to have customers without power. As a result, mobile units are typically used for planned outages or to relieve transformer overloads until a more permanent solution can be implemented.¹⁵³ (Mobile units are stored in an enclosed area out of the weather at the Mobile Wood facility in Bow, NH, for state-wide use.¹⁵⁴)

Mobile units are often used to restore customer load at non-bulk substations (4.16kV, 12.47kV, or 13.8kV) where alternative supply sources do not exist. The exhibit below summarizes PSNH’s available mobile transformer voltages and sizes.¹⁵⁵

Exhibit 17 - Inventory of Mobile Transformers

Quantity	Nameplate Data		
	Primary Voltage (kV)	Secondary Voltage (kV)	MVA
3	115	34.5	35
1	115	12.47	30
1	46 or 34.5	13.09	14
2	34.4	4.36 or 13.09	10
1	34.4	4.36 or 13.08	7

Mobile units include a high-side disconnection device (e.g., circuit breaker) and a transformer. Cable rails are included to connect the low side if an overhead connection is impossible. The largest units (115-34.5kV 35MVA) require three trailers. The smallest units (34.5-4.16kV, 5MVA) require only one trailer.¹⁵⁶

¹⁵¹ DR BPA 1-006, Attachment BPA 1-006, 2020 Design Violations Summary Report – NH Distribution System, revised March 18, 2021

¹⁵² DRs BPA 10-006 and BPA 12-009 1

¹⁵³ Interview #18 and Interview #61

¹⁵⁴ Interview #61 and DR BPA 12-009, page 2

¹⁵⁵ DR BPA 10-006

¹⁵⁶ Interview #61

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

5.27 Proposed bulk and non-bulk substation solutions for all regions (Central, Eastern, Northern, Southern, and Western) appear reasonable and not oversized or overbuilt.

RCG reviewed the October 1, 2021, *2020 Design Violations Summary Report – New Hampshire Distribution System Planning*, revised on March 18.¹⁵⁷ The number of proposed capital project bulk and non-bulk transformer replacements by region/area due solely to unhealthy transformers (i.e., no other planning criteria violations) are shown in the exhibit on the following page. All but one replacement required at least one other planning criteria violation before solution alternatives were considered.

Exhibit 18 - 2020 Design Violations Summary Report - Xfmr Replacement Projects

Substation	Existing						Solution				
	Voltage (kV)	MVA	Install Yr	MW Load 2020	# Fdrs	Violation	Voltage (kV)	MVA	MW Load 2029	# Fdrs	Other
Cocheco Street (Dover)	115-34.5kV	TB22 - 44.8 TB55 - 44.8	1972 2001	80.00	4	Unhealthy transformer TB22; N-1 STE violation; N-1 bus fault	115-34.5kV	TBxx - 62.5 TBxx - 62.5	82.00	4	Replace with larger transformers; add series bus tie breakers
Great Bay	115-34.5kV	TB171 - 44.8	2002	45.00	2	N-0 base case load violation	115-34.5kV	TB171 - 44.8	45.00	2	Transfer load to Timber Swamp
Madbury	115-34.5kV	TB65 - 44.8 TB74 - 44.8	1971 1976	70.00	4	Unhealthy transformer TB65; N-1 STE violation; N-1 bus fault	115-34.5kV	TBxx - 62.5 TBxx - 62.5	80.00	5	Replace with larger transformers; add series bus tie breakers; add new feeder
Mill Pond	115-12.47kV	TB171 - 44.8	2014	10.00	4	N-0 base case load violation	115-12.47kV	TB171 - 44.8	13.00	4	Replace transformer at Cutts Street Substation; upgrade distribution lines
Rochester	115-34.5kV	TB53 - 44.8 TB57 - 44.8	1968 2002	60.00	4	N-1 STE violation	115-34.5kV	TB53 - 44.8 TB57 - 44.8	65.00	4	Transfer load to Tasker Farm Substation

The total number of proposed capital projects by region/area in the *2020 Design Violations Summary Report* required to resolve all identified planning criteria violations are summarized in the Exhibit below. DSPG 2020 provides the following guidance for planning criteria:

“The planning design criteria are intended to maintain safe, reliable operation of the power system. Projected violations that are not within the planning design criteria are not tolerated. When these criteria are violated, the system must be reinforced, reconfigured, or upgraded to eliminate the constraints by the forecasted violation year.”¹⁵⁸

¹⁵⁷ All proposed solutions are tentative and subject to further study by System Planning and SDC review; and are based on yet-to-be-approved planning criteria outlined in DSPG 2020 per Attachment BPA 1-006, October 1, 2021, *2020 Design Violations Summary Report – New Hampshire Distribution System Planning*, revised March 18, 2021.

¹⁵⁸ LCIRP, October 1, 2020, Appendix D, Section 4.8.2, page 38

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

The exhibits below (All Projects and Bulk Subs) were tabulated from a detailed spreadsheet developed by RCG from the *Violations Summary Report* included in Appendix A. The Eastern Region bulk-substation-violations section of the detailed spreadsheet was extracted and presented in the Exhibit to serve as an example of what can be found in the detailed spreadsheet for proposed bulk and non-bulk capital projects.

Exhibit 19 - 2020 Design Violations Summary Report - All Projects

Region / Area	ALL Capital Projects Multiple Violations	Region / Area	ALL Capital Projects Multiple Violations
BULK Transformers (115kV and above)		NON-BULK Transformers (below 115kV)	
Central	6	SE Corner	7
Eastern	5	SE Center	3
Northern	12	Center	2
Southern	8		
Western	6		
TOTAL	37	TOTAL	12

Exhibit 20 - 2020 Design Violations Summary Report – Bulk Subs – Eastern Region

Region / Area	Capital Projects Due <u>Solely</u> to Unhealthy Transformers	Capital Projects Unhealthy Transformers <u>Plus</u> at Least <u>One</u> Other Violation	Region / Area	Capital Projects Due <u>Solely</u> to Unhealthy Transformers	Capital Projects Unhealthy Transformers <u>Plus</u> at Least <u>One</u> Other Violation
BULK Transformers (115kV and above)			NON-BULK Transformers (below 115kV)		
Central	0	3	SE Corner	1	4
Eastern	0	2	SE Center	0	2
Northern	0	6	Center	0	1
Southern	0	2			
Western	0	5			
TOTAL	0	18	TOTAL	1	7

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The substation report summarizes planning violations for each region (bulk) and area (non-bulk) in Appendix A. Details are provided for both “existing” and “solution” system conditions. The “Solutions” column summarizes “preferred alternative solutions” (sometimes referred to as “best overall solution alternative” per earlier definitions). (Note: All solutions are based on the *yet-to-be-approved* planning criteria outlined in DSPG 2020¹⁵⁹ and, as a result, are subject to further study by System Planning and a critical review by the SDC.¹⁶⁰) Project solutions are to collaborate between System Planning, Design Engineering, and Distribution Engineering (for inside-the-fence connections to distribution feeders).¹⁶¹

All existing transformers in the above exhibit (Bulk Subs) are 44.8MVA (older units no longer included in the transformer design standards). The new standard specifies 62.5MVA. Based on asset condition assessments and the ability to meet system design needs, strategic plans call for these older units to be systematically replaced. This is the case for Cocheco Street and Madbury Substations. The proposed solution calls for the 44.8MVAs to be replaced with 62.5MVAs to resolve unhealthy transformer issues and multiple (N-1) violations. For both substations, series-tie breakers are proposed to increase reliability and provide load transfer capability options should a transformer fail. Engineering simulations verified all system requirements would be met and planning criteria violations resolved.

At the distribution substation level, Eversource follows accepted industry maintenance and replacement practices of inspecting substations and testing power transformers on a schedule. This policy allows PSNH/Eversource to determine when to replace older, potentially failing transformers consistent with PSNH/Eversource's (and industry) updated asset management policies and procedures. Eversource changed its PSNH policy of power transformer sizes to several specific MVA sizes and voltage ratings to reduce required inventory. This policy shift allows PSNH to order these long-lead-time units without incurring the additional capital expense involved when making a unique procurement on short notice, requiring the Company to “buy in” to the existing manufacturers’ transformer production schedule. Having spares of these standard transformers now cover a broader number of installed distribution power transformers and reduces the overall number of spares in inventory.¹⁶²

Another program replaces old oil circuit breakers with newer vacuum breakers, which offer better controls, are environmentally friendly, and are far safer to operate. In the past, there have been industry-wide incidents where the oil breakers have failed and

¹⁵⁹ LCIRP, October 1, 2020, Appendix D

¹⁶⁰ DR BPA 1-006, Attachment BPA 1-006, *2020 Design Violations Summary Report – New Hampshire Distribution System*, revised March 18, 2021, page 4 of 158

¹⁶¹ Interview #21

¹⁶² Interview #61 and Interview #73

caused damage. Further, the industry, for decades, has been moving to eliminate hazardous oils that, when spilled, cause ground environmental contamination.¹⁶³

Transformer rewinding/rebuilding is an option to purchase new units depending on transformer condition, time to rebuild, and cost. However, Eversource has not found many circumstances where rewinding is a feasible alternative.¹⁶⁴ RCG understands and agrees with this position.

Environmentally friendly alternatives to mineral oil can be used to retro-fill power transformers and extend useful life. An example is FR3[®] which is derived from 100% renewable vegetable oils for use in distribution and power generation transformers of all voltage classes. FR3 transformers can operate 15^oC to 20^oC warmer than conventional mineral-oil transformers without sacrificing reliability or life expectancy, allowing for increased load capacity.¹⁶⁵ Eversource has briefly considered the FR3 technology but believes more investigation/evaluation is needed before applicability decisions can be made.¹⁶⁶

5.28 Eversource routinely implements industry-accepted design practices, following a set of guidelines detailed in DSPG 2020, supplemented by a comprehensive set of documentation maintained in the Engineering Standards Bookshelf. RCG agrees with this process.

One example is installing feeder ties to create multiple sources to improve service reliability and create load-transfer options, making more efficient use of capital. Another is making good use of enhanced checklists in Eversource's enhanced capital review/approval process to improve design quality by focusing attention on engineering and pricing details. However, an area of concern is the low priority PSNH places on integrating DER technologies which could create planning problems down the road if DER penetration rates significantly exceed growth forecasts.

PSNH's distribution voltage classes and corresponding installed miles are given in the exhibit below.¹⁶⁷

¹⁶³ Interview #61

¹⁶⁴ DR BPA 12-012

¹⁶⁵ IEC 60076-14 Part 14: Liquid-immersed power transformers using high-temperature insulation materials. Edition 1.0. September 2013; IEEE C57.154 Standard for the Design, Testing, and Application of Liquid-Immersed Distribution, Power, and Regulating Transformers Using High-Temperature Insulation Systems and Operating Elevated Temperature. October 30, 2012.

¹⁶⁶ Interview #16

¹⁶⁷ DR BPA 1-025

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Exhibit 20 - Miles of Distribution Lines by Type

Voltage Class	Overhead (Miles)	Underground (Miles)	Total (Miles)
4kV	2,733.29	215.43	2,948.72
8.32kV	352.38	36.05	388.43
12.47kV	5,486.63	570.45	6,057.08
13.8kV	8.69	8.36	17.05
34.5kV	3,599.82	1,191.23	4,791.05
Total	12,180.81	2,021.52	14,202.33

System one-line diagrams are of good quality, well-marked with legends, and appear comprehensive, categorized by “*Electric System Control Center*” and “*System Operations Center*.” A PSNH map highlights major portions of the distribution system.¹⁶⁸ (A reduced version of this map is included in the Reliability section of this report.)

PSNH’s 34.5kV system is 60+ years old and unique to the three-state area (CT, MA, NH).¹⁶⁹ The above exhibit shows 3600 miles of 34.5kV, 5487 miles of 12kV, and 2733 miles of 4kV. Expanding the 34.5kV system where other voltages already exist and satisfy system planning criteria “makes no sense, and it is not done.” 34.5kV lines are tapped to meet specific load growth demands, but PSNH has no system-wide plans to upgrade to 34.5kV.¹⁷⁰

Voltage upgrade decisions (4kV, 12kV, 13.2kV, 34.5kV) are based on the best technical/financial solutions to service the loads. Considerations include the cost-per-saved-customer-minute and the number of customers affected.¹⁷¹ A case in point is the 4kV system which is reliably operating and meeting the needs. Nashua is an example of where it would cost too much to upgrade the 4kV infrastructure. Currently, the PSNH has no plans to expand/replace the 4kV system.¹⁷²

Another example might be a projected overload of a 4kV substation transformer triggering possible conversion to 12kV. If there is no benefit to converting, the overloaded substation may be retired, and the load transferred to a step transformer. The decision is on the extent to which the substation transformer is forecasted to be overloaded.¹⁷³

¹⁶⁸ DR BPA 1-026 and Confidential Attachments

¹⁶⁹ Interview #11

¹⁷⁰ Interview #13, Interview #16, and Interview #20

¹⁷¹ DR BPA 7-006

¹⁷² Interview #11, Interview #16, and Interview #20

¹⁷³ DR BPA 7-006

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Taps taken off 34.5kV lines in RoWs could have one or 1000 customers per circuit. As a result, there is an effort to use distribution automation to create circuit taps or segments that will limit outage exposure to 500-count customer blocks while creating load transfer options. For radial lines, 500-count blocks do not mean only 500 customers will be affected by upstream faults; it simply means the ability now exists to isolate customers into blocks of 500. An important point to make is the following: On a radial circuit with in-line fault protect (breakers), faults occurring closer to the head-end or substation side of the line will affect all customers beyond the point of failure. The radial line must be looped or tied to another independent generation source to overcome this.

Eversource is an industry leader in implementing IEC 61850 technology. The Eddie Substation in NH is the first such T&D installation which serves as an example for future facilities. To keep the focus on substation installations, IEC 61850 will not be applied to the distribution system (reclosers) until some future date is determined.¹⁷⁴

Bare wire can no longer be installed on distribution circuits unless a phase is added or extended. Covered wire and spacer cable (optional) is used instead but only on a per-case basis, with justification.¹⁷⁵ PSNH believes tree trimming along the distribution backbone is adequate, especially over the last ten (10) years. However, PSNH recognizes vegetation management will continue to be an ongoing challenge. One of the most significant problems is scenic roads, where it is difficult to secure tree-trimming approvals (34.5kV RoWs are maintained by transmission maintenance and construction).¹⁷⁶

In support of distribution automation, more than 1700 smart devices are installed in PSNH. Currently, there is no peer-to-peer communication between smart devices because PSNH did not want to duplicate DMS (Distribution Management System) communication logic. Instead, data is brought back to a central location for processing. Local device control is still operational.

Looped (backup) feeder-tie connections exist around the system. Multiple ties exist fed from different substations and circuits in the Southern, Central, and Eastern areas. In the Northern and Western regions, there are far fewer looped connections. Even so, there are enough connections to use DA to achieve the 500-customer segmenting target mentioned earlier.¹⁷⁷ DMS will automatically switch ties based on pre-programmed priorities to minimize customers out of service.¹⁷⁸

¹⁷⁴ Interview #34

¹⁷⁵ Interview #16

¹⁷⁶ Interview #16

¹⁷⁷ NOTE: projects to loop circuits using feeder-tie connections, and projects designed to achieve 500 customer segmentation are two different efforts.

¹⁷⁸ Interview #19

5.29 The use of greenfield substation sites is discouraged, but when needed, PSNH looks to set a 5-acre minimum land parcel requirement. RCG concurs with this for the reasons stated below.

Minimally sized green-field substation sites may not be large enough to allow mobile-transformer use. RCG believes this to be a good policy. When evaluating substation development solutions, PSNH avoids trying to “fix” substations with significant maintenance issues as cost-saving measures will likely cause more extensive problems and incur additional costs down the road, resulting in unplanned outages that could have been avoided.

If physical space permits, new substations will be built on greenfield sites next to old substations, then switched over to minimize customer downtime. When looking to secure property, PSNH sets a minimum 5-acre requirement, often being able to purchase more land. Eversource considers the incremental cost (e.g., \$150K) to be minimal compared to overall project costs, and the extra space provides a means for building around obstacles (e.g., wetlands), offers multiple orientation design options, provides larger buffer areas from neighbors, and makes future expansion possible.¹⁷⁹

A typical substation design is the Twombly Street Substation (DR 9-018). The design process uses 3D software to facilitate standardization by using similar designs as starting points, then making modifications as needed. Double-ended substation designs (two transformers) are not standard due to overcapacity versus reliability concerns. This approach is consistent with PSNH's policy of “only doing what is necessary.”¹⁸⁰

There is an external perception that substation overdesigns tend to happen when more than the minimum amount of greenfield land is purchased. Eversource does not believe this to be the case, contending it saves capital dollars in the long run for the reasons explained above.¹⁸¹ When coupled with the efficient application of metal-clad switchgear (discussed in the Design Standards section of this report), dollar savings can be even more significant.

¹⁷⁹ Interview #73

¹⁸⁰ Interview #61

¹⁸¹ Interview #61

5.30 PSNH's Protection philosophies and equipment used are consistent with industry-standard practices.

Regarding system protection, the distribution system at the substation level consists of bulk-connected transformers and buses configured with high-speed differential protection. Distribution feeder breakers use time overcurrent protection schemes to coordinate with downline reclosers and fuses.¹⁸² For radial circuits, the fuse closest to the fault opens first. If the fault is between the fuse and the upstream recloser, the recloser operates first. If the fault is between the substation feeder breaker and downstream recloser, the substation feeder breaker operates first. This process is referred to as *selectively coordinated fault protection*. RCG agrees with this approach.

There are no planned changes to this overall approach. However, equipment upgrades are often made as part of asset-replacement capital projects. Examples include replacing electromechanical relays with microprocessor-based devices, adding redundant relaying; replacing fuses with reclosers (e.g., cutout-mounted recloser); and adding high-speed instantaneous or differential protection.¹⁸³

Changes in protection schemes and equipment are also required when DER technologies are applied to distribution feeders to accommodate two-way power flows safely. This DER-related scenario is used on an as-needed basis.

5.31 More data-centric discussions are needed with the Division. Not enough data-centric discussions are being held between PSNH and the Division to demonstrate/explain why the best *overall* solution alternative is not always the least-cost solution alternative.

There are five broad categories of capital projects:

- 1) Basic business (customer connections);
- 2) Grid modernization;
- 3) Equipment obsolescence;
- 4) Distribution line work; and
- 5) Distribution substation work.¹⁸⁴

¹⁸² DR BPA 1-034

¹⁸³ DR BPA 1-034

¹⁸⁴ Interview #13

For project development, it is essential to understand the terminology being used by Eversource when presenting solution alternatives. Eversource definitions for each type of alternative follow.¹⁸⁵

- *Alternative Solutions* – All *reasonable* solutions that address specific identified needs.
- *Feasible Alternative Solutions* – Viable solutions that have no identifiable constraints precluding construction or implementation.
- *Technically Feasible Alternative Solutions* – Viable solutions that have no technical constraints precluding construction or implementation.
- *Least-Cost Alternative Solutions* – Solutions that have the least cost. As outlined in RSA 378:37, it is New Hampshire's energy policy that "least-cost planning" requires the selection of solutions that represent the "*lowest reasonable cost*" based on consideration of factors other than cost, including reliability and diversity of energy sources; to maximize the use of cost-effective energy efficiency and other demand-side resources; and to protect the safety and health of citizens, the physical environment of the state, and the future supplies of resources, with consideration of the financial stability of the state's utilities.
- *Best Overall Alternative Solutions* – Eversource refers to these as "*Preferred Alternatives*." Solutions with the best combination of electrical performance, cost, future expandability, and feasibility to comprehensively address all the identified needs in the required timeframe.

Sometimes, "do nothing" is listed as an alternative on the PAF forms. While discouraged, it is an acceptable alternative if a case can be made that more maintenance, increased observation, or operational workarounds can satisfactorily resolve the issues.¹⁸⁶

5.32 More complete documentation is required for NWA solutions. Not enough attention is given to documenting potential NWA solutions, even though NWA evaluations are integral to the Eversource project selection process. To date, no NWA solutions have been implemented in NH.

Even though progress is being made in developing/applying tools to streamline the NWA evaluation process, more out-of-the-box thinking is required to create feasible alternatives. For example, only two NWA solutions were proposed (Loudon 31W2 and

¹⁸⁵ DR BPA 14-007

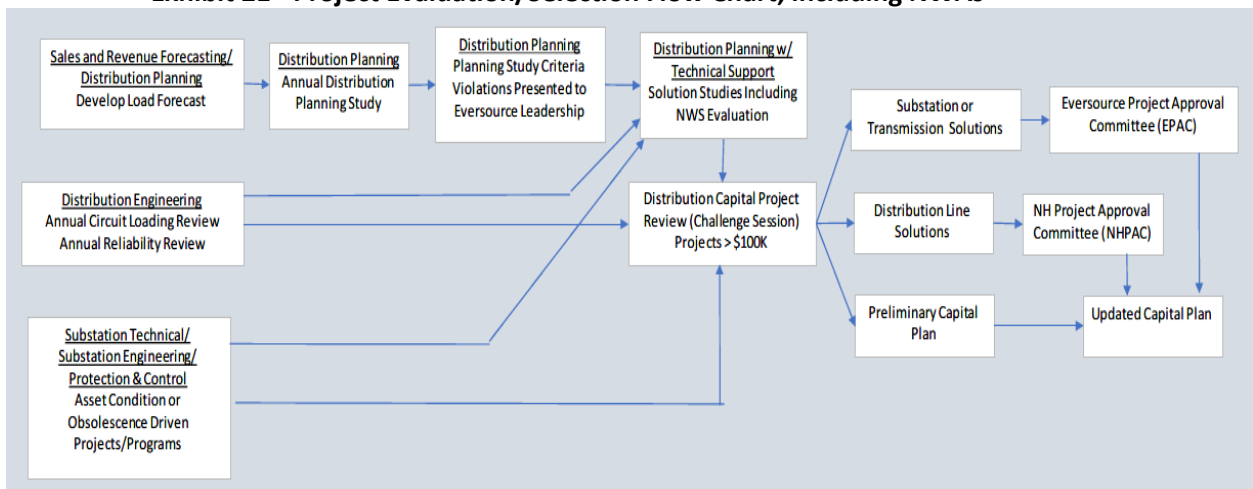
¹⁸⁶ Interview #34

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Hanover Street 16W3, both non-bulk substations) in the *2020 Design Violations Summary Report*¹⁸⁷ out of 37 bulk substation projects and 12 non-bulk substation projects.

The exhibit below provides a high-level flow chart of the project evaluation/selection process for both traditional and NWA solutions. For all substation planning criteria violations, “potentially suitable” NWA solutions must be considered. If a project is a specific size and there is adequate timing (enough time to implement the solution), then NWAs are considered potentially “suitable.” NWAs must then pass a revenue requirements impact evaluation to determine which solution will, in the short or long-term, impact customers the least.

Exhibit 21 - Project Evaluation/Selection Flow Chart, including NWAs¹⁸⁸



Sometimes, NWAs are a sound deferral strategy for more traditional solutions. In the end, a solution must pass a benefit-cost analysis, i.e., the value of the NWA solution divided by the value of the conventional solution must be greater than or equal to 1 for an NWA to pass the benefit-cost analysis threshold. An NWA also has a “fit” criteria, e.g., an NWA is considered not applicable when there is an asset health issue due to failing equipment.¹⁸⁹

If an NWA does not apply (e.g., equipment failure), it must be noted on the PAF forms.¹⁹⁰ However, this policy/guideline is *not* being consistently followed, another failure in communications. PAF forms do not always include statements regarding potential NWA

¹⁸⁷ DR BPA 1-006, Attachment BPA 1-006 dated 10/01/2021

¹⁸⁸ DR BPA 15-017; LCIRP, March 31, 2021, Supplement, Appendix A, NWA Framework

¹⁸⁹ Interview #18

¹⁹⁰ Interview #62

solutions, good or bad, as was discovered in a May 5, 2021, NH-PAC meeting. An NWA status statement should be included on all distribution line project NH-PAC forms. It can be as simple as, "Due to the immediate need (less than six months) of the project, no NWA investigations were conducted as forth in the rules of the NWA Framework."

The NWA Framework¹⁹¹ (and NWA Screening Tool) places a value on environmental benefits (e.g., emissions), but these benefits are not rigorously analyzed. In NH, no NWA solution has been approved and implemented. Even though no NWA incentives are currently in place, discussions have been held with some municipalities for potential use.¹⁹²

System Planning developed the NWA screening tool over a six-month period (2019-2020) for all three states to screen NWA alternatives based on cost and technical merits. Factors considered include energy efficiency profiles, CVR, demand-side management, behind-the-meter generators, diesel generators, battery storage, battery storage plus solar, solar, and combined heat & power (CHP). The cost of the traditional and NWA solutions is calculated using the latest approved rate making mechanisms to ensure accurate revenue requirement impacts. Costs are synthesized over a five/six-year period. Results are compared to avoided deferral costs for traditional solutions.¹⁹³

The cost threshold for NWA to be competitive is around \$3 M, e.g., a 2MW, 5MWh battery storage installation costs around \$5M. PSNH believes going through the motions for anything less does not make sense.¹⁹⁴

5.33 Conduct in-house training programs for NH hosting capacity map developers and system planning personnel, especially if lessons learned from Eversource CT and MA are included in the training will be productive.

DER hosting capacity maps show the best potential interconnection locations. In MA and CT, hosting capacity maps were developed using Synergi software. In NH, hosting maps do not yet exist¹⁹⁵ but are expected to be released early 2023. When detailed Synergi planning models are completed for NH, individual phase circuit modeling and DER technology models (PV, wind, energy storage) will be possible. More complete what-if studies can then be performed when investigating DER integration capabilities (including the impact of electric vehicle charging stations) and associated system performance

¹⁹¹ LCIRP, March 31, 2021, Supplement, Appendix A-1

¹⁹² Interview #18

¹⁹³ Interview #13

¹⁹⁴ Interview #13.

¹⁹⁵ Interview #13

(including how to safely address two-way power flows), especially when advanced load forecasting algorithms (future scenario modeling) are used.

System Planning is responsible for DER interconnection strategies, including meeting hosting capacity limitations and 2-way power flow constraints (1-way radial now). Protection & Control (P&C) is responsible for DER system protection and associated device settings (e.g., transfer trip, relays). The NH DER integration strategy was initially part of an NH Grid Modernization Program (GMP) not yet approved by the PUC. Integral to the Plan was a systematic conversion of the distribution system to handle two-way power flows from one-way radial designs. The nightmare scenario is if DER penetration quickly increases, significant changes in system design/protection will be needed in a relatively short time to meet hosting capacity and two-way power flow requirements.¹⁹⁶

5.34 CVR is not being investigated adequately. Consideration should be given to more aggressively investigating and implementing Conservation Voltage Reduction (CVR) for peak demand and energy savings.

Given the relatively high content of residential system load --- 44% of kWh residential sales; 50% of kW residential peak demand. CVR potential in PSNH has *not* been evaluated.

CVR hasn't been incorporated in PSNH but is part of a planned volt-var optimization (VVO) implementation to interface SCADA with DMA with controllable capacitor banks, line voltage regulators, and micro-capacitors (connected to the 240-volt side of distribution transformers).¹⁹⁷

CVR can reduce peak load demand (kW) and energy use (kWh) by as much as 3%, depending on the system. Opportunities exist on distribution feeders serving loads where normal operating voltages can be reduced without impacting the end-user, e.g., resistive loads, which generally occur for residential loads. Industrial/commercial loads typically contain large motors where voltages cannot be adjusted without impacting the end-user; this results in minimal CVR opportunities. The Exhibit below summarizes the residential versus industrial/commercial make-up for PSNH. *The percent residential load is large enough to justify investigating CVR potential.*

¹⁹⁶ Interview #34

¹⁹⁷ Interview #19

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Due to a significant shift in interior residential lighting in NH towards LED lighting (50% in 2020 versus less than 1% in 2009),¹⁹⁸ CVR opportunities may be reduced (LEDs use far less energy). It is further recognized that the load profiles of residential customers in northern NH are different from load profiles in southern NH. Nevertheless, a more in-depth investigation of CVR potential is justified.

CVR is considered an NWA solution and, as such, is included in the NWA screening tool. Eversource’s rationale is that CVR is one of the easiest and most cost-effective NWA alternatives for reducing energy use and lowering peak demand. When evaluating energy efficiency, the (N-1) design guidelines no longer apply to CVR or PV behind the meter because the controlling devices are located at different locations.¹⁹⁹

Exhibit 22 - Residential, Industrial, and Commercial 2020 Load Totals for NH

Customer Class	# Customers 2020	%	kWh Sales 2020	%	Customer Class	kW Coincident Peak Demand 2020	%
Residential	446,612	84.9%	3,373,392,618	43.9%	Residential	864,068	49.8%
Commercial	75,849	14.4%	3,003,670,859	39.1%	Small Commercial/Ind	321,512	18.5%
Manufacturing	2,719	0.5%	1,294,235,314	16.8%	Medium Commercial/Ind	340,270	19.6%
Public Streetlighting	753	0.1%	12,400,749	0.2%	Large Commercial/Ind	207,947	12.0%
Other	12	0.0%	5,880	0.0%			
	-----	-----	-----	-----		-----	-----
	525,945	100.0%	7,683,705,420	100.0%		1,733,797	100.0%
	Reference: BPA 15-019		Reference: BPA 15-020			Reference: BPA 15-021	

¹⁹⁸ New Hampshire Residential Baseline Study submitted by Itron to the New Hampshire Evaluation, Measurement, and Verification Working Group, June 11, 2020, pages ES-2 and ES-3

¹⁹⁹ Interview #13

Recommendations

- R.8 Develop and test (as a joint effort between System Planning and Distribution Engineering) detailed Synergi feeder models, taking full advantage of System Planning's familiarity with Synergi to facilitate the process.
- R.9 Perform an in-depth/rigorous analysis of the data-checking and conversion process for new software platforms (e.g., DistriView to Synergi data sets) independent of the Grid Mod group's conversion verification process to ensure data continuity and integrity are being maintained throughout.
- R.10 Develop detailed documentation to maintain data integrity as data conversions are made from one software platform to another, e.g., DistriView to Synergi, Storms to Maximo. This is especially true for Synergi, where individual phase models for distribution circuits are being developed, i.e., converting from 3-phase balanced distribution line models to 1-phase unbalanced distribution line models.
- R.11 Investigate the potential benefits of retro-filling power transformers with the latest technology insulating fluids, e.g., extending transformer life (without compromising reliability) and deferring capital investments. Include guidelines for identifying candidate transformers.
- R.12 More clearly explain and illustrate with examples why the best overall solution alternatives are not always the least-cost solution alternatives. It is not sufficient to state all criteria violations have been resolved. In addition, consistently document all alternatives considered in the formal project paperwork. Include a formal statement on NWA solution considerations (even if the statement says NWA solutions were not applicable) and reasons why.
- R.13 Compare how the traditional solution alternatives are developed and priced against how NWA solution alternatives are developed and priced. Identify areas that disadvantage NWA solutions, e.g., how projected O&M costs are treated. Document key drivers that contribute to cost differences between traditional and NWA solutions.
- R.14 Develop and conduct in-house training programs for New Hampshire DER hosting map development engineers. Lessons learned from Eversource CT, and MA should be integral parts of this training.
- R.15 Continue to investigate Conservation Voltage Reduction (CVR) potential energy/demand savings for PSNH, given the relatively high content of residential system load --- 44% kWh residential sales; 50% kW residential peak demand.

System Reliability Performance

PSNH's Distribution System consists of 17,600 miles of distribution lines; and 139 substations in a heavily treed state, creating operational challenges to maintain a reliable overhead Distribution system. Recent reliability metrics indicate PSNH's progress in improving system reliability.

Major components of PSNH's electric distribution system are summarized in the following Exhibit:²⁰⁰

Exhibit 23 - PSNH Distribution System Components

12,200	mi	Overhead Distribution Lines
3,000	mi	Road-Side Distribution Lines
600	mi	Off-Road Distribution Lines
1,800	mi	Underground Distribution Lines
17	%	Distribution Lines - Backbone
83	%	Distribution Lines - OH Lateral Circuits from the Backbone
139		Distribution Substations
184		Substation Transformers (1.5 MVA to 140 MVA)
179,000		Jointly-Owned Poles
276,000		Solely-Owned Poles

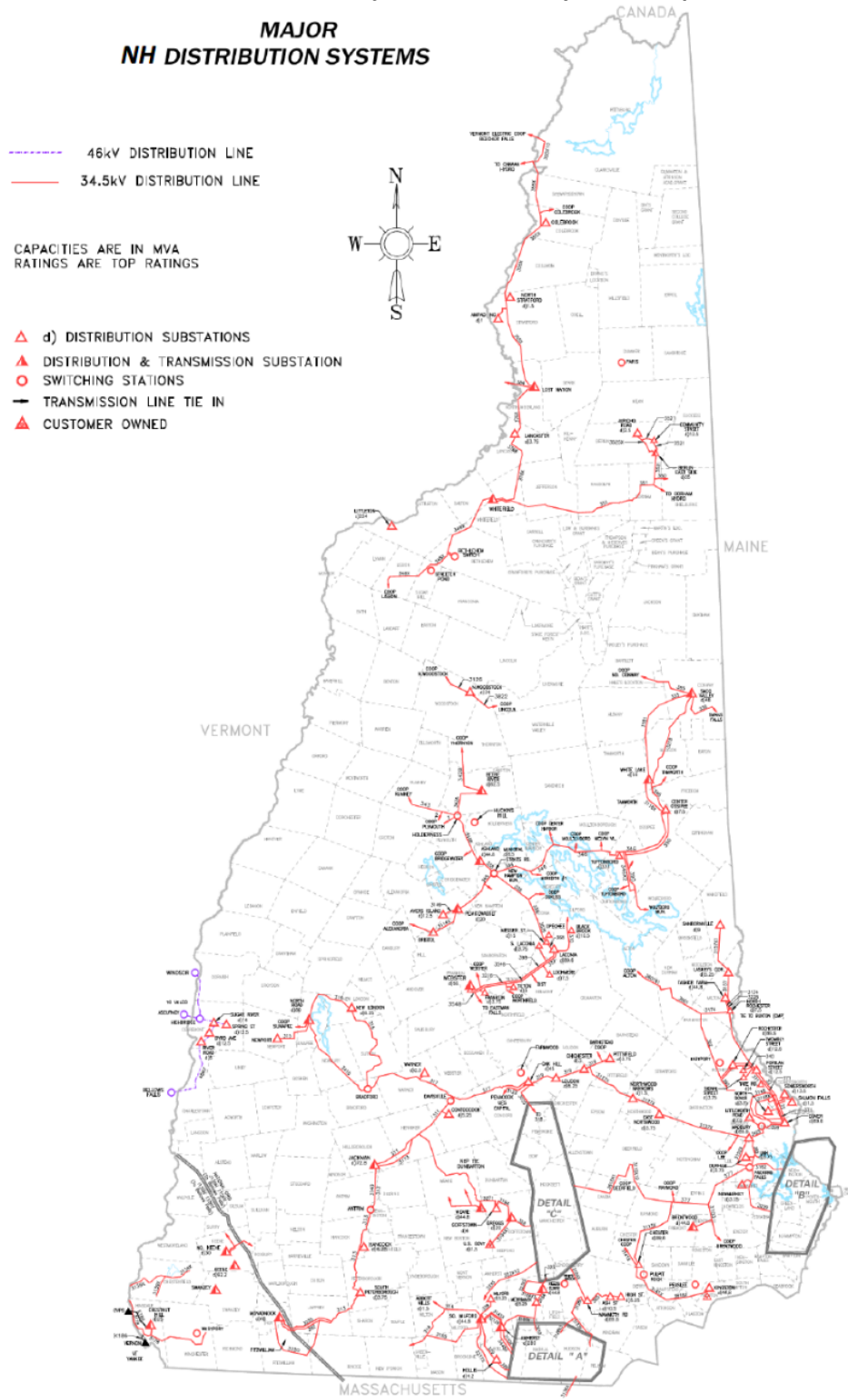
The exhibit below shows a state-wide overview map of the distribution system.²⁰¹ Red lines signify 34.5kV circuits and dashed lines are 46kV circuits. The map suggests higher load densities in the state's southern portion, especially the southeast region. Also, while not apparent from the map, it should be noted NH is a heavily treed state which creates challenges in constructing and maintaining the overhead portion of the distribution system.

²⁰⁰ Docket 19-057, Testimony of Joseph A. Purington and Lee G. Lajoie, May 28, 2019, Bates page 397

²⁰¹ DR BPA 1-026, Attachment BPA 1-026 C

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Exhibit 24 - PSNH Major Distribution Systems Map
MAJOR NH DISTRIBUTION SYSTEMS



6.1. Eversource closely monitors reliability performance using industry-recognized reliability metrics. Eversource has proactively identified, prioritized, and implemented distribution automation projects that have consistently resulted in annual reliability performance improvements. Eversource has also defined complementary resiliency program initiatives to maintain and further improve reliability performance.

Distribution reliability falls into the following two categories:²⁰²

- *Feeder level* - The goal is to minimize both the duration and the frequency of outages due to a fault. The new policy target for customers impacted by a line fault is 500 customers. The desired results are being achieved by segmenting the feeders via switching that started with the Reliability Enhancement Program (REP) using distribution automation to achieve the target.
- *Substation level* - The goal is to develop strategies for load pick-up should a power transformer, or feeder circuit fail. System Planning is responsible for making this happen through substation configuration, bus configuration (e.g., ring bus or breaker-and-half schemes), and equipment selection.

Historical reliability statistics are the quantitative basis for sound decision-making and come in many forms. Overall reliability statistics are excellent for self-evaluation. Utility-to-utility comparisons are made, but differences in each electrical network (weather conditions, number of customers served, customer willingness to pay for reliability, and equipment used) must be considered. While such comparisons have benchmarking value (e.g., utility ranking against its peers), the metrics are most valuable for a single utility system when relative comparisons are examined from period to period (week, month, or year). The data can help make the best decisions considering the utility's system-specific circumstances.

Reliability indices (metrics) indicate system performance and individual circuit conditions, i.e., if the system or circuit reliability improves or worsens over time. Reliability indices are situational and reflect different baselines depending on system-specific designs and operational philosophies. *IEEE Guide for Electric Power Distribution Reliability Indices (Standard 1366²⁰³) facilitates uniformity in distribution service reliability indices and aid in consistent reporting practices related to distribution systems,*

²⁰² Interview #34

²⁰³ IR-57 IEEE-1366-Reliability-Indices-2-2019 - NGRID

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

substations, circuits, and defined regions. The standard is universally used (including by Eversource) to characterize distribution system reliability.²⁰⁴

In times of extreme events, it may be unreasonable or difficult to track customer outages. As a result, Standard 1366 accounts for major storms separately to assist in tracking severe weather outages (e.g., tornados, thunderstorms, and the like) leading to unusually long outages. In NH, accumulated ice and wind make for significant reliability problems on overhead distribution circuits. A utility can either include planned interruptions/outages (PIs) or keep them separate to measure downtime caused by operations. A utility typically reports reliability metrics with and without storms so that restoration can be a measurable performance objective.

Capital programs require the justification of system improvement projects based on the need to improve overall system reliability and at specific points in the system. To this end, annual system-wide statistics, individual distribution line statistics, and specific components (e.g., transformers, poles, etc.) are collected—annual results aid in determining if reliability improvement initiatives are needed.

Distribution system interruption data and IEEE performance indices can provide data-driven insights when considering reliability improvement measures. Indices most often referenced are the following:

- **SAIDI** - System Average Interruption Duration Index (>5 min typically) ($\text{CMI} \div \text{CS}$) - Number of minutes of interruption average customer experiences.
- **MAIFI** - Momentary Average Interruption Frequency Index (<5 min typically) - How often the average customer experiences power quality disturbances.
- **SAIFI** - System Average Interruption Frequency Index ($\text{SAIDI} \div \text{CAIDI}$) (or $\text{CI} \div \text{CS}$) - How often the average customer experiences an interruption (>5 min).
- **CAIDI** - Customer Average Interruption Duration Index ($\text{SAIDI} \div \text{SAIFI}$) (or $\text{CMI} \div \text{CI}$) - Average time required to restore service.

²⁰⁴ IR-58 Understanding Distribution Reliability Metrics

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

Additional reliability metrics used by Eversource are the following:

- **COSAIDI**²⁰⁵ - Contribution to PSNH (system-wide) SAIDI - Used to rank individual circuit performance, considering cost-per-saved-customer minute (primary consideration), number of customers impacted, frequency of interruptions, exposure to lengthy outages due to access issues, and the impact on critical customers.
- **MBI** - Months Between Interruptions (months ÷ SAIFI, e.g., $12 \div 0.9654 = 12.4$ MBI)
- **CI** - Customers Interrupted/Impacted
- **CS** - Customers Served
- **CMI** - Customer Minutes Interrupted
- **CIII** - Customers Interrupted per Interruption Index (CI ÷ # events) - This metric is used primarily at the circuit level to help identify the need and location for additional protective devices or automation to reduce the number of customers impacted by a single event.²⁰⁶

Important industry norms and definitions follow:²⁰⁷

- **IEEE Criteria** - Reliability performance without MEDs.
- **MEDs** - Major Event Days - Calculated reliability metric based on five years of performance data (including storms and planned & scheduled interruptions), resulting in a daily-SAIDI-threshold-value-per-year. MEDs equate to days exceeding this threshold.
- **Eversource Reportable Criteria** - IEEE criteria without planned interruptions. This indicator is the main criterion used within the Eversource organization.
- **Without Storms IEEE Quartile Rankings** - This represents the range of reliability metrics respondents experienced during non-major storm days but includes minor storm data.
- **With Storms IEEE Quartile Rankings** - It represents the range of reliability metrics respondents experienced during all days. This ranking includes all-in data, MED days, and minor storm data.

²⁰⁵ DR BPA 1-36

²⁰⁶ DR BPA 14-005

²⁰⁷ Id.

6.2. PSNH’s reliability performance shows a consistent improvement based on key reliability indices, suggesting system reliability investments are working.

Year-to-year system-wide reliability performance is a vital indicator of the ability to minimize customer outage minutes when expected or higher frequency/probability of occurrence events happen. PSNH’s performance over ten years is summarized in the two exhibits presented below based on the following reliability metrics: CI, CMI, SAIDI, CAIDI, SAIFI, and CIII. Both exhibits show a steady, consistent improvement in these indices over ten years (2011 to 2021). (Note: The number of “Parent Events” in the first exhibit represents the sum of the “Parent Events” in the two exhibits that follow.)

Exhibit 25 - NH Reliability Statistics 2011-2021 – ALL Events²⁰⁸

Year	# Parent Events	CI	CMI	SAIDI	CAIDI	SAIFI	CIII
2011	14,025	1,420,678	1,121,114,669	2,250	789	2.852	101
2012	11,363	875,435	298,949,392	598	341	1.751	77
2013	10,067	774,073	106,693,930	213	138	1.544	77
2014	11,713	939,411	440,781,256	874	469	1.864	80
2015	8,548	573,772	60,883,395	119	106	1.124	67
2016	11,012	826,837	105,678,322	202	128	1.584	75
2017	16,808	1,018,158	509,073,382	969	500	1.939	61
2018	15,196	1,014,800	207,455,653	392	204	1.920	67
2019	12,013	639,783	122,747,595	231	192	1.204	53
2020	13,761	808,823	249,991,929	467	309	1.512	59
2021	8,883	451,936	82,054,948	152	182	0.839	51

Exhibit 26 - NH Reliability Statistics 2011-2021 – excludes MEDs²⁰⁹

Year	# Parent Events	CI	CMI	SAIDI	CAIDI	SAIFI	CIII
2011	8,968	624,920	77,932,762	156	125	1.254	70
2012	9,323	609,069	70,958,452	142	117	1.218	65
2013	8,614	581,827	69,062,920	138	119	1.160	68
2014	9,599	623,637	61,912,845	123	99	1.237	65
2015	8,295	538,776	54,177,931	106	101	1.055	65
2016	9,862	720,704	72,391,329	139	100	1.380	73
2017	11,789	578,995	62,146,242	118	107	1.102	49
2018	10,361	565,301	63,373,060	120	112	1.069	55
2019	8,875	393,465	43,907,584	83	112	0.740	44
2020	8,866	431,001	51,239,298	96	119	0.805	49
2021	6,892	321,961	35,531,699	66	110	0.598	47

²⁰⁸ Id.

²⁰⁹ DR BPA 1-35-1, Attachment. MEDs = Major Event Days (Storms)

Exhibit 27 - NH Reliability Statistics 2011-2021 – includes only MEDs²¹⁰

Year	# Parent Events	CI	CMI	SAIDI	CAIDI	SAIFI	CAIFI
2011	5,057	795,758	1,043,181,907	2,094	1,311	1.597	157
2012	2,040	266,366	227,990,940	456	856	0.533	131
2013	1,453	192,246	37,631,010	75	196	0.383	132
2014	2,114	315,774	378,868,411	752	1,200	0.626	149
2015	253	34,996	6,705,464	13	192	0.069	138
2016	1,150	106,133	33,286,993	64	314	0.203	92
2017	5,019	439,163	446,927,140	851	1,018	0.836	88
2018	4,835	449,499	144,082,593	273	321	0.850	93
2019	3,138	246,318	78,840,011	148	320	0.464	78
2020	4,895	377,822	198,752,631	371	526	0.706	77
2021	1,991	129,975	46,523,249	86	358	0.241	65

6.3. PSNH reliability quartile rankings have consistently improved over the last five years when compared to peer utilities (other northeast utilities), placing PSNH in the 1st and 2nd quartiles. However, reliability performance consistently lags Eversource CT and MA, suggesting there may be room for improvement.

Another key indicator is how well a utility performs compared to its peers. Multiple reliability indices (defined above) are typically used when developing quartile rankings.

The exhibit below summarizes PSNH’s reliability performance over five years based on PSNH (ES) reportable criteria (IEEE criteria without planned interruptions and MEDs) representing the range of reliability metrics respondents experienced during non-storm days. The quartile data is based on 17 (varies slightly by year) Northeast and Mid-Atlantic medium-sized companies to provide reasonably comparative data and are based on a three-year historical average of the data; e.g., 2021 quartiles are based on 2018-2020 average data.²¹¹

PSNH consistently ranked in the 1st and 2nd quartiles against its peers for 2017-2021 (highlighted in green below).²¹² Being in the 1st quartile for both SAIDI (system outage minutes) and SAIFI (outage frequency) is excellent and the goal of most utilities. The PSNH believes the interconnected nature of NH substations is key to this reliable performance.²¹³ For SAIDI and SAIFI, low and decreasing numbers are good. Sometimes,

²¹⁰ Id.

²¹¹ DR BPA 12-013

²¹² DR BPA 14-005, page 3

²¹³ Interview #18

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

simply maintaining existing numbers is good enough. RCG agrees with these observations.

Exhibit 28 - PSNH Reportable Criteria²¹⁴

NH - IEEE Criteria - Without IEEE MED Storms									IEEE Quartiles SAIDI			IEEE Quartiles CAIDI			IEEE Quartiles SAIFI			IEEE Quartiles MBI		
Year	# Parent Events	CI	CMI	Cust Served	SAIDI	CAIDI	SAIFI	CIII	Q1	Q2	Q3	Q1	Q2	Q3	Q1	Q2	Q3	Q1	Q2	Q3
2017	11,735	581,568	62,285,406	525,227	119	107	1.11	50	108.1	138.1	160.2	98.4	109.5	139.2	1.03	1.13	1.34	11.6	10.6	8.9
2018	10,303	565,301	63,373,060	528,668	120	112	1.07	55	97.1	120.3	148.2	94.8	105.3	125.8	1.01	1.12	1.25	11.9	10.7	9.6
2019	8,821	393,556	43,913,997	531,399	83	112	0.74	45	96.8	116.9	139.0	94.9	103.8	122.5	0.98	1.10	1.21	12.2	10.9	9.9
2020	8,830	431,124	51,247,908	535,095	96	119	0.81	49	81.3	118.5	139.6	94.7	108.2	124.6	0.93	1.06	1.20	12.9	11.3	10.0
2021	9,370	448,477	52,107,413	531,916	98	116	0.84	48	84.8	121.4	149.7	95.3	109.7	129.6	0.92	1.06	1.26	13.0	11.3	9.5

CAIDI (customer outage minutes) performance was not as strong as SAIDI and SAIFI, mainly in the 2nd quartile. When both SAIDI and SAIFI are decreasing (which they are), both the average frequency and the average duration of outages are reduced. However, CAIDI, as the ratio of SAIDI to SAIFI can increase while SAIDI and SAIFI both decrease, if the rate of decrease of SAIDI is lower than the rate of decrease of SAIFI. If reducing CAIDI is an important objective, System Planning can suggest solution alternatives to minimize the occurrence/lengths of these outages.

MBI (months between interruptions) (MBI = months ÷ SAIFI) performance is shown in the Exhibit below.²¹⁵ The MBI results for all years place the PSNH in the 1st quartile, which is excellent. For MBI, higher numbers indicate more months between major interruptions, which is consistent with the above CAIDI discussion, i.e., having fewer outages but longer duration.

Exhibit 29 - PSNH Quartile Performance – MBI

NH - ES Reportable Criteria - (IEEE Excl PI) - With Targets					ES Reportable Actuals/Targets								MBI Over 12 Months		
Year	# Parent Events	CI	CMI	Cust Served	SAIDI		CAIDI		SAIFI	MBI*		CIII	NH - ES Quartiles MBI		
					Actual	Target	Actual	Target	SAIFI	Actual	Target		Q1	Q2	Q3
2017	8,949	502,996	56,981,288	525,227	108	104	113	99	0.96	13	11	56	12.0	11.0	9.4
2018	8,164	475,763	56,822,365	528,668	107	107	119	107	0.90	13	12	58	12.5	11.1	9.9
2019	6,033	296,872	36,594,457	531,399	69	102	123	115	0.56	21	14	49	13.2	11.2	10.0
2020	7,455	367,108	45,916,873	535,095	86	95	125	117	0.69	17	15	49	13.9	11.6	10.3
2021	7,615	361,472	45,162,030	539,189	84	93	125	122	0.67	18	16	47	13.8	11.9	9.8

²¹⁴ DR BPA 14-005, page 2; DR BPA 12-013, Attachment to BPA 12-013

²¹⁵ Id.

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

When all events (PI²¹⁶ & MED) are included (exhibit below), the PSNH ranks in the lower portion of the 3rd quartile for SAIDI, CAIDI, and SAIFI (highlighted in green), i.e., doing worse than many of its peers. However, in 2021, all three indices moved from the 3rd to the 1st quartile. Even though all PSNH indices (SAIDI, CAIDI, and SAIFI) increased over previous years, this shift indicates there were more events and longer-duration events that caused the numbers to increase and that this occurred for all respondents. PSNH’s numbers increased less than its peers, causing a quartile shift. Specific details on how this happened require additional investigation.

Exhibit 30 - NH – ES Reportable Criteria – Quartile Performance with PI & MED²¹⁷

NH - With Storms - All-In										All-In Quartiles SAIDI			All-In Quartiles CAIDI			All-In Quartiles SAIFI		
Year	# Parent Events	CI	CMI	Cust Served	SAIDI	CAIDI	SAIFI	CIII	Q1	Q2	Q3	Q1	Q2	Q3	Q1	Q2	Q3	
2017	16,436	991,058	488,857,780	525,227	931	493	1.89	60	158.2	238.0	732.0	122.6	199.1	446.2	1.19	1.50	1.85	
2018	14,903	990,643	200,596,779	528,668	379	202	1.87	66	123.5	166.8	256.0	109.9	137.5	192.4	1.12	1.25	1.54	
2019	11,785	623,614	118,360,911	531,399	223	190	1.17	53	119.8	155.0	217.7	110.5	125.4	157.9	1.08	1.22	1.48	
2020	13,485	785,235	240,072,600	535,095	449	306	1.47	58	118.4	149.7	217.9	110.9	132.4	161.7	1.00	1.18	1.46	
2021	11,217	562,999	94,270,738	539,189	175	167	1.04	50	143.5	199.7	388.2	120.5	156.8	235.8	1.10	1.31	1.56	

Since Eversource sets reliability goals for three states (NH, CT, and MA) (considered peer utilities), it may be appropriate to compare NH targets (performance *expectations*) against CT and MA targets. This exercise can be done by comparing SAIDI, CAIDI, and MBI targets in the exhibit below based on 2017-2021 ES reportable criteria (IEEE excluding Planned Interruptions [Pi’s]). (Note: MBI is a key metric used by Eversource.)

Reliability targets are set by Eversource in January for all three states²¹⁸ based on the following considerations: historical reliability performance; technology investments, system hardening initiatives; improvements in customer service feeds (i.e., alternate feeds); and improvements in restoration procedures.²¹⁹ As seen in the exhibit below, CT and MA targets stayed essentially the same (only minimal change) for 2017 through 2021, suggesting performance expectations were met with existing performance goals; i.e., reliability indices were acceptable as-is.

²¹⁶ PI is an abbreviation for Planned Interruptions.

²¹⁷ DR BPA 14-005, page 3; DR BPA 12-013, Attachment to BPA 12-013

²¹⁸ DR BPA 8-021

²¹⁹ DR BPA 12-010

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

For PSNH, the targets are set to be more challenging each year, i.e., reduced SAIDI (outage duration) and MBI (months between interruptions) increased. Since MBI is inversely proportional to SAIFI (months ÷ SAIFI), an increasing MBI means SAIFI (frequency of interruptions) decreases. If this trend in setting NH reliability targets continues, NH’s targets will eventually meet or surpass CT and MA’s.

Exhibit 31 - Reliability Targets for NH, CT, and MA²²⁰

Year	Location	Measure	Target	Measure	Target	Measure	Target
2017	Electric Field Ops CT	SAIDI (ES)	76.45	CAIDI (ES)	105.05	MBI (ES)	16.45
2018	Electric Field Ops CT	SAIDI (ES)	77.75	CAIDI (ES)	107.55	MBI (ES)	16.55
2019	Electric Field Ops CT	SAIDI (ES)	75.05	CAIDI (ES)	110.05	MBI (ES)	17.55
2020	Electric Field Ops CT	SAIDI (ES)	74.75	CAIDI (ES)	112.05	MBI (ES)	17.95
2021	Electric Field Ops CT	SAIDI (ES)	73.45	CAIDI (ES)	115.05	MBI (ES)	18.75

Year	Location	Measure	Target	Measure	Target	Measure	Target
2017	Electric Field Ops MA	SAIDI (ES)	65.55	CAIDI (ES)	90.05	MBI (ES)	16.45
2018	Electric Field Ops MA	SAIDI (ES)	72.05	CAIDI (ES)	99.65	MBI (ES)	16.55
2019	Electric Field Ops MA	SAIDI (ES)	68.25	CAIDI (ES)	100.05	MBI (ES)	17.55
2020	Electric Field Ops MA	SAIDI (ES)	68.05	CAIDI (ES)	102.05	MBI (ES)	17.95
2021	Electric Field Ops MA	SAIDI (ES)	66.45	CAIDI (ES)	104.05	MBI (ES)	18.75

Year	Location	Measure	Target	Measure	Target	Measure	Target
2017	Eversource Electric NH	SAIDI (ES)	104.25	CAIDI (ES)	99.05	MBI (ES)	11.35
2018	Eversource Electric NH	SAIDI (ES)	107.05	CAIDI (ES)	107.05	MBI (ES)	11.95
2019	Eversource Electric NH	SAIDI (ES)	102.25	CAIDI (ES)	115.05	MBI (ES)	13.45
2020	Eversource Electric NH	SAIDI (ES)	94.95	CAIDI (ES)	117.05	MBI (ES)	14.75
2021	Eversource Electric NH	SAIDI (ES)	92.75	CAIDI (ES)	122.05	MBI (ES)	15.75

Eversource uses monthly scorecards to track performance against targets. Results are distributed to the PSNH Electric Operations management team and included in the monthly Executive Performance Review Package. It is reviewed in the PSNH President’s biweekly staff meeting and monthly work plan meetings attended by all PSNH officers, directors, and managers. All reported metrics use the following color codes: Blue (means 10% or more *above* target); Green (means *on* target); Yellow (means *below* target); and Red (means 10% or more *below* target). The portion of the operations scorecard dealing with reliability performance for Jan-Nov 2021 is shown in the exhibit below.²²¹

²²⁰ DR BPA 12-010, Attachment to BPA 12-010

²²¹ DR BPA 8-021

Business Process Audit of Eversource and PSNH’s CapEx DE 19-057

Exhibit 32 - New Hampshire Ops Performance Scorecard Jan-Nov 2021²²²

	Actual	Target		
MBI	19.2	15.5	B	MBI is the 2nd highest in 8 years. Compared to 2020 YTD, minor storms have impacted ~32k fewer customers YTD.
CAIDI	121.1	121.9	G	CAIDI continues to recover following the March storms, in part due to less minor storm activity and non-storm CAIDI being lower.
SAIDI	69.5	86.5	B	SAIDI came in at its second lowest level since 2013. SAIDI YTD is 10.7 minutes lower than 2020 YTD.

SAIDI and MBI are both Blue (10% or more above target), while CAIDI is Green (on target), suggesting that as of November 2021, PSNH was exceeding reliability performance expectations. In 2011 (per an earlier exhibit), SAIDI exceeded 150 min; in November 2021, SAIDI was only 70 min, a significant improvement. CAIDI remains a challenge even though performance against the target is considered good. [The CI metric (customers impacted per event) was shown in an earlier exhibit and has also been downward (i.e. improving) for ten years.²²³]

PSNH understands spending capital dollars on reliability when targets are being met or exceeded is a hard sell. However, reliability is a historical performance metric. PSNH’s concern is with issues that could result in significant customer outage minutes. The main issues may be restoration speed and criticality of load, which are most often dealt with at the circuit or substation level. (A standard reliability measure is *worst performing feeders* which will be addressed later in this report.) Resiliency and reliability improvement initiatives are interconnected, i.e., resiliency needs cannot be evaluated or met without first assessing and meeting reliability needs.²²⁴ (Resiliency is mentioned below and will be addressed in a later section of this report.)

6.4. With this level of reliability performance, it is difficult to justify additional capital spending to “improve” reliability. However, when resiliency is considered, future/continued reliability becomes a focus for proposed capital projects.

To understand PSNH’s reliability improvement investments, one must understand the Reliability Enhancement Program (REP) initiated as part of the 2006 rate case (Docket No. DE 06-028). REP provided PSNH with additional capital to improve reliability through enhanced capital system programs and equipment upgrades.

²²² DR BPA 8-021

²²³ Interview #16

²²⁴ Interview #62

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The REP transitioned to REP II in 2010 following PSNH's 2009 rate case completion. While the original program focused on vegetation management, REP II included additional system improvement projects.²²⁵ REP transitioned again in 2015, creating REP3, including everything in REP plus REP II, and adding projects like distribution automation and circuit ties. The REP program was scaled back in 2018 and ended in 2019.²²⁶

While not identified as REP, REP reliability/resiliency programs are embedded in today's capital budget program. Example projects/programs include the following:²²⁷

- Distribution Automation Program,
- TripSaver Program,
- Line Sensor Program,
- Circuit Ties Program,
- Direct Buried Cable Replacement Program,
- Pole Inspection Program,
- Oil Circuit Breaker (OCB) Replacement Program,
- Capacitor Switch Replacement Program,
- PLC Automation Scheme Replacement Program,
- Electromechanical Relay Replacement Program,
- Substation Animal Protection Equipment Program, and
- RoWs Hardening/Reconductoring Program.

Each program is considered a project requiring a PAF and associated justification. Each project is evaluated and authorized annually before being included in the approved capital budget. A core tenet of Eversource is to adhere to the approved yearly capital spend limit, which forces management to prioritize capital projects for any given year.

6.5. PSNH's most significant asset-related condition assessment issues involve power transformers, PCB-containing equipment (transformers, circuit breakers, bushings), and animal protection. In each case, systematic replacement plans are implemented consistent with capital budget constraints. RCG agrees with this approach.

Asset management deals with two types of aging: First, due to years in service; and second, due to loading. For transformers, the EPRI-based PTX tool addresses both

²²⁵ DR BPA 3-3, Table on page 2

²²⁶ DR BPA 3-3

²²⁷ DR BPA 4-15

types of aging along with other factors to determine the optimal replacement schedule. (See this report's System Planning Criteria-Technical Standards/Guidelines section for more on the PTX tool.) Storm conditions can ultimately be the last straw to failure.

The goal is to extend transformer life as much as reasonably practical through regular maintenance programs and major overhauls while anticipating the conditions for potential transformer failure before a storm hits. Maintenance could involve rebuilding a transformer as a cost-saving measure over buying new ones. However, rebuilds are often not viable solutions due to conditions or cost constraints.

PSNH has more than 80 power (bulk) transformers that are 50+ years old. They believe these older transformers cannot be replaced fast enough to stay out of the high-risk category. So, as a precautionary measure, spare transformers are maintained in the "warm" state for the different voltage classes and strategically located by region in each state.²²⁸ Concurrently, PSNH management recently decided to standardize on four power transformers (62.5MVA, 30MVA, 12.5MVA, and 140MVA) to meet system requirements while reducing the number of spares. RCG believes this to be a sound approach.

Environmental concerns must also be addressed. One of the more significant environmental issues involves replacing PCB equipment with non-PCB equipment. Regulatory requirements for PCB use and disposal must be considered, as well as the financial risks if PCBs are released into the environment. Timely replacement/disposal of PCB-containing dielectrics is key to preventing future expensive liabilities.²²⁹ The most significant source of PCBs is U-type bushings used to connect power transformers. Another source is oil circuit breakers used to connect the transformers to lines and buses. These components are usually replaced as part of a substation rebuild project.²³⁰ For Eversource, PCB replacement program strategies are developed by the Director of Quality Assurance T&D.²³¹

Another potential risk is aggressive animal behavior, requiring more sophisticated animal protection. Ravens have been an "unbelievable problem in vandalizing substations," according to one of the interviewees.²³² Even though animal protection had been installed per industry standards, the ravens found a way to bypass the protection. After meeting with utilities dealing with similar animal issues, Eversource decided to install lasers as the most promising way to alleviate the problem. Time will tell if more

²²⁸ Interview #21 and Interview #16

²²⁹ Bench, Dan. "Identification, Management, and Proper Disposal of PCB-Containing Electrical Equipment used in Mines." Page 10 of 11, date unknown but estimated to be early 2000's.

²³⁰ Interview #61

²³¹ Interview #61

²³² Interview #61

actions are needed. RCG believes this approach to problem-solving is consistent with industry best practices.

6.6. PSNH appears to be following current standard industry practices when identifying and resolving power quality issues (primarily voltage related).

Customer power quality (PQ) expectations are high, driven by more home offices and sophisticated and temperamental electronics. Industrial and commercial customers demand the same and, in some cases, higher levels of power quality. Voltage complaints are monitored, and not many are received in NH.²³³ Some customers classify momentary interruptions (<5 min) as PQ problems even though PQ refers to perceptible voltage and current fluctuations, which can adversely impact electronic equipment.

Per DSPG 2020, System Planning is addressing the following power quality issues:²³⁴

- Steady-state thermal and voltage criteria guidelines,
- DER impact on voltages,
- Voltage flicker issues,
- Transformer reverse power capabilities, and
- Unbalanced voltage (3V0) for high impedance ground fault issues.

6.7. Worst performing feeders are monitored and ranked on an annual basis. Some feeders are classified as the worst performers year after year due partly to two major North-South 34.5 kV lines not being looped (creating alternate feeds). When faults occur on these circuits, all customers downstream of the faults will experience an outage.

Utilities continually develop and maintain a list of worst-performing feeders annually based on a consistent reliability performance metric. Eversource uses COSAIDI [Contribution to PSNH (system wide) SAIDI], which weights radial circuits with large customer counts more heavily than other circuits. As a result, the same circuits can appear on the worst-performing circuits list year after year.²³⁵ For example, a 150-mile circuit

²³³ Interview #11

²³⁴ LCIRP, October 1, 2020, Appendix D, page 9

²³⁵ DR BPA 1-36, Attachment to BPA 1-36

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

with 8000 customers will have more exposure than a 75-mile circuit. Some circuits have been in the top 10 for a decade.²³⁶

Efforts are underway to apply SCADA-controlled pole-top devices (e.g., reclosers) to break distribution lines into customer blocks of 500 customers or less (discussed earlier in this report). This cost-effective program can improve a worst-performing circuit and prevent a circuit from making the list.²³⁷ However, the best solution is to find locations where alternate feeds can be feasibly constructed for long radial circuits, i.e., create circuit loops with alternate feeds, not just segment lines into customer groups. Looping is often not feasible due to cost or physical constraints. In these cases, localized NWA solution options should be considered.

PSNH is willing to accept higher costs-per-saved-customer-minutes for projects that benefit large numbers of customers.²³⁸ Unfortunately, this runs counter to the goal of “treating all customers equally” since customers at the end of radial circuits will always be impacted by upstream faults, i.e., these customers will be continually disadvantaged because of where they live. Recognizing radial circuits can be challenging to manage, RCG believes every reasonable attempt should be made to minimize the disparity. As PSNH continues to loop more of the remaining radial circuits, this problem will continue to dissipate.

PSNH evaluates each circuit, determines where reasonable, cost-effective solutions can be applied and includes them in the capital plan. However, the ten worst-performing feeders do not automatically appear on the plan but must be evaluated and prioritized along with all other proposed projects. As a result, PSNH does not proactively develop a worst-performing-feeder-improvements project schedule since it must compete with all other system needs during each budget cycle. In addition, the list of worst-performing circuits is based on a single year's performance, meaning new circuits and potentially more cost-effective projects will be proposed and reviewed each year.²³⁹

²³⁶ Interview #16

²³⁷ DR BPA 1-36

²³⁸ DR BPA 1-36

²³⁹ Id.

6.8. Resiliency is another cornerstone to building a reliable distribution system. Given PSNH's heavily treed/ice environment, RCG believes PSNH is pursuing a reasonable course of action by looking for systematic opportunities to improve at-risk circuits and substations incrementally. Investing in resiliency programs to preserve reliable performance and meet customer expectations is consistent with industry-standard practices.

Reliability and resiliency are often mistakenly used interchangeably. However, they are different. *Reliability* is most simply defined as the power is either ON or OFF. IEEE summarizes the more commonly applied industry definitions (from NERC, US DOE, IEEE, and NATF) in Technical Report PES-TR83.²⁴⁰ In this report, US DOE defines reliability as “the ability of the system to deliver expected service through both planned and unplanned events.”

For *Resiliency*, there is no universally acceptable industry definition despite attempts by organizations worldwide to do so. PJM (Pennsylvania-New-Jersey-Maryland) Interconnection came up with the following simplistic definition for resiliency: “It is about the power system’s ability to withstand extreme or prolonged events.”²⁴¹ The author goes on to say, “You cannot be resilient if you are not first reliable.” Reliability is the historical performance of a system or circuit, while resiliency is the future performance of a system or circuit under potentially extreme conditions. The industry currently categorizes resiliency projects into (a) mitigation, (b) preparedness, (c) response, and (d) recovery.²⁴²

Eversource defines *Reliability* as the ability of the electric power system to deliver electricity to the end-user.²⁴³ When evaluating reliability performance, Eversource applies standard industry-accepted reliability metrics (SAIDI, SAIFI, CAIDI) discussed elsewhere in this report.

Eversource defines *Resiliency* as “the ability (of) the electric power system to withstand and recover from low probability, high impact, extreme and damaging conditions, including weather and other natural causes.”²⁴⁴ Or, put another way, the ability

²⁴⁰ IEEE Power & Energy Society Industry Technical Support Leadership Committee Task Force. “Resilience Framework, Methods, and Metrics for the Electricity Sector,” Technical Report PES-TR83, October 2020.

²⁴¹ Ott, Andy (President and CEO). “Reliability and Resilience: Different Concepts, Common Goals,” PJM Inside Lines, December 17, 2018.

²⁴² IEEE Power & Energy Society Industry Technical Support Leadership Committee Task Force. “Resilience Framework, Methods, and Metrics for the Electricity Sector,” Technical Report PES-TR83, October 2020.

²⁴³ DR BPA 14-006

²⁴⁴ *Id.*

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

to withstand a storm and other significant events, and recover from them in a reasonable amount of time.²⁴⁵

While Eversource does not have a formal documented process for triggering resiliency projects,²⁴⁶ resiliency initiatives have been set as follows:²⁴⁷

- Tree Trimming
- Electrical Hardening
- Structural Hardening
- Equipment Automation

When the industry evaluates reliability performance and calculates metrics, it is usually done with and without major events. Major events are excluded to focus on the day-to-day performance of the system. Major events, typically weather-related, have a low probability of occurring, but they can have significant ramifications. Electric utilities must prepare the system for such events and have active plans to respond. Although PSNH ranks in the 1st and 2nd reliability quartiles excluding major events (see Reliability section), that PSNH only ranks in the lower portion of the 3rd reliability quartile when major events are included²⁴⁸ suggests there are potential opportunities for improving resiliency to reduce the impact of storms and improve restoration capabilities post-storm, especially when considering the observable increase in frequency/intensity of storms in New England.²⁴⁹ (While not part of this business process review, RCG believes it would be advantageous for PSNH to review/update its emergency response plans.)

Examples of resiliency-based capital projects initiated by PSNH include the following:

- Upgrading distribution poles, shown to have ground line rot issues, to stronger class 2 wood poles or more resilient steel poles in areas of difficult access;
- Replacing cross arms with composite ones;
- Reconductoring to more resilient conductors such as covered wire and spacer cable in areas where tree damage is more prone; and
- Installing distribution automation (automated switching) to reduce the impact of customer outages by isolating faulted feeder sections.

²⁴⁵ Interview #16

²⁴⁶ DR BPA 9-019

²⁴⁷ Eversource. "Improving Electric Reliability: Eversource's System Resiliency Program," www.eversource.com

²⁴⁸ DR BPA 7-007, Attachment pages 10-12

²⁴⁹ DR BPA 14-006

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

The question always is, “When is reliability/resiliency good enough?” Or, put another way, how can capital funds be best allocated to meet reliability targets and satisfy resiliency goals? Some in PSNH contend resiliency has not been a problem;²⁵⁰ others say improvements are needed.²⁵¹ The ultimate answer lies in which projects get approved. Today’s submittals must follow the latest Eversource capital-approval process, including technical and cost justification components. The more compelling the case, the more likely the approval. Distribution Engineering collaborates with System Resiliency & Reliability group to identify potential resiliency projects.²⁵²

PSNH’s core capital distribution investments are primarily in overhead equipment and facility upgrades to make the system more resilient to major events while preparing a platform for integrating advanced technologies (e.g., DER) at virtually any point on the system, including the ability to accommodate two-way power flows on distribution lines.²⁵³

Since conditions change yearly, the assumption that “reliability is good enough” is not acceptable. There will always be risks and corresponding needs for corrective actions. Investments in resiliency measures are needed to prevent/minimize catastrophic events. PSNH looks to the industry for guidance on how far to go and when to stop.²⁵⁴ Two important PSNH system characteristics are the significant number of trees present and the system's high probability of ice buildup on the lines, which places PSNH in a high risk position.

PSNH believes investments in reliability and resiliency are necessary to remain in the 1st quartile (preferably) or 2nd quartile (at worst) peer reliability performance categories.²⁵⁵ The nightmare scenario is an ice storm with the wind causing tremendous damage from falling trees and bringing down power lines and poles. When protective devices (switches) try to operate to clear faults, the devices cannot because contacts are frozen shut. Worse yet, feeds from either end may be cut off by system faults. There is a need to protect against 60-70 mile/hour winds which seem to be occurring more frequently.²⁵⁶ Ice, ice loading, and wind are ongoing concerns, even for well-trimmed RoWs.²⁵⁷ For these reasons, PSNH has placed a high priority on reliability- and resiliency-related investments.

²⁵⁰ Interview #61

²⁵¹ Interview #16 and DR BPA 7-007

²⁵² DR BPA 9-019

²⁵³ DR BPA 1-005

²⁵⁴ Interview #11

²⁵⁵ Interview #16

²⁵⁶ Interview #16

²⁵⁷ Interview #11

Business Process Audit of Eversource and PSNH's CapEx DE 19-057

PSNH believes operations does a very good job of maintaining substation equipment. However, there is a concern (this has not happened yet) that failure events will start to increase due to aging infrastructure. For example, several 62.5MVA and 44.5 MVA transformers are 50+ years old.²⁵⁸ The oldest 140MVA transformer is 36+ years old. In response to these concerns, PSNH is taking measures to quantify and prioritize actions using the EPRI-based PTX transformer assessment tool (discussed in earlier sections of this report).

A substation reliability program in process for several years is the oil circuit breaker (OCB) replacement program, which focuses on replacing aging and PCB-containing equipment. If a substation OCB fails, many customers can be affected. If the OCB contains PCBs, potentially significant environmental cleanup will be required.²⁵⁹

PSNH believes the biggest obstacle for reliability-based projects is getting them scoped, engineered, approved, and included in the capital plan. Three active distribution substation projects (White Lake, Dover, and Monadnock); and seventeen (17) additional distribution substation projects were identified in the *2020-2029 Load Flow Study* as having (N-1) contingency violations (based on the DSPG revised planning criteria).²⁶⁰ 14 of the 17 projects were due to STE (Short Term Emergency) rating violations, bus faults, bus-tie breaker issues, and single-contingency transmission issues (causing a double-contingency condition on the distribution system). (Refer to Appendix A for a complete list of projects and respective violation summaries.)

These 20 substation projects total \$225 M based on conceptual engineering estimates. PSNH believes all 20 are needed. However, that would exceed the annual capital budget. According to PSNH, "The challenge (then) becomes prioritizing and spreading them over a reasonable period of budget cycles to get them all done prudently."²⁶¹ The updated capital approval process is expected to facilitate this process.

PSNH determined NH's pole inspection program meets today's needs but is concerned about future resiliency needs. 35% of the pole population is 40+ years old. The concern centers around what the former inspection program did not do, proactively replacing the oldest poles. The inspection program looks for imminent replacement needs (<10 years). PSNH believes better pole integrity/replacement metrics are needed from an asset management perspective, which is the position taken in recent rate cases.²⁶²

²⁵⁸ Interview #61

²⁵⁹ Interview #61

²⁶⁰ Interview #62

²⁶¹ Interview #62

²⁶² Interview #11

Customer expectations are changing, and according to one interviewee, “We don’t want to fail 400-4,000 poles in the same storm.” Add to that the changing nature of weather and the concern is magnified. Customers could be out for eight or more days in worst-case scenarios. PSNH believes the pole replacement target should be closer to 1,000 poles/year rather than the relatively small number done today. PSNH believes replacing poles in clusters rather than one at a time is the most cost-effective approach from a resiliency point of view.²⁶³

PSNH does not believe a resiliency program can be based on the following position: “In the last five years, we have not had a storm that resulted in more than a two-day outage for customers.” Customers, regulators, and politicians are not going to accept two-day outages. So, resiliency is essential in meeting and maintaining reliability expectations.²⁶⁴

Recommendations

- R.16 Conduct a protection and coordination study in conjunction with System Planning at the distribution circuit level to better understand and anticipate how 2-way power flows can be safely accommodated.**
- R.17 Take more aggressive actions to correct chronic problem feeders by implementing one or more of the following:**
- **Reduce COSAIDI or other reliability targets to encourage more aggressive distribution automation and sectionalizing schemes; and**
 - **Find locations where alternate feeds can be feasibly constructed for long radial circuits, i.e., create circuit loops, not just segmented customer groups; and**
 - **Apply localized NWA solution options, where suitable, when looping feeders is not a feasible alternative and the solution exceeds NWA thresholds. Subsequent revisions to the NWA Framework may be required.**

²⁶³ Interview #11

²⁶⁴ Interview #62

Third-Party Claims

7.1. Within the external constraints of third-party damage recovery, PSNH has a reasonable process to track and recover the costs associated with third-party damages to the distribution system and transfer the net costs into ratebase. However, the process is not fully documented in writing which could create opportunities for varying interpretations of how to execute the process and any decisions required.

In RCG's experience, when a third-party entity damages a typical utility's property (generally already included in ratebase) the utility must repair or replace the damaged equipment to ensure reliable and safe service. As the damage is unpredictable, the financial impact can vary from period to period. All or a portion of the capital expenditure (and maintenance expenses) may be offset by recoveries from the responsible party causing the damage or the responsible party's insurance coverage.

A typical utility estimates an annual amount for capital expenditures within its capital budgeting process. That amount is reconciled to the actual cost of repairing the damage less the recovery of those costs from the responsible party causing the damage. The costs of repairs would typically enter ratebase (less the recovered costs) during a rate case or tracker mechanism as authorized by the regulatory scheme.

During PSNH's request for its first step adjustment pursuant to the settlement reached in Docket DE 19-057, treatment of its post-rate decision capital costs prompted questions from the Division over how PSNH accounted for the capital costs and the associated recovered costs. At that time, PUC Staff (now the Division) conducted an audit of the initial 2019 Step adjustment, and the audit report was submitted at the time of the second step adjustment (2020) filing and third-party claims became an issue in that proceeding. Cross-examination covering the issue took place, and the Commission decided to include the issue within the Business CapEx Process Audit.

"Eversource discussed its treatment of costs related to replacing plant in service when a third-party damages utility property. Eversource explained that once the Company knows that the damage was caused by a third party, and the third party is identified as responsible for payment, the Company will bill the individual or insurance company for the damages. Once Eversource generates the bill for damages, Eversource credits the work order within the annual project in the calendar year that the Company actually bills the third party. Eversource argued that it would be inappropriate to assume recovery of damaged plant is a given and stated

that this topic should be addressed during its upcoming business process audit."²⁶⁵

The Division audit (February 1, 2021) states, "To date, PSNH has not responded sufficiently. Audit Issue #1"" PSNH included \$1,789,400 in the current 2019 Step adjustment. This figure does not account for the anticipated contributions of \$(1,189,200)." ²⁶⁶

The Division audit process includes two opportunities to potentially resolve differences through the discovery process and the comment period provided to the utilities. As a result, drafts and input were exchanged between the Division auditors and PSNH. The audit was issued, and PSNH provided comments.²⁶⁷ According to PSNH, there was limited discussion. The Division audit group concluded that it could not confirm or trace the expected reimbursement offset based on its review of PSNH's filings.²⁶⁸ The Division's audit report was entered into the case as an exhibit in the 2020 Step adjustment hearings by the Division with the subsequent cross-examination of PSNH on the issue.²⁶⁹

7.2. Third-party damage presents PSNH with some unique challenges as the incidence and timing of damage are beyond the PSNH's control.

While third-party damages are a small part of PSNH's annual capital expenditures, all, or some portion of those expenditures (the amount not reimbursed by the responsible party or its insurance coverage) will eventually enter ratebase and become a cost of doing business and thus increase rates paid by customers.

Unlike standard PSNH-initiated capital projects, third-party damage is not initiated by PSNH, and the work scope and timing are only under PSNH's limited control. While the total capital amounts are accumulated into a budgetary line item, they consist of many independent incidents. The exhibit below indicates the number of incidents.

²⁶⁵ Order No. 26,504 Page 3

²⁶⁶ DR BPA 5-004, Attachment Page 3

²⁶⁷ Claims Panel #1

²⁶⁸ DR BPA 5-004, Attachment Page 5

²⁶⁹ Claims Panel #1

Exhibit 33 - Annual Number of Events and the Number of Identified Offenders

Year²⁷⁰	Number of Incidents²⁷¹	Total Costs Before Recovery²⁷²	Responsible Party Identified²⁷³
2017	1,197	\$ 2,172,199	515
2018	1,421	\$ 2,560,753	594
2019	1,584	\$ 2,467,492	640
2020	1,231	\$ 2,929,850	448
2021	1,308	\$ 3,106,301	478

Typically, PSNH is notified of damage to its facilities by the police as they respond to and investigate an accident. In other incidents, third-party damage may be caused by a contractor damaging PSNH's facilities that require a response by PSNH. During routine inspections of PSNH's facilities, third-party damage may be detected.

7.3. PSNH's responders immediately document the site in written form, photographs of the site and identification of the responsible party (if available); together create a formal record of the event.

Depending on how the incident is reported and the severity of the damage, the initial work and investigation are performed by a Response Specialist²⁷⁴ or a line crew.²⁷⁵ PSNH on-site responders may take a photo of the responsible party's license plate at the scene.²⁷⁶ That information is embedded within the electronic record of the work order.²⁷⁷

Reimbursement for third-party damages can take a substantial effort and take significant time to resolve. PSNH's collection for third-party damages is hampered by the state of New Hampshire's not requiring mandatory auto liability insurance, the responsible party's ability to pay compared to the cost to collect, the availability of police reports, and unreported (hit and run) incidents. However, the collection is aided by the NH DMV license suspension process.

²⁷⁰ Incidents and amounts may be out of synch due to date of recording the various aspects of the incident.

²⁷¹ DR BPA 8-013

²⁷² DR BPA 5-003

²⁷³ DR BPA 8-013

²⁷⁴ Interview #71 and Claims Panel #1

²⁷⁵ Interview #72

²⁷⁶ Claims Panel #1

²⁷⁷ Claims Panel #1

7.4. While PSNH has a process for discovering, tracking claims,²⁷⁸ and accounting for the costs of third-party damages, that process is not formally memorialized in a written policy that spans the entire process.

PSNH does not have a detailed flowchart or process document for the entire third-party claims process²⁷⁹. Although PSNH provided a narrative in response to a data request²⁸⁰ the third-party process is not recognized in a distinct Sarbanes Oxley (SOX) accounting process, rather controls fall within separate functional areas.²⁸¹

Conceptually there are three types of major damage claims. (The "Type" designation has been created by RCG solely for clarity.)

- Type 1 – The responsible party cannot be identified (hit and run event).²⁸² *No potential offset of costs is expected.*
- Type 2 – The responsible party is identified and has liability insurance. *Reasonable expectation of payment:*
 - Payment may not be for the amount originally billed due to insurance negotiations related to the asset's depreciated cost.²⁸³
- Type 3 – The responsible party is identified but has no insurance. *Extended time to receive payment (if any) due to:*
 - Payment plans,
 - No assets,
 - Costs of recovery (legal fees) are expected to exceed repair costs, and
 - The final payment status (none or partial) may take years depending on the processes involved.²⁸⁴

Due to the timing of the repair compared to the eventual recovery of none, all, or a portion of the costs from the responsible party, a reconciliation process is needed to recognize and confirm accounting for the actual payment level compared to the amount billed to the entity.

²⁷⁸ DR BPA 16-001

²⁷⁹ Claims Panel #1

²⁸⁰ DR BPA 5-005 and Claims Panel #1

²⁸¹ Claims Panel #1 1:34:09

²⁸² DR BPA 8-013 and Claims Panel #1

²⁸³ Claims Panel #1

²⁸⁴ Claims Panel #1

7.5. The Administrators, who are the designated employees responsible for capturing, validating, and monitoring the costs of third-party damage, appear to be functioning well and are appropriately managed.

RCG interviewed two Administrators (a position located at the regional operating centers) who described PSNH's process to determine if an incident has occurred and then create a claim. Daily, the Administrators monitor activity such as trouble reports from the outage-reporting system to find incidents. The priority of this monitoring is considered second only to payroll. The Administrator will create an individual work order for each incident.²⁸⁵ The initial preparation of the claim is handled by an Administrator²⁸⁶ at the local operating center. The work order contains backup information including incident photos.²⁸⁷ The costs of the incident are retrieved from PSNH work order records and time reporting. Some inherent time delays are attributed to all until other costs are entered into the work order, such as environmental response contractor and material costs.²⁸⁸

The Administrator will search for the responsible party within the records entered by the PSNH responder. The Administrator will use the Lexis-Nexis document database and if necessary, make personal contact with local police to obtain a police report.²⁸⁹ The identification of the responsible party may be difficult as not all damage is reported to the police, such as hit and run incidents²⁹⁰ and damage found later during routine inspections by PSNH. Further, obtaining police reports has been complicated by COVID-19 and freedom of information issues.²⁹¹ In some cases, long delays have occurred.²⁹²

If an Administrator is unavailable due to absence, such as vacation or illness, there is a backup procedure in place to ensure that the monitoring for incidents continues.²⁹³

²⁸⁵ Claims Panel #1

²⁸⁶ Interviews #71 and Interview #72

²⁸⁷ Claims Panel #1

²⁸⁸ Interview #71

²⁸⁹ Interview #71 and Claims Panel #1

²⁹⁰ Claims Panel #1

²⁹¹ Interview #71 and Interview #72

²⁹² DR BPA 12-005(d)

²⁹³ Interview #72

7.6. The job description for the Administrator function does not include the third-party damage function and therefore is out of date.

As part of RCG's investigation, the Administrator's position description was requested. RCG found that the duties within the provided job description²⁹⁴ did *not* include the third-party incident discovery and claim creation functions.

7.7. The description of the initial portion of the claim process performed within the operating center was detailed in a narrative provided however, the checks and balances are unclear.²⁹⁵ Combined with the lack of a detailed process flowchart or other similar definitions, RCG is concerned that the claim development process is not well defined, and therefore subject to possible misinterpretation.

The Operations Supervisor determines when to close out a work order²⁹⁶ and reviews construction work in progress to determine if incidents have not been processed.²⁹⁷ During a panel interview conducted by RCG, a PSNH participant noted if a claim is not generated, it "*does not percolate in our system.*"²⁹⁸

It is unclear to RCG, who is responsible for confirming that no third party can be identified. This would be a control issue as the Operating Center management could circumvent the claims process. RCG found no evidence of this occurring.

Recommendations

- R.18 PSNH should develop a formal method to track the status of third-party claims in process but not yet completed at the operating center level.**
- R.19 PSNH should create an accurate job description for the Administrator position that reflects the importance of the claim's preparation process.**
- R.20 PSNH should revise the third-party claims process to have the Claims group review incidents where no responsible party is identified or when the operating center management has closed an incident without generating a claim.**

²⁹⁴ DR BPA 11-002

²⁹⁵ Interview #72 and BPA 12-1 Attachment Page 5

²⁹⁶ Claims Panel #1

²⁹⁷ Claims Panel #1

²⁹⁸ Claims Panel #1

7.8. The process to administer and resolve claims with the responsible party is defined, appears to be functioning well and is appropriately managed.

Once the incident cost is established by the Administrator and approved by Operating Center management, the information is forwarded to the Claims Department, which processes the claim. The Claims Analyst contacts the responsible party and seeks payment²⁹⁹ based on information in the police report or contact with the responsible party. Supported by a tracking system to follow up on the claims billed³⁰⁰, the Claims Analyst may make multiple follow-up contacts, negotiate payment arrangements, and, if necessary, request the NH DMV to suspend the responsible party's license for failure to pay for the damage.

Payments are tracked monthly as payment plans extend over time and therefore are monitored.³⁰¹ If the responsible party fails to pay after four months, a "14-day letter", which is a notice of the possibility of license suspension, is sent to the responsible party.³⁰² The Claims Analyst typically allows 30 days for a response and then will request the NH DMV to suspend the license of the responsible party.³⁰³ The possibility of license suspension has proved a good tool for the claims process.³⁰⁴ When suspension cannot be achieved, the claim will typically be sent to collections.

7.9. While not specifically documented but detailed through RCG's interviews and PSNH's responses to RCG data requests, accounting for third-party damage and the offsetting reimbursement is a defined and managed process.

Once the claims process has begun, the accounting for the claim takes place. Costs are moved from FERC Account 107 Construction Work in Progress to Account 106 Work Completed but Not Classified. Charges are classified according to FERC accounting conventions,³⁰⁵ and costs are apportioned between capital and O&M accounts³⁰⁶.

²⁹⁹ Claims Panel #1

³⁰⁰ DR BPA 12-008, 16-001 and Claims Panel #1

³⁰¹ Claims Panel #1

³⁰² Claims Panel #1

³⁰³ Claims Panel #1

³⁰⁴ Claims Panel #1

³⁰⁵ Claims Panel #1

³⁰⁶ DR BPA 12-005

7.10. PSNH customers are protected by the PSNH's immediate recognition of potential reimbursement from responsible parties (the Sundry Bill process) while the collection process is underway. The amount recognized is reduced by the reserve analysis.

At the same time, the potential (but not yet collected) Sundry Bill to the responsible party is recognized as an offset in Account 108 Accumulated Depreciation. PSNH provided the FERC accounting guideline that suggests the reimbursement be credited to Account 108 as a recovery from insurance.³⁰⁷

The actual level of the reimbursement for an incident is often different than the initial bill, which will decrease the amount credited to Account 108 in a later period. The difference may result from negotiations with the insurance carrier, negotiations with the responsible party, non-payment by various parties, or differences in overhead percentage charges, which may change monthly.³⁰⁸

7.11. The accounting process for establishing reserves for non-payment of billed reimbursement is defined.

Periodically PSNH will review the status of reimbursements (Sundry Bills as a whole) and adjust the reserve amounts to reflect the potential for non-payment of the Sundry Bills that have previously been rendered. While the analysis of uncollectible accounts³⁰⁹ is considered an "art" and uses judgement factors to deal with the "pooled" uncollectible³¹⁰, the concept of the uncollectible reserve balance³¹¹ is like the reserve established for customer receivables³¹². PSNH provided the process used to establish such reserves³¹³ and an analysis from January 1, 2019, as requested by RCG.³¹⁴ This process includes input from the Claims group.

Each year an annual budget for damage is established (project # INS9R).³¹⁵ A "supplemental" request will be developed if a budget overrun looks possible.³¹⁶ The

³⁰⁷ DR BPA 12-006

³⁰⁸ Claims Panel #1

³⁰⁹ Claims Panel #1

³¹⁰ Claims Panel #1

³¹¹ Claims Panel #1

³¹² Claims Panel #1

³¹³ DR BPA 15-013

³¹⁴ DR BPA 15-014

³¹⁵ Claims Panel #1

³¹⁶ Claims Panel #1

overrun is not a result of PSNH actions as the damage is caused by third parties, whether identified or not.

7.12. A programming error leading to a misclassification of credits is in the process of correction, and a temporary mechanism is being used in the interim.

A programming error in the implementation of a new software system that interfaces into accounting system resulted in reimbursement credits assigned to FERC Account 107 Construction Work In Progress instead of FERC Account 108 Accumulated Depreciation in the mapping process. This was disclosed in a footnote to a data response rather than during an interview or the body of the response.³¹⁷ On follow-up, PSNH indicated that it is transferring the amounts quarterly to correct this misclassification³¹⁸ and that a consultant has been engaged to correct the erroneous classification process within the software³¹⁹.

Recommendations

- R.21 PSNH should develop a flowchart and process narrative to define and illustrate the entire third-party claim process in one document.**
- R.22 PSNH should correct the software which improperly allocates reimbursements to Account 107 instead of Account 108.**

³¹⁷ DR BPA 12-005(c)

³¹⁸ DR BPA 16-002

³¹⁹ Claims Panel #2

Communications

In any regulatory filing, including an application for rate relief, the typical utility has the burden of proof. Implicitly the utility also has a burden to reply in a timely fashion according to the norms in that regulatory jurisdiction.

To facilitate the review of the third-party claim process, PSNH suggested using a Claims interview panel. Ultimately, there were two Claims interview panels. Using interview panels permitted a wide-ranging positive discussion that explained the functions of the involved PSNH groups and their interactions, rather than piecing together details from several interviews.

7.13. Relevant items were not disclosed clearly or in sufficient detail by PSNH in data responses, sometimes to its detriment by not highlighting positive information or actions.

A misclassification by a new software program of reimbursements was disclosed within a footnote to a data response rather than directly disclosed in that data response.³²⁰ Although PSNH had both a short and long-term resolution of the issue, PSNH did not highlight the ongoing, positive actions taken by PSNH.

The extended time to release a third-party claim work order due to a late police report was apparent when comparing various dates within the documents provided as a data response.³²¹ PSNH did not highlight information that would document a delay beyond PSNH's control due to delayed availability of police reports.

In response to a data request for the Administrator's job description, the response did not highlight that the job description provided was outdated and therefore not useful for the purposes that RCG requested.³²² Only after RCG's informal questioning of PSNH was this situation confirmed.

³²⁰ DR BPA 12-005(c)

³²¹ DR BPA 12-005(d)

³²² DR BPA 11-002

7.14. PSNH's overall communications, in the context of the review of the third-party damage process review by RCG, was not timely.

The requests to schedule interview panels have taken well over a reasonable two weeks (ten business day) expectation, and no estimated date to schedule the interview panel was provided in the interim period.

Many data responses have taken well over a reasonable two weeks (ten business day) expectation, and no estimated date of delivery was provided in the interim period. In RCG's experience with management and process audits, we have not seen such response times (up to 45 calendar days).

Recommendations

- R.23 If PSNH cannot complete a response to a data request and transmit the data response within ten business days, an estimated completion date should be formally transmitted by the tenth business day.**
- R.24 In its data responses, PSNH should highlight its ongoing and planned responses to issues and the impact of third parties' actions, rather than embedding the issue within the data.**
- R.25 To facilitate and clarify data requests and data responses, PSNH and the Division should consider adding technical conferences before and after data requests are requested and responded to.**

**BUSINESS PROCESS AUDIT
OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a
EVERSOURCE ENERGY'S NEW HAMPSHIRE
DISTRIBUTION CAPITAL PROJECTS
JULY 2023**

APPENDICES

**REQUESTED BY
THE NEW HAMPSHIRE
DEPARTMENT OF ENERGY'S
DDIVISION OF REGULATORY SUPPORT
ELECTRIC DIVISION**

**PREPARED BY
RIVER CONSULTING GROUP, INC.**

Business Process Audit of PSCNH (Eversource) DE 19-057

Appendix Contents

Appendix A – 2020 Design Violations Summary Report.....3
Appendix B – Software Tools7
Appendix C – Abbreviations11
Appendix D – Projects Review26

Appendix A

2020 Design Violations Summary Report

Bulk Substations

Non-Bulk Substations



Appendix A: 2020 Design Violations Summary Report - Bulk Substations

Substation	Region	Existing						Solution				
		Voltage (kV)	MVA	Install Yr	MW Load 2020	# Fdrs	Violation	Voltage (kV)	MVA	MW Load 2020	# Fdrs	Other
Bedford	Central	115-34.5kV	TB164 - 44.8 TB191 - 44.8	2004 2004	61.00	7	N-1 STE violation; N-1 bus tie violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	65.00	7	Replace with larger transformers
Eddy	Central	115-34.5kV	TB26 - 44.8 TB81 - 44.8	1978 1968	61.00	6	Unhealthy transformers TB26 and TB81; N-1 STE violation; N-1 bus tie violation	115-34.5kV	TBD	72.00	6	Solution TBD - depends on Bedford and Huse Road substations final configuration
Garvins	Central	115-34.5kV	TB39 - 67.2 TB51 - 67.2	1974 1974	69.00	7	Unhealthy transformer TB39; N-1 bus fault violation	115-34.5kV	TB39 - 67.2 TB51 - 67.2	75.00	7	Add series bus tie breakers
Huse Road	Central	115-34.5kV	TB46 - 44.8 TB58 - 48.0	1987 1969	72.00	5	Unhealthy TB58; N-1 STE violation; N-1 bus fault violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	80.00	5	Replace with larger transformers; add series tie breakers
Pine Hill	Central	115-34.5kV	TB118 - 44.8 TB161 - 44.8	2003 1968	59.00	4	N-1 STE violation; N-1 bus tie violation	115-34.5kV	TBD	60.00	4	Solution TBD - depends on Bedford and Huse Road substations final configuration
Rimmon	Central	115-34.5kV	TB26 - 44.8 TB81 - 44.8	2015 2015	65.00	7	N-1 STE violation	115-34.5kV	TBD	69.00	7	Solution TBD - depends on Bedford and Huse Road substations final configuration
Cocheco Street (Dover)	Eastern	115-34.5kV	TB22 - 44.8 TB55 - 44.8	1972 2001	80.00	4	Unhealthy transformer TB22; N-1 STE violation; N-1 bus fault violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	82.00	4	Replace with larger transformers; add series bus tie breakers
Great Bay	Eastern	115-34.5kV	TB171 - 44.8	2002	45.00	2	N-0 base case load violation	115-34.5kV	TB171 - 44.8	45.00	2	Transfer load to Timber Swamp Substation
Madbury	Eastern	115-34.5kV	TB65 - 44.8 TB74 - 44.8	1971 1976	70.00	4	Unhealthy transformer TB65; N-1 STE violation; N-1 bus fault violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	80.00	5	Replace with larger transformers; add series bus tie breakers; add new feeder
Mill Pond	Eastern	115-12.47kV	TB171 - 44.8	2014	10.00	4	N-0 base case load violation	115-12.47kV	TB171 - 44.8	13.00	4	Replace transformer at Cutts Street Substation; upgrade distribution lines
Rochester	Eastern	115-34.5kV	TB53 - 44.8 TB57 - 44.8	1968 2002	60.00	4	N-1 STE violation	115-34.5kV	TB53 - 44.8 TB57 - 44.8	65.00	4	Transfer load to Tasker Farm Substation
Ashland	Northern	115-34.5kV	TB5 - 44.8	2005	36.00	2	N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TB5 - 44.8 TBXX - TBD	38.00	2	Add second transformer; add third and fourth feeder to Meredith and Ashland Municipal to utilize increased capacity; solves violations at other substations
Beebe River	Northern	115-34.5kV	TB62 - 44.8	1974	21.00	2	Unhealthy transformer TB62; N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TB62 - 44.8	21.00	2	Add second transformer at Ashland Substation
Berlin (Eastside)	Northern	115-34.5kV	TB83 - 15.0 TB115 - 20.0	1954 1947	17.00	3	Unhealthy transformers TB83 and TB115; N-1 bus fault violation	115-34.5kV	TBD	21.00	3	Solution TBD - voltage support along 34.5kV line
Laconia	Northern	115-34.5kV	TB24 - 44.8 TB125 - 44.8	1977 2002	61.00	5	Unhealthy transformer TB24; N-1 STE violation; N-1 bus fault violation	115-34.5kV	TB24 - 44.8 TB125 - 44.8	69.00	5	Transfer load to Webster/Daniel Substation; add series bus tie breakers
Lost Nation	Northern	115-34.5kV	TB033 - 28.0 TX129 - 44.8	1961 2017	10.00	4	Unhealthy TB033; N-1 bus fault violation	115-34.5kV	TB033 - 28.0 TX129 - 44.8	11.00	4	Replace manual load-break switch with SCADA-controlled device to restore load on radial feeder
North Woodstock	Northern	115-34.5kV	TB67 - 44.8	1986	9.00	2	N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TB67 - 44.8	12.00	2	NH Electric Coop to add D-SCADA to 34.5kV
Oak Hill	Northern	115-34.5kV	TB15 - 44.8 TB84 - 45.0	2003 1991	68.00	4	N-1 STE violation; N-1 transformer violation; N-1 bus tie violation	115-34.5kV	TB15 - 44.8 TB84 - 45.0	69.00	4	Transfer load to Garvins Substation
Pemigewasset	Northern	115-34.5kV	TX88 - 62.5	2018	25.00	3	N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TX88 - 62.5	25.00	3	Add second transformer at Ashland Substation. [Note: 20 MVA TB88 was replaced with a new 62.5 MVA TX88, Q4 2020.]
Saco Valley	Northern	115-34.5kV	TB60 - 44.8	1976	20.00	3	N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TB60 - 44.8	23.00	3	Replace manual load-break switch with SCADA-controlled device to restore load on radial feeder
Webster and Daniel	Northern	115-34.5kV	TB43 - 44.8 TB59 - 44.8	2016 2016	39.00	3	N-1 bus fault violation; N-1 bus tie violation; N-1 transmission violation	115-34.5kV	TB43 - 44.8 TB59 - 44.8	41.00	3	Replace manual load-break switch with SCADA-controlled device to restore load on radial feeder
White Lake	Northern	115-34.5kV	TB76 - 28.0 TB82 - 28.0	1964 1963	49.00	4	Unhealthy transformers TB76 and TB82; base load violation; N-1 transformer violation; N-1 STE violation; N-1 bus fault violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	50.00	4	Replace both transformers; add series bus tie breakers
Whitefield	Northern	115-34.5kV	TB89 - 44.8	1966	20.00	3	Unhealthy TB89; N-1 bus fault violation	115-34.5kV	TB89 - 44.8	25.00	3	Replace manual load-break switch with SCADA-controlled device to restore load on radial feeder
Amherst	Southern	345-34.5kV	TB68 - 140.0 TB85 - 140.0	1987 2003	105.00	5	N-1 bus fault violation; N-1 bus tie violation	345-34.5kV	TB68 - 140.0 TB85 - 140.0	110.00	5	Replace and add a 2nd transformer at South Milford Substation; replace both transformers at Bridge Street Substation



Appendix A: 2020 Design Violations Summary Report - Bulk Substations

Substation	Region	Existing					Solution					
		Voltage (kV)	MVA	Install Yr	MW Load 2020	# Fdrs	Violation	Voltage (kV)	MVA	MW Load 2029	# Fdrs	Other
Bridge Street	Southern	115-34.5kV	TB45 - 44.8 TB52 - 44.8	1973 1973	55.00	5	Unhealthy transformers TB45 and TB52; N-1 STE violation; N-1 bus fault violation; N-1 transmission violation	115-34.5kV	TBxx - 62.5 TBxx - 62.5	59.00	5	Replace both transformers; solution TBD for N-1 transmission violation
Bridge Street 4kV	Southern	115-4.16kV	TB15C - 10.5	2007	7.20	6	N-1 transformer violation; N-1 bus fault violation; N-1 bus tie violation	115-4.16kV	TB15C - 10.5	8.00	6	Deploy mobile 34.5-4.16kV substation in an emergency (typical procedure for non-bulk substations)
Hudson	Southern	115-34.5kV	TB33 - 44.8 TB44 - 44.8	2005 1974	43.00	6	N-1 bus fault violation	115-34.5kV	TB33 - 44.8 TB44 - 44.8	47.00	6	Transfer load or add series bus tie breakers (study needed to determine best alternative)
Lawrence Road	Southern	345-34.5kV	TB48 - 140.0	1995	49.00	5	N-1 transformer violation; N-1 bus fault violation	345-34.5kV	TB48 - 140.0	49.00	5	Add transformer breaker to Lawrence Road Substation; study needed to determine if bus tie breaker or additional capacity at neighboring substations will resolve N-1 bus fault violation
Long Hill	Southern	115-34.5kV	TB10 - 44.8 TB20 - 44.8	2005 1969	65.00	4	Unhealthy transformer TB20; N-1 STE violation; N-1 bus fault violation; N-1 transmission violation	115-34.5kV	TB10 - 62.5 TB20 - 62.5	71.00	4	New transmission line from South Milford Substation; replace both transformers; add series bus tie breakers
Scobie Pond	Southern	115-12.47kV	TB131 - 30.0 TB132 - 30.0	2011 2011	33.00	6	N-1 bus fault violation; N-1 bus tie violation; N-1 transmission violation	115-12.47kV	TB131 - 30.0 TB132 - 30.0	32.00	6	Enhance 12.47kV distribution to increase line capacity; add series bus tie breakers
South Milford	Southern	115-34.5kV	TB86 - 44.8	2014	45.00	2	N-0 base load violation; N-1 transformer violation; N-1 bus fault violation; N-1 bus tie violation	115-34.5kV	TB86 - 62.5 TBxx - 62.5	50.00	2	Replace transformer; add 2nd transformer; add new feeder; construct new transmission line into South Milford
Chestnut Hill	Western	115-34.5kV	TB87 - 12.5 TB98 - 12.5	1947 1947	17.00	2	Unhealthy transformers TB87 and TB98; N-1 transformer violation; N-1 bus fault violation	115-34.5kV	TB87 - 44.8 TB98 - 44.8	18.00	2	Replace both transformers with 44.8 MVA or 62.5 MVA; add series bus tie breakers; add 2 feeder breakers
Emerald Street (Keene)	Western	115-12.47kV	TB18 - 12.5 TB23 - 12.5 TB3 - 22.4 TB7 - 22.4 TB12 - 22.4	1953 1954 2000 1964 1969	31.00	10	Unhealthy: TB18, TB23, TB7, TB12; N-1 bus tie violation	115-12.47kV	TB3 - 22.4 TBxx - 30.0 TBxx - 30.0	40.00	10	Replace 12.47kV switchgear; replace 4 unhealthy transformers with 2-30 MVA transformers; solution TBD for N-1 bus tie violation
Jackman	Western	115-34.5kV	TB61 - 28.0 TB33 - 44.8	1964 2008	36.00	5	Unhealthy transformer TB61; N-1 bus fault violation	115-34.5kV	TB61 - 28.0 TB33 - 44.8	38.00	5	Add series bus tie breakers
Monadnock	Western	115-34.5kV	TB80 - 28.0 TB40 - 20.0	1965 1951	35.00	3	Unhealthy TB40; N-1 transformer violation; N-1 STE violation; N-1 bus fault violation; N-1 bus tie violation	115-34.5kV	TBxx - 44.8 TBxx - 44.8	40.00	3	Replace both transformers with 44.8 MVA or 62.5 MVA; add series bus-tie breakers; add cap bank to supplement existing
North Keene	Western	345-34.5kV	TB145 - 140.0	2015	19.00	5	N-1 bus fault violation; N-1 bus tie violation	345-34.5kV	TB145 - 140.0	22.00	5	Replace manual load-break switch with SCADA-controlled device to restore load on radial feeder
North Road	Western	115-34.5kV	TB38 - 44.8 TB49 - 44.8	1971 1971	40.00	4	Unhealthy transformers TB38 and TB49; N-1 bus fault violation	115-34.5kV	TB38 - 44.8 TB49 - 44.8	42.00	4	Add series bus tie breakers

Source: Attachment BPA 1-006, October 1 2021 --> 2020 Design Violations Summary Report - New Hampshire Distribution System Planning, revised March 18 2021

Central	6
Eastern	5
Northern	12
Southern	8
Western	6

Substations	37



Appendix A: 2020 Design Violations Summary Report - Non-Bulk Substations

Substation	Location	Existing					Violation	Solution				
		Voltage (kV)	MVA	Install Yr	MW Load 2020	# Fdrs		Voltage (kV)	MVA	MW Load 2029	# Fdrs	Other
Cutts Street 15W4	SE Corner	34.5-12.47	15W4 - 4.5	1956	3.80	1	Unhealthy transformer 15W4	34.5-12.47	15W4 - 12.5	4.20	1	Replace transformer with 12.5 MVA unit (solves Mill Pond capacity problem); enhance distribution system with D-SCADA and possible reconductoring and/or reconfiguration
Goffstown 27W2	SE Corner	34.5-12.47	27W2 - 3.0	1956	1.80	1	Unhealthy transformer 27W2; N-0 base load violation	n/a	n/a	3.20	1	Remove 27W2 and 45H1 subs (1 feeder each); upgrade distribution line to 34.5kV
Goffstown 45H1	SE Corner	34.5-4.16	45H1 - 1.8	1955	1.90	1	Unhealthy transformer 45H1; N-0 base load violation	n/a	n/a	3.10	1	
Loudon 31W1	SE Corner	34.5-12.47	31W1 - 5.25	2006	4.00	1	N-0 base load violation	34.5-12.47	31Wx - 12.5	5.60	1	Replace 31W1 and 31W2 with <u>single</u> transformer; NWA candidate
Loudon 31W2	SE Corner	34.5-12.47	31W2 - 3.36	1964	3.60	1	Unhealthy transformer 31W2; N-0 base load violation			3.80	1	
Rye 48H1	SE Corner	34.5-4.16	15W4 - 3.75	1956	3.50	2	Unhealthy transformer 15W4; N-0 base load violation	???	???	4.10	2	?? (error in report)
Salmon Falls 51H1	SE Corner	13.8-4.16	51H1 - 1.5	1996	1.50	1	N-0 base load violation	13.8-4.16	51H1 - 1.5 51Hx - 1.5	1.70	1	Add second 1.5 MVA transformer
Hanover Street 16W3	SE Center	34.5-12.47	16W3 - 3.36	1962	3.60	1	Unhealthy transformer 16W3; N-0 base load violation	34.5-12.47	16W3 - 3.36	4.00	1	Transfer 12.47kV load to 34.5kV distribution system; NWA candidate
Meetinghouse Road 3W2	SE Center	34.5-12.47	3W2 - 5.04	1969	5.35	1	N-0 base load violation	34.5-12.47	3W2 - 5.04	5.85	1	Transfer 12.47kV load to 34.5kV distribution system
Suncook 44W2	SE Center	34.5-12.47	44W2 - 5.04	1965	4.90	1	Unhealthy transformer 44W2; N-0 base load violation	34.5-12.47	44W2 - 5.04	5.10	1	Transfer 12.47kV load to 34.5kV distribution system
Opechee Bay TB10	Center	34.5-12.47	TB10 - 2.5	1956	3.00	1	Unhealthy transformer TB10; N-0 base load violation	34.5-12.47	TB10 - 2.5	3.20	1	Transfer load to Messer Street
Weirs	Center	n/a	n/a	n/a	n/a	n/a	Site of future 34.5-12.4 kV substation	n/a	n/a	n/a	n/a	Site of future 34.5-12.4 kV substation

Source: Attachment BPA 1-006, October 1 2021 --> 2020 Design Violations Summary Report - New Hampshire Distribution System Planning, revised March 18 2021

SE Corner 7
 SE Center 3
 Center 2

 Substations 12

Appendix B

Software Tools

Business Process Audit of PSCNH (Eversource) DE 19-057

Commercial

Aspen OneLiner – Short circuit and relay coordination software package for electric power system protection engineers from Aspen.

Cascade – Asset inventory, maintenance, and condition-tracking software from DNV.

Clik Field Services Management – Crew tablet scheduling software from Clik Software. This software is planned to be replaced.

DistriView™ – An integrated suite of voltage-drop, short circuit, relay coordination, harmonics, and reliability calculation software for utility distribution systems from Aspen.

e-Builder – Construction management software from Trimble.

GIS – Geographic Information System for capturing, storing, checking, and displaying geographic position data.

IBM Planning Analytics – Enterprise financial planning software tool from IBM designed to implement collaborative planning, budgeting, and forecasting solutions.

Inventor 3D Design Software – Professional-grade 3D CAD software for product design and engineering for both solid and surface modeling from Autodesk.

Jira Software – Software tool from Atlassian that helps facilitate the agile process, which is an iterative and collaborative approach to managing the work associated with a project.

Maximo – Asset management, monitoring, and predictive maintenance software package from IBM. Work orders are created in this software and capture material, contract, and time charges. The project number from PowerPlan links these charges to the plant accounting system.

Planning Analytics – Business performance management software suite from IBM. It is designed to implement collaborative planning, budgeting, and forecasting solutions, interactive "what-if" analyses, as well as analytical and reporting.

PowerPlan – Integration hub specialty project accounting software that automates key accounting functions, and manages interfaces between sources of transactions, including general ledger, project accounting, plant accounting, and book depreciation from PowerPlan, Inc. Project numbers are initiated within this software and become the link to charges made to specific work orders created in Maximo.

Power BI Tool – Dashboard generating tool from Microsoft.

Primavera P6 – Project management and scheduling software from Oracle.

Business Process Audit of PSCNH (Eversource) DE 19-057

PSCAD™ – Power systems EMT (Electro-Magnetic Transient) simulations from PSCAD, a subsidiary of Manitoba Hydro International Ltd.

PSS/E – Electric power system analysis software package from Siemens [came with PTI purchase] used for transmission studies.

PTLOAD – Power transformer load simulation software package from EPRI.

PTX Software – Power transformer condition assessment software (Power Transformer Expert System) from EPRI.

Synergi Electric – Power distribution simulation software package from DNV.

Synergis Adept – Engineering document (drawings) management software from Synergis Technologies, LLC.

Teams – Proprietary business communication platform developed by Microsoft for video conferencing and meetings management.

WorkDay – Human Resource Information System (HRIS) software from Workday for data analytics, HR, finance, management, and enterprise planning.

Custom In-House

NWA Screening Tool¹ – An Excel-based Eversource internal document that allows System Planning to screen capacity project needs at specific locations for potential application of NWA solutions. The Tool is designed to enable rapid initial screening of NWA options against traditional system upgrade projects. And will provide appropriate sizing of such locations.

Custom modifications to EPRI PTX Software tool – To better focus on transformer health management.

¹ LCIRP, March 31, 2021 Supplement, Appendix A-1, “Non-Wires Alternative Framework, Version 2.0.

Appendix C

Abbreviations

Business Process Audit of PSCNH (Eversource) DE 19-057

ABR	Automatic Bus Restoral scheme
ADA	Advanced Data Analytics
ADMS	Advanced Distribution Management System
ADR	Active Demand Response
AEIC	Association of Edison Illuminating Companies
AFUDC	Allowance for Funds Used During Construction
AI	Artificial Intelligence
AMF	Advanced Metering Functionality
AMI	Advanced Metering Infrastructure
AMR	Automated Meter Reading
ANSI	American National Standards Institute
APPR	Approved (in MAXIMO)
APS	Accounting Policy Statement
APS-01	Accounting Policy Statement 01 (corporate accounting policy)
ARO	Asset Retirement Obligation
AS&E	Administrative Salaries and Expenses
ASCE	American Society of Civil Engineers
Aspen OneLiner	(Aspen) Software for studying power system protection
AVG	Average
BCA	Benefit Cost Analysis
BES	Bulk Electric System
BESS	Battery Energy Storage System
BMS	Business Management System
BOD	Board of Directors
BOM	Bill of Materials
BOT	Board of Trustees
BP	Best Practices
BPA	Business Process Audit
BPS	Bulk Power System
BTM	Behind-the-Meter

Business Process Audit of PSCNH (Eversource) DE 19-057

Bulk Distribution Substation – A collection of equipment and transformers used to step the Transmission source voltage (115 kV and higher) down to a Distribution voltage (usually 34.5 kV and below)

Non-Bulk Distribution Substation – A collection of equipment and transformers used to step the Distribution source voltage (46 kV and 34.5 kV) down to a lower Distribution voltage (usually 12.47 kV and 4.16 kV)

BUG	Back-Up Generation
CAIDI	Customer Average Interruption Duration Index
CAGR	Compound Annual Growth Rate
CAM	Cost Allocation Manual
CapEx	Capital Expense
CBRC	Capital Budget Review Committee
CBC	Capital By Category
OCA	Office of Consumer Advocate
CCA	Chromated Copper Arsenate
CCNC	Completed Construction Not Classified
CCVT	Coupling Capacitor Voltage Transformer
CDG	Community Distributed Generation
CEG	Cost Estimating Group
CENH	Clean Energy New Hampshire
CEO	Chief Executive Officer
CESIR	Coordinated Electric System Interconnection Review
CFO	Chief Financial Officer
CGS	Certificate of Good Standing
CHP	Combined Heat and Power
CI	Customers Interrupted
CIII	Customers Interrupted per Interruption Index
C/I or C&I	Commercial/Industrial or Commercial & Industrial customers
CIP	Capital Improvement Plan (or Critical Infrastructure Protection)
CIO	Chief Information Officer
CIS	Customer Information System

Business Process Audit of PSCNH (Eversource) DE 19-057

CLF	Conservation Law Foundation
CMI	Customer Minutes Interrupted
CMS	Customer Meter Services
CoA	Certificate of Assurance
COC	Contractors of Choice
CoE	Center of Excellence
Company	Public Service Company of NH d/b/a Eversource Energy
COO	Chief Operating Officer
CO2	Carbon Dioxide
COSAIDI	Company System Average Interruption Duration Index
COVID-19	Pandemic
CPP	Critical Peak Pricing
CPPM	Capital Project Process Model
CRIS	Customer Related Information System
CS	Customer Solutions (or Customers Served)
CSDBR	Company Sanctioned Data Backup Required
CSOC	Cyber Security Operations Center
CSS	Customer Service System
CU	Compatible Unit
CVA	Certificate of Vote/Authority
CVR	Conservation Voltage Reduction
CY	Calendar Year
CYME	International power systems solutions and software provider
CYMDIST	CYME distribution system analysis software
CYMTCC	CYME over-current protection analysis software
DA	Distribution Automation
DAL	Drastic Action Limit
DAS	Distribution Automation Switching
DC	Direct Current
DEC	Department of Environmental Conservation

Business Process Audit of PSCNH (Eversource) DE 19-057

DER	Distributed Energy Resource
DERs	Distributed Energy Resources
DERMS	Distributed Energy Resource Management System
DES	Department of Environmental Services
DG	Distributed Generation
DIP	Distribution Integrated Planning
DistriView	ASPEN DistriView Integrated Software Package
Division	Department of Energy Regulatory Support Division (Staff)
DLC Program	Direct Load Control Program
DLM	Dynamic Load Management
DMS	Distribution Management System
DoA	Delegation of Authority
DOE	NH Department of Energy
DoNHDE	New Hampshire Distribution Engineering
DP	Distribution Provider
DPC	Distribution Planning Criteria
DR	Demand Response (Distributed Resource or Data Request)
DRWG	IEEE's Distribution Reliability Working Group
D-SCADA	Distribution Supervisory Control and Data Acquisition
DSINPRG	Design in Progress (in MAXIMO)
DSM	Demand Side Management
DSOC	Distribution System Operations Center
DSP	Distributed System Platform
DSPG	Distribution System Planning Guide
DSS	Distribution System Supply
DTS	Distribution Transfer Switching
EAM	Earnings Adjustment Mechanism
EBIT	Earnings Before Income Tax
EBU	Electric Business Unit
EDI	Electronic Data Interchange

Business Process Audit of PSCNH (Eversource) DE 19-057

E2E	End-to-End
E&S	Engineering and Supervision
EE	Energy Efficiency (can also mean Eversource Energy)
EERS	Energy Efficiency Resource Standard
EG	Emergency Generation
ELF	Electric Load Forecast
EMS	Energy Management System
EMT	Electromagnetic Transients
ENST	Eversource NWS Screening Toolset
EOC	Engineers of Choice
EPA	Environmental Protection Agency
EPAC	Eversource Project Approval/Authorization Committee
EPC	Engineer-Procure-Construct
EPRI	Electric Power Research Institute
EPS	Electric Power System
ERISA	Employee Retirement Income Security Act
ERM	Enterprise Risk Management
ERP	Enterprise Resource Planning
ESP	Electric System Planning
ES	Energy Storage
E&S	Engineering and Supervision
ESCC	Electric System Control Center
ESP	Electronic Security Perimeter
Esri	Global leader in GIS software
ESS	Energy Storage System
ETT	Enhanced Tree Trimming
EV	Electric Vehicle
Event	Single contingency (N-1) lasting one cycle (24 hrs)
EWR	Engineering Work Request
FC	Fuel Cell

Business Process Audit of PSCNH (Eversource) DE 19-057

FERC	Federal Energy Regulatory Commission
FLISR	Fault Location, Isolation, and Service Restoration
FSSP	Financial Simplification and Standardization Project
FTE	Full-Time Equivalent
FTM	Front of the Meter
FWO	Field Work Order (created in MAXIMO)
FY	Fiscal Year
GAGAS	(Federal) General Accountings Government Auditing Standards
GHG	Greenhouse Gas
GIS	Geographic Information System
GMSG	Grid Modernization Stakeholder Group
GOP	Generator Operator
GPS	Global Positioning System
GridLab-D	Power distribution simulation software from PNNL
Grid Mod	Grid Modernization
GST	Granite State Test
GSU	Generator Step-Up transformer
GTEP	Grid Transformation and Enablement Program
GW	Gigawatt
GWh	Gigawatt-hour
HC	Hosting Capacity
HCA	Hosting Capacity Analysis
HR	Human Resources Organization
HRIS	Human Resource Information System
IA	Internal Auditing (can also mean Interconnection Agreement)
IBM	International Business Machines
IDP	Integrated Distribution Plan
IEEE	Institute of Electrical & Electronics Engineers
IFC	Issued For Construction
IFR	Initial Funding Request

Business Process Audit of PSCNH (Eversource) DE 19-057

IFRF	Internal Funding Request Form
IMP	Integrity Management Plan
IMS	Incident Management System
INIT	Initiate (in MAXIMO)
IoT	Internet of Things
IOU	Investor-Owned Utility
IPE	Independent Professional Engineer
IT	Information Technology
IS	Information Systems
ISO	Independent System Operator
ISO-NE	Independent System Operator – New England
ISOC	Integrated System Operations Center
IT	Information Technology
JM-AM-2001	Corporate project approval process
KPI	Key Performance Indicator
kV	Kilovolt
kvar	Kilovar
kW	Kilowatt
kWh	Kilowatt-hour
LBMP	Locational-Based Marginal Price
LCC	Load Carrying Capacity
LCE	Lead Commissioning Engineer
LCIRP	Least-Cost Integrated Resource Plan
LCTA	Least Cost Technically Acceptable
LED	Light-Emitting Diode
LRP	Long Range Plan
LSP	Local System Plan/Planning
LSR	Large-Scale Renewables
LTC	Load Tap Changer
LTE	Long Term Emergency rating

Business Process Audit of PSCNH (Eversource) DE 19-057

LVA	Locational Value Analysis
LVMs	Line Voltage Monitors
MADC	Marginal Avoided Distribution Capacity
MAIFI	Momentary Average Interruption Frequency Index
M&C	Maintenance and Construction
MAX	Maximum
Maximo	Work and Asset Management System software
MBI	Months Between Interruptions (months in period divided by SAIFI)
MCOS	Marginal Cost of Service
MDEC	Miscellaneous Distribution Expense Capitalization
MDM	Meter and Data Management
MDMS	Meter Data Management Services
MED	Major Event Days/Definition
METT	Maintenance of the Enhanced Tree Trimming specification
MIN	Minimum
MTM	Market to Market
MW	Megawatt
MWh	Megawatt-hour
NARUC	National Association of Regulatory Utility Commissioners
NEC	National Electric Code
NE-ISO	New England Independent System Operator
NEPOOL	New England Power Pool
NERC	North American Electric Reliability Corporation
NESC	National Electrical Safety Code
NH	New Hampshire
NHDOT	New Hampshire Department of Transportation
NHEC	New Hampshire Electric Cooperative
NHPAC	New Hampshire Project Approval/Authorization Committee
NHPUC	New Hampshire Public Utilities Commission
NPCC	Northeast Power Coordinating Council

Business Process Audit of PSCNH (Eversource) DE 19-057

NPV	Net Present Value
NREL	National Renewable Energy Laboratory
NTF	National Transmission Forum
NWA	Non-Wires Alternatives
NWS	Non-Wires Solutions
OCA	NH Office of the Consumer Advocate
OCB	Oil Circuit Breaker
O&M	Operations and Maintenance
OMS	Outage Management System
OPAF	Operations Project Authorization Form
OpEx or O&M	Operations Expense or Operations & Maintenance Expenses
OPGW	Asset Management Programs for Replacements
OPM	Operational Performance Management
OQ	Operator Qualifications
OQ'd	Operator Qualified
OT	Operational Technology
OTAF	Operations Technical Approval Form
PAC	Planning Advisory Committee (or Project Approval Committee)
PACT	Protection And Control Test committee
PAF	Project Authorization Form
P&L	Profit and Loss
PCM	Portfolio Calibration Meeting
PE	Professional Engineer
PEX	Performance Excellence
PFR	Partial Funding Request
PHEV	Plug-in Hybrid Electric Vehicle
PI	Planned Interruption
PLC	Power Line Carrier (or Project Life Cycle)
PM	Project Manager
PMI	Project Management Institute

Business Process Audit of PSCNH (Eversource) DE 19-057

PMO	Project Management Office
PNNL	Pacific Northwest National Laboratory
PQ	Power Quality
POC	Point of Control
POI	Point of Interconnection
PowerPlan	Integration hub software from PowerPlan, Inc.
PP4	Planning Procedure 4
PSNH/EE	Public Service Company of NH d/b/a Eversource Energy
PSPM	Protection System Maintenance Program
PSS/E	Power system software package from Siemens
PTF	Pool Transmission Facility
PTLoad	EPRI transformer loading software package
PTO	Participating Transmission Owners
PTX	Power Transformer Expert System
PUC/NHPUC	State of New Hampshire Public Utilities Commission
PV	Photovoltaic (Solar)
QA/QC	Quality Assurance/Quality Control
RCG	River Consulting Group
Regulated Load	Load that has voltage regulation at a 34.5kV primary voltage beyond the bulk distribution facility/substation
RDISP	Ready to Dispatch (in MAXIMO)
REP	Reliability Enhancement Program
RIDS	Risk Informed Decision Support
RFI	Request for Information
RFP	Request for Proposal
RM	Risk Management
ROE	Return on Equity
ROW	Right of Way
RSA	Revised Statutes Annotated
RSP	Regional System Plan

Business Process Audit of PSCNH (Eversource) DE 19-057

RTU	Remote Terminal Unit
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SAMP	Strategic Asset Management Plan
SCADA	System Control and Data Acquisition
SCLL	Single Contingency Load Loss
SCT	Societal Cost Test
SD	System Design
SDC	Solution Design Committee (or Substation Design Change)
SDM	Substations Design Manual
SEC	Securities and Exchange Commission
SFR	Supplemental Funding Request
SGIP	Small Generator Interconnection Process
SHE	Safety, Health, and Environmental
SIR	Standardized Interconnection Requirements
SLA	Service Level Agreement
Smallworld	Software GIS mapping tool
SME	Subject Matter Expert
SMT	Scheduled Maintenance Trimming
SOC	System Operations Center
SPCA	Spacer Cable
SRF	Supplemental Request Form
SSF	Solution Selection Form
Staff	New Hampshire DOE Staff (Regulatory Support)
STE	Short Term Emergency rating
Sub-T	Sub-transmission
SVC	Static VAR Compensator
Synergi Electric	Power Distribution System and Electrical Simulation software package from DNV

Business Process Audit of PSCNH (Eversource) DE 19-057

Synergis Adept	Engineering document (drawings) management software from Synergis Technologies, LLC
TAF	Technical Approval Form
T&D	Transmission and Distribution
T&M	Time and Material
TFRAT	Transformer Rating, bulk transformer “loss of life” used historically by legacy PSNH (superseded by SYSPLAN-008)
THI	Temperature Humidity Index
TO	Transmission Owner
TOP	Transmission Operator
TOU	Time-of-Use
TRC	Total Resource Cost
TRS	Trouble Reporting System
TVP	Time-Varying Pricing
UCT	Utility Cost Test
UG	Underground
UER	Utility Energy Registry
UES	Unitil Energy Systems
Unregulated Load	Load that has no voltage regulation at a 34.5kV primary voltage beyond the bulk distribution facility/substation
URD	Underground Residential Distribution
USDOE	US Department of Energy
USSC	US Sanction Committee
VAD	Value Added Data
VCB	Vacuum Circuit Breaker
VDER	Value of Distributed Energy Resources
VP	Vice President
VT	Voltage Transformer
VTOU	Voluntary Time-of-Use
VVO	Volt-VAR Optimization
VVO/CVR	Volt-VAR Optimization /Conservation Voltage Reduction

Business Process Audit of PSCNH (Eversource) DE 19-057

WO	Work Order
WTBS	Waiting To Be Scheduled (In MAXIMO)
WTHI	Weighted Temperature Humidity Index
Yellow Book	Federal General Accountings Government Auditing Standards
ZEV	Zero-Emission Vehicle

Appendix D

Projects Review

Business Process Audit of PSCNH (Eversource) DE 19-057

A sampling of capital projects was reviewed² to evaluate adherence to Company processes/guidelines and standard industry practices. Information reviewed included the following: History, planning violations, solution alternatives, preferred solution rationale, and project-specific lessons learned.

A review of projects indicated an established engineering process was being followed. However, RCG believes more comprehensive and consistent communications and project oversight could have identified/resolved issues earlier in the project development process, including how best to use outside contracted resources.

The following projects were reviewed [*a representative sample taken from hearings, rate case, data requests, LCIRP, Company website, system planning studies (criteria violations), Staff concerns/questions, and budget variances*]:

- I. East Northwood Phase Extension
- II. Loudon Station
- III. Nashua Millyard Substation
- IV. Monadnock Distribution Substation Rebuild
- V. Pack Monadnock Distribution Line Rebuild
- VI. Pemigewasset Transformer Project
- VII. Reconductor New Boston Road, Bedford
- VIII. West Rye Substation Rebuild
- IX. Viper Replacement Project
- X. Rimmon Substation Animal Protection
- XI. Goffstown Substation Elimination – Phase 1
- XII. Replace Notre Dame Substation with MITS and Dunbarton Road Substation with Pad-mounted Step Transformer

For each project, *summaries and observations* are provided followed by project-specific *lessons learned*.

I. East Northwood Phase Extension (2020-2021)³

1 - Planning violations: Low voltages; phase overloads/imbbalances; and protection issues.

² Process reviews were conducted not technical reviews.

³ Data Reqs BPA 8-001; BPA 9-010; BPA 9-011; BPA 1-013

Business Process Audit of PSCNH (Eversource) DE 19-057

2 - Three (3) alternatives were considered.

- Alternatives #1 and #2 were significantly more expensive, did not resolve all technical issues, and were not fully investigated.
- Alternative #3 (preferred alternative): 63W1 Reconductor Drake Hill Road was the lowest cost and resolved all technical issues.

3 - Funding approval process:

- Challenge Session Form: \$900,000 - August 24, 2020
- PAF: \$1,062,000 - January 21, 2021
- Actual indirect costs were greater than PAF estimated costs because they were based on historical average costs per foot rather than actual project work scope estimates.
- Tree-trimming cost estimates were not obtained for the PAF.
- Competitive bids for line construction contractor labor costs (the largest component of most distribution line projects) were also not obtained for the PAF.

Lessons learned per the Company:

- Project-specific unit construction estimates should be used instead of typical estimates when competing PAFs.
- The results of competitive contractor bids should be used when completing PAFs, such as tree trimming, construction oversight, and ledge pole sets.
- Cost estimates developed by engineering personnel need to be based on specific work scopes rather than historical average labor rates when completing PAFs.
- **RCG conclusion:** Overall project documentation was delivered to RCG in pieces, requiring multiple DRs, and complicating the review process.

II. Loudon Station⁴ (project still under review; no approved PAF as of this writing⁵)

1 - Planning violations: N-0 base load violation; and unhealthy transformers.

2 - Five (5) potential traditional solutions were evaluated, and ten (10) potential NWA solutions (using the NWA Screening Tool).

- Preferred traditional solution: Replace 31W1 and 31W2 transformers with a single transformer.
- Preferred NWA solution: Mobile generators (3) operating 3-to-6 days per year as part of a 5-year deferral strategy.

⁴ LCIRP Mar 31 2021, Supplement, Appendix A-2; Data Request BPA 1-006, 10/01/21 Attachment

⁵ Interview #18

Business Process Audit of PSCNH (Eversource) DE 19-057

3 - Funding options:

- Traditional Solution -> \$6,500,000 (if deferred 5 years, net present value savings would be \$1,657,186)
- NWA Solution -> \$194,928/year (if implemented)

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** The Loudon study was a good example of how the NWA Screening Tool can be used to quantify potential NWA solutions which can serve as an example for future projects.

III. Nashua Millyard Substation (2016-2022)⁶

1 - Planning violations: Obsolete equipment (>65 years old); and congested physical site.

2 - Seven (7) alternatives were considered.

- Alternative #4 was selected as the preferred solution based on receiving the highest total-ranking score, using a decision matrix of 9 weighting factors, 2 of which were operating costs and system-loss savings.
- Alternative # 4 was not the least-cost solution.

3 - The project was initiated (2016) before the inception of EPAC or SDC and was initially reviewed at CPAC, the predecessor to EPAC. When SDC and EPAC processes were established, the Millyard project was brought before both committees. Full funding was approved by EPAC in 2021.

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** The systematic ranking process used to arrive at the preferred alternative (Alternative # 4) was a good, objective way to arrive at and subsequently support the decision even though it was not the lowest cost solution.
- **RCG conclusion:** Project checklists for the new capital approval process are more comprehensive than the forms completed and approved for this project.

⁶ Data Request BPA 7-001; BPA 7-002; IR-48a; IR 48b

Business Process Audit of PSCNH (Eversource) DE 19-057

IV. Monadnock Distribution Substation Rebuild (2020-2023)⁷

1 - Planning violations: Unhealthy transformer⁸; (N-1) transformer violation; (N-1) STE violation; (N-1) bus fault violation; and (N-1) bus-tie violation.

2 - Two (2) alternatives were scoped in detail by an outside engineering firm.

- Alternative #1 breaker-and-a-half design.
- Alternative #2 was a ring-bus design. Included: Replacement of both transformers; the addition of series bus-tie breakers; and the addition of an additional capacitor bank as a supplement to the existing capacitor bank.
- Alternative #2 was selected because it addressed reliability issues.

3 - Funding approval process:

- An initial Solution Selection Form (SSF) was submitted on March 16, 2021, with no budget estimates since the project was in the early initiation stages. An NWA was not considered since the Company does not evaluate NWA solutions for asset condition issues. A greenfield site was selected to facilitate construction and scheduled outages.
- SDC approved an updated SSF on September 29, 2021, along with conceptual budget estimates (30%-40% engineering completed).
- On November 29, 2021, an outside engineering firm provided detailed project estimates for Alternative #2 totaling \$23,399,900 with a range of -25% (\$17,550,000) and +50% (\$35,100,000).

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** More detailed and accurate project estimates are needed for funding approval. The tolerance ranges of -25% to +50% are too large. A more industry-accepted range is +/-10%.

⁷ LCIRP Mar 31 2021 Supplement, Appendix E-3; BPA 1-006, 10-01/21 Attachment; BPA 6-008, 11/29/21 Attachment

⁸ Data Request BPA 8-004: The following factors are used by the PTX tool to create a health index → Normal degradation, abnormal thermal condition, abnormal electrical condition, abnormal core condition, oil quality, and age.

Business Process Audit of PSCNH (Eversource) DE 19-057

V. Pack Monadnock Distribution Line Rebuild (2017-2021)⁹

1 - Planning violations: This off-road, 1-phase distribution line, was not up to code and could present a safety hazard to the public following a request by a third-party telecom company to attach equipment to the line.

2 - Multiple alternatives were considered and reviewed with external stakeholders (due to the sensitivity of the site), including overhead and underground options.

- Project plans were revised to incorporate feedback. The Company continued communications with stakeholders throughout the pre-and post-construction phases.
- The best overall solution was to reconductor with tree wire and upgrade with stronger poles to accommodate additional equipment and better withstand adverse weather conditions.
- Potential NWA solutions were not applicable in this case.

3 - In 2020, the Company submitted permit applications. All approvals were secured in time to complete line construction in 2021.

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** Maintaining regular communications with stakeholders throughout all project phases (planning, construction, commissioning) was effective on this project and should be a standard process for all projects.

VI. Pemigewasset Transformer Project (2017-2020)¹⁰

1 - Planning violations: (N-1) transformer violation; and (N-1) bus fault violation.

2 - Five (5) alternatives were considered.

- Alternative #2 was selected as the preferred alternative using a decision matrix with weighting factors.
- Alternative #2 was neither the highest nor the lowest cost but was considered the best overall technical solution since it resolved (N-1) violations at adjacent substations (Ashland and Laconia).
- NWA status is unknown since it was not included in the PAF.

4 - Funding approval process: (details below)

⁹ LCIRP Mar 31 2021 Supplement, Appendix F-1; Data Requests BPA 9-009; BPA 9-007; BPA 9-006

¹⁰ Data Request BPA 8-002; DE 19-057 dated 07-19-21; Data Request BPA 5-010

Business Process Audit of PSCNH (Eversource) DE 19-057

- PAF: \$4,063,000 - February 14, 2018 (EPAC approved)
- SFR: \$2,754,000 - June 10, 2020 (EPAC approved)
- SFR (revised): \$3,700,000 - April 14 2021
- The \$4.063M PAF included a "Project Checklist" where the initiator indicated a "field constructability review (had) been completed." However, this was only a cursory review since a detailed site walk-through (constructability review) was not conducted until 2019.
- The \$2.754M SFR was to cover a larger control house (the existing control house is too small), bringing the total funding request to \$6.817M.
- The \$2.754M SFR was replaced with a larger \$3.7M SFR to cover engineering costs (internal + outside engineering firm) to correct a transformer issue (synch scope wiring error discovered during initial energization testing), animal protection, smart grid enhancements, and improperly (by the outside engineering firm) accounted for Company overhead costs. The PAF + revised SFR totaled \$7.7M (which EPAC approved on 4/14/21). However, a PUC \$900,000 disallowance occurred due to PSNH's failure to hold the primary contractor liable for the wiring error.

Lessons learned per the Company:

- The legacy authorization process was in place for this project (i.e., prior to 2018 capital approval process changes),¹¹ meaning PAF completion did not follow the new capital SDC/EPAC approval process which requires engineering to validate major assumptions prior to submitting the PAFs.
- Indirect cost estimates in the original PAF were prepared by an outside engineering firm that did not properly account for Company overheads.
- The Company believes animal protection should have been submitted for separate funding approval since it was not included in the original PAF.
- Better checks and balances and communications were needed throughout this project. Improvements made by the Company due in part to this project include the following:¹²
 - Formation of an Engineering Project Controls Group in late 2019.
 - Creation of an *Administrative Procedure M7-EN-2000 Engineering Deliverables* effective 7/1/20.

¹¹ DE 19-057, 07-19-21, page 22

¹² Data Request BPA 5-010

Business Process Audit of PSCNH (Eversource) DE 19-057

- **RCG conclusion:** Better attention to engineering design details and project oversight might have prevented issues with control house size requirements after initial funding approval had been received; e.g., the increased number of switchgear bays should have been an early red flag.
- **RCG conclusion:** The new capital approval process might have reduced or eliminated the need for supplemental funding requests.

VII. Reconductor New Boston Road, Bedford (2020-2021)¹³

NOTE: The New Boston Road Project was submitted by the Company as a typical distribution capital project. A comprehensive project timeline was overlaid on the process flow chart provided with Data Request BPA 8-005.

1 - Planning violations: Major load imbalance; and potential low-voltage issues.

2 - Three alternatives were considered. Only the preferred alternative met all technical requirements.

- Preferred alternative: Replace 1-phase conductor with 3-phase 477 spacer cable. Redistribute load from phase C (1-phase) to two new phases (A & B). Replace the single-phase recloser with the three-phase recloser. Collateral benefits: Contributes to establishing a long-needed circuit tie between circuits 3194X1 and 322X10, improving reliability. Spacer cable improves resiliency.
- NWA status is unknown since it was not included in the PAF.

3 - Funding approval process:

- Challenge Session: September 2, 2020 (delayed from Aug)
- PAF: \$825,000 - February 11, 2021 (approved by NH-PAC)
 - Funding estimates were based on historical cost-per-foot values and considered limited risk since the project involved standard overhead construction. The Company's preference moving forward is to have the design completed and actual construction bids in hand (if using contract resources) before presenting full funding requests for approval.
- A preliminary engineering design was completed in January 2021.
- An initial, high-level constructability review with Electric Field Operations was conducted in January 2021.

¹³ Data Request BPA 8-005

Business Process Audit of PSCNH (Eversource) DE 19-057

- A PAF was created in January 2021 (and approved in February as indicated above).
- Detailed engineering constructability reviews were conducted in April 2021 (after PAF approval). While constructability reviews are required for all distribution line projects, *formal constructability documentation was not required at the time. Going forward, the Company intends to make this a requirement.*

Lessons learned per the Company:

No specific lessons learned were recorded by the Company for this project. However, lessons learned (documented on pages 3-4 of BPA 8-005) accumulated from similar projects (per Data Request BPA 8-005) follow:

- If outside resources are to be used, estimates should be based on results from a competitive bidding process.
- Full funding requests should include contingency amounts for items such as ledge pole sets, Company pole sets in non-Company maintenance areas, and other potential unknown costs.
- Overall project cost estimates should include:
 - Tree-trimming costs from the Vegetation Management Department.
 - Internal labor costs for items such as recloser settings development, equipment testing, commissioning, and project management which are not in the compatible units of the Work Management System (Maximo).
 - Labor costs for construction representatives.

VIII. West Rye Substation Rebuild (2016-2018)¹⁴

1 - Planning violations: Unhealthy transformers (age, gassing); obsolete equipment¹⁵; loading issues; and low voltage issues.

2 - Two (2) alternatives were considered. Only the preferred alternative met all technical and environmental requirements.

- Preferred alternative: Replace two 1.5 MVA 34.5-4.16 kV substation transformers with one 10/12 MVA 34.5 - 12.47 kV substation (Eversource standard transformer size). Install 3 reclosers along with RTUs (for distribution automation).

¹⁴ Data Requests BPA 7-005; BPA 11-001; DE 19-057 dated 12-23-19

¹⁵ Replacement parts are no longer available to maintain the equipment.

Business Process Audit of PSCNH (Eversource) DE 19-057

- NWA status is unknown as it was not included in the PAF.

3 - Funding approval process:

- PAF: \$1,303,000 - April 12, 2016
- SFR #1: \$286,189 - July 20, 2017
- SFR #2: \$712,118 - February 28, 2018
- SFR #3: \$364,000 - September 28, 2018
- SFR #4: \$524,597 - October 4, 2019
- Total Funding after SFRs = \$3,190,715 (245% increase)

4 - **SFR #1:** To include design/materials/construction for mobile transformer tap on 3105X line. More than expected contractor resources were used for design work (an outside consultant was used for all engineering/design). More than expected material costs. Station service, PTs, site expansion, fencing, grounding, and stoning were not included in the original estimate.

5 - **SFR #2:** To cover increased costs for construction, testing, and commissioning based on actual bid pricing. The work scope for line taps was not appropriately defined. Responsible parties were not clearly identified. ROW clearing and environmental monitoring were not considered. Oversights occurred due to SFR #1 not being written by the project manager, but by the engineering lead. The Company indicated this was due to the construction window only being 3 months long, and issues arose after construction had started. Issues also occurred with the closeout and material reconciliation processes.

6 - **SFR #3:** To cover increased costs by the construction company to remedy civil and electrical design issues in the field. The materials ordered differed from the drawing specifications. Other issues included poor materials handling, discrepancies between internal/external designs, discrepancies in stock-coded materials, and wiring discrepancies in pre-wired junction boxes.

7 - **SFR #4:** To cover a scope increase (line work) after the start of new substation construction due to a lack of clarity on the demarcation between line costs tied to the substation and line costs associated with a voltage conversion project. Antenna/radio materials were also not included in the original work scope because the protection and control bill of materials was not available until after the construction contractor had been awarded the job. Animal protection materials were also not included in SFR #3 (only the labor to install the materials was included in SFR #3). Other contributing factors for SFR #4: Materials previously missed by the contractor and Eversource during the bidding process; siting and construction services were higher than expected; testing and commissioning services were needed longer than expected; property taxes were not included in any of the previous SFRs or the original PAF, and indirect costs increased more than expected between 2017 and 2018.

Lessons learned per the Company:

Business Process Audit of PSCNH (Eversource) DE 19-057

- Lessons learned taken from SFR #3 (as submitted):
 - Project managers (PMs) and Engineering groups should work together in the estimating process to ensure checklists and documentation are complete.
 - Cost analysts need to use updated overhead and loader costs.
 - PMs should not submit SFRs before approving any field changes not already in the budget.
- **RCG conclusion:** More detailed documentation, more complete explanations and better communications are needed from project inception through project completion to facilitate “a more administratively efficient review process for Staff and Commission.”¹⁶

IX. Viper Replacement Project (2018-2018)¹⁷

1 - Violations: Reliability/safety concerns due to an installed recloser vacuum bottle defect that could result in violent failures. Recloser refurbishment and/or replacement needed ASAP (262 units). The recloser defect was discovered after 15 field failures. “It was kind of scary because we had so many failures in a short amount of time. We were worried about having some major reliability impacts while waiting for vendor repairs.”¹⁸

2 - This project was not a typical reliability improvement or load-driven project due to reliability/safety concerns with defective reclosers and negotiations with suppliers.

3 - Solution alternatives:

- **Alternative #1** - Replace defective reclosers with rebuilt units at zero material costs and minimal protection-and-control engineering costs, temporarily bypassing the defective units until rebuilt units could be delivered and installed (5-week estimate).
- **Alternative #2** (preferred alternative) - The Company’s senior management decided to expedite the project due to safety/reliability concerns by acquiring replacement equipment from alternative recloser vendors, substantially increasing material and labor costs. Since it was not possible to determine which defective reclosers would fail, expedited replacement of all affected units was approved by Company management
 - Refurbish and reinstall 165 defective reclosers.

¹⁶ DE 19-057, 12-01-20, page 52, lines 21-23

¹⁷ Data Requests BPA 9-012; BPA 9-013; BPA 9-014; DE-057, DR TS2-056 dated 10/28/19; DE 19-057, DR Staff 12-045 dated 09/20/19, Attachment Staff 12-045 AE

¹⁸ Interview #34

Business Process Audit of PSCNH (Eversource) DE 19-057

- Replace 97 defective reclosers with alternative vendor equipment.
 - Refurbished reclosers (165 units) are to be redeployed when needed on the distribution system at \$0.00 material cost. Since the defect was known and corrected by the manufacturer, the Company was confident refurbished units would perform reliably.¹⁹
- **NWA** alternatives were not considered applicable and as a result, were not investigated.

4 - Funding approval process:

- PAF: \$950,000 - January 22 2018
- SFR: \$8,929,000 - February 27 2018
- Total Funding Request after SFRs: \$9,879,000
- Total Project Costs: \$5,796,925 [approximately \$4M lower than SFR due to lower-than-expected defective recloser replacement costs (\$7,065 each instead of \$13,000); lower-than-expected alternative vendor costs (\$61,288 each instead of \$75,000); and lower-than-expected indirect costs of \$1,100,000].
- The February 17 2018 SFR was submitted immediately after the original PAF to switch the project from Alternative #1 to the highly expedited Alternative #2.

Lessons learned per the Company:

- The Viper project occurred prior to the new capital project approval process. Today, this kind of project would be managed by the Director of NH Distribution Engineering and his team working with the Protection & Control (P&C) group and approved by the NH-PAC (since it was a distribution line project). SDC/EPAC approvals would not be required since the project was not a substation project.
- If expedited project scenarios are foreseen as a possibility, the fiscal impacts of these scenarios should be included in the PAFs.²⁰
- **RCG conclusion:** The value of reliability and safety should have been quantified on PAF and SFR forms to justify expediting defective recloser replacements at substantially higher costs.

¹⁹ Data Request BPA 9-013

²⁰ Data Request BPA 9-014

Business Process Audit of PSCNH (Eversource) DE 19-057

- **RCG conclusion:** The Company should have presented a more rigorous financial analysis to demonstrate due diligence in obtaining the least-cost supplier pricing.
- **RCG conclusion:** The Company should have presented a more rigorous engineering analysis to quantify why only 97 defective reclosers (out of a total number of 262) had to be replaced with alternative vendor equipment.
- **RCG conclusion:** The Company should have provided more detailed and easier-to-understand documentation with the filing²¹ to make it easier for Staff to evaluate what had been done and why additional funding was needed/justified.

X. Rimmon Substation Animal Protection (2019-2022)²²

NOTE: The Rimmon SS Animal Protection Project was submitted by the Company as a typical substation capital project. A comprehensive project timeline was overlaid on the process flow chart provided with Data Request BPA 8-005.

1 - Violations: Outages caused by ravens. Ravens damaged traditional animal coverings on insulators by pecking away at them. Eventually, the coverings failed, and outages ensued.²³ The problem began in 2018 with 10 outages caused by ravens.

2 - Eight (8) alternatives were considered. Alternative #1 was initially selected but rejected following an SDC review/challenge. Alternative #6 was ultimately selected (to install lasers as a deterrent) as the preferred alternative.

- NWA is unknown since it was not addressed in the PAF.

3 - Funding approval process:

- SSF #1: no funding request - January 7, 2019 SDC
- IFRF: \$100,000 - June 10 2019
- SSF #2: Eight Alternatives - January 21, 2020 SDC
- Alternative #1 was first proposed to the SDC at a cost of \$4,500,000. SDC challenges led to a much cheaper alternative (Alternative # 6) at a cost of only \$339,000.

4 - Detailed documentation was maintained throughout the funding approval process including detailed budget estimates for all eight alternatives, site drawings, site pictures, completed constructability review forms, control panel layouts, and a project scope document.

Lessons learned per the Company:

²¹ DE 19-057, 10/28/2019

²² Data Request BPA 8-003; BPA 9-018

²³ Interview #73

Business Process Audit of PSCNH (Eversource) DE 19-057

- Documentation must be *clear*; justification must be in terms of asset health or maintenance record if asset-based; or must be tied to specific planning criteria if reliability based.
- SDC/EPAC challenges resulted in a more cost-effective solution than would not have otherwise been discovered.
- More detailed cost estimates provided a more accurate basis for comparing alternative solutions which is consistent with the new process.
- Conducting field constructability reviews *after* detailed designs are completed validates assumptions and identifies outstanding issues/risks.
- Metal-clad switchgear offers better animal protection than open-air switchgear and is more secure.²⁴
- **RCG conclusion:** This project is a good example of how SDC/EPAC challenges can lead to lower-cost solutions while meeting technical and environmental objectives.

XI. Goffstown Substation Elimination – Phase 1²⁵

A full-funding PAF was submitted on 4/27/21 along with two of five alternatives. In a Goffstown System Planning Study published November 2019, five (5) alternatives were evaluated, including an NWA option.

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** All five alternatives should have been included in the PAF for completeness.

XII. Replace Notre Dame Substation with MITS and Dunbarton Road Substation with Pad-mounted Step Transformer²⁶

This project was not included in the 2021 capital budget, but the Company plans to submit it for future consideration. Estimated cost: \$3,512,000.

The proposed use of MITS (Modular Integrated Transportable Substation) technology in this project is a good example of how engineering and construction costs can be saved by using

²⁴ Interview #73

²⁵ Data Request BPA 10-001 and Attachments

²⁶ Data Request BPA 1-014 and Attachment B

Business Process Audit of PSCNH (Eversource) DE 19-057

modular substation designs. MITS was also considered for the Milford Substation and there did seem to be potential cost savings, but the MITS option was not selected as a preferred alternative.²⁷

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** Where feasible and ratings permit, modular substation designs should be more widely considered. Modular substations are rapidly deployable and highly standardized compared to traditional substation designs, reducing engineering and construction costs.

2020 Design Violations Summary Report - Projects (Appendix A) (Data Request BPA 1-006)

Thirty-seven (37) bulk substation projects and twelve (12) non-bulk substation projects were identified in the *2020 Design Violations Summary Report*²⁸. None have moved through the capital approval process as more study is needed.

Lessons learned per the Company:

- None was given.
- **RCG conclusion:** Of the 49 projects (37 + 12) in the *2020 Design Violations Summary Report*, only two were flagged as potential NWA candidates: Loudon 31W1 and 31W2; and Hanover Street 16W3. Per DSPG 2020 requirements, the NWA Framework screening tool is to be used to evaluate potential NWA solutions. However, it is not known if the NWA tool had been used for all projects. Nevertheless, NWA status should be included on the PAF forms, even if it is only a statement that NWA was not applicable due to the project being asset-condition based (for example). This has **not** been a Company practice and has led to NWA questions when reviewing PAF forms.

²⁷ Interview #61

²⁸ Attachment Data Request BPA 1-006

Solution Selection Form

Project Title:	Project Number:
Date Prepared: Click drop-down to enter date	Company: Choose an item
Organization: Choose an item	Class(es) of Plant: Choose an item
Project Initiator:	Project Category: Choose an item
Managing Organization: Choose an item	Schedule ID#:
Project Manager:	Project Type: Choose an item
Project Sponsor:	Project Purpose:
Estimated in service date:	EJ Community Impact: Choose an item
Conceptual Grade Cost Estimate (preferred solution):	
Facility Type (check all that apply): <input type="checkbox"/> PTF <input type="checkbox"/> non-PTF <input type="checkbox"/> local PTF <input type="checkbox"/> Distribution <input type="checkbox"/> N/A (General Plant) <input type="checkbox"/> BPS <input type="checkbox"/> BES <input type="checkbox"/> CIP	

When completing this form =>

Follow instructions contained in 'Solution Selection Form - Guide - 2023-12-07' located here: <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>

Consult JA-AM-2001-A Capital Project Approval Process for process guidance.

<\\nu.com\data\SharedData\EPAC\Administrative>

For additional support please reach out to solutiondesigncommittee@eversource.com

[1] Project Need Statement

[2] Project Objectives

[3] Alternatives Considered with Cost Estimates

Environmental Justice Considerations shall be included as part of the alternative analysis.

[4] Project Scope (Preferred Solution)

[5] Project Schedule

Add additional key milestones specific to this project as needed.

Milestone	Scheduled Completion Date
IFR Approval	
SDC Approval	
Conceptual Design Completion	
EPAC Partial Funding Approval (for applicable projects)	
EPAC Full Funding Approval	
Start of Construction	
Project In-Service Date (ISD)	
Project Need Date (for applicable projects)	

[6] References

References
1.
2.
3.
4.
5.

[7] Attachments (One-Line Diagrams, Images, etc.)

Please make sure all attachments provided here are referenced above in the appropriate section of the PAF with the correct attachment number.

Attachments
A. Cost Estimate
B.
C.
D.
E.
F.

[8] Preliminary Project Checklist (Preferred Solution)

PLANNING	
Is a NX-9 required?	Choose an item
Is an ISO-NE PAC presentation required?	Choose an item
Is a PPA required?	Choose an item
Is a TCA Application Required?	Choose an item
ENVIRONMENTAL JUSTICE COMMUNITIES	
Is any part of this project in an Environmental Justice Community?	Choose an item
Was the Equity Framework Checklist completed?	Choose an item
Has Project Services established an enhanced outreach plan per State Regulatory requirements?	Choose an item

Solution Selection Form

Project Title: <i>Short descriptive title that best describes the project. If project has already received initial or partial funding, project title should remain constant throughout the project lifecycle and match prior authorization documents.</i>	Project Number: <i>The Power Plan project number. For assistance securing a project number, send an email to tranEPAC@eversource.com</i>
Date Prepared: <i>Date SSF submitted to EPAC or state PAC administrator</i>	Company/ies: <i>Select the region from the dropdown list– Eversource “CT”, “EMA”, WMA or “NH”. If multiple regions, type in name of additional regions after the dropdown (example “Eversource CT, Eversource NH”).</i>
Organization: <i>Select the Director’s organization that is preparing the SSF from the dropdown list.</i>	Class(es) of Plant: <i>Select the Plant Class identified in the Plant Accounting Manuals (i.e. T SS, T Line, D SS, D Street, Telecomm, or Other) from the dropdown list. If multiple classes of plant, type in name of additional classes after the dropdown (example “T SS, T Line”).</i>
Project Initiator: <i>Typically engineer level</i>	Project Category: <i>See file Project Budget Categories.xlsx in the folder: N:\EPAC\Administrative\ and select the appropriate project budget category from the dropdown list (example System Planning projects to choose “Planning (T)” and Interconnection/Generation Projects to choose “Interconnection/Generation”). If project includes multiple categories, type in the name of additional categories after the dropdown (example, “Stations-Transformer, Circuit Breakers”).</i>
Managing Organization: <i>Select what organization will own project management responsibilities for the project</i>	Schedule ID#: <i>The Primavera P6 schedule ID</i>
Project Manager: <i>Enter the name of the PM</i>	Project Type: <i>Select one of “Specific”, “Annual”, “Prelim Project”, or “Program” from the dropdown list.</i>
Project Sponsor: <i>Typically the initiator’s director</i>	Project Purpose: <i>The type of need the project is solving, capacity, reliability, asset condition interconnection, etc.</i>
Estimated in service date: <i>Best estimate at least by Quarter – make sure this matches the date in the project schedule table below</i>	EJ Community Impact: <i>Does this project impact an Environmental Justice (EJ) Community, select Yes or No</i>
Conceptual Grade Cost Estimate (preferred solution): <i>Enter Conceptual Grade Cost Estimate for the preferred solution. If multiple project numbers listed, specify request amount for each project number. If project is reimbursable, state what percentage is reimbursable. If multiple facility types, designate by project number (example, 404040 PTF, 404041 non-PTF in the total request cell</i>	
Facility Type: <i>Check boxes for “PTF”, “Non-PTF”, “local PTF” and/or “Distribution” (check as many as apply). Use General Plant when applicable. Mark and BPS when applicable.</i>	

SSF formatting note: All responses should be black, size 11, Arial font. Paragraphs should be spaced with a 1.15 multiple with 10pt spacing after each paragraph. The SSF header and footer should not be modified unless the SSF document needs to be specially marked for CIP or CEII reasons.

General Notes

- After submitting a request to solutiondesigncommittee@eversource.com the Project Solutions team will perform a first line review of the request. SSF should be submitted as a word file.
 - Project Solutions review feedback will be sent back to the initiator embedded as tracked changes and review comments within the originally submitted word document. A deadline to incorporate Project Solutions feedback into the SSF (and attachments) will be included in the Project Solutions feedback email.
 - Project Solutions team feedback is based on adherence to procedural requirements and general best practices for SSF included information, content and data; formatting, grammar and spelling; etc
 - For Revised SSFs –the FINAL Word version of the original SSF should be used and tracked changes made to the FINAL WORD version should be submitted to solutiondesigncommittee@eversource.com. If needed, please request the original Word SSF from solutiondesigncommittee@eversource.com. Include any other necessary attachments as well.
-
- Consult JA-AM-2001-A Capital Project Approval Process for process guidance. [\\nu.com\data\SharedData\EPAC\Administrative](https://nu.com\data/SharedData/EPAC/Administrative)
 - The information required (need, objectives, scope of preferred solution, cost estimate(s), and alternatives analysis) can be supplemented with attachments (i.e. MS Word, MS PowerPoint, MS Excel, PDF files).
 - Attachments should be submitted as separate files and not embedded within this form.
 - Previously approved Initial Funding Request forms or other approved authorizations should be included with the submission of this form as a separate attachment.

[1] Project Need Statement

- Description of the problem that exists which this project is intending to solve.
- Detailed explanation of the drivers behind why this project is necessary (i.e. specific planning criteria violations, aging infrastructure/obsolete equipment, regulatory requirement, interconnection requirement, asset condition, etc.).
- Provide supporting detail on the existing equipment and conditions: reference recent testing, inspection and maintenance data; note the installation date/age of existing equipment and any lack of available replacement parts; etc.

[2] Project Objectives

What the project objectives are and how achieving the project objectives will effectively resolve the existing problem.

[3] Alternatives Considered with Cost Estimates

- *Provide a list of the alternatives evaluated with estimated costs for each alternative (including the preferred alternative).*
- *Environmental Justice Considerations shall be included as part of the alternative analysis.*
- *List and describe all electrical and routing alternatives considered along with their cost estimates.*
- *Include a project scope summary for each alternative. For the preferred alternative save project scope details for the Project Scope section.*
- *Include the pros and cons of each alternative as well as challenges and potential risks.*
- *Explain why the preferred alternative is the chosen solution when weighed against each non-preferred alternative.*
- *Provide a summary of any non-wires alternatives analysis conducted along with reasoning for dispositioning the non-wires alternatives and the cost estimates.*
- *Describe the customer/community impacts of the preferred solution and alternatives.*

[4] Project Scope (preferred solution)

- *Detail what will be done, how it will be done and when, and by whom.*
- *For projects with multiple locations, lines and/or substations, organize scope information by individual location.*
- *Utilize tables whenever possible to organize scope information.*
- *Detail scope accomplished to this point.*
- *Include material quantity, and details such as make, manufacturer, and model if available, as well as any guidance or restrictions to provide bounds on the scope of the project.*
- *For replacement projects identify current existing equipment that will be removed as well as equipment to be installed.*
- *Include scope from all pertinent disciplines (i.e. Engineering, siting and outreach, environmental, civil and electrical construction, etc.).*
- *Scope should match the scope listed in the backup cost estimate.*
- *Include reference to the constructability review (if completed) with the date of the review and any pertinent information from the constructability review.*
- *For SS project include impacts to station batteries, control house space and noise impact if transformers are involved.*

[5] Project Schedule

- *Utilize the appropriate list of required milestones for this funding request type.*
- *Reference JA-AM-2001-A for the required milestones listed by funding request type.*
- *Add additional milestones as needed, including engineering, procurement, permitting, construction, partial funding approval milestones to capture the major dates of the project.*
- *If applicable, include dates for milestones/phases already completed or in progress.*
- *Mark non-applicable milestones N/A*
- *Ensure Milestone information contained in this table matches the project P6 schedule, if applicable. Reference the P6 attachment below the milestone table.*

[6] References

References
1.
2.
3.
4.
5.

- *List any references useful for PAF review, including prior funding authorization forms and any documents or standards referenced in sections above.*

[7] Attachments (one-line diagrams, images, etc.)

Please make sure all attachments provided here are referenced above in the appropriate section of the SSF with the correct attachment number.

Attachments
A. Cost Estimate
B.
C.
D.
E.
F.

- *Identify multiple cost estimate attachments as A1, A2, A3 etc. Use same methodology for other attachments as well.*
- *Explain why standard attachments are not included*
- *Include any applicable previous submittals for this project and program submittals as attachments.*

[8] Preliminary Project Checklist (for the preferred solution)

PLANNING	
Is a NX-9 required?	Choose an item _____
Is an ISO-NE PAC presentation required?	Choose an item _____
Is a PPA required?	Choose an item _____
Is a TCA Application Required?	Choose an item _____
ENVIRONMENTAL JUSTICE COMMUNITIES	
Is any part of this project in an Environmental Justice Community?	Choose an item _____
Was the Equity Framework Checklist completed?	Choose an item _____
Has Project Services established an enhanced outreach plan per State Regulatory requirements?	Choose an item _____

PLANNING

Is a NX-9 required?	Identify if a thermal ratings update is required, including cable sizing, conductor length, limiting element changes, etc.
Is an ISO-NE PAC presentation required?	Identify if criteria are met to prepare a presentation for the ISO-NE Planning Advisory Committee. Note if the project has already been presented to ISO-NE.
Is a Proposed Plan Application (PPA) required?	Identify if a Proposed Plan Application is needed.
Is a Transmission Cost Allocation (TCA) Application Required?	Identify if an ISO-NE transmission cost allocation application is required.

ENVIRONMENTAL JUSTICE COMMUNITIES

Is any part of this project in an Environmental Justice Community?	Yes or No Equity and Environmental Justice team will confirm
Was the Equity Framework Checklist Completed?	Yes or No Equity and Environmental Justice team will confirm
Has Project Services established an enhanced outreach plan per State Regulatory requirements?	Yes or No Include details of what community impacts may result from the project and any mitigations to be made to minimize those impacts in the Regulatory Approval section.

Operations Project Authorization Form

Project Title:	Project Number:
Date Prepared: Click drop-down to enter date	Company: Choose an item
Organization: Choose an item	Class(es) of Plant: Choose an item
Project Initiator:	Project Category: Choose an item
Managing Organization: Choose an item	Schedule ID#:
Project Manager:	Project Type: Choose an item
Project Sponsor:	Capital Investment part of original Op Plan: Choose an item
Estimated in service date:	Emergency Related Request? Choose an item
Eng./Constr. Resources Budgeted? Choose an item	Facility Type (check all that apply): <input type="checkbox"/> PTF <input type="checkbox"/> non-PTF <input type="checkbox"/> local PTF <input type="checkbox"/> Distribution <input type="checkbox"/> N/A (General Plant)
EJ Community: Choose an item	Authorization Type: Choose an item
Total Capital Request:	

[1] Executive Summary

When completing this form =>

Follow instructions contained in 'Project Authorization Form - Guide - 2022-01-01' located here: \\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms

For additional support please reach out to tranepac@eversource.com

Detail other costs, project risk items and their allocations:

Risk	Allocation
1. <i>-Enter First Risk Item Here-</i>	\$
2.	\$
3.	\$
4.	\$
5.	\$
Total	\$0

Explain unique payment provisions, if applicable:

Identify and detail any unique O&M impacts resulting from this project:

[3] Technical Justification

Project Need, Objective and Justification

Project Scope

Substation Equipment *(use as applicable, delete if N/A)*

Station	Device Position / Nomenclature	Device Removals <i>include manufacturer</i>	Device Additions <i>include manufacturer</i>

Line Inspection Report *(use as applicable, delete if N/A)*

XXXX Line Report	
Total structures	0
Steel lattice structures	0
Steel monopole structures	0
Wood structures	0
Planned Replacements or Removals	0
Original structures remaining	0

XXXX Inspection Report	
Priority A	0
Priority B	0
Priority C	0
Priority D	0
Priority Rating	
Priority A	No defects found
Priority B	Minimal defect; Repair as needed
Priority C	Moderate defect. Repair or replace under next scheduled maintenance
Priority D	Severe defect; Replacement recommended

Background

[4] Alternatives Considered

Environmental Justice Considerations shall be included as part of the alternative analysis

[5] Project Schedule

Include required milestones as outlined in Capital Project Approval Process Job Aid JA-AM-2001-A. Add additional key milestones specific to this project as needed.

Milestone	Scheduled Completion Date
IFR Approval	
SDC Approval (for applicable projects)	
Conversion of Tx development costs, 183 to 107 (applicable to projects that require SSF approval and/or ISO preferred alternative selection)	
EPAC Partial Funding Approval (for applicable projects)	
Preliminary Design Completion (or latest pre-full funding design phase)	
EPAC Full Funding Approval	
Siting Approval (for applicable projects)	
Start of Construction	
Project In-Service Date (ISD)	
Project Need Date (for applicable projects)	
ISO Related Milestones: (for applicable projects)	
<ul style="list-style-type: none"> • ISO Preferred Alternative Selected 	
<ul style="list-style-type: none"> • PAC Presentation 	
<ul style="list-style-type: none"> • TCA Submittal 	

[6] Regulatory Approvals

EJ Community Considerations:

For projects requiring environmental justice community considerations per required state regulatory requirements, detail what community impacts may result from the project and any mitigations to be made to minimize those impacts.

[7] Risk and Risk Mitigation Plans

Contingency:

Risk Mitigation:

Risk	Mitigation
1. -Enter First Risk Item Here-	
2.	
3.	
4.	
5.	
Total	

[8] References

References
1.
2.
3.
4.
5.

[9] Attachments (One-Line Diagrams, Images, etc.)

Please make sure all attachments provided here are referenced above in the appropriate section of the PAF with the correct attachment number.

Attachment	Included in Submittal?
A. Cost Estimate	YES / NO / N/A
B. P6 Schedule	YES / NO / N/A
C. Constructability Review	YES / NO / N/A
D. System and Station One-Lines	YES / NO / N/A
E.	YES / NO / N/A
F.	YES / NO / N/A

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.

Project Checklist - Transmission & Substation Capital Project	
Project Name:	Project Number:
Facility Type:	
<input type="checkbox"/> BPS <input type="checkbox"/> BES <input type="checkbox"/> PTF <input type="checkbox"/> local PTF <input type="checkbox"/> non-PTF <input type="checkbox"/> CIP <input type="checkbox"/> Distribution <input type="checkbox"/> General Plant <input type="checkbox"/> CONVEX <input type="checkbox"/> SCADA	
PLANNING	
Is a NX-9 required?	<u>Choose an item</u>
Is an ISO-NE PAC presentation required?	<u>Choose an item</u>
ISO-NE Presentation Date (if completed):	<u>Enter Date</u>
Cost in ISO-NE Presentation (\$M) (if completed):	<u>Enter Cost (\$M)</u>
Is a PPA required?	<u>Choose an item</u>
ISO-NE Approval Date (if completed):	<u>Enter Date</u>
Is a TCA Application Required?	<u>Choose an item</u>
TCA Submittal Date (if submitted):	<u>Enter Date</u>
Cost in TCA Submittal (\$M) (if submitted):	<u>Enter Cost (\$M)</u>
Enter ISO-NE RSP / Asset Condition ID, if assigned:	<u>Enter ISO-NE ID</u>
PLANNING/PROTECTION & CONTROLS	
Are RAS/SPS/UVLs affected?	<u>Choose an item</u>
OPERATIONS	
Outage Required?	<input type="checkbox"/> Primary Equipment (Power Transfer) <input type="checkbox"/> Secondary Equipment (P&C only) <input type="checkbox"/> Outage Not Required
Do SCLL Conditions Exist?	<u>Choose an item</u>
Has an outage schedule been approved?	<u>Choose an item</u>
Are Operations & Maintenance procedures/training required?	<u>Choose an item</u>
STANDARDS	
Does the project include standard equipment and designs?	<u>Choose an item</u>
SUBSTATION ENGINEERING	
Does this impact Revenue Metering	<u>Choose an item</u>
Is preliminary short circuit/ breaker duty analysis required?	<u>Choose an item</u>
Are there any changes to the baseline audible noise?	<u>Choose an item</u>
Is there an impact to the existing ground grid?	<u>Choose an item</u>
Is a Transient Over Voltage (TOV) analysis required?	<u>Choose an item</u>

Project Checklist - Transmission & Substation Capital Project	
Project Name:	Project Number:
P&C ENGINEERING	
OP-22 - Are PMUs and DDR required?	Choose an item _____
If BPS, is an NPCC Directory #4 presentation required?	Choose an item _____
Are ISO-NE OP-24 Appendix B updates necessary?	Choose an item _____
TRANSMISSION LINE ENGINEERING	
Are there any changes that affect the baseline EMF?	Choose an item _____
Are there any changes that affect the baseline EMI?	Choose an item _____
SITING	
Has Siting reviewed this project?	Choose an item _____
Name of Siting contact:	_____ _____
Is a Siting filing required? <i>(If yes, list in regulatory approvals section)</i>	Choose an item _____
PERMITTING	
Is there any permitting required? <i>(If yes, list in regulatory approvals section)</i>	Choose an item _____
PROJECT SERVICES (OUTREACH) and ROW WORK COORDINATION	
Has Project Services reviewed this project?	Choose an item _____
Name of Project Services contact:	_____ _____
What is the level of outreach expected?	Choose an item _____
Has ROW Coordination reviewed this project?	Choose an item _____
Is this project coordinating with other existing scheduled work?	Choose an item _____
ENVIRONMENTAL JUSTICE COMMUNITIES	
Has the Equity and Environmental Justice team reviewed this project?	Choose an item _____
Name of Equity and Environmental Justice contact:	_____ _____
Is any part of this project in an Environmental Justice Community?	Choose an item _____
Was the Equity Framework Checklist completed?	Choose an item _____
Has enhanced outreach required per State Regulatory requirements been completed?	Choose an item _____
INITIATOR	
Has a field constructability review been completed?	Choose an item _____

Project Checklist - Transmission & Substation Capital Project	
Project Name:	Project Number:
INVESTMENT RECOVERY	
Does the project require development of an Investment Recovery plan?	Choose an item _____
COST ESTIMATING	
What team/firm prepared the cost estimate?	Choose an item _____
Name of the person who prepared the estimate:	_____
Was the estimate reviewed by Eversource Estimating?	Choose an item _____

Job Aid

Capital Project Approval Process

JA-AM-2001-A, Rev. 7

Process Owner:

Effective Date: 06/01/2022

John Dipaola-Tromba

John Dipaola-Tromba

Director, Business and Quality Assurance,
Transmission

Table of Contents

1	Purpose	2
2	Affected Groups	2
3	Responsibilities	3
3.1	Project Initiator	3
3.2	Project Manager (PM).....	3
3.3	Project Sponsor	4
3.4	Solution Design Committee (SDC).....	4
3.4.1	Project Types.....	4
3.5	Eversource Project Approval Committee (EPAC).....	5
3.5.1	Project Types.....	5
3.6	State Project Approval Committees (CT PAC, MPAC, and NH PAC).....	5
3.6.1	Project Types.....	6
3.7	Cost Estimating	6
4	General Instructions.....	7
4.1	Project Initiation	7
4.2	Project Initiation for Programs	8
4.3	Conceptual Engineering	8
4.4	Solution Vetting	8
4.5	Preliminary Engineering.....	9
4.6	Full Project Authorization	10
4.6.1	Program Approval	10
4.6.2	Program Release Authorization	10
4.6.3	Delegation of Authority	11
4.7	Detailed Engineering, Siting, and Permitting.....	11
4.8	Construction and Construction Variance Monitoring.....	11
4.9	Project Closeout.....	12
5	Instructions for Planned Projects \$300k or less (Annuals) including Capital Tools	12
6	Instructions for Emergent Work	13
7	Definitions & Acronyms	13
8	Revision History	16
	Attachment A, Solution Design Committee Charter.....	18
	Attachment B, Eversource Project Authorization Committee Charter.....	22
	Attachment C, State Project Approval Committee (State PAC) Charter.....	26
	Attachment D, Transmission and Substation Project Approval Process Flow Charts	30
	Attachment E, Transmission and Substation Project Approval Process Detailed Flow Chart	29
	Attachment F, Distribution Project Approval Process Flow Chart.....	30
	Attachment G, PAF Schedule Milestone Requirements	31

1 Purpose

This job aid provides instructions and guidance on the process for initiating and then obtaining technical and financial approval for capital projects within all three states. This job aid will focus on project initiation, solution vetting by the Solution Design Committee (SDC), and approval of the Project Authorization Form (PAF) by the Eversource Project Approval Committee (EPAC) for transmission and substation projects and by each of the state Project Approval Committees (state PACs) for distribution projects. The authorization forms used by each committee can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. Completed samples of each form can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms\Sample Forms>. This job aid supports the guidance contained in Accounting Policy Statement 1 (APS01), Operations Project Authorization, which can be found on the Eversource intranet at <https://eversourceenergy.sharepoint.com/sites/Accounting/SitePages/Accounting-Policies-%26-Procedures.aspx>.

2 Affected Groups

As described in Responsibilities and General Instructions, the System Planning, Asset Management, Transmission Interconnections, and Project Management groups, along with the SDC, EPAC, and state PAC committees will have primary responsibility for the project review and approval process. The following general groups will also be affected by this job aid as their participation is critical to the successful initiation, development, review, and approval of capital projects.

- Transmission Line, Substation Design, Substation Technical, Protection and Controls, Grid Modernization and Distribution Engineering
- Construction
- Scheduling
- Licensing and Permitting
- Environmental
- Siting and Project Services
- Procurement
- Investment Planning
- Operations
- Engineering Project Controls
- Transmission Project Controls

3 Responsibilities

3.1 Project Initiator

In general, Transmission and Substation projects will be initiated by either the System Planning (Reliability, Capacity, Distributed Energy Projects), Asset Management (Asset Condition Projects), Grid Modernization or Transmission Interconnections Department (Interconnection Projects). Distribution street and line projects with no substation scope will be initiated by the Distribution Engineering group. Telecom projects (aside from OPGW projects which will be initiated by the Asset Management group) will be initiated by the Telecommunications Engineering Group.

For Transmission and Substation projects, the project initiator is responsible for establishing a project by securing initial (or in some cases partial) funding. The initiator is responsible for development of the establishing document(s), typically an initial funding request (IFR), a program level PAF with initial funding for early program development or a partial funding request in some cases. The project initiator will be responsible for securing funding from state PAC for Distribution line projects.

For Transmission and Substation projects, a PM will typically be assigned at the time initial funding is procured. As outlined in section 3.2 the PM assumes responsibility for the project budget and schedule as well as organizing engineering, siting, permitting and outreach activities working with the various departments. If a project manager is assigned, the project initiator will support the PM during the engineering phases and PAF development as needed.

For applicable projects (See Section 3.4.1 below for details), the project initiator is responsible for the development of the Solution Selection Form (SSF) and presentation of the project preferred and alternative solutions to the SDC.

For projects that do not have a project manager assigned, the project initiator will be responsible for; coordinating conceptual engineering activities and conceptual cost estimates (-25%/+50%) to support alternatives analysis; coordinating preliminary engineering activities and developing an updated +/-25% planning grade cost estimate. The project initiator will then be responsible for updating the PAF and securing full funding from the EPAC or a state PAC. Once a project is fully approved and funded, project ownership transfers to the project manager for the project execution and closeout phases.

3.2 Project Manager (PM)

For projects managed by the Transmission Projects organization a PM will typically be assigned at the time initial funding is procured. The PM will own the project budget and schedule from the time of assignment. The PM is also responsible for; coordinating conceptual engineering activities and conceptual cost estimates (-25%/+50%) to support alternatives analysis; coordinating preliminary engineering activities and developing an updated +/-25% planning grade cost estimate by driving collaboration with the various engineering disciplines and affected departments. The project manager is responsible for overseeing the development of partial and full funding requests. PAFs shall include the financial and technical project details, a detailed backup cost estimate, a project checklist, the current

project schedule, a listing of required schedule milestones as shown in Attachment G, and a Constructability Review (CR) Form (CR form required for full funding requests) at least seven working days prior to the next scheduled EPAC meeting for Transmission and Substation projects or three working days prior to the next scheduled state PAC meeting for Distribution projects. For transmission projects, the detailed cost estimate must be in accordance with Attachment D to PP4 (ISO-New England Planning Procedure 4). The estimate should be formatting in-line with Transmission Project Control's Work Breakdown Structure (WBS).

The PM will also be responsible for any required supplemental approval with support from the project initiator, if necessary.

3.3 Project Sponsor

Typically, the Project Sponsor will be the director of the project initiator. The Project Sponsor will be responsible for review and approval of project documents before they are submitted to the committees for approval.

3.4 Solution Design Committee (SDC)

The SDC will serve as solution development gate keepers to ensure the best solution is selected, ensure guiding principles are followed, and drive standardization. SDC will review project alternatives, scope, and conceptual grade cost estimates during the solution vetting process. The SDC administrators will use the email address SolutionDesignCommittee@eversource.com to communicate with project initiators and for all committee communications. More information on solution vetting can be found in Section 4.4 and the full responsibilities of the SDC are contained in [Attachment A, Solution Design Committee Charter](#).

3.4.1 Project Types

The SDC will review and approve solutions for the following Transmission and Substation project types:

- System Planning – Reliability and Capacity Projects
- Asset Management – Programs (OPGW Programs, Breaker Programs, etc.), Rebuilds, Conductor/Cable Replacements, Program releases with significant scope in addition to the program.
- Transmission Interconnection Projects – Projects on track to sign Interconnection Agreements may be reviewed by the SDC at the request of the sponsoring engineering director.
- Other Telecom projects and programs

Like-for-like asset replacement projects and individual releases within defined programs with minimal scope variations will not need to be reviewed or approved by the SDC. EPAC member directors will also have discretion to determine whether a specific project or program will require review and approval by the SDC. In certain cases where there is a quorum of EPAC representatives present at the SDC, an initial or partial funding request may be presented in conjunction with an SSF for the same project at the SDC.

3.5 Eversource Project Approval Committee (EPAC)

The EPAC will be responsible for the review and approval of the technical and financial merits of transmission and substation projects. For project and program initiations, the EPAC will review and authorize Initial Funding Request Forms (IFRs) typically up to \$250,000, including Program Level PAFs with initial funding. The EPAC may also review requests for initial funding beyond \$250,000 if a larger funding amount is required to complete preliminary engineering activities. For previously initiated projects and programs, the EPAC will review partial and full funding PAFs, Program Level PAFs, and Program Release Forms. The EPAC will review conceptual grade cost estimates (-25%/+50%) for projects looking to secure partial funding and will review planning grade cost estimates (+/-25%) for projects looking to secure full funding authorization. The EPAC administrators will use the email address TranEPAC@eversource.com to communicate with project teams and for all committee communications. The full responsibilities of the EPAC are contained in [Attachment B, Eversource Project Authorization Committee Charter](#).

3.5.1 Project Types

The EPAC will review and approve the following project types:

- Planned Transmission line and/or substation projects (Transmission and Distribution substation over \$300,000 total cost)
- Transmission line and/or substation programs (OPGW Programs, Breaker Programs, etc.)
- Telecom projects that impact transmission lines and/or substations
- New or reconfiguration of a distribution substation (regardless of voltage level)
- Substation projects with transmission and distribution components will be reviewed as a package, only by the EPAC
- Customer interconnection requests that require transmission or substation work
- Emergency projects greater than \$500,000 total cost (refer to section 6 for further details)
- Any other project per the discretion of the EPAC chairperson(s)

All other distribution projects will be reviewed and approved by the state PAC (see section 3.6.1). See Section 5 for review process for transmission and substation projects less than or equal to \$300,000 total cost.

3.6 State Project Approval Committees (CT PAC, MPAC, and NH PAC)

The state PACs will be responsible for the review and approval of the technical and financial merits of Distribution projects. There will be three different project approval committees to review and approve the projects; one from each state (CT PAC, MPAC, and NH PAC).

The state PACs will review initial funding requests to develop detailed engineering and to support early establishment of projects in Eversource financial and scheduling systems. Regardless of cost, initial funding requests shall adhere to PAC approval processes and shall include a schedule by which engineering plans to complete detailed engineering, produce a planning grade cost estimate and present for full funding authorization. The state PAC committee chair will track projects that are given

approval for initial funding and ensure timely submission, review and approval of PAFs for full funding authorization. Distribution projects looking to secure full funding authorization shall develop PAFs containing a planning grade (+/-25%) cost estimate.

The full responsibilities of the state PACs are contained in [Attachment C, State Project Approval Committee \(State PAC\) Charter](#).

3.6.1 Project Types

The state PACs will review and approve the following project types:

- Overhead distribution projects greater than \$300,000.
- Underground distribution and combined overhead-underground distribution projects greater than \$1 million.
- Customer interconnection requests with total cost estimates (including indirect costs) greater than \$1 million. Customer interconnection projects less than \$1 million are reviewed and approved in PowerPlan and typically will not require review and approval by the state PAC.
- DG interconnection request without substation scope that require a new feeder (regardless of cost) or with total cost estimate greater than \$500,000. Note that DG interconnection projects with substation scope will be reviewed by EPAC as described in Section 3.5.1.)

Note that per APS01 and Operations executive management, all other underground, overhead, and underground-overhead mixed distribution projects under the dollar thresholds listed above but over \$500,000 total cost require PAF documentation. Projects \$300K or greater but less than \$500K may require PAF documentation at the discretion of the PAC committees, except for emergency projects and standard distribution underground interconnections in EMA, both of which will only require PAFs for projects \$500K or greater in all cases. These PAFs will be reviewed and approved directly in PowerPlan. The approving director can use his/her discretion to require any of these projects to be reviewed at the state PAC. All other transmission and substation projects will be reviewed and approved by the EPAC (see section 3.5.1).

3.7 Cost Estimating

The Transmission Cost Estimating team will support development of project cost estimates for Transmission and Substation projects. Depending on the complexity of the project, the approximate cost, and other factors the level of support provided by the Cost Estimating team may range from taking the lead in developing the estimate to reviewing an estimate prepared by the project team. To request support from the Cost Estimating team, project teams should complete the Estimate Request Form which can be found at [\\nu.com\data\SharedData\Estimating-Shared\2\) Estimate Templates\1\) Est Request form\Current](\\nu.com\data\SharedData\Estimating-Shared\2) Estimate Templates\1) Est Request form\Current) and submit to Cost_Estimation_Request@Eversource.com

4 General Instructions

The process to proceed with each successive phase of a capital project is designed to ensure that there is a valid need, the right solution alternatives are evaluated, the technical approach is sound, and resources are budgeted and prudently spent. The overall process flow for Transmission and Substation projects is depicted in [Attachment D, Transmission and Substation Project Approval Process Flow Charts](#). [Attachment E, Transmission and Substation Project Approval Process Detailed Flow Chart](#) is a 17"x11" flowchart with more detailed descriptions. The overall process flow for Distribution projects is depicted in [Attachment F, Distribution Project Approval Process Flow Chart](#). The initiation and major engineering and approval phases of the process flow charts correspond to the sections below.

These general instructions are for the project types listed in Sections 3.5.1 and 0. Refer to Section 5 for instructions for planned transmission and substation projects less than or equal to \$300,000. Refer to Section 6 for instructions for securing approval of emergent work.

4.1 Project Initiation

Following the identification of a project need the initiator will secure a project number. Project initiators can email TranEPAC@eversource.com for assistance securing a project number. Project initiators will then complete an IFR and submit it to EPAC via TranEPAC@eversource.com. The IFR may be used to request funding per Section 3.5. The form can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms\>. The initiator will be required to state the project need and objectives and include an explanation of the funding request amount, including a budget for conceptual and preliminary engineering activities and the required schedule milestones as shown in attachment G. The IFR may include a budget for initial internal siting and permitting preparation activities. The IFR should not include funding for detailed engineering or procurement of any material. The EPAC chairman may decide to approve the request directly or may request that the initiator present the request for input and feedback to the EPAC.

Once an IFR is approved, the EPAC administrator will send the approved form to Investment Planning to create a project and submit it for Delegation of Authority approvals in PowerPlan, the Eversource software tool for financial approval. The initial funding is obtained once delegation of authority has been performed through PowerPlan in accordance with APS01 (See [Section 4.5.3](#) for more information on Delegation of Authority Policy). Once fully approved in PowerPlan a Work Order (WO) will be assigned. The EPAC administrator will copy the Project Management on the submittal to Investment Planning so that a Project Manager can be assigned as appropriate. The Project Manager should work with their Investment Planning contact to determine the work order setup best suited for the management and execution of the project. For some projects the Project Manager role may remain with the Project Initiator, be assigned to a lead engineer, or be assigned to an individual in Maintenance and Operations.

4.2 Project Initiation for Programs

Initial funding can also be requested at the program level using the Program Level Project Authorization Form. The form can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. The funding can be used to advance specific project scope under an approved program. Sections 4.5.1 and 4.5.2 contains more information on full approval of programs and program level releases.

4.3 Conceptual Engineering

The project initiator should follow the Project Alternative Process in procedure M2-TP-2018 for the identification, development and selection of project alternatives. As described in detail in M2-TP-2018, the project manager with support from the project initiator will coordinate the following activities with input from affected departments:

- Incorporate designs from standards library and develop scope and major equipment lists for all alternatives under consideration.
- Conceptual engineering of all competitive alternatives including early field review and desktop analysis.
- Identification of key project risks with the appropriate level of detail with respect to constructability, routing, outage planning, possible Single Contingency Loss of Load (SCLL) conditions and applicable mitigation actions, siting and permitting, environmental impacts, community and external stakeholder impacts, site control, procurement, etc.
- Identification of any land rights needs.
- Develop project strategies to mitigate identified risks.
- Conceptual grade cost estimates (-25%/+50%) for all competitive alternatives (at least the preferred solution and leading alternative). Order of magnitude cost estimates (-50%/+200) should be provided for alternatives that are not competitive with the preferred solution. The project team should request support from the Cost Estimating team for all estimates.

The project team will then recommend a preferred solution and document the rationale for the choice of preferred solution. For conceptual engineering deliverable requirements refer to procedure M7-EN-2000R0 Engineering Deliverables and a listing of the deliverables found at <\\nu.com\data\SharedData\EPAC Project Deliverables>.

4.4 Solution Vetting

Prior to proceeding with Preliminary Engineering of the preferred solution, more comprehensive projects and asset condition projects at the program level will need to be reviewed and approved by the SDC (See Section 3.4.1 for list of project types the SDC will review). The project team will submit a Solution Selection Forms (SSF) to the SDC via SolutionDesignCommittee@eversource.com at least seven business days prior to the next scheduled SDC meeting. The SDC will review the SSF and confirm that the project team has selected the best solution. The SSF will require a statement of the project need and objectives, documentation of the alternatives analysis, scope and major equipment list for the preferred solution, and a conceptual grade cost estimates for the preferred solution and any competitive alternatives. The form can be found at

<\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. The full responsibilities of the SDC are contained in [Attachment A, Solution Design Committee Charter](#). Once reviewed and approved by the Solution Design Committee, projects will proceed with Preliminary Engineering.

Certain Transmission and substation projects do not require review and approval by the SDC such as like-for-like asset replacement projects and individual releases within defined programs with minimal scope variations. Questions regarding the need for a project to visit the SDC can be clarified by contacting SolutionDesignCommittee@eversource.com.

Distribution street and line projects without substation components may also require a solution vetting process. The state PAC chairperson may require more complex distribution street and line projects to complete a distribution design review prior to state PAC approval.

4.5 Preliminary Engineering

Once the project team has chosen a preferred solution with scope definition, it can proceed with preliminary engineering and development of an updated cost estimate of the preferred solution. In order to receive full funding approval, projects will require planning grade (+/-25%) cost estimates. The cost estimate shall be submitted in the form of the Project Controls work breakdown structure (WBS). The WBS format can be referenced the EPAC PAF template located at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. The project team should request support from the Cost Estimating team to develop the planning grade cost estimate.

The project team will work with the affected groups listed in Section 2 to complete more in-depth investigations, develop a mitigation plan for project risks, and refine project strategies

For preliminary engineering deliverable requirements refer to procedure M7-EN-2000R0 Engineering Deliverables and a listing of the deliverables found at <\\nu.com\data\SharedData\EPAC Project Deliverables>. Example preliminary deliverables include:

- Constructability Review
- ROW Environmental Mapping
- Preliminary Three-Line
- SS Control Enclosure Layout
- UG Plan and Profile

If the initial funding is not sufficient to complete preliminary engineering and develop a planning grade cost estimate, then the project team can prepare a PAF and make a request for partial funding at EPAC per Section 3.5. The request should generally be for the budget amount that will be required to fulfill project engineering activities, prepare a full funding request and planning grade cost estimate. For large scale projects multiple partial funding requests may be required. Partial funding may include funds for detailed engineering activities. As with IFRs, partial funding requests may include a budget for internal siting and permitting preparation activities but should not include funding for procurement of any material. The request should also include a listing of required schedule milestones as listed in Attachment G.

After a minimum of preliminary engineering is completed, the PAF will be completed and the project will be presented to either the EPAC or the state PAC for full approval and funding authorization. PAFs that will be reviewed at EPAC should be submitted to TranEPAC@eversource.com at least seven business days prior to the next scheduled EPAC meeting. For the project types listed in Section 3.4.1, the EPAC will not review full funding requests unless the project has already been approved by the Solution Design Committee. The project checklist, a Constructability Review Form, a copy of the current project schedule, a listing of required schedule milestones as shown in Attachment G and a detailed backup cost estimate in accordance with Attachment D to ISO-NE Planning Procedure 4 (PP4) must accompany the PAF.

4.6 Full Project Authorization

4.6.1 Program Approval

EPAC will review and approve Asset Management programs using the Operations Program Level Project Authorization Form. The form can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. In addition to the information required on the PAF for a regular project (need, objectives, scope, background/justification, etc.) the Program Level PAF will also require a financial evaluation completed on a unit cost basis so that the capital cost of each application of the program can be fully understood. The unit cost is often based on a similar project that has been completed.

- A listing of proposed circuits or substations by state that will be included in the scope of the program.
- An estimate of the program capital investment value by state.
- A proposed schedule for bringing forward and executing the program level releases.
- A description of the investigations that will be needed at each location to develop the scope and cost estimate at a specific site.

As described in Section 4.1.1 Program Level PAFs may also be combined with an initial funding request at the program level so that the initiator will have funds to develop the scope of the program at specific sites and bring forward full funding program release requests. Partial funding may be obtained for individual program release requests when initial funding is not sufficient to complete preliminary engineering and develop a planning grade cost estimate.

4.6.2 Program Release Authorization

Once the scope, site-specific cost estimate and constructability reviews are completed for a particular location or circuit, a Program Release Form will be submitted for full funding. The Program Release Form can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>. Each Release will summarize the scope and cost estimate at a specific location and discuss any variances between the scope or cost estimates from the expected unit costs and scope approved in the Program Level PAF. Once an individual program release is approved at EPAC, any initial funding costs that were originally charged at the program level will be journaled to the specific project, which will allow those costs to be capitalized along with the specific project and also make more budget available at the program level to

develop additional Program Release Forms. Once approved, the approval process for a Program Release Form will be the same as stated above for the full funding PAF.

4.6.3 Delegation of Authority

Once approved, the EPAC or state PAC administrator will submit the EPAC-approved PAF to Investment Planning for approvals in PowerPlan in accordance with the company Delegation of Authority Policy (DOA). The DOA specifies the capital authorization level of various company positions (manager, director, vice president, senior vice president / subsidiary president, Executive vice president, etc.). The MS Excel file "Power Plan Project Approval Trees" found at N:\EPAC\Administrative\ lists which specific individuals at each authorization level that will be required to approve projects authorized by EPAC. There are separate approval trees listed for transmission line and substation major projects and distribution substation projects. The full project funding is attained once delegation of authority has been performed through PowerPlan in accordance with APS01. PMs should include up to thirty days in project schedules to complete approvals in PowerPlan and sixty days for projects that will require Delegation of Authority approval by the Eversource Subsidiary Board.

Projects must be fully approved in PowerPlan before their scope or cost estimates can be shared publicly. This includes but is not limited to sharing cost estimates with ISO-NE, sharing cost estimates with customers for customer or interconnection projects, filing a siting or permitting application that includes a cost estimate, and conducting project outreach. If a project schedule requires the release of project information prior to full project approval in PowerPlan is possible, then a project team can request approval from EPAC to release the information. If EPAC approval is also not possible, then the project team can seek the SDC's approval to release the information.

4.7 Detailed Engineering, Siting, and Permitting

Once the project is fully authorized in PowerPlan, the project team can proceed with detailed engineering, siting and permitting application filings, project outreach, ordering major material, and other development activities.

4.8 Construction and Construction Variance Monitoring

The project manager or lead will manage the project's execution and construction while monitoring the project's spend vs. its authorized cost. In cases where the project, totaling greater than \$300K for planned work or greater than \$500K for emergent work, will exceed its APS-01 tolerances, or there is a significant change to the project's technical design or a significant change to the project's scope the project manager shall submit a Revised PAF or Supplemental Request Form (SRF) to the EPAC or state PAC.

A Revised PAF can be submitted under one or more of these conditions, given the listed condition(s) is(are) the primary driver for the change:

1. Revised PAF – Scope [Applicable to all projects]
 - Capital investment for additional units of property that were not previously part of the project scope.
 - Significant change(s) in technical design (i.e. OH vs UG, air vs. GIS, etc.)

2. Revised PAF – Pre-Construction [Applicable to projects yet to begin construction forecasting 5% or greater than their original total full funding authorization]

- Market conditions cause awarded (or to be awarded) vendor contract amount(s) for labor or material to be higher than the amount(s) for the equivalent labor or material allocation(s) in the approved full funding estimate.
- An agency, stakeholder or impacted party external to Eversource causes an uncontrollable change to the project resulting in higher project costs.
- Indirect rate(s) increase from the full funding estimate.

Projects forecasting 5% or greater than their original total full funding authorization prior to construction should consult PM management to decide if pre-construction revised authorization should be pursued. Projects forecasting over \$5M total cost will require a detailed review by Cost Estimating to corroborate the project forecast's cost increase drivers match the intent of Pre-Construction re-authorization. Project that will exceed their APS-01 tolerances must seek reauthorization, either revised or supplemental funding depending on the circumstance.

Additional requests for a Revised PAF can be evaluated on a case-by-case basis by the EPAC committee. The justification for all Revised PAFs is subject to the review and approval of the EPAC committee.

A SRF shall be submitted where the project will exceed its APS-01 tolerances in all other cases than those allowing for revised funding. Supplemental authorization requests should be prepared as soon as it is likely that the project cost is expected to increase and the updated project forecast exceeds the APS01 tolerance for the current authorization. Supplement requests should also be submitted once a scope change is identified. The SRF can be found at <\\nu.com\data\SharedData\EPAC\Administrative\EPAC Forms>.

If a supplement is approved by the EPAC or state PAC, the committee administrator will send the approved SRF to Investment Planning for submittal for Delegation of Authority approvals in PowerPlan. When determining when to submit a supplement, PMs should note that attaining full approval in PowerPlan may take up to thirty days and sixty days for projects that will require Delegation of Authority approval by the Eversource Subsidiary Board.

4.9 Project Closeout

All project documents will be closed and affected databases updated upon project closeout in accordance with [M6-PM-2001](#), Project Management Process, or applicable local project closeout process.

5 Instructions for Planned Projects \$300K or less (Annuals) including Capital Tools

Each year annual transmission and distribution substation budgets are approved and funded to support the many small planned projects that will be completed that year. Per APS01 and Operations executive management, planned transmission and distribution substation projects less than or equal to \$300,000

total cost and emergency projects less than or equal to \$500,000 total cost do not require their own PAFs.

Planned annuals require the initiator to document the work scope, justification, estimated cost and in-service date(ISC). To create a work order that will charge against one of these annual budgets for a small planned transmission or distribution substation project, the project initiator must follow the Capital Annuals Process found at [\\nu.com\data\SharedData\EPAC\Administrative](https://nu.com\data\SharedData\EPAC\Administrative). The EPAC Annuals administrative team can be contacted at CapitalAnnualsRequest@eversource.com.

6 Instructions for Emergent Work

Each year annual transmission and distribution substation budgets are approved in each region and funded to support the many small projects that classify as emergent work within that year. In the case of emergency projects to fix equipment that failed while in-service or is at high risk of imminent failure that needs to be addressed real-time not allowing for fully planned project development, only those emergency projects exceeding \$500,000 total cost will require a PAF.

Emergent annuals require the initiator to document the work scope and justification. To create a work order that will charge against one of these annual budgets for an emergency transmission or distribution substation project, the project lead must follow the Capital Annuals Process found at [\\nu.com\data\SharedData\EPAC\Administrative](https://nu.com\data\SharedData\EPAC\Administrative). The EPAC Annuals administrative team can be contacted at CapitalAnnualsRequest@eversource.com.

7 Definitions & Acronyms

Annuals	Annuals refers to the annual project budgets that are approved to support small projects and small emergent work projects.
APS	Eversource Accounting Policy Statement
Conceptual Engineering	The project design phase required to obtain a project cost estimate accurate to -25%/+50% and to generate an SSF
Conceptual Estimate	A cost estimate with target accuracy of -25% to +50%
Construction	The project phase for the implementation of an engineered project
DOA	Delegation of Authority
Detailed Engineering	The project phase following preliminary engineering. See M7-EN-2000R0 Engineering Deliverables for further details.
Emergent Work	Refers to work to fix equipment that failed while in-service or is at high risk of imminent failure that needs to be addressed real-time
Engineering Estimate	A cost estimate with target accuracy of +/-10%
EPAC	Eversource Project Approval Committee
IFC Engineering	Issue for Construction Engineering phase follows detailed engineering. IFC engineering completion is typically required to support an Engineering

	Estimate (+/-10%). See M7-EN-2000R0 Engineering Deliverables for further details.
Initial Funding	<ul style="list-style-type: none"> • Initial Funding provides exploratory early development dollars intended to facilitate refinement of the project concept, particularly the project need, justification and objectives. • Project scope and alternatives as well as a resource loaded, project schedule shall be developed. • Initial funding can support funding up to Preliminary design if the requested dollars are <\$250K (Some exceptions may be considered). • Initial Funding is not intended to support complete project design and engineering and should not fund the project beyond the Preliminary design phase. • The core project team should be assembled using Initial Funding.
IFR	Initial Funding Request Form required to initiate a project with funding and setup a Work Order, the initiator will complete an IFR and submit it to the EPAC.
ISD	In-Service Date
ISO-NE	The independent operator of New England’s bulk electric power system and transmission lines. ISO-NE manages a comprehensive regional planning process.
M2-TP-2018	The Project Alternative Strategy procedure document published by the System Planning organization.
M6-PM-2001	The Project Management Process procedure document
M6-PM-2012	Constructability Review procedure document
M7-EN-2000R0	Engineering Deliverables procedure document
PAF	Project Authorization Form required by Accounting Policy Statement 2 for the purpose of requesting authorization of capital funds for a particular project
Partial Funding	<ul style="list-style-type: none"> • Partial Funding is intended to fund design/engineering for the project as well as project support including site evaluation/prep activities, siting and outreach plans, early procurement activities (in some cases Limited Notice to Proceed for Long-Lead equipment), site testing, outage planning activities, etc. • Partial Funding should not be used to purchase material nor be used for construction activities. • Since Partial Funding typically requests >\$250K, a PAF should be completed.
Planned Annual	Scheduled capital work costing \$300K or less that is <u>not</u> to fix equipment that failed while in-service that needs to be addressed real-time
Planning Estimate	A cost estimate with target accuracy of +/-25%

PM	Project Manager
PowerPlan	Eversource financial approval tool
PP4	ISO-NE Planning Procedure 4
Preliminary Engineering	The project phase for the engineering needed to obtain a project cost estimate accurate to $\pm 25\%$ and to generate a PAF
Program Level PAF	Authorization document for programs. A program is a substation need that will be addressed at numerous sites (i.e. Oil Circuit Breaker Replacements, Relay Replacements, etc.) or a line need that will be addressed on numerous circuits (i.e. Structure Replacements, Fiber Optic Expansion, etc.)
Program Release Form	Authorization form for a specific site or circuit of an approved program.
SCLL	Single Contingency Loss of Load
SDC	Solution Design Committee is a three-state committee that reviews substation and transmission projects and programs to ensure that the best solution is selected and standardization is implemented across the company
SSF	Solution Selection Form – Document that the SDC will review and approve
SRF	Supplement Request Form
State PAC	State Project Approval Committee. There will be three state project approval committees for distribution projects: MPAC, CT PAC, and NH PAC
WBS	Work Breakdown Structure
WO	Work Order

8 Revision History

Revision 7 – June 1, 2022

- Updated Attachment G project milestones required
- Added Revised PAF – pre-construction definition to section 4.8
- Updates section 3.6, PAC Project Types
- Other minor updates

Revision 6 – January 1, 2022

- Updated dollar threshold requirements in accordance with Jan 1 2022 APS01 update
- Updated section 5 to reflect modified annuals process
- Updated section 3.6 to include updated state PAC instructions
- Update section 3.7 Cost Estimating instructions
- Updated sections 4.1, 4.3, 4.6 to add schedule milestone requirements
- Added attachment G, PAF Schedule Milestone Requirements
- Added definitions for initial funding and partial funding
- Added IFC Engineering to Attachment D and E
- Other minor updates

Revision 5 – June 1, 2020

- Added Sections 4.1.1, 4.5.1, and 4.5.2 containing description and instructions for initiating programs, Program Level PAFs, and Program Release Forms
- Added Sections 4.5.3 to add additional description of Delegation of Authority Policy
- Added Sections 5 and 6 to include instructions for securing authorization for emergent work and annual projects
- All Sections: Added detail and instructions for distribution line projects, distributed generation interconnection projects, and communications engineering projects.
- Other minor updates

Revision 4 – November 2, 2018

- Updated all sections to align with updated project lifecycle including new Project Initiation Process and Solution Design Committee Process

Revision 3

- Minor updates

Revision 2 – October 27, 2017

- All Sections: Changed from TRC and CPAC to EPAC and state PACs

Revision 1 – December 7, 2016

- 4 General Instructions – Added location of forms
- 4.2 Detailed Engineering Approval – Added requirement to complete TAF Transmission Checklist

- 5 Definitions and Acronyms – Added acronyms used in Attachment F
- 6 Summary of Changes – Added section
- Added Attachment F, TAF Transmission Checklist and Instructions

Revision 0 – August 28, 2016

- Original issue

Attachment A, Solution Design Committee Charter

Purpose

The Solution Design Committee (SDC) will serve as solution development approval committee to ensure the best solution is selected, ensure guiding principles are followed, and drive standardization. SDC will review project alternatives, scope, and conceptual grade cost estimates during the solution vetting process.

Applicability

The SDC is responsible for solution selection review of electrical Transmission and Substation projects in all three states of the following types:

- System Planning – Reliability & Capacity Projects
- Asset Management – Programs (OPGW Programs, Breaker Programs, etc.), Rebuilds, Conductor/Cable Replacements, Program releases with significant scope in addition to the program.
- Transmission Interconnection Projects – Projects on track to sign Interconnection Agreements may be reviewed by the SDC at the request of the sponsoring engineering director.

Like-for-like asset replacement projects and individual releases within defined programs with minimal scope variations will not need to be reviewed or approved by the SDC. EPAC member directors will also have discretion to determine whether a specific project will require review and approval by the SDC.

Objectives

The objectives of the SDC are as follows:

1. Confirm that the right subject matter experts from affected departments were appropriately involved in the conceptual engineering, alternatives analysis, and solution selection.
2. Confirm project teams identified and considered a robust set of alternatives when selecting the best solution in accordance with M2-TP-2018 Project Alternative Process.
3. Ensure the development of project solutions and alternatives incorporate standardized design and equipment, where practical/possible.
4. Review initial conceptual engineering, scope, and cost estimates for all potential project alternatives. Cost estimates should be of conceptual grade (-25%/+50%) for the preferred solution and competitive alternatives.
5. Review and confirm that project teams identify project risks for the preferred solution and its alternatives with the appropriate level of detail with respect to constructability, routing, outage planning, possible SCLLs, siting and permitting, environmental impacts, community and external stakeholder impacts, land rights needs and site control, procurement, etc.
6. Review and confirm project team's alternatives analyses and choice for preferred solutions and ensure the rationale is appropriately documented.
7. Coordinate with EPAC to initiate any needed process changes on at least a biennial basis.

Membership

SDC shall consist of an executive sponsor, a chairperson, voting members, an administrator, and non-voting attendees as shown on the below table. The chairperson may designate additional voting members, if required.

SDC Membership List

SDC Role	Company Position
Executive Sponsor	VP, Substation and Transmission Engineering
Co-Chairperson	Director, Substation Design Engineering
Co-Chairperson	Director, Substation Protection and Controls
Administrator(s)	As appointed by the Chairperson
Voting Member	Director, Transmission Business and Quality Assurance
Voting Member	Director(s), System Planning
Voting Member	Director, Transmission Line Engineering
Voting Member	Director, Substation Technical Engineering
Voting Member	Director, Distribution Technical Engineering
Voting Member	Director, Engineering Capital Projects
Voting Member	Director, Project Performance
Voting Member	Director(s), Transmission Project Management
Voting Member	Director, Transmission Siting and Project Services
Voting Member	Director(s), Station Operations
Voting Member	Director, Transmission Project Controls
Voting Member	Director, Engineering Project Controls
Attendee	Manager of Project Solutions
Attendee	Manager of Siting
Attendee	Manager of Project Services
Attendee	Manager of Estimating
Attendee	Manager of Asset Management
Attendee	Manager(s) of Substation Engineering
Attendee	Manager(s) of Protection and Controls
Attendee	Manager(s)/Lead(s) of Transmission Line and Civil Eng.
Attendee	Manager(s) of Substation Technical Engineering
Attendee	Manager(s) of System Planning
Attendee	Manager of Licensing and Permitting
Attendee	Manager(s) of Environmental Affairs
Attendee	Manager(s) of Procurement
Attendee	Supervisor(s)/Manager(s) of Outage and Ops Planning
Attendee	Manager of Generation Interconnections
Attendee	Manager of Operational Compliance
Attendee	Manager(s) of Transmission Line Operations
Attendee	Manager(s) of Station Operations/ Field Engineering/ System Dispatch
Attendee	Manager(s) of Systems Engineering
Attendee	Manager of ISO Policy and Economic Analysis

Roles and Responsibilities

Executive Sponsor

- Provide senior management vision, direction and feedback to the SDC
- Appoint the Chairperson(s)

Chairperson(s)

- Preside at SDC meetings
- Designate a Voting Member as an alternate to preside at meetings in his/her absence
- Solicit Voting Member appointments
- Appoint a SDC administrator
- Determine the meeting schedule and location(s)
- Approve meeting agendas
- Review meeting materials on the agenda prior to the SDC meeting
- Hold votes as required
- Participate in discussions and votes to meet the SDC objectives
- Initiate the biennial review of the SDC process in coordination with EPAC
- Create subcommittees as required

Voting Member

- If required, designate a manager in the same organization as a voting alternate to participate in the SDC
- Review meeting materials on the agenda prior to the SDC meeting
- Participate in discussions and votes to meet the SDC objectives
- Participate in the biennial review of the SDC process as required

Administrator

- Schedule meetings
- Prepare draft meeting agendas
- Quality Screening of Project Documentation
- Distribute meeting materials to attendees five working days prior to a scheduled SDC meeting
- Record the result of any votes
- Prepare and distribute meeting notes
- Record Solution Select Forms presented and their attachments and meeting results
- Attend to and manage the SolutionDesignCommittee@eversource.com email inbox

Project Lead/Initiator

- Complete a Solution Selection Form (including statement of need, project objectives, alternatives analysis, and scope for preferred solution) for any proposed capital project that meets the applicability criteria described above
- Ensure that SDC objectives listed above are fully met, and that subject matter experts from affected departments were included in the alternatives analysis.

- Submit the Solution Selection Form to the SDC administrator via SolutionDesignCommittee@eversource.com at least five working days prior to the next scheduled SDC meeting (ensures document screening and review by committee members)
- Attend the SDC meeting and present the Solution Selection Form to SDC members
- Revise the Solution Selection Form and/or respond to comments from the SDC as required

Quorum

The Chairperson(s) (or alternate) plus a minimum of four Voting Members (or alternates) shall constitute a quorum for voting purposes if all appropriate disciplines are present to challenge the merits of the project(s).

Meeting Schedule and Location

The SDC shall schedule meetings twice monthly. The Chairperson(s) may cancel a meeting or require more frequent meetings from time to time as required. The location of the SDC meeting will rotate between MA, CT, and NH.

Voting

The Voting Members and the Chairpersons, or their designated alternates, are eligible to vote. A vote is carried by a simple majority. Each person has one vote.

Subcommittees

The Chairperson may establish standing or ad hoc subcommittees as required to meet the objectives of the SDC. Subcommittees shall be chaired by a voting member of the SDC or their designated alternate.

Attachment B, Eversource Project Authorization Committee Charter

Purpose

The Eversource Project Authorization Committee (EPAC) reviews and approves the technical and financial merits of Transmission and Substation projects, including the selection of preferred solutions that are consistent with Eversource priorities (e.g. safety, reliability, cost efficiency). The EPAC authorizes, monitors and adjusts capital expenditure and resources for projects; prioritizes projects for the capital program and defers projects based on budget and resource availability.

Applicability

The EPAC is responsible for the technical review and financial approval of electrical Transmission and Substation projects in all three states.

Objectives

The objectives of the EPAC are as follows:

1. Receive, review, and approve Initial Funding Request Forms
 - a. Review the need and confirm that a capital project is needed to address the need.
 - b. Review and approve the project's objectives.
 - c. Ensure the funding request amount, planned development activities, and schedule are appropriate.
2. Receive, review, and approve PAFs for all projects that meet the Accounting Policy Statement No. 1 threshold. A lower threshold may be imposed by the EPAC, if desired.
 - a. Ensure that the PAF justification is valid.
 - b. Review and approve the project's technical merits.
 - c. Ensure that all reasonable alternatives were evaluated and appropriately rejected.
 - d. Ensure the scope and cost estimates are reasonable to $\pm 25\%$ for projects seeking full authorization.
 - e. The committee has the ability to review engineering designs, ensuring the proposed work is in accordance with Eversource Standards, evaluate load implications, assess root cause / reliability and vet out all possible alternatives.
 - f. Not all projects presented are requesting funding and require a vote – these projects will be noted "FOR DISCUSSION ONLY".
 - g. Ensure the PAF project checklist is complete.
 - h. Ensure the Constructability Review Form is complete
 - i. Ensure the financial analysis is reasonable to the accuracy appropriate to the project phase.
 - j. Ensure the project schedule is achievable and reasonable to the accuracy appropriate to the project phase
 - k. Ensure risks and mitigation plans are identified.
3. Evaluate project funding and priorities relative to the five-year capital plan.

4. Ensure project approval statuses and DOA progress are reviewed at least monthly.
5. Prioritize projects for deferment or cancellation.
6. Review EPAC process performance and lessons learned and coordinate with the state PACs to initiate any needed changes on at least a biennial basis.

Membership

EPAC shall consist of an executive sponsor, a chairperson, voting member directors, an administrator, and non-voting attendees as shown on the below table. The chairperson may designate additional voting member directors, if required.

EPAC Membership List

EPAC Role	Company Position
Executive Sponsor	VP, Transmission Projects
Co-Chairperson	Director, Transmission Project Controls
Co-Chairperson	Director, Transmission Business and Quality Assurance
Administrator	EPAC Program Manager
Member Director	Director(s), Transmission Project Management
Member Director	Director, Transmission Line Engineering
Member Director	Director, Substation Design Engineering
Member Director	Director, Substation Technical Engineering
Member Director	Director, Substation Protection and Controls
Member Director	Director, Distribution System Planning
Member Director	Director, Transmission System Planning
Member Director	Director, Siting and Project Services
Member Director	Director(s), Investment Planning
Member Director	Director, Sustainability and Environmental Affairs
Member Director	Director, Reliability, Compliance and Implementation
Member Director	Director(s), Transmission/System Ops
Member Director	Director, System Operations
Member Director	Director(s), Field Operations Lines
Member Director	Director(s), Field Operations Substations
Member Director	Director(s), Field Engineering
Member Director	Director, Engineering Project Controls
Member Director	Director, Engineering Capital Projects
Member Director	Director, Project Performance
Attendee	Manager of Project Solutions
Attendee	Manager of Transmission Siting
Attendee	Manager of Project Services
Attendee	Manager of Transmission Cost Estimating
Attendee	Manager of Licensing and Permitting
Attendee	Manager(s) of Procurement
Attendee	Manager(s) of Substation Engineering
Attendee	Manager(s) of Protection and Controls
Attendee	Manager(s)/Lead(s) of Transmission Line and Civil Eng.
Attendee	Program Manager- Transmission Capital Program

Attendee	Supervisor(s)/Manager(s) of Outage and Ops Planning
Attendee	Manager of Standards
Attendee	Manager of Budget and Investment
Attendee	Manager of Generation Interconnections
Attendee	Manager of Asset Management
Attendee	Manager of Operational Compliance
Attendee	Manager(s) of Line Operations
Attendee	Manager(s) of Substation Technical Engineering
Attendee	Manager(s) of System Planning

Roles and Responsibilities

Executive Sponsor

- Provide senior management vision, direction and feedback to the EPAC
- Appoint the Chairperson(s)

Chairperson(s)

- Preside at EPAC meetings
- Designate a Member Director as an alternate to preside at meetings in his/her absence
- Solicit Member Director appointments from the leadership team
- Appoint a EPAC administrator
- Determine the meeting schedule and location(s)
- Approve meeting agendas
- Review meeting materials on the agenda prior to the EPAC meeting
- Hold votes as required
- Participate in discussions and votes to meet the EPAC objectives
- Initiate the biennial review of the EPAC process in coordination with the other EPACs
- Create subcommittees as required

Member Director

- If required, designate a manager in the same organization as a voting alternate to participate in the EPAC
- Review meeting materials on the agenda prior to the EPAC meeting
- Participate in discussions and votes to meet the EPAC objectives
- Participate in the biennial review of the EPAC process as required

Administrator

- Schedule meetings
- Prepare draft meeting agendas
- Quality Screening and Quality Measurement of Project Documentation.
- Distribute meeting materials to attendees three working days prior to a scheduled EPAC meeting

- Record the result of any votes
- Prepare and distribute meeting notes
- Record PAFs and SRFs presented and meeting results
- Submit PAFs and SRFs approved to Investment Planning for Delegation of Authority approvals in PowerPlan
- Attend to and manage the TranEPAC@eversource.com email inbox

Project Lead/Initiator

- Complete a PAF (including financial and technical details, cost estimate, project checklist, and Constructability Review Form) for any proposed capital project or change, ensuring that EPAC objective one items are fully met, and obtain any necessary reviews and approvals prior to submittal to the EPAC
- Submit the PAF to the EPAC administrator via TranEPAC@eversource.com at least seven working days prior to the next scheduled EPAC meeting for engineering approval (ensures document screening and review by committee members)
- Attend the EPAC meeting and present the PAF to EPAC members
- Revise the PAF and/or respond to comments from the EPAC as required

Quorum

The Chairperson(s) (or alternate) plus a minimum of four Member Directors (or alternates) shall constitute a quorum for voting purposes if all appropriate disciplines are present to challenge the merits of the project(s).

Meeting Schedule and Location

The EPAC shall schedule meetings twice monthly. The Chairperson(s) may cancel a meeting or require more frequent meetings from time to time as required.

Voting

The Member Directors and the Chairpersons, or their designated alternates, are eligible to vote. A vote is carried by a simple majority. Each person has one vote.

Subcommittees

The Chairperson may establish standing or ad hoc subcommittees as required to meet the objectives of the EPAC. Subcommittees shall be chaired by a voting member of the EPAC or their designated alternate.

Attachment C, State Project Approval Committee (State PAC) Charter

Purpose

The State Project Approval Committees (State PACs) review and challenge the technical merit of proposed distribution projects, and approve them as consistent with Eversource priorities (e.g. safety, reliability, cost efficiency).

Applicability

This charter applies to the three state PACs in Connecticut, Massachusetts and New Hampshire that are responsible for all Eversource electrical distribution projects originating in their respective states.

Objectives

The objectives of a state PAC are as follows:

1. Receive, review and approve Project Authorization Forms (PAFs) for all projects that meet the Accounting Policy Statement No. 1 threshold. A lower threshold may be imposed by the state PAC, if desired.
 - a. Ensure that the PAF justification is valid.
 - b. Review and approve the project's technical merits.
 - c. Ensure the scope and cost estimates are reasonable to $\pm 25\%$ for projects seeking full authorization and to $-25\%/+50\%$ for projects seeking initial funding.
 - d. Ensure that all reasonable alternatives were evaluated and appropriately rejected.
 - e. The committee has the ability to review detailed engineering designs, ensuring the proposed work is in accordance with our Standards, evaluate load implications, assess root cause / reliability and vet out all possible alternatives.
 - f. Not all projects presented are requesting funding and require a vote – these projects will be noted "FOR DISCUSSION ONLY".
 - g. Ensure risks and mitigation plans are identified.
 - h. Ensure the PAF project checklist is complete.
 - i. Ensure the Constructability Review Form is complete.
 - j. Ensure the financial analysis is reasonable to the accuracy appropriate to the project phase.
 - k. Ensure the project schedule is achievable and reasonable to the accuracy appropriate to the project phase.
 - l. If CEO or subsidiary board approval is required, ensure project and cost analysis has been reviewed by the Enterprise Risk Management and Financial Planning & Analysis departments.
2. Release engineering labor and funds for detailed engineering on approved PAFs.
3. Review projects authorized for detailed engineering at least monthly to control engineering spend.

4. Review state PAC process performance and lessons learned and coordinate with the other state PACs and the EPAC to initiate any needed changes on at least a biennial basis.
5. Provide a forum for design review for more complex distribution street and line projects. The state PAC chairperson will use their judgement to determine which projects require distribution design review prior to state PAC approval.

Membership

Each state PAC shall consist of an executive sponsor, a chairperson, voting member directors, an administrator and non-voting attendees as shown in the below table. The chairperson may designate additional voting member directors, if required.

State PAC Membership List

State PAC Role	Company Position
Executive Sponsor	VP, Engineering
Chairperson	Director, Distribution Engineering
Administrator	Appointed by Chairperson
Voting Member	Manager, Distribution Engineering
Voting Member	Manager, Investment Planning
Voting Member	Manager, Distributed Generation
Voting Member	Manager/Supervisor, Field Engineering
Voting Member	Manager, Integrated Planning, Scheduling
Voting Member	Manager, System Operations
Voting Member	Manager, Field Operations
Voting Member	Manager, Substation Technical Engineering
Voting Member	Manager, Engineering Standards
Attendee	Project Manager(s)

Roles and Responsibilities

Executive Sponsor

- Provide senior management vision, direction and feedback to the state PAC
- Appoint the Chairperson

Chairperson

- Preside at state PAC meetings
- Designate a Member Director as an alternate to preside at meetings in his/her absence
- Solicit Member Director appointments from the leadership team
- Appoint a state PAC administrator
- Determine the meeting schedule and location(s)
- Approve meeting agendas
- Review meeting materials on the agenda prior to the state PAC meeting

- Hold votes as required
- Participate in discussions and votes to meet the state PAC objectives
- Release funds on approved PAFs for detailed engineering
- Initiate the biennial review of the state PAC process in coordination with the other state PACs
- Create subcommittees as required
- Determine which projects should complete a design review prior to state PAC approval

Voting Member

- If required, designate a voting alternate to participate in the state PAC
- Review meeting materials on the agenda prior to the state PAC meeting
- Participate in discussions and votes to meet the state PAC objectives
- Participate in the biennial review of the state PAC process as required

Administrator

- Schedule meetings
- Prepare draft meeting agendas
- Distribute meeting materials to attendees three days prior to a scheduled state PAC meeting
- Record the result of any votes
- Prepare and distribute meeting notes
- Record PAFs presented and meeting results in the capital project database

Project Initiator (typically engineer level)

- Complete a PAF for any proposed capital project, ensuring that state PAC objective 1 items are fully met, and obtain any necessary reviews and approvals prior to submittal to the state PAC
- Submit the PAF to the state PAC administrator at least three working days prior to the next scheduled state PAC meeting for engineering approval
- Attend the state PAC meeting and present the PAF to state PAC members
- Revise the PAF and/or respond to comments from the state PAC as required
- Once fully authorized, if costs exceed the approved PAF levels by more than the amounts shown in Accounting Policy Statement No. 1, create a SRF, attach to the previously approved PAF, and resubmit for review and approval.

Quorum

The Chairperson(s) (or alternate) plus a minimum of two Member Directors (or alternates) shall constitute a quorum for voting purposes if all appropriate disciplines are present to challenge the merits of the project(s).

Meeting Schedule

Each of the state PACs shall schedule meetings at least bimonthly. The Chairperson may cancel a meeting or require more frequent meetings from time to time as required.

Voting

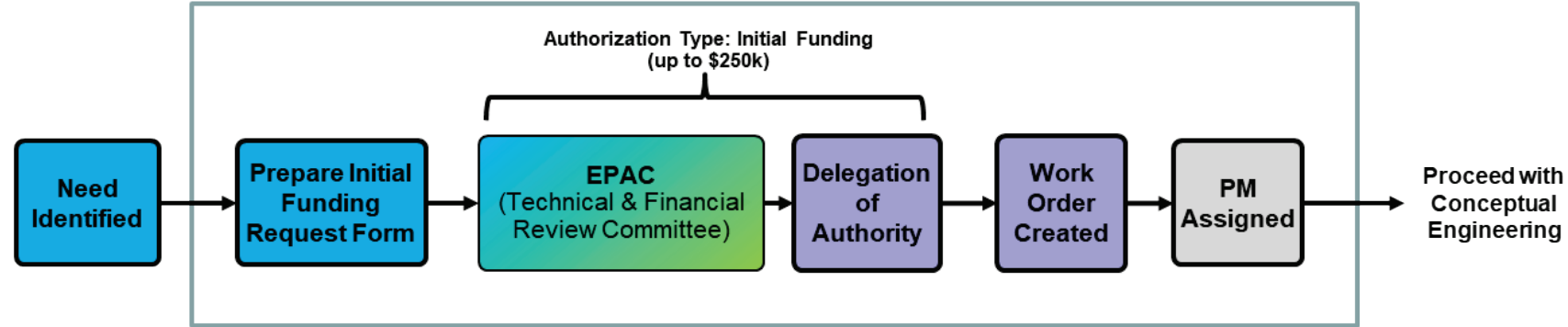
The Member Directors and the Chairperson, or their designated alternates, are eligible to vote. A vote is carried by a simple majority. Each person has one vote.

Subcommittees

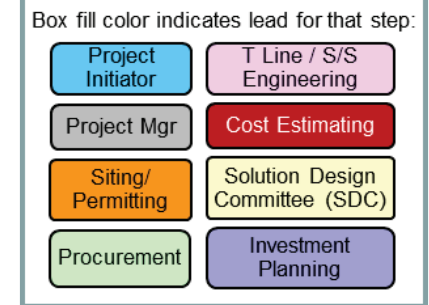
The Chairperson may establish standing or ad hoc subcommittees as required to meet the objectives of the state PAC. Subcommittees shall be chaired by a voting member of the state PAC or their designated alternate.

Attachment D, Transmission and Substation Project Approval Process Flow Charts

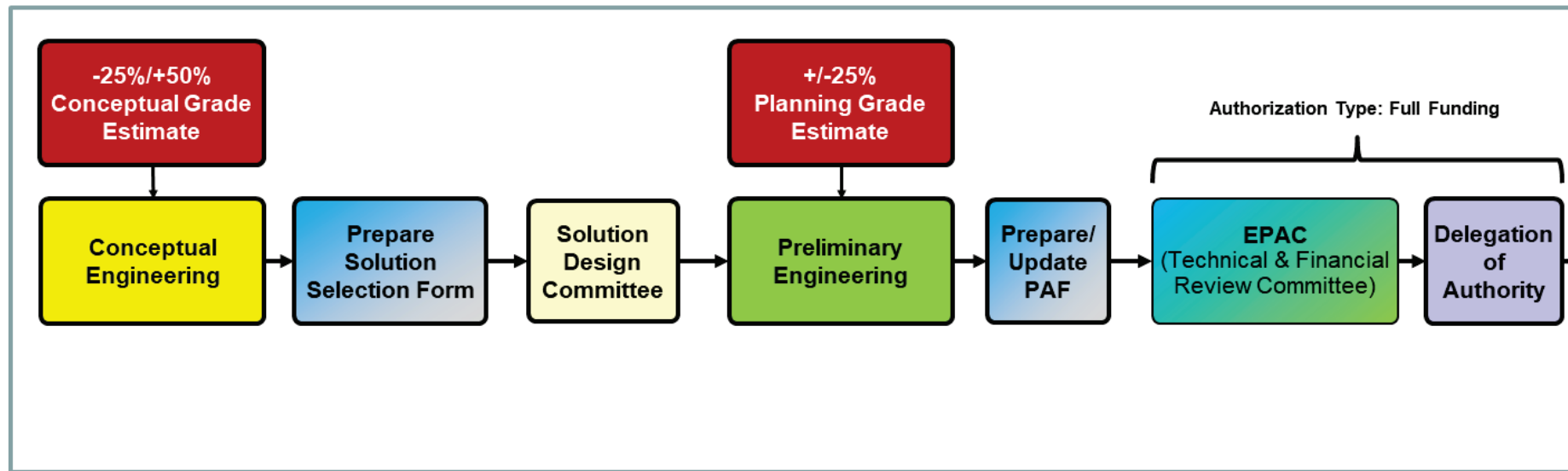
Project Lifecycle Initiation Process



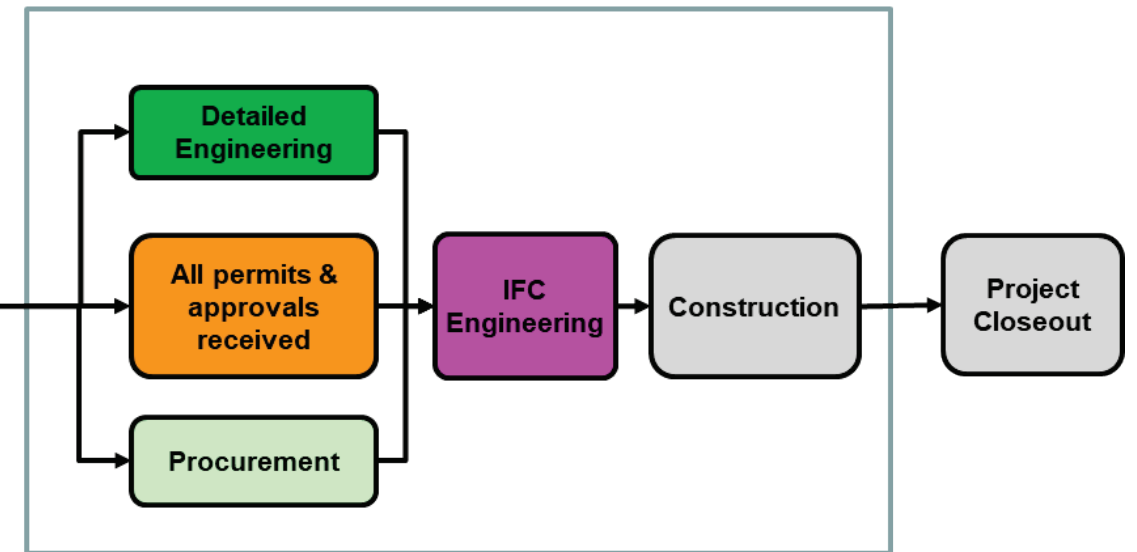
Legend



Project Lifecycle Process - Conceptual Engineering through Project Approval:

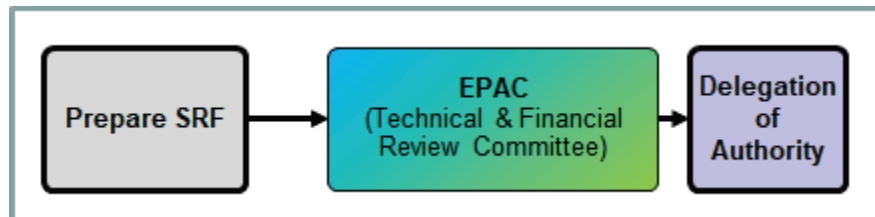


Project Execution:

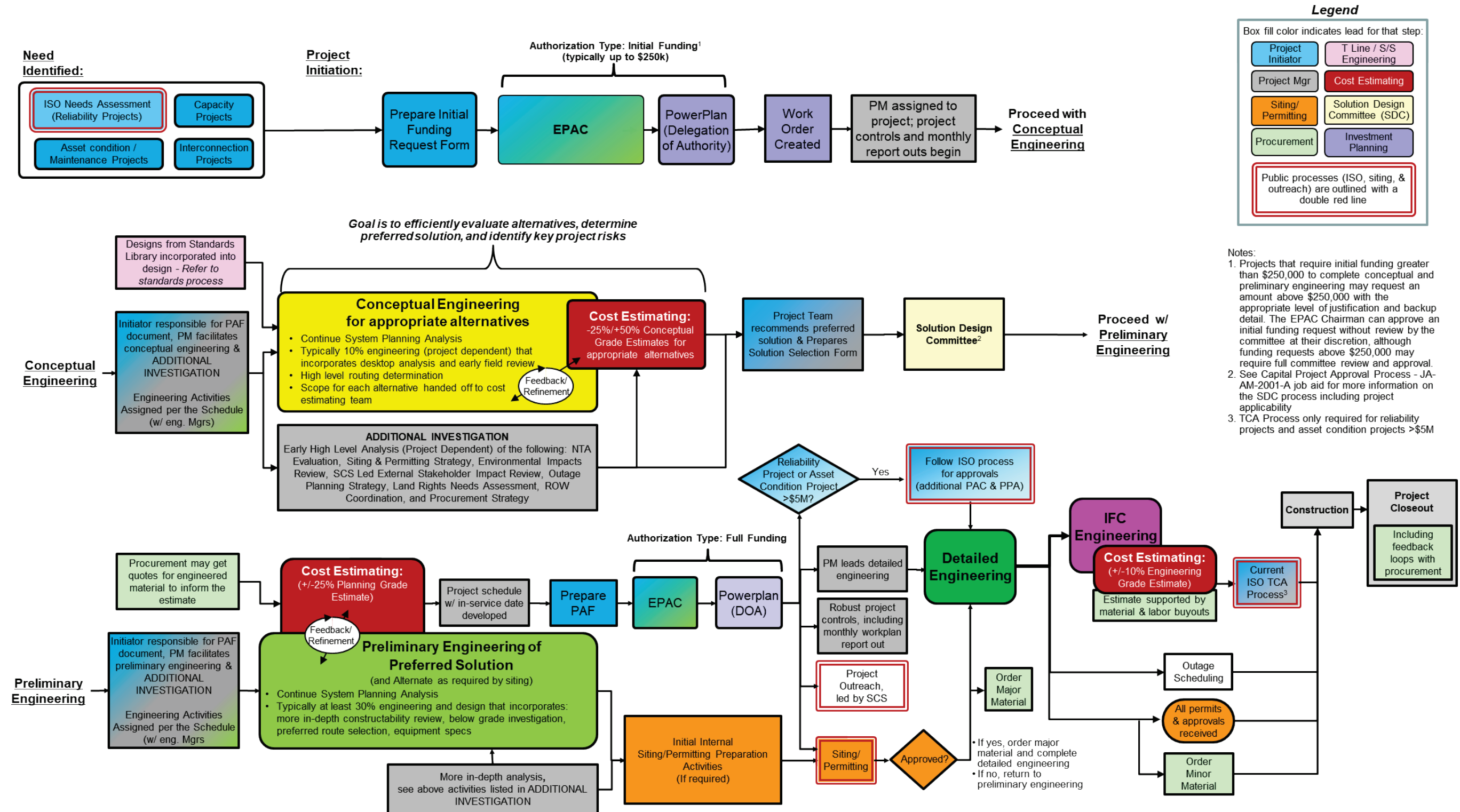


Supplemental Authorization Process

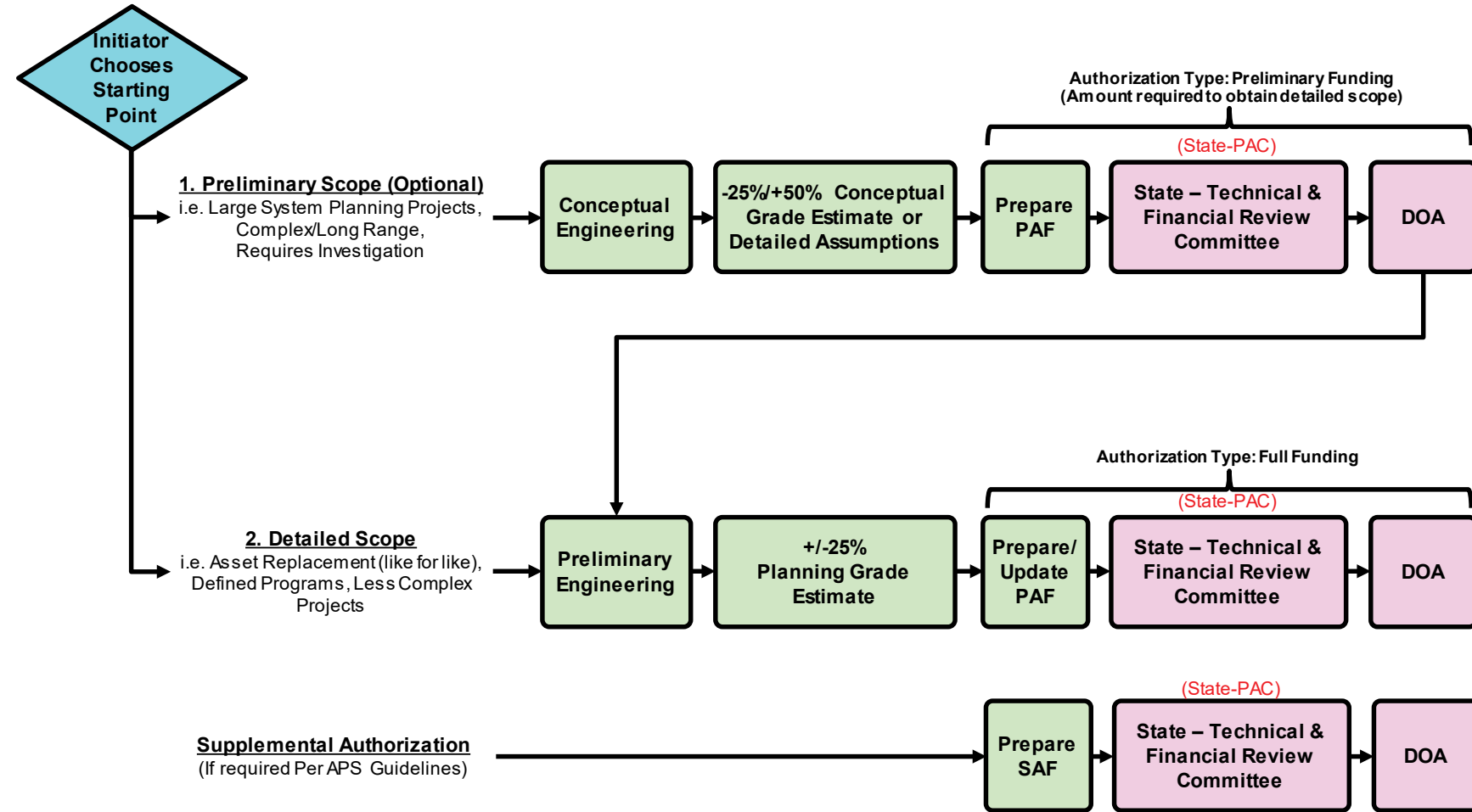
(if required per APS guidelines)



Attachment E, Transmission and Substation Project Approval Process Detailed Flow Chart



Attachment F, Distribution Project Approval Process Flow Chart



Attachment G, PAF Schedule Milestone Requirements

Use the appropriate list of milestones for the authorization type to populate the project milestone schedule within the IFR or PAF.

Inclusion of the appropriate milestones is required for IFR and PAF submittal.

These milestones support baselining of the project schedule. In the case of initial funding the initial project baseline schedule is defined within twenty business days of IFR approval. The IFR milestones are used as reference to support the initial baseline. In the cases of partial funding and full funding the included milestones are representative of the schedule baseline established ahead of submittal.

Projects can re-baseline at each funding stage of a project.

INITIAL FUNDING REQUEST FORM	PROJECT AUTHORIZATION FORM [PARTIAL AND FULL FUNDING REQUESTS]
<p><i>Project initiator leads this effort</i></p>	<p><i>Project Manager leads this effort</i></p>
<p><u>Required Items</u></p>	<p><u>Required Items</u></p>
<ul style="list-style-type: none"> ➤ SDC Approval (for applicable projects) ➤ Conversion of Tx development costs, 183 to 107 (applicable to projects that require SSF approval and/or ISO preferred alternative selection) ➤ EPAC Partial Funding Approval (for applicable projects) ➤ EPAC Full Funding Approval ➤ Start of Construction ➤ Project In-Service Date (ISD) ➤ Project Need Date (for applicable projects) 	<ul style="list-style-type: none"> ➤ IFR Approval ➤ SDC Approval (for applicable projects) ➤ Conversion of Tx development costs, 183 to 107 (applicable to projects that require SSF approval and/or ISO preferred alternative selection) ➤ EPAC Partial Funding Approval (for applicable projects) ➤ Preliminary Design Completion (or latest pre-full funding design phase) ➤ EPAC Full Funding Approval ➤ Siting Approval (for applicable projects) ➤ Start of Construction ➤ Project In-Service Date (ISD) ➤ Project Need Date (for applicable projects) ➤ ISO Related Milestones (for applicable projects) <ul style="list-style-type: none"> • ISO Preferred Alternative Selected • PAC Presentation • TCA Submittal
<p>In certain cases partial funding may not be necessary and the project can proceed directly from initial to full funding. Connect with Project Manager to identify the appropriate project stage.</p>	

Visual Comparison of Design Criteria

Comparison as-of March 2024

The following guide compares in a summarized fashion the differences between Eversource’s New Hampshire electric system design criteria of both legacy guiding documents and today’s Distribution System Planning Guide (DSPG 2020). For a detailed comparison of the planning criteria within ED-3002, SYSPLAN-010 and DSPG 2020, refer to the comparison table of design criteria.

The different planning criteria documents were in use as the primary document as follows:

ED-3002	January 10, 2003 to August 1, 2018
SYSPLAN-010	August 1, 2018 to September 22, 2020
DSPG 2020	September 22, 2020 to Present

Contents

1.0 – Base Case Loading	2
2.0 – Single Contingency Event, Transformer	3
2.1 – Initial Event (t=0+ event start)	3
2.2 – Contingency Restoration (t=30 minutes from event)	4
2.3 – Post-Contingency (t=24 hours+ from event).....	5
3.0 – Single Contingency Event, Single Bus Section.....	6
3.1 – Solid Bus Substation Configuration.....	6
3.2 – Single Bus Tie Breaker Configuration	7
4.0 – Single Contingency Event, Bus Tie Breaker	8
5.0 – Transmission Contingency Event	9

1.0 – Base Case Loading

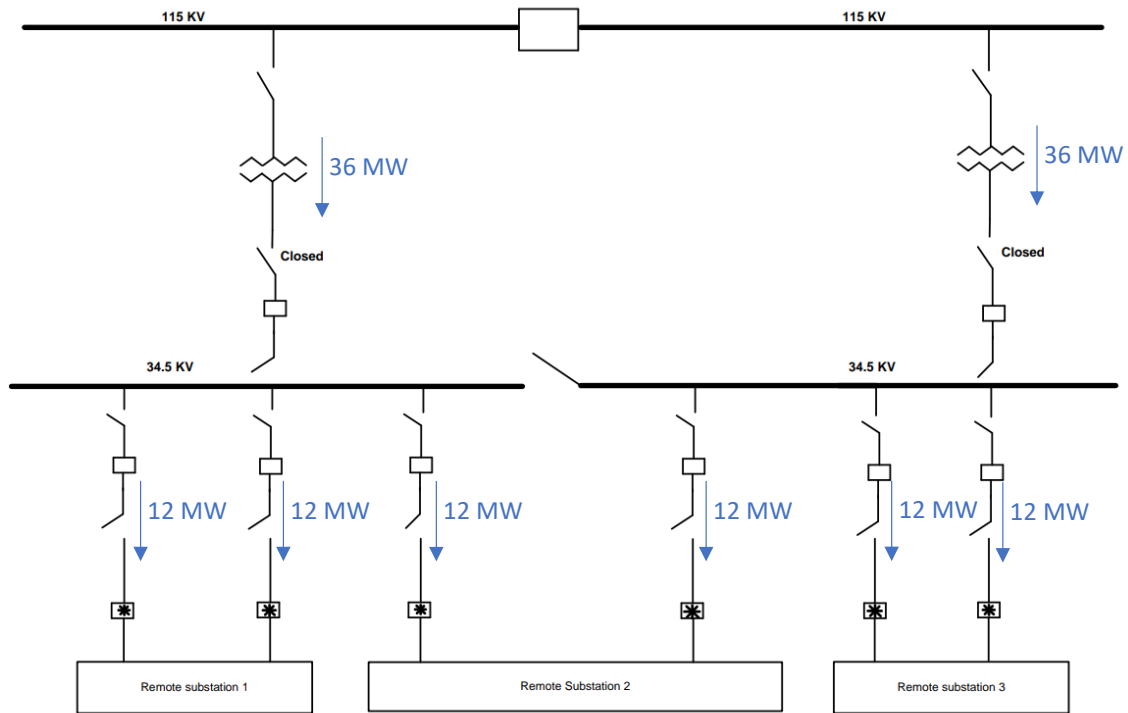


Figure 1. Normal condition substation loading. Asterisk denotes a normally open line-tie.

Transformer Ratings:

Document	ED-3002	SYSPLAN-010	DSPG 2020
Top Nameplate	44.8 MVA	44.8 MVA	44.8 MVA
Normal (Continuous)	50.0 MVA *	44.0 MVA	44.0 MVA
Long-Term Emergency (4 or 12 hour rating)	50.0 MVA *	51.0 MVA	53.0 MVA
Short-Term Emergency (30 minute rating)	67.2 MVA	67.0 MVA	61.0 MVA

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria	97% to 127% of Nameplate Rating (85% of TFRAT*)	75% of Nameplate Rating	95% of Nameplate Rating
Transformer Capacity	42.5 MVA	33.6 MVA	42.5 MVA
Transformer Loading	36 MVA	36 MVA	36 MVA
Design Compliance	Meets Design Criteria	Design Violation	Meets Design Criteria

* TFRAT = PSNH Transformer Rating = Singular rating was calculated above nameplate and is equivalent to both today's Normal and LTE ratings.

2.0 – Single Contingency Event, Transformer

2.1 – Initial Event (t=0+ event start)

Initial system loading before System Operator intervention. With loss of the transformer, the remaining transformer in service serves all load. For this example, assuming it is installed, transformer protection initiates load shed of a feeder (12 MW).

Feeder load shed is not an acceptable solution in newer design criteria.

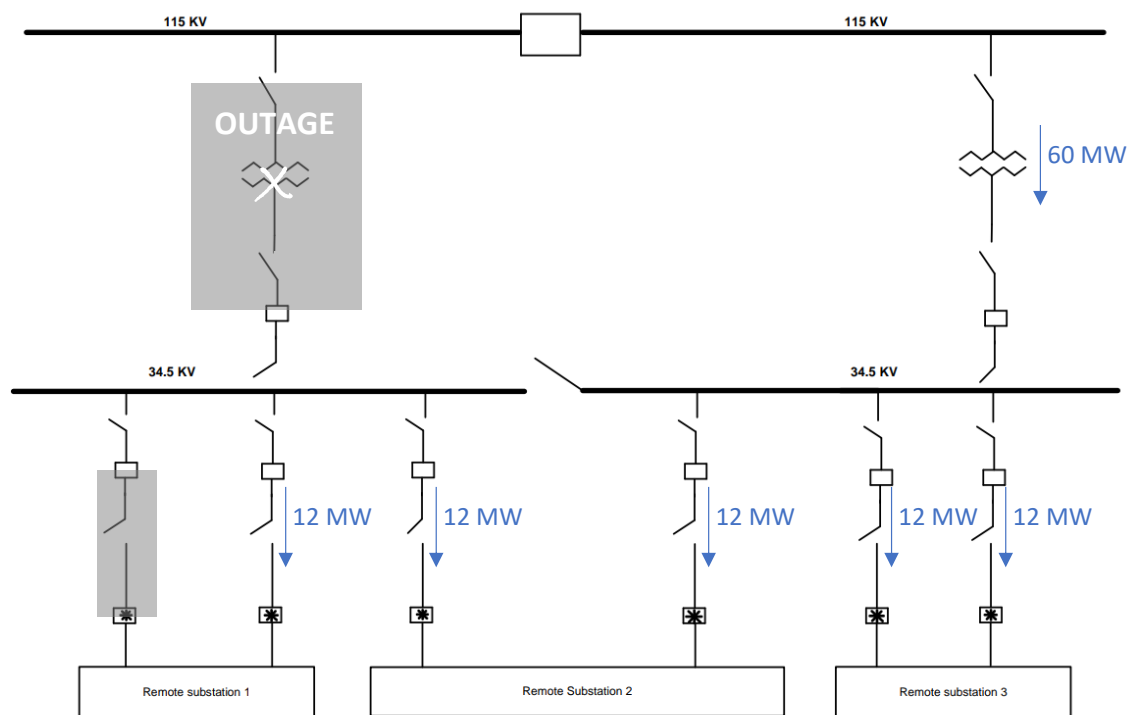


Figure 2. Transformer N-1 Single Contingency with initial substation loading identified. One feeder is tripped as part of the station's transformer protection scheme. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria: Transformer Rating	115% to 150% of Nameplate Rating	100% STE	100% STE
Transformer Capacity	50 MVA	67 MVA	61 MVA
Transformer Loading	60 MVA	With Load Shed: 60 MVA Total: 72 MVA	With Load Shed: 60 MVA Total: 72 MVA
Design Compliance	This stage of TX N-1 Contingency was not studied – Design Violation.	Feeder Load Shed is not an acceptable solution – Design Violation.	Feeder Load Shed is not an acceptable solution – Design Violation.

2.2 – Contingency Restoration (t=30 minutes from event)

System Operators perform restoration of load or reduce loading on equipment with remote-controlled SCADA switching to within substation LTE ratings and line emergency ratings. Design criteria limits the restoration steps to three blocks. This example shows two load block transfers (24 MW, first and last feeders) to restore customer load and reduce equipment loading.

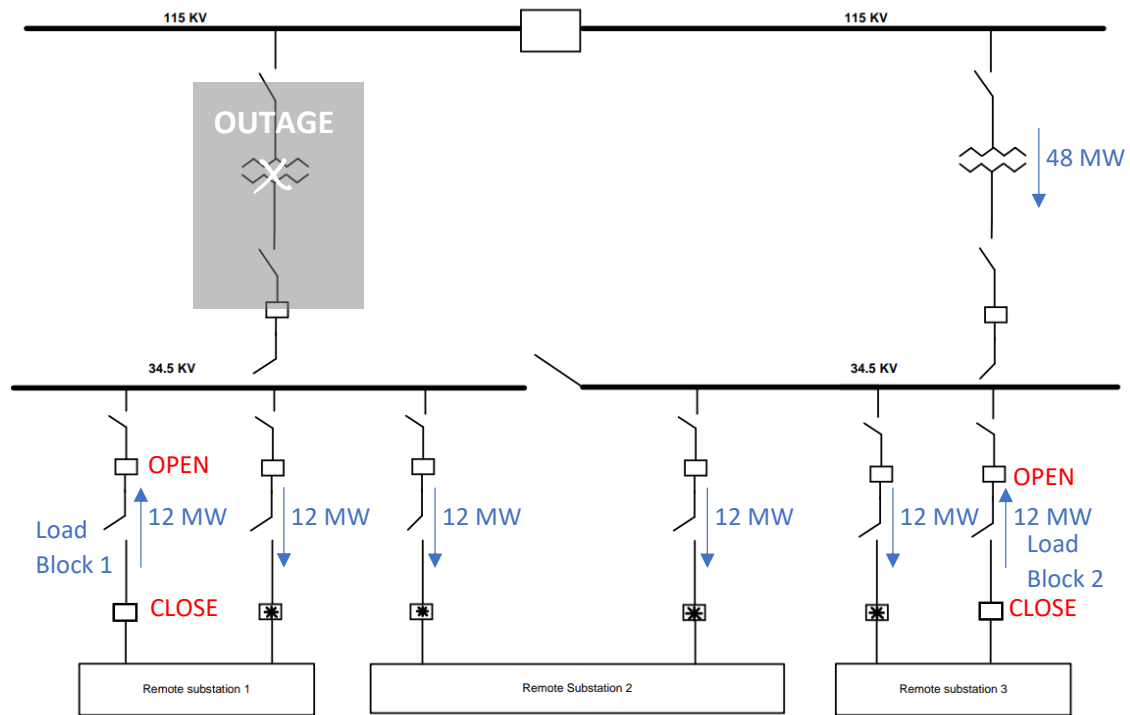


Figure 3. Transformer N-1 Single Contingency showing two load block transfers. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria:	115% to 150% of Nameplate Rating	100% LTE	100% LTE
Transformer Rating	50 MVA	51 MVA	53 MVA
Transformer Capacity	48 MVA	48 MVA	48 MVA
Transformer Loading	< 30 MW	0 MW	0 MW
Design Criteria:	24 MW	24 MW	24 MW
Customer Outage	0 MW	0 MW	0 MW
Load Restored by other sources	0 MW	0 MW	0 MW
Customer Outage	Meets Design Criteria	Meets Design Criteria	Meets Design Criteria

2.3 – Post-Contingency (t=24 hours+ from event)

Reduce loading on equipment with additional switching (if available) to ensure load levels are within normal operating ratings within one load cycle (24-hours). An addition feeder (12 MW, second feeder) is offloaded to a remote source in addition to the first two feeders (24 MW, first and last feeders) that were moved as a result of initial event response.

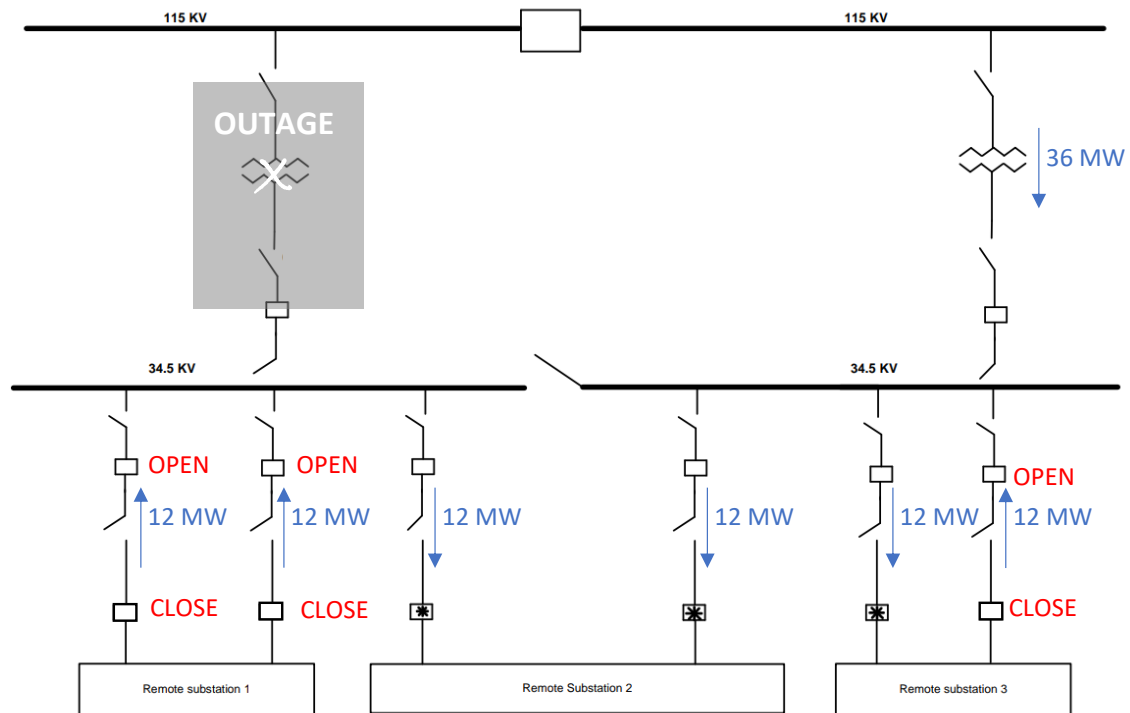


Figure 4. Transformer N-1 Single Contingency showing additional switching performed to reduce loading within Nameplate and Normal ratings. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria:			
Transformer Rating	115% to 150% of Nameplate Rating	100% STE	100% STE
Transformer Capacity	50 MVA	44.8 MVA	44.8 MVA
Transformer Loading	48 MVA	36 MVA	36 MVA
Design Criteria:			
Customer Outage	0 MW	0 MW	0 MW
Load Restored by other sources	24 MW	36 MW	36 MW
Customer Outage	0 MW	0 MW	0 MW
Design Compliance	This stage of TX N-1 Contingency was not studied – Meets Design Criteria.	This stage of TX N-1 Contingency was not studied – Meets Design Criteria.	Meets Design Criteria

3.0 – Single Contingency Event, Single Bus Section

3.1 – Solid Bus Substation Configuration

System Operators perform restoration of load or reduce loading on equipment with remote-controlled SCADA switching to within substation LTE ratings and line emergency ratings. Design criteria limits the restoration steps to three blocks. Three load blocks (36 MW) are transferred to remote sources, leaving three feeders in a sustained outage.

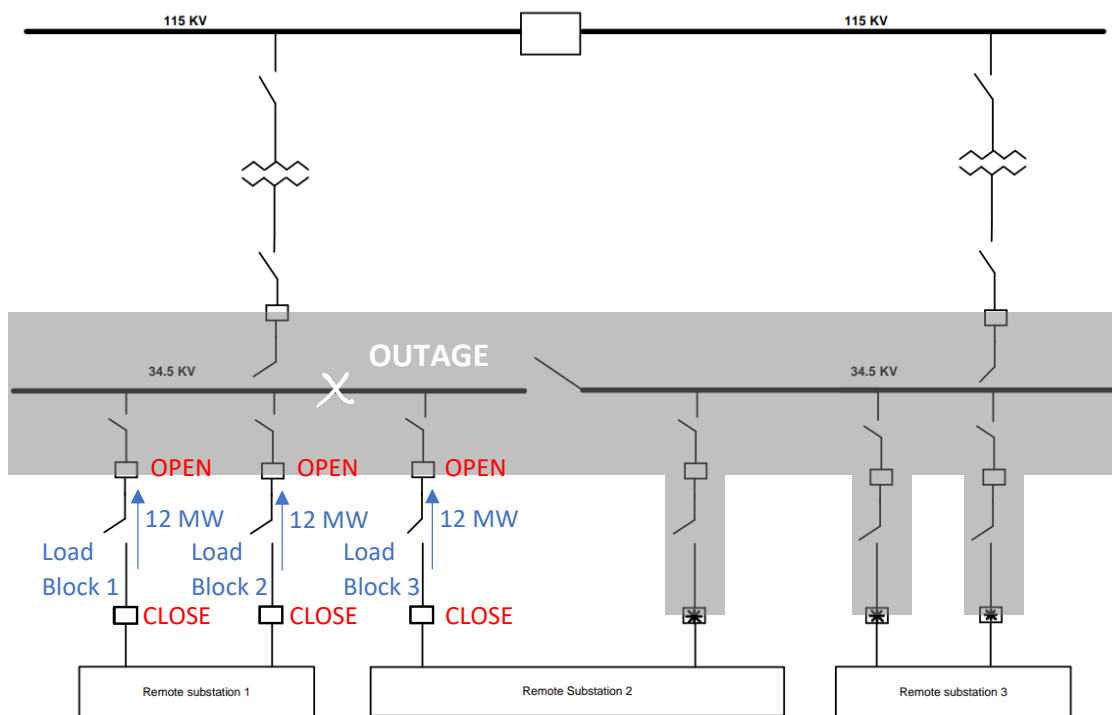


Figure 5. Bus Section single contingency at a solid-bus substation with outage impacting all six feeders. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria:			
Transformer Rating			100% LTE
Transformer Capacity			53 MVA
Transformer Loading			0 MVA
Design Criteria:			
Customer Outage			0 MW
Load Restored by other sources			36 MW
Customer Outage			36 MW
Design Compliance	Bus N-1 Contingency was not studied.	Bus N-1 Contingency was not studied.	Design Violation

3.2 – Single Bus Tie Breaker Configuration

System Operators perform restoration of load or reduce loading on equipment with remote-controlled SCADA switching to within substation LTE ratings and line emergency ratings. Design criteria limits the restoration steps to three blocks. Three load blocks (36 MW) are transferred to remote sources, restoring all impacted customer load.

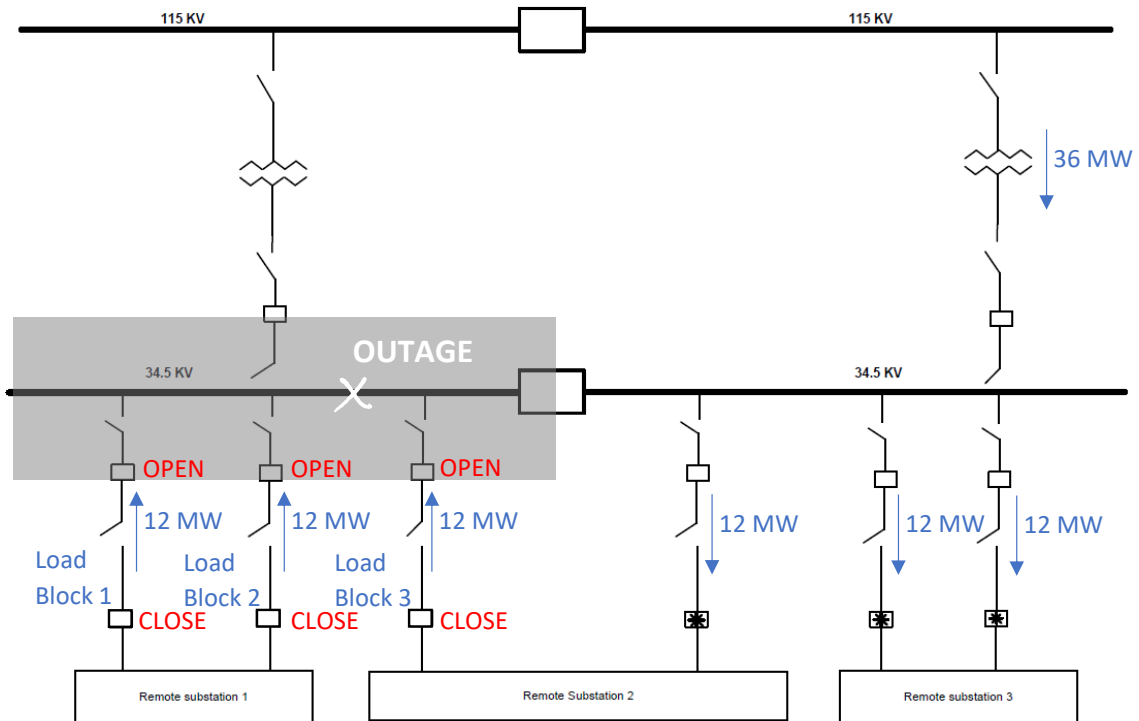


Figure 6. Bus Section single contingency at a station with a bus tie breaker. Contingency event is limited to three of the six feeders. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria:			
Transformer Rating			100% LTE
Transformer Capacity			53 MVA
Transformer Loading			36 MVA
Design Criteria:			
Customer Outage			0 MW
Load Restored by other sources			36 MW
Customer Outage			0 MW
Design Compliance	Bus Section Contingency was not studied.	Bus Section Contingency was not studied.	Meets Design Criteria

4.0 – Single Contingency Event, Bus Tie Breaker

System Operators perform restoration of load or reduce loading on equipment with remote-controlled SCADA switching to within substation LTE ratings and line emergency ratings. Design criteria limits the restoration steps to three blocks. Three load blocks (36 MW) are transferred to remote sources, leaving three feeders in a sustained outage.

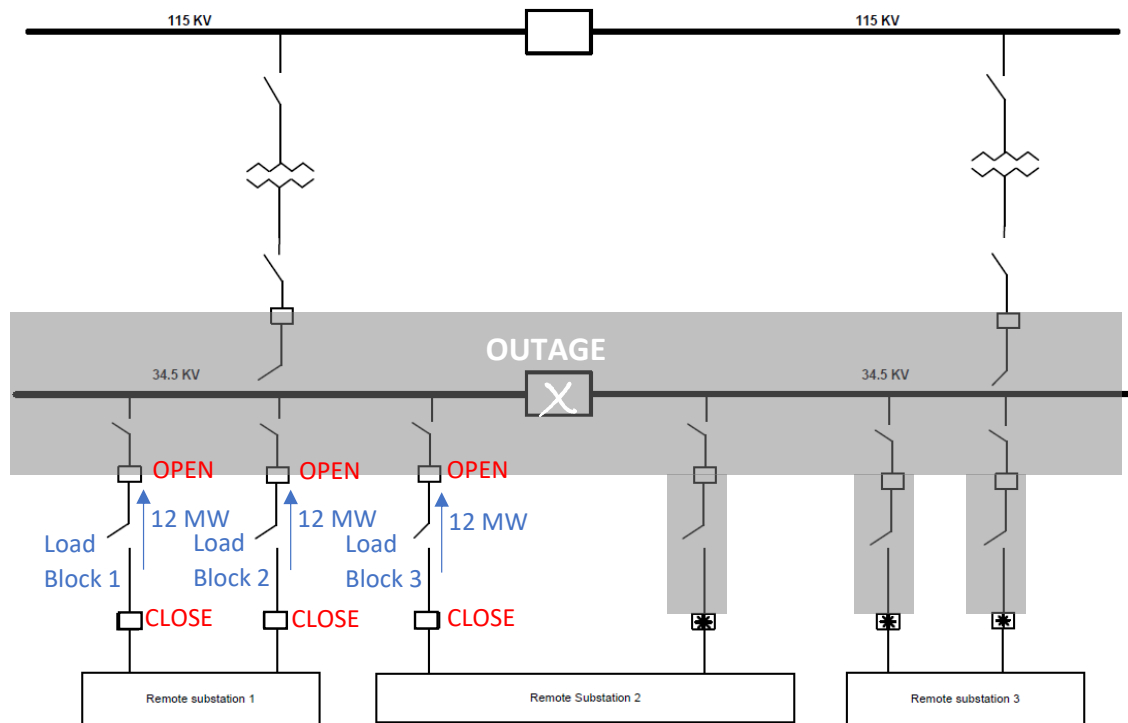


Figure 7. Bus Tie Breaker single contingency at a solid-bus substation with outage impacting all six feeders. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria: Transformer Rating			100% LTE
Transformer Capacity			53 MVA
Transformer Loading			0 MVA
Design Criteria: Customer Outage			0 MW
Load Restored by other sources			36 MW
Customer Outage			36 MW
Design Compliance	Bus Tie Breaker Contingency was not studied.	Bus Tie Breaker Contingency was not studied.	Design Violation

5.0 – Transmission Contingency Event

A single contingency event occurs on the transmission system. This could be a line fault, stuck breaker, or bus fault. In many cases this contingency event causes a study scenario that looks the same as one of the above distribution single contingencies. On occasion the location of the transmission equipment can cause a larger impact. Changing the original substation layout, this scenario with only three feeders presented has three load block transfers that restore all load.

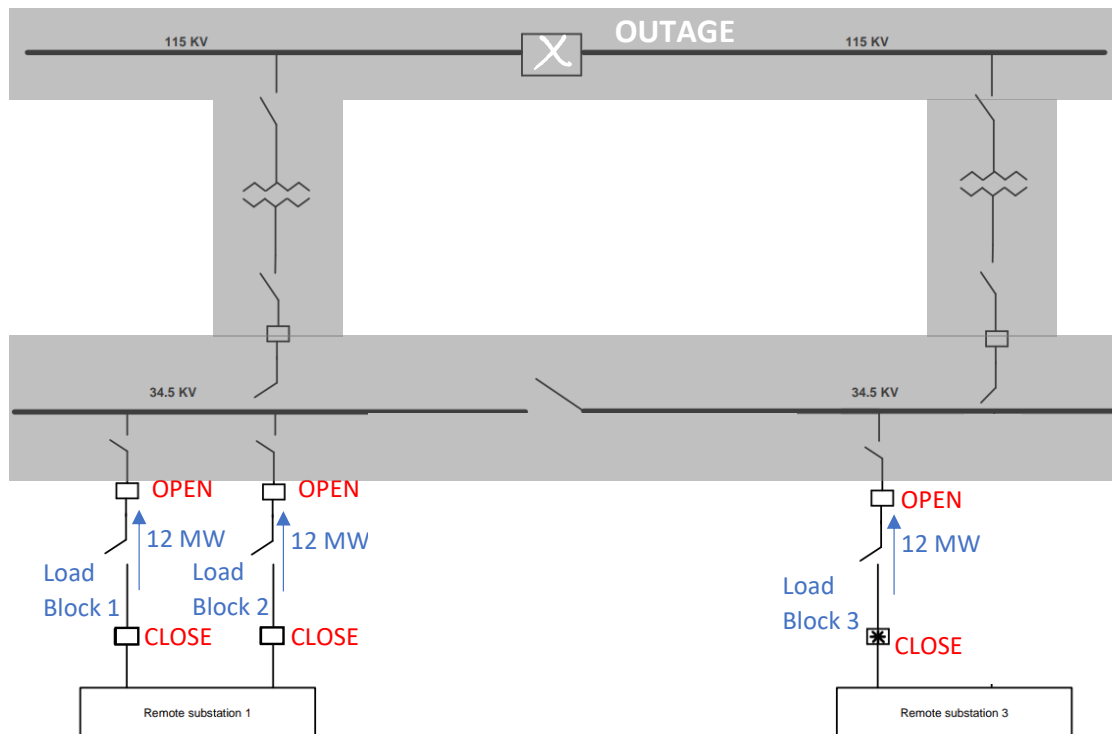


Figure 8. Single contingency transmission outage impacting both sources at the substation. Asterisk denotes a normally open line-tie.

Document	ED-3002	SYSPLAN-010	DSPG 2020
Design Criteria: Transmission	Outage < 30 MW	Outage = 0 MW	Transmission N-1 impacts no more than one Distribution TX
Load Restored by other sources	36 MW	36 MW	36 MW
Customer Outage	0 MW	0 MW	0 MW
Transmission Outage	N-1	N-1	N-1
Distribution Outage	N-2	N-2	N-2
Design Compliance	Meets Design Criteria	Meets Design Criteria	Design Violation

Document:	ED-3002	SYSPLAN-010	DSPG 2020
Jurisdiction:	NH (D)	CT-MA-NH (T&D)	CT-MA-NH (D)
Primary Criteria Document:	1/10/2003-8/1/2018	8/1/2018-9/22/2020	9/22/2020-Present

Bulk Substations (115kV and above)			
Normal Operation (N-0, Base Case) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Transformer Loading - Design <i>(Upgrade Identified)</i>	< 97% - 127% top nameplate rating (< 85% TFRAT)	< 75% top nameplate rating	CT-MA: < 75% top nameplate rating NH: < 95% top nameplate rating
Transformer Loading - Operation	< 115% - 150% top nameplate rating (< 100% TFRAT)	< 100% top nameplate rating	< 100% top nameplate rating
Contingency Operation (N-1, Single Event) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Scenario(s)	Transformer Feeder Breaker Transmission Lines - Radial Transmission Lines - Non-Radial Dispatchable Peak Shaving Generation	Transformer Transmission Line - Radial	Transformer Bus Section Bus Tie Breaker
Transformer Loading, Initial Event (t=0+ min)	< 115% - 150% top nameplate rating (< 100% TFRAT)	< 100% STE rating	< 100% STE rating
Transformer Loading, Contingency (t=30 min)	< 115% - 150% top nameplate rating (< 100% TFRAT)	< 100% LTE rating	< 100% LTE rating
Transformer Loading, Post-Contingent (t=24 hr) <i>(after LTE 12 or 4 hour duration or one 24-hour load cycle)</i>	< 115% - 150% top nameplate rating (< 100% TFRAT)	< 100% top nameplate rating	< 100% top nameplate rating
Load Block Transfer Limit	3	3	3, with 4th in reserve
Remaining Isolated Load	< 30MW load out for up to 24 hrs	0 MW (no loss of load)	0 MW (no loss of load)
Transmission Supply	< 30MW load out for up to 24 hrs	0 MW (no loss of load)	Single Transmission N-1 shall not cause greater than a single Distribution N-1.

Non-Bulk Substations (below 115kV)			
Normal Operation (N-0, Base Case) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Transformer Loading - Design <i>(Upgrade Identified)</i>	< 85% TFRAT (< 97% - 127% top nameplate rating)	< 100% LTE rating (< 115% - 150% top nameplate rating)	< 100% top nameplate rating
Transformer Loading - Operation	< 100% TFRAT (< 115% - 150% top nameplate rating)	< 100% LTE rating (< 115% - 150% top nameplate rating)	< 100% top nameplate rating
Contingency Operation (N-1, Single Event) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Scenario(s)	Not defined.	Not defined.	Transformer
Transformer Loading, Initial Event (t=0+ min)	< 100% TFRAT (< 115% - 150% top nameplate rating)	< 100% LTE rating (< 115% - 150% top nameplate rating)	< 100% STE rating
Transformer Loading, Contingency (t=30 min)	< 100% TFRAT (< 115% - 150% top nameplate rating)	< 100% LTE rating (< 115% - 150% top nameplate rating)	< 100% LTE rating
Transformer Loading, Post-Contingent (t=24 hr) <i>(after LTE 12 or 4 hour duration or one 24-hour load cycle)</i>	< 100% TFRAT (< 115% - 150% top nameplate rating)	< 100% LTE rating (< 115% - 150% top nameplate rating)	< 100% top nameplate rating
Load Block Transfer Limit	Not defined.	Not defined.	Not defined.
Remaining Isolated Load	Not defined.	Not defined.	Not defined.

Distribution Lines			
Normal Operation (N-0, Base Case) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Line Loading, Overhead - Design <i>(Upgrade Identified)</i>	< 100% normal rating	< 100% normal rating	< 90% normal rating
Line Loading, Underground - Design <i>(Upgrade Identified)</i>	< 100% normal rating	< 100% normal rating	< 80% normal rating
Line Loading, Overhead - Operation	< 100% normal rating	< 100% normal rating	< 100% normal rating
Line Loading, Underground - Operation	< 100% normal rating	< 100% normal rating	< 100% normal rating
Voltage, Primary Line - Unregulated Load	97.5% - 105%	n/a	n/a
Voltage, Primary Line - Regulated Load	95% - 105%	n/a	n/a
Voltage, Customer Service	95% - 105%	95% - 105%	95% - 105%
Voltage, Customer Service - Primary Voltage <i>Only for Customers Responsible for Voltage Regulation</i>	90% - 110%	90% - 110%	90% - 110%
Contingency Operation (N-1, Single Event) - Distribution Design Criteria			
	PSNH ED-3002	SYSPLAN-010	Distribution System Planning Guide (DSPG 2020)
Line Loading, Overhead - Design <i>(Upgrade Identified)</i>	< 100% emergency rating	< 100% emergency rating	CT-MA: < 90% normal rating NH: < 90% emergency rating
Line Loading, Underground - Design <i>(Upgrade Identified)</i>	< 100% emergency rating	< 100% normal rating	< 80% normal rating
Line Loading, Overhead - Operation	< 100% emergency rating	< 100% emergency rating	CT-MA: < 100% normal rating NH: < 100% emergency rating
Line Loading, Underground - Operation	< 100% emergency rating	< 100% normal rating	< 100% normal rating
Voltage, Primary Line - Unregulated Load	95% - 105%	n/a	n/a
Voltage, Primary Line - Regulated Load	92% - 105%	n/a	n/a
Voltage, Customer Service	92% - 105%	95% - 105.8%	92% - 105.8%
Voltage, Customer Service - Primary Voltage <i>Only for Customers Responsible for Voltage Regulation</i>	90% - 110%	90% - 110%	90% - 110%

Administrative Procedure

Substation & Transmission System Operations Review Committee

M5-OC-2001, Rev. 16

Approval Signature: *Barry R. Bruun*

Barry R. Bruun

Process Director- Transmission
Owner: Operations, CT & MA

Effective
Date: 09/10/2021

Table of Contents

1. Purpose	2
2. Scope	2
2.1. Eversource Transmission System vs. BPS and BES	2
3. Roles and Responsibilities	3
4. Process Steps	4
4.1. Conduct of S&TSORC	4
4.2. Transmission Availability Data System	8
5. Administrative Information	8
5.1. Requirements	8
5.2. Definitions	9
5.3. References	11
6. Summary of Changes	11
Attachment A, NERC TADS Automatic Outage Cause Code Types	16
Attachment B, S&TSORC Disturbance Report Subcommittee	19
Attachment C, Substation Equipment Committee	21
Attachment D, Protection and Control & Test Committee	22
Attachment E, Transmission Operations Center Event Review Board	23
Attachment F, Transmission Line Equipment Committee	25
Attachment G, BES Cyber Asset Patch Management Committee	26
Attachment H, Operating Experience Subcommittee (OES)	27

1. Purpose

The purpose of this administrative procedure is to establish and implement a Substation and Transmission System Operations Review Committee (S&TSORC), concerned with Substation and Transmission issues, such as:

- Substation and Transmission system reliability and availability
- Substation and Transmission system disturbances and trends in disturbances
- Industry Operating Experience/Events (OE)
- Transmission Availability Data System (TADS)
- Bulk Electric System (BES) Cyber Asset patch management for Medium Impact assets
- Associated tactical and strategic corrective actions designed to maximize transmission system reliability, efficiency and effectiveness

This procedure also discusses the responsibilities and activities of the following S&TSORC subcommittee and supporting committees:

- S&TSORC Disturbance Report Subcommittee (DRS)
- Substation Equipment Committee (SEC)
- Protection & Control and Test (PACT) Committee
- Transmission Operations Center Event Review Board (TOCERB)
- Transmission Line Equipment Committee (TLEC)
- BES Cyber Asset Patch Management Committee (BCAPMC)
- Operating Experience Subcommittee (OES)

2. Scope

This document applies to:

- Members and activities of, as well as subcommittees and supporting committees to, S&TSORC
- Asset Strategy and S&TSORC activities for OE

2.1. Eversource Transmission System vs. BPS and BES

Federal Energy Regulatory Commission (FERC) Order [693-A](#), “Mandatory Reliability Standards for the Bulk-Power System, section II.A.1” recognizes some ambiguity between the terms “Bulk-Power System” (BPS) and “Bulk Electric System” (BES) (reference Section [5.2](#) “Definitions” of this document). FERC Order [693-A](#) tentatively resolves the conflict by advocating the North American Electric Reliability Corporation (NERC) Glossary, subject to future action by FERC.

Note that, at present, S&TSORC is concerned with the entire Eversource Transmission System, which can exceed the parameters of the current definitions for BES or BPS.

3. Roles and Responsibilities

Roles and responsibilities are identified in the Process Steps section. The role is listed along the left margin and is followed by numbered instructions.

S&TSORC consists of a S&TSORC Chair, a S&TSORC Secretary, and S&TSORC members. Director – Transmission Operations, CT & MA will serve as S&TSORC Chair. Members are representatives of various Eversource organizations associated with electrical transmission and interfaces, listed below or as selected by S&TSORC.

- Director, Transmission Operations, CT & MA
- Director System Operations, NH
- Director, Protection and Control Engineering
- Director, Substation Technical Engineering
- Director, Engineering, Transmission Lines
- Director, Substation Design
- Director(s), Field Engineering and Communication
- Director, Business and Quality Assurance, Transmission
- Director(s) Stations Operations - MA, CT and NH
- Manager(s) – Protection & Controls Engineering
- Manager(s) – Field Communications, CT, MA and NH
- Manager(s), Field Engineering, CT, MA and NH Manager – Transmission Line Construction & Maintenance
- Manager – Transmission Line and Civil Engineering
- Manager – Asset Strategy & Performance
- Manager – Operations, CONVEX
- Manager – Bulk Power System Operations
- Manager - System Operations NH
- Manager(s) – Substation Operations – CT, MA and NH
- Manager – Construction & Maintenance, WMA
- Manager(s) – Substation Technical Engineering
- Manager, Compliance Standards and Support, P&C
- Manager, Reliability Compliance
- Manager, Technical Field Engineering
- Manager, UG Transmission
- Manager, Telecom Engineering

4. Process Steps

4.1. Conduct of S&TSORC

Disturbance activities in the following steps are coordinated with M7-EN-3011, "Transmission System Disturbance Analysis".

S&TSORC Members

- 4.1.1. Ensure issues affecting substation and transmission systems operations, reliability, continuity, integrity or quality of electric services to customers are addressed, to include, but not limited to, the following:
 - a. Review Significant Events such as substation and transmission system outages and disturbances, including corrective actions taken in response to these events.
 - EXCEPTION - those disturbances reviewed and closed out per [Attachment B](#), "S&TSORC Disturbance Report Subcommittee".
 - b. Proper operation of protection and control equipment.
 - c. Identify and monitor substation and transmission system performance issues, such as:
 - Disturbances (notification received per ISO-NE [OP 10](#), Electric System Control Center (ESCC) [OP-0010](#), Connecticut Valley Electric Exchange (CONVEX) [OI 0010](#), and NSTAR OP-10
 - Underlying (root) causes categorized by the NERC TADS Automatic Outage Cause Code Types (reference [Attachment A](#))
 - Trends and symptoms of outages
 - Relay misoperation and human error mitigation initiatives
 - Protection System Degradation, as categorized and addressed per ISO-NE OP-24, Protection Outages, Settings and Coordination and Eversource ESOP-24, Protection System and Relay Work Control.
 - d. Coordinate investigations of causes of unplanned events affecting Nuclear Plant Interface Requirements (NPIRs) and develop corrective actions to minimize future risk of such events with nuclear generator operators.
 - e. Establish policies and procedures to correct system performance issues, maintain system integrity, and improve reliability.
 - f. Recommend engineering and design changes to improve reliability and performance.
 - g. Compliance with applicable revisions of NERC, Northeast Power Coordinating Council, Inc. (NPCC), and ISO-NE standards that address reviews of system outages and disturbances.

- h. Under-Frequency Load Shedding (UFLS) and Under-Voltage Load Shedding (UVLS) events receive a thorough Engineering review to ensure transmission system operated as planned.

NOTE

Significant UFLS events may warrant the attention of the NPCC SS-38 working Group on Inter-Area Dynamic Analysis.

- i. TADS and disturbances to TADS Elements (reference Section [4.2](#), “Transmission Availability Data System”)
- j. Review of BCAPMC activities, including:
 - Assignment of evaluation of BES Cyber Asset patch
 - Approval of mitigation plan for applicable BES Cyber Asset patches

S&TSORC Chair

- 4.1.2. Schedule monthly S&TSORC meetings.
 - a. Annually, ensure S&TSORC members are notified of S&TSORC meeting schedule.

S&TSORC Secretary

- 4.1.3. Within one week prior to regularly scheduled S&TSORC meeting, ensure the S&TSORC meeting agenda is prepared and distributed to S&TSORC members. Agenda to include, as a minimum when applicable:
 - Review of minutes from previous S&TSORC meeting.
 - Review of unresolved issues from previous S&TSORC meeting.
 - Review and discussion of S&TSORC subcommittee activities and submittals (e.g., DRS, PACT, SEC)
 - Summary of issues, events, resolutions, and recommended actions.
 - Annual Eversource TADS Elements Disturbance Report (reference Section [4.2](#), “Transmission Availability Data System”)

S&TSORC Chair
S&TSORC Members

- 4.1.4. Invite guests to the S&TSORC meeting, as needed to address investigations and resolutions of issues affecting guests’ company or organization.

S&TSORC Secretary

- 4.1.5. Coordinate presenters with agenda items.

S&TSORC Members

- 4.1.6. Attend each S&TSORC meeting **or assign** personnel to attend in your place who can knowledgeably address S&TSORC issues affecting your organization.

S&TSORC Chair, Secretary, and Members

- 4.1.7. Refer to agenda and conduct/participate in S&TSORC meeting, as follows:
- a. Ensure a quorum of at least two S&TSORC members, plus Chairman, is present at each S&TSORC meeting, subject to the following:
 - S&TSORC business cannot be conducted without a quorum (minimum of two S&TSORC members plus the Chairman).
 - Alternate personnel assigned to attend meeting in place of a S&TSORC Member do not count towards the two member quorum.
 - If S&TSORC Chair is absent for a S&TSORC meeting, S&TSORC chair may appoint a S&TSORC member as an alternate, and alternate (in the role as S&TSORC Chair) does **not** count towards the two member quorum.
 - b. Review and discuss agenda items (and other concerns at the discretion of the S&TSORC chair), and identify actions to investigate and resolve issues.
 - c. Address disturbances and outages, as follows (reference M7-EN-3011, "Transmission System Disturbance Analysis"):
 - (1) Review disturbance and outage issues (except disturbances closed out per [Attachment B](#) "S&TSORC Disturbance Report Subcommittee") and supporting documentation such as:
 - Substation equipment malfunctions, e.g.: circuit breakers, capacitors, disconnect switches, protection & control equipment, etc.
 - Transmission line equipment failures, e.g.: shield wires, poles, crossarms, etc.
 - Storm related occurrences, e.g.: lightning, wind, ice, debris, etc.
 - Current S&TSORC subcommittee submittals, such as
 - Summary reports
 - Significant incident investigation reports prepared by construction and test contractors
 - (2) If disturbance investigations and corrective actions are not acceptable, identify shortcomings and return to DRS for resolution.
 - (3) If additional disturbance activity is required:
 - (a) Identify actions and action owners.
 - (b) Continue processing disturbance issue using M7-EN-3011, Transmission System Disturbance Analysis to include review and acceptance by DRS and/or at S&TSORC meeting.

d. Assign a S&TSORC status designator, as follows, to each S&TSORC issue:

O , Open	<ul style="list-style-type: none"> • Items not reviewed by the assigned investigator nor signed off as resolved by S&TSORC. • Items that require follow-up corrective action. These items remain open until recognized within another tracking system (i.e., an approved project number for an identified system modification).
C , Closed	Items with reviews and disposition completed by S&TSORC.

- Assign personnel or subcommittees, as needed, to fulfill S&TSORC obligations and resolve issues. Subcommittee sponsors shall select the chair(s) and members. Subcommittee members may name a delegate in their absence. Current subcommittees include:
 - DRS (reference [Attachment B](#))
 - SEC (reference [Attachment C](#))
 - PACT Committee (reference [Attachment D](#))
 - TOCERB (reference [Attachment E](#))
 - TLEC (reference [Attachment F](#))
 - BCAPMC (reference [Attachment G](#))
 - OES (reference [Attachment H](#))

S&TSORC Secretary

- 4.1.8. Record S&TSORC meeting activities in the minutes for each meeting.
- 4.1.9. Assign unique S&TSORC tracking number to each issue brought before S&TSORC, to facilitate tracking issue through resolution and follow-up.

NOTE

Currently, disturbances and OE are tracked in CATSWeb, which automatically assigns unique issue, action, and task tracking numbers.

- 4.1.10. Maintain Transmission Frequency (TFREQ) and Transmission Line Outage Duration Index (TLODI) Key Performance Indicator (KPI), on a monthly basis.
- 4.1.11. Within one week after a S&TSORC meeting, distribute meeting minutes to S&TSORC members, NH SORC Chair, and others as requested.

4.2. Transmission Availability Data System

Transmission availability data is critical in assessing transmission system performance. The NERC TADS User Group (TADSUG) expects Transmission Owners (TOs) to submit data on the transmission availability of TADS Elements (see section 5.2 Definitions) using forms prescribed in the NERC Transmission Availability Data System (TADS) Data Reporting Instructions. This process was developed and is administered by the NERC TADSUG as described in the “Transmission Availability Data System Revised Final Report”. (TADS documents and additional information are available at the “Transmission Availability Data System (TADS)” webpage <http://www.nerc.com/pa/RAPA/tads/Pages/default.aspx>)

TADS is limited to certain transmission elements with operating voltages of ≥ 200 kV. Currently at Eversource, only the 345 kV portions of the transmission system and the 230 kV terminal at Merrimack and MA East lines 282-602 (West Medway-Waltham) and 240-601 (West Medway-Framingham) are above this threshold.

S&TSORC Secretary

- 4.2.1. Reference the “TADS Data Reporting Instruction Manual” and perform the following:
- Maintain a list of disturbances to the Eversource Transmission System that meet the parameters for TADS submittal.
 - Ensure that all disturbances of Eversource TADS Elements are submitted to the Reliability Compliance group within the schedule, and using the forms, prescribed in the “TADS Data Reporting Instruction Manual”.

5. Administrative Information

5.1. Requirements

System outages and disturbances are required to be reviewed per the documents listed below:

- ISO-NE OP 20, Analysis and Reporting of Power System Incidents
- NERC CIP-007, Cyber Security – Systems Security Management
- NERC CIP-010 – Configuration Change Management, Vulnerability Assessments
- NERC EOP-004, Event Reporting
- NERC NUC-001, Nuclear Plant Interface Coordination
- NERC PRC-004, Protection System Misoperation Identification and Correction
- NERC PRC-012, Remedial Action Schemes
- NPCC C-45, Procedure for Analysis and Reporting of Protection System Misoperations

- NPCC Directory 4 – System Protection Criteria
- NPCC Directory 7 – Remedial Action Schemes
- NPCC Directory 12 – Automatic UFLS Program Requirements

BES Cyber Asset patch management process is required to be reviewed per the document listed below:

- NERC CIP-007, Cyber Security – Systems Security Management

5.2. Definitions

Word or phrase	Definition
BCAPMC	BES Cyber Asset Patch Management Committee
BPS	<p>Bulk Power System “Generation and transmission facilities on which faults or disturbances can have a significant effect outside of the local area.” (per “Acronyms for Eversource Trans System”)</p> <p>“The interconnected electrical systems within northeastern North America comprised of system elements on which faults or disturbances can have a significant adverse impact outside of the local area.” (per NPCC A-7 Glossary of Terms)</p> <p>Bulk-Power System “Facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof) and (B) electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.” (from Federal Power Act section 215, per FERC Order 693A)</p>
CONVEX	Connecticut Valley Electric Exchange (CT, Western MA)
CT	Connecticut
DRS or S&TSORC-DRS	Disturbance Report Subcommittee (S&TSORC subcommittee)
ESCC	Electrical System Control Center (New Hampshire)
FERC	Federal Energy Regulatory Commission
ITOMS	International Transmission Operations & Maintenance Study - A consortium of international transmission companies that are interested in comparing performance and sharing leading practices and processes.
KPI	Key Performance Indicator
MA	Massachusetts
Near Miss (safety incident)	An unplanned event that could have created an undesired outcome including injury or property damage.

Word or phrase	Definition
NERC	North American Electric Reliability Corporation
NH	New Hampshire
NPCC	Northeast Power Coordinating Council, Inc.
OE	Operating/Operational Experience/Events
Outage	Removal of equipment from normal service.
P&C	Protection and Control
PACT or S&TSORC-PACT	Protection & Control and Test (S&TSORC subcommittee)
SEC, or S&TSORC-SEC	Substation Equipment Committee (S&TSORC subcommittee)
S&TSORC	Substation and Transmission System Operations Review Committee
Significant Event	A transmission system event which typically meets one or more of the following criteria: <ul style="list-style-type: none"> • reportable to ISO-NE, NPCC, or DOE • UFLS event • Near Miss or higher safety incident • involves inter-area coordination or impact • involves failure of a Special Protection System (SPS) function • total loss of transmission system equipment protection • part of an adverse system trend
SMEs	Subject Matter Experts
SS-38 Working Group on Inter-Area Dynamic Analysis	Working group appointed by the NPCC Reliability Assessment Program, Task Force on System Studies (TFSS).
TADS	Transmission Availability Data System
TADSTF	Transmission Availability Data System Task Force
TFREQ	Transmission Frequency KPI for the measure of disturbance frequency.
TLEC	Transmission Line Equipment Committee (S&TSORC subcommittee)
TO	Transmission Owner
TOCERB	Transmission Operations Center Event Review Board
UFLS	Under-Frequency Load Shedding
UVLS	Under-Voltage Load Shedding

5.3. References

FERC Order [693-A](#) “Mandatory Reliability Standards for the Bulk-Power System”

NERC “[Glossary of Terms Used in Reliability Standards](#)”, also known as the “NERC Glossary”

NERC [Transmission Availability Data System \(TADS\) Data Reporting Instruction Manual](#)

NERC Transmission Availability Data System Revised Final Report

NERC [NUC-001-4](#) Nuclear Plant Interface Coordination

NPCC Document [A-7](#) “NPCC Glossary of Terms”

ISO-NE [OP 10](#) Emergency Incident and Disturbance Notifications

CONVEX [OI 0010](#) Disturbance and Significant Incident Processing and Reporting

ESCC [OP-0010](#) Power System Emergency Reporting

NSTAR OP-10 Emergency Incident and Disturbance Notifications

[RF-PI-9001](#), CATSWeb NU Issue Management User Guide

6. Summary of Changes

Revision 16

Replaces M5-OC-2001, “Substation & Transmission System Operations Review Committee, Revision 15, Effective 08/22/2017

- Added additional Manager and Director Members. Replaced Attachment H, Operational Concerns Committee with new Operating Experience Subcommittee. Updated sponsors of committee/subcommittees. Updated regulatory requirements and various references. Removed TLODI references. Updated Definitions to remove those that are in the NERC glossary and TADS procedure

Revision 15

Replaces M5-OC-2001, “Substation & Transmission System Operations Review Committee, Revision 14, Effective 06/01/2017

- Added Attachment H, Operational Concerns Committee and reference to it in Section 4.1.7

Revision 14

Replaces M5-OC-2001, "Transmission System Operations Review Committee", Revision 13, Effective 03/21/2016

- Updated 5.1, Requirements listing
- All instances of TSORC changed to S&TSORC
- Attachment A updated

Revision 13

Replaces M5-OC-2001, "Transmission System Operations Review Committee", Revision 12, Effective 02/24/2015

- Replaced Northeast Utilities and NU with Eversource, where possible
- Revised Purpose
- Updated job titles
- Added Step 4.1.1.j.
- Updated Definitions and Requirements
- Added Attachment G, BES Cyber Asset Patch Management Committee, and associated references

Revision 12

Replaces M5-OC-2001, "Transmission System Operations Review Committee", Revision 11, Effective 1/30/2014

- Added Note to Step 4.1.10
- Added Section 4.3 – TLODI Adjustments and Exclusions
- Changed all references to M1-PI-3002, "CATSWeb User Guideline for Transmission Disturbances/S&TSORC Actions" to RF-PI-9001, "CATSWeb NU Issue Management User Guide"
- Step 4.1.6 – reworded for clarity
- Added links
- Updated Requirements, Definitions and References

Revision 11

Replaces "*Transmission System Operations Review Committee*", Revision 10, effective 5/20/2013

- Roles and Responsibilities – updated to reflect current practice of calling them out in the Process Steps
- Removed reference to Director-Transmission Asset Strategy from Roles and Responsibilities section and Attachment E
- Removed reference to Transmission Asset Strategy in Attachment E

Revision 10

Replaces "*Transmission System Operations Review Committee*", Rev. 9, effective 07/24/12

- Updated procedure and attachments to include NSTAR members

- Removed Section 4.2 Operating Experience due to no longer an NATF member
- Changed TSAIDI to TLODI to improve transmission line reliability measurement
- Expanded step 4.1.8 to include "on a monthly basis"
- Updated Section 5.3 to cite references currently used in document

Revision 9

Replaces "*Transmission System Operations Review Committee*", Rev. 8, effective 11/22/10

- Updated Attachment A, NU Transmission Outage Internal Cause Code
- Updated Attachment E, Transmission Operations Center Event Review Board
- Changed all references to Transmission Owners & Operators Forum (TOOF) to North American Transmission Forum (NATF)
- Roles and Responsibilities – updated S&TSORC Member titles
- Corrected Definition of KPI

Revision 8

Replaces "*Transmission System Operations Review Committee*", revision 7, effective 08/05/10

- Section 1 Purpose – Added Transmission Line Equipment Committee (TLEC) to the listing of subcommittees
- Section 3 Roles and Responsibilities - Added S&TSORC members
- Added TLEC to Definitions
- Added Attachment F

Revision 7

Replaces "*Transmission System Operations Review Committee*", revision 6, effective 03/31/10

- Section 1 Purpose – Added Transmission Operations Center Event Review Board to the listing of subcommittees
- Section 4.1.7.e. – Added TOCERB
- Added TOCERB to Definitions
- Added Attachment E

Revision 6 (change bars have been added in right margins)

Replaces "*Transmission System Operations Review Committee*" revision 5, effective 2/21/2008

- TADS – Added Section 4.3 and revised procedure accordingly to recognize activities related to the FERC Transmission Availability Data System.

- Section 1 Purpose and Att C S&TSORC DRS – clarified that DRS is a subcommittee to S&TSORC and does not have a management sponsor, as is typical for many NU committees such as the S&TSORC supporting committees, TSEC and TPACT, described in Attachments C and D.
- Added Section 4.1.1.d. “Coordinating investigations of causes of unplanned events affecting Nuclear Plant Interface Requirements (NPIRs) and developing corrective actions to minimize future risk of such events with nuclear generator operators.”
- Section 5.1 Requirements – added NERC EOP-004-1 Disturbance Reporting
- Deleted “M, Monitor” category from Section 4.1.7.d “Assign a S&TSORC status designator (following) to each S&TSORC issue:” as the designator is no longer used by S&TSORC.
- Deleted Attachment A “Disturbance Investigation Priorities” as a KPI is now used to track the close out of disturbance reports. Relabeled remaining attachments accordingly – A. B. C, and D from B, C, D, and E.

Revision 5

Replaces “*Transmission System Operations Review Committee*” revision 4, effective 12/17/2007

- Revised Attachment C “S&TSORC Disturbance Report Subcommittee” to recognize Manager/Supervisor-Distribution Protection & Controls Engineering responsibilities to address Distribution disturbances that affect NU Transmission System (to comply with NERC standards PRC-004, 009, 016 and 022 concerning Distribution corrective actions for disturbances affecting the Transmission system).
- Att. E TPACT, added member “Manager-Test and Technical Support” per Dan Anderson, current holder of that position.
- Added new section 2.1 “NU Transmission System” and discussion, and definitions for BES/BPS, to clarify the S&TSORC focus on the entire NU Transmission System regardless of limitations from definitions of BPS and BES.
- Moved Attachment F “Operating Experience” to section 4.0 “Process Steps” to align with approved document format.

Revision 4

Replaces “*Transmission System Operations Review Committee*” revision 3, effective 8/03/2007

- Revised Attachment F “Operating Experience” to provide additional instructions for NATF and OE activities (to address management expectations).
- Section 3 Roles and Responsibilities, S&TSORC Members: replaced “CL&P Distribution Representative” with “Manager – CL&P Maintenance” to align with current S&TSORC member roster.

Revision 3

Replaces “*Transmission System Operations Review Committee*” revision 2, effective 4/23/2007.

- Revised section 4.1 to recognize CATSWeb interface with disturbance report activities.
- Revised step 4.1.7 quorum requirements from 4 S&TSORC members to 2 S&TSORC members per direction of S&TSORC chair.
- Att. A “Disturbances Investigation Priorities”, added note that source of this table is M8-MT-1001 “Transmission Maintenance Program”.
- Att. B “NU Transmission Outage Internal Cause Coding”, added words to code categories “E” and “HE-Ext” to clarify outage causes are limited to the NU transmission system.
- Added Operating Experience activity (Att. F and Sect. 3 Responsibilities).

Revision 2

Replaces “*Transmission System Operations Review Committee*” revision 1, effective 12/18/2006.

- Steps 4.1.1.c and 4.1.7.b, and Section 5.1 Requirements – recognized S&TSORC oversight of item 1 to 2006 NERC Readiness Audit Recommendations.
- Att. B “NU Transmission Internal Cause Code” - updated descriptions for cause code categories: Weather, Vegetation, Miscellaneous, Human Error.
- Added Attachment D Transmission Protection And Control & Test (TPACT) Committee, and recognized TPACT activities/input in body of procedure.
- Moved documents with requirements affecting this procedure from 5.3 References to 5.1 Requirements (no change bars shown).

Revision 1

Replaces “*Transmission System Operations Review Committee*” revision 0, effective 10/24/2006.

- Added details for Disturbance Report Subcommittee (DRS), including:
 - Attachment C “S&TSORC Disturbance Report Subcommittee”
 - S&TSORC review of DRS submittals
- Added details for Transmission Substation Equipment Committee (TSEC), including:
 - Attachment D “Transmission Substation Equipment Committee”
 - S&TSORC review of TSEC submittals
- Step 4.1.9: reduced time for distribution of S&TSORC meeting minutes from 2 weeks to 1 week to support DRS meeting schedule (monthly, about 2 weeks prior to S&TSORC meeting).
- Step 4.1.3, 3rd bullet: recognize subcommittee submittals (in lieu of minutes).
- Recognized use of Attachments A and B information in instructions.
- Recognized review of UVLS events like done for UFLS events.

Revision 0

- None – this document is the original issue

Attachment A, NERC TADS Automatic Outage Cause Code Types

Automatic Outage

An outage that results from the automatic operation of a switching device, causing an element to change from an in-service state to a not in-service state. Single-pole tripping followed by successful AC single-pole (phase) reclosing is not an automatic outage.

Weather, excluding lightning

Automatic outages caused by weather such as snow, extreme temperature, rain, hail, fog, sleet/ice, wind (including galloping conductor), tornado, microburst, dust storm, and flying debris caused by wind.

Lightning

Automatic outages caused by lightning.

Environmental

Automatic outages caused by environmental conditions such as earth movement (including earthquake, subsidence, earth slide), flood, geomagnetic storm or avalanche.

Contamination

Automatic outages caused by contamination such as bird droppings, dust, corrosion, salt spray, industrial pollution, smog or ash.

Foreign Interference

Automatic outages caused by foreign interference from objects such as an aircraft, machinery, a vehicle, a train, a boat, a balloon, a kite, a bird (including streamers), an animal, flying debris not caused by wind, and when falling conductors from another line cause an outage.

Foreign interference is not due to an error by a utility employee or contractor. Categorize these as "Human Error".

Fire

Automatic outages caused by fire or smoke.

Vandalism, Terrorism or Malicious Acts

Automatic outages caused by intentional activity such as shot conductors or insulators, removing bolts from structures, and bombs.

The above definition includes intentional malicious acts such as cyber-attacks. However, accidental acts initiated by any incorrect action traceable to employees and/or contractors for companies operating, maintaining, and/or providing assistance to the Transmission Owner should be cause coded as "Human Error".

Failed AC Substation Equipment

Automatic outages caused by the failure of AC Substation, i.e., equipment “inside the substation fence” including transformers and circuit breakers, but not protection system equipment as is not part of the AC substation. Refer to the definition of “AC Substation”.

Failed AC/DC Terminal Equipment

Automatic outages caused by the failure of AC/DC terminal equipment, i.e., equipment “inside the terminal fence” including power-line carrier (PLC) filters, AC filters, reactors and capacitors, transformers, DC valves, smoothing reactors, and DC filters, but not protection system equipment as it is not part of the DC terminal. Refer to the definition of “AC/DC Terminal”.

Failed Protection System Equipment

Automatic outages caused by the failure of protection system equipment includes any relay and/or control misoperations, except those that are caused by incorrect relay or control settings that do not coordinate with other protective devices. Categorize these as “Human Error”.

Failed AC Circuit Equipment

Automatic outages related to the failure of AC circuit equipment, i.e., overhead or underground equipment “outside the substation fence”. Refer to the definition of “AC Circuit”.

Failed DC Circuit Equipment

Automatic outages related to the failure of DC circuit equipment, i.e., overhead or underground equipment “outside the terminal fence”. Refer to the definition of “DC circuit”. However, include the failure of a connecting DC bus within an AC/DC back-to-back converter in this category.

Vegetation

Automatic outages (both momentary and sustained) caused by vegetation, with the exception of the following exclusions, which are contained in FAC-003-1:

1. Vegetation-related outages that result from vegetation falling into lines from outside the right-of-way that result from natural disasters shall not be considered reportable with the Vegetation cause code. Examples of disasters that could create non-reportable Vegetation cause code outages include, but are not limited to earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defied either by the Transmission owner or an applicable regulatory body, ice storms, floods, and
2. Vegetation-related outages due to human or animal activity shall not be considered reportable under the Vegetation cause code. Examples of human or animal activity that could cause a non-recordable Vegetation cause code outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or agricultural activities, or removal or digging of vegetation.

Outages that fall under the exclusions should be reported under another cause code and not the Vegetation cause code.

Power System Condition

Automatic outages caused by power system conditions such as instability, overload trip, out-of-step, abnormal voltage, abnormal frequency, or unique system configurations (e.g., an abnormal terminal configuration due to existing condition with one breaker already out-of-service).

Human Error

Automatic outages caused by any incorrect action traceable to employees and/or contractors for companies operating, maintaining, and/or providing assistance to the Transmission Owner will be identified and reported in this category. In addition, any human failure or interpretation of standard industry practices and guidelines that cause an outage will be reported in this category.

Unknown

Automatic outages caused by unknown causes should be reported in this category.

Other

Automatic outages for which the cause is known, however, the cause is not included in the above list.

Attachment B, S&TSORC Disturbance Report Subcommittee

PURPOSE

The purpose of the S&TSORC Disturbance Report Subcommittee (S&TSORC-DRS, or DRS) is to promote S&TSORC meeting effectiveness by screening out those Disturbance Reports that do not require S&TSORC review or resolution.

RESPONSIBILITY

S&TSORC has assigned the DRS responsibility for:

- Initial review of Disturbance Reports.
- Screening out, ensuring resolution, and closing out disturbance reports determined by DRS as not warranting S&TSORC involvement.
- Coordinating with Distribution to ensure misoperations affecting the Eversource Transmission System are reviewed, analyzed and resolved; and appropriate corrective actions identified and completed.

ORGANIZATION

The S&TSORC-DRS sponsors are the Director – Substation Technical Engineering and Director Protection and Control Engineering who select DRS chairs and members. The DRS is composed of the following personnel, and as augmented by S&TSORC:

The following share chair responsibilities for DRS activities to include scheduling meetings and participants.

- Manager – Protection & Controls Compliance Standards and Support
- Manager – Field Engineering

Other DRS members:

- Manager – Field Communications
- Manager – Asset Management
- Manager – Substation Technical Engineering

MEETING SCHEDULE AND FREQUENCY

Monthly meetings scheduled one to two weeks prior to scheduled S&TSORC meeting and post end of month under review.

ACTIVITY

Perform an initial review of disturbance reports, and ensure the root cause of each disturbance is accurately and consistently identified per [Attachment A](#) “Eversource Transmission Outage Internal Cause Code”.

Close-out those disturbance reports which meet any of the following criteria:

- Disturbance event resulted in correct operation of substation and transmission system/components, to include correct: tripping times, reclosing operations, lockout operations, transfer trips, etc.
- Disturbance involving misoperation where **all** corrective actions have been identified and closure of disturbance event is assured via currently scheduled activity.

Prepare a DRS summary report containing the following:

- Disturbance reports closed out by DRS.
- Disturbance reports reviewed, but not closed out, by DRS.
- Trends, generic issues, and events considered by DRS having sufficient significance to warrant S&TSORC review.

DELIVERABLES

Submit the DRS summary report and supporting information to S&TSORC to be included as attachments to minutes of the S&TSORC meeting where presented.

Attachment C, Substation Equipment Committee

PURPOSE

The Substation Equipment Committee (SEC) provides an overview of substation equipment performance, excluding equipment addressed by the Protection and Control & Test (PACT) Committee.

RESPONSIBILITY

SEC has the responsibility for:

- Evaluating substation equipment issues
- Ensuring acceptable performance of substation equipment and components,
- Tracking and trending of equipment failures,
- Identification of opportunities for capital projects & programs,
- The sharing of critical information and lessons learned

ORGANIZATION

SEC sponsor is the Director – Substation Technical Engineering, who selects a SEC chair and members consisting of CT, MA, and NH representatives from the following, as a minimum:

- Manager – Asset Management
- Manager – Substation Operations
- Manager – Field Engineering
- Manager – Substation Engineering and Design
- Manager – T&D Standards
- Manager – Substation Technical Engineering (Chair)

MEETING SCHEDULE AND FREQUENCY

Monthly, and as requested by S&TSORC, the SEC sponsor, or SEC Chair.

ACTIVITY

Provide the substation equipment implementation function for S&TSORC.

Provide a forum to:

- Review and discuss resolution of substation equipment issues
- Establish synergies in equipment, preventative maintenance, emergency spare inventory and other substation equipment issues across the Eversource system

Review service bulletins from suppliers of substation equipment for issues that may affect Eversource equipment

Identify and propose implementation of new substation technology/equipment based on best practices of industry.

DELIVERABLES

Quarterly SEC reports (meeting minutes are acceptable) that summarize SEC activities, concerns, and recommendations to be submitted at the S&TSORC meetings.

Attachment D, Protection and Control & Test Committee

PURPOSE

The Protection and Control & Test (PACT) Committee provides an overview of all Protection and Control (P&C) issues associated with the Eversource system across all three regions, including related test issues.

RESPONSIBILITY

PACT has the responsibility for:

- Oversight of Eversource P&C and testing regulatory compliance
- Evaluating P&C misoperations, equipment issues, and identifying equipment failure trends

ORGANIZATION

PACT sponsors are Director – Protection and Control Engineering and Director(s) Field Engineering, who select PACT co-chairs and members. Members should include the following representatives from each region (CT, MA, NH):

- Manager – Operations (CONVEX, Mass Ave, ESCC)
- Manager – Protection & Controls Engineering
- Manager – Field Engineering
- Manager – Field Communications
- Manager – Asset Management (Chair)
- Manager – Substation Technical Engineering

MEETING SCHEDULE AND FREQUENCY

Quarterly, and as requested by S&TSORC, the PACT sponsor, or the PACT Chair.

ACTIVITY

Provide the P&C implementation function for S&TSORC

DELIVERABLES

Quarterly PACT reports (meeting minutes are acceptable) that summarize PACT activities, concerns, and recommendations to be submitted at the S&TSORC meetings.

Attachment E, Transmission Operations Center Event Review Board

PURPOSE

The Transmission Operations Center Event Review Board (TOCERB) provides an internal forum to review transmission operations infrastructure events and oversee the disposition of follow-up actions.

RESPONSIBILITY

The TOCERB shall:

- i) ensure ongoing review of events
- ii) ensure prompt and appropriate corrective actions are taken
- iii) focus on maintaining continuous improvement in the reliability of transmission operations infrastructure

By institutionalizing the review and analysis process for significant transmission operations infrastructure events, Eversource will have an enhanced ability to:

- mitigate consequences of infrastructure events;
- enable Eversource leadership to consider and authorize corrective actions;
- share lessons learned among multiple departments;
- identify common causes and trends;
- ensure Eversource management has reviewed and identified internal changes necessary to ensure improvement in infrastructure performance;
- oversee internal assessments of Eversource's infrastructure failure events;
- ensure the development of Action Plans to correct the problem;
- ensure all key functional areas of Eversource that are affected by infrastructure failure are engaged and knowledgeable about events and issues with infrastructure failures.

ORGANIZATION

Membership may consist of representatives, or designees, from Transmission Operations, NH Energy Delivery, eastern MA Operations, Environmental and Property Management, IT Infrastructure, and Transmission Maintenance and Work Management. Meetings are organized by the Director, Transmission Operations, CT and MA, who serves as chairman.

- **Chairman**
 - Schedule and conduct meetings.
- **Vice Chairman**
 - Act in the place of the Chairman at the Chairman's request.
- **Secretary**
 - Coordinate activities of the transmission Operations Infrastructure Event Review Board.
 - Create Agendas for the Chairman's review and approval.
 - Take meeting minutes and publish them following approval by the Chairman.
 - Prepare materials necessary to support the Board and Board meetings.
- **Members**
 - Attend all meetings or assign responsibility within the individual's functional area.
 - Review and discuss all significant transmission operations infrastructure events.
 - Collect and analyze all relevant data.
 - Provide oversight and guidance of internal assessment activity on infrastructure failures.

- Facilitate the development of corrective actions and prioritize for implementation.
- Follow through with action plans.
- **Transmission Operations:**
 - Establish and maintain a list of all infrastructure events and corrective actions.
 - Oversee, coordinate and track all CATSWeb items related to Infrastructure events.
- **Infrastructure Owner (Internal Technical Expert):**
 - Report significant transmission operations infrastructure events.
 - Investigate and prepare root cause analysis.
 - Prepare a report including the date and time of the incident, incident summary, root cause analysis, corrective actions and any other considerations and present the report to the TOCERB at their scheduled meeting.
 - Follow through with corrective actions.
 - Share lessons learned with other pertinent departments.

MEETING SCHEDULE AND FREQUENCY

Meetings will be scheduled on an as needed basis depending on the frequency and severity of the Infrastructure Events. Meetings will take place in the Transmission Operations Center or at a place scheduled by the Chairman. A meeting will be scheduled within 30 days of an event requiring review.

ACTIVITY

Review transmission operations infrastructure events and oversee the disposition of follow-up actions

DELIVERABLES

Submit TOCERB status report and supporting information to S&TSORC at the S&TSORC meeting immediately following preparation of those documents. Corrective actions not completed at the time of the TOCERB review will be tracked in CATSWeb.

Attachment F, Transmission Line Equipment Committee

PURPOSE

The Transmission Line Equipment Committee (TLEC) provides an overview of line equipment performance.

RESPONSIBILITY

TLEC has the responsibility for:

- Transmission line maintenance philosophy
- Evaluating all transmission line equipment issues
- Ensuring acceptable performance of transmission line equipment and components

ORGANIZATION

TLEC sponsor is the Director – Transmission Engineering, who selects a TLEC chair and members consisting of CT, MA, and NH representatives from the following, as a minimum:

- Manager – Line Construction & Maintenance, Transmission (Chair)
- Field Supervisor – Transmission Line Construction & Maintenance
- Supervisor – Electric Field Operations (Transmission)
- Manager – Asset Strategy & Performance
- Manager – Transmission Line and Civil Engineering
- Senior/Lead Engineer

MEETING SCHEDULE AND FREQUENCY

Quarterly, and as requested by S&TSORC, the TLEC sponsor, or TLEC Chair.

ACTIVITY

Provide the line equipment implementation function for S&TSORC.

Provide a forum to:

- Review and discuss resolution of line equipment issues
- Assess and implement emerging technology and practices for use on the Eversource Transmission System

Provide current Maintenance activities and expenditures.

Provide status updates of active aerial and on-foot patrols.

DELIVERABLES

Submit quarterly TLEC summary report that summarizes TLEC activities, concerns, and recommendations to S&TSORC at the S&TSORC meeting immediately following preparation of those documents.

Attachment G, BES Cyber Asset Patch Management Committee

PURPOSE

The BES Cyber Asset Patch Management Committee (BCAPMC) provides a patch management process for tracking, evaluating, and installing patches for applicable Medium Impact BES Cyber Assets.

RESPONSIBILITY

BCAPMC has the responsibility for:

- Tracking BES Cyber Asset patches that involve cyber security fixes
- Assigning Subject Matter Experts (SMEs) to evaluate BES Cyber Asset patches that involve cyber security fixes
- Developing mitigation plans for S&TSORC approval to install BES Cyber Asset patches that involve cyber security fixes

ORGANIZATION

BCAPMC sponsor is the Director-Transmission Operations, who selects a BCAPMC chair and members consisting of representatives from the following, as a minimum:

- Manager – Operational Compliance (Chair)
- Manager – Field Communications
- Manager – Protection and Controls Engineering
- Manager – System Control and Protections Engineering
- Supervisor – Transmission Protection & Controls (NH)

MEETING SCHEDULE AND FREQUENCY

Monthly not to exceed 35 days, and as requested by S&TSORC.

ACTIVITY

Identify and track source(s) for the release of cyber security patches for Medium Impact BES Cyber Systems.

Before monthly S&TSORC meeting:

- Prepare list of patches to be discussed
- Prepare preliminary assignment of SME to evaluate patch

Obtain S&TSORC approval for installation of applicable patches.

Obtain S&TSORC approval for mitigation plan to install applicable patches.

DELIVERABLES

Submit monthly BCAPMC summary report to S&TSORC at the S&TSORC meeting immediately following preparation of those documents.

Attachment H, Operating Experience Subcommittee (OES)

PURPOSE

The Operating Experience subcommittee (OES) provides an internal forum to review lessons learned from external reported events or incidents, currently obtained from the North American Transmission Forum (NATF) Human Performance Corrective Action Program Operating Experience (CAP-OE) Practice Group. Subjects reviewed can encompass a wide variety of issues including but not limited to substation or line equipment, maintenance, system operations, system protection, human performance, and compliance. The S&TSORC OES assists in determining if S&TSORC action is required to identify Eversource gaps, risks or threats and strengthen Eversource practices.

RESPONSIBILITY

The OE subcommittee shall:

- Ensure ongoing review of external events or incidents.
- Provide summary presentations of the events or incidents to support discussion at S&TSORC.
- Obtain recommendations of follow-up action, either assignments to S&TSORC subcommittee or individual.

ORGANIZATION

The OES sponsors are the Director – Substation Technical Engineering and Director Protection and Control Engineering who selects the OES chair and members. The OES is composed of Eversource personnel which participate in the following three NATF Participant groups and as augmented by S&TSORC:

- NATF Human Performance Corrective Action Program Operating Experience (CAP-OE) Practice Group, Substation Technical (Chair)
- NATF Equipment Performance and Maintenance Lines Equipment Practice Group
- NATF System Protection Practice Group

MEETING SCHEDULE AND FREQUENCY

Meetings to be scheduled monthly based on applicable NATF CAP-OE lessons learned available.

ACTIVITY

- Team Chair will provide members with monthly NATF OE reports
- The OES will filter reports for applicability to Eversource and recommend which reports get further review at S&TSORC.
- Team Chair will summarize the selected reports at each monthly S&TSORC meeting.
- S&TSORC members will decide if further action is needed and will delegate to the respective S&TSORC subcommittee, such as PACT, DR or TLECT. An individual may also be assigned.
- Per the current S&TSORC process, the assigned subcommittees will determine an Eversource extent of condition and action plan, which will be tracked until completion.
- On occasion, the S&TSORC members may have an Eversource Operating Experience to share with the NATF community. If so, this will be discussed during the OES section of the monthly S&TSORC agenda. The OES will support the development of the report and submittal to NATF, pending S&TSORC, senior leadership and legal review.

DELIVERABLES

Submit the OES summary report of supporting information to S&TSORC to be included as attachments to minutes of the S&TSORC meeting where presented.

Supervisor's Briefing Sheet

EVERSOURCE

Field Documentation

Issue Date: 04-Oct-24

Document Number: SBS-24-008

Revision: 0

Subject: *Metal-Clad Switchgear Inspection and Maintenance*

Effective Date: 04-Oct-24

Background

T&D Standards has been tasked with creating new work method standards for routine inspection and maintenance on equipment which corresponds to recent EMP Chapter updates. These work methods will supersede the current **EMP 6.0** Documents within the chapter which includes a routine inspection performed monthly, as well as major maintenance performed "as required".

EMP 5.65 - Metal-Clad Switchgear was recently updated in 2023 and a newly written Work Method **WMS 51.07** has been created and will supersede **EMP 6.65** upon approval. **WMS 51.07** - *Metal-Clad Switchgear Inspection and Maintenance* provides details for the inspection and maintenance requirements for the metal-clad switchgear structure itself. Requirements for the components that reside within the structure are covered in separate documentation.

The highlights of the document include:

- Section 4 of the document details the inspection items for the monthly routine inspection performed while the switchgear is energized.
- Section 5 of the document details the items for major maintenance that are typically only performed when issues are found, and the switchgear needs to be removed from service for repairs.
- Section 6 added to cover annual inspection of lifting devices where applicable to meet OSHA requirements. This will also be included in an updated **EMP 5.65**.

Expectations

Effective 2024, **WMS 51.07** shall be used for maintenance and inspections of metal-clad switchgear.

References

EMP 5.65 – Metal-Clad Switchgear

WMS 51.07 – Metal-Clad Switchgear Inspection and Maintenance

Contact Information

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Revision History

Revision Number	Date	Summary of Changes
0	04-Oct-24	Original document

Effort to harmonize the BASE model development approach between the DER Planning MA team, DSP MA team and the AFM team.

Participants

Team representative: John Cerulli, Syed Ali - DER Planning MA

Team representative: Ling Yang - DSP MA

Team representative: Steffen Ziegler - AFM team

John Kreso

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Charles Thomas

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Mark Bentson

Approvers

Team representative: Syed Ali - DER Planning MA

Team representative: Ling Yang - DSP MA

Team representative: Steffen Ziegler - AFM team

Scope

The effort to harmonize the BASE model development of Synergi Electric substation models is necessary to provide higher quality models and time savings to the DER Planning team and DSP MA team. The AFM team will modify and/or amend the existing recipe for BASE model development (referred to as “value stream” document). The expected start date of applying the new and modified recipe will go in effect from January 2024 on. The impact of the new and modified recipe will be evaluated in the meantime, by aspects of necessary effort, automation potential, database accesses and re-training.

Transformer- and Transmission impedances:

1. Use transmission impedances from Aspen. This needs to be part of the model build effort.
2. Use transformer impedances from NX-9 (once verified with data owner). Verify transformer impedance from transformer nameplate/test report, compare with NX-9, this should be part of model build effort. (A common R/X calculator needs to be used by all modelers).
3. Use actual transformer voltages (rather than system nominal voltages), nameplate information and test report from NX-9.
4. Compare fault duty at substation bus, not on the feeders. Open the Synergi feeder breakers to eliminate the impact of DER on the substation bus fault current. (Aspen does not include DER. If you want to compare it to Aspen the modeler has to open the feeder breakers in Synergi).
5. Include the Aspen fault current in the notes to make the comparison easier.
6. Using the same fault current settings in Synergi for all departments is recommended. The fault current settings should be available to all System Planning departments.
7. Run fault analysis and compare with Aspen fault duties for feeders at the substation bus (within reasonable margin, e.g.: +- 15%).

Large DER (>= 500 kW)

In general, there are two options to best integrate/allocate these loads:

Option 1:

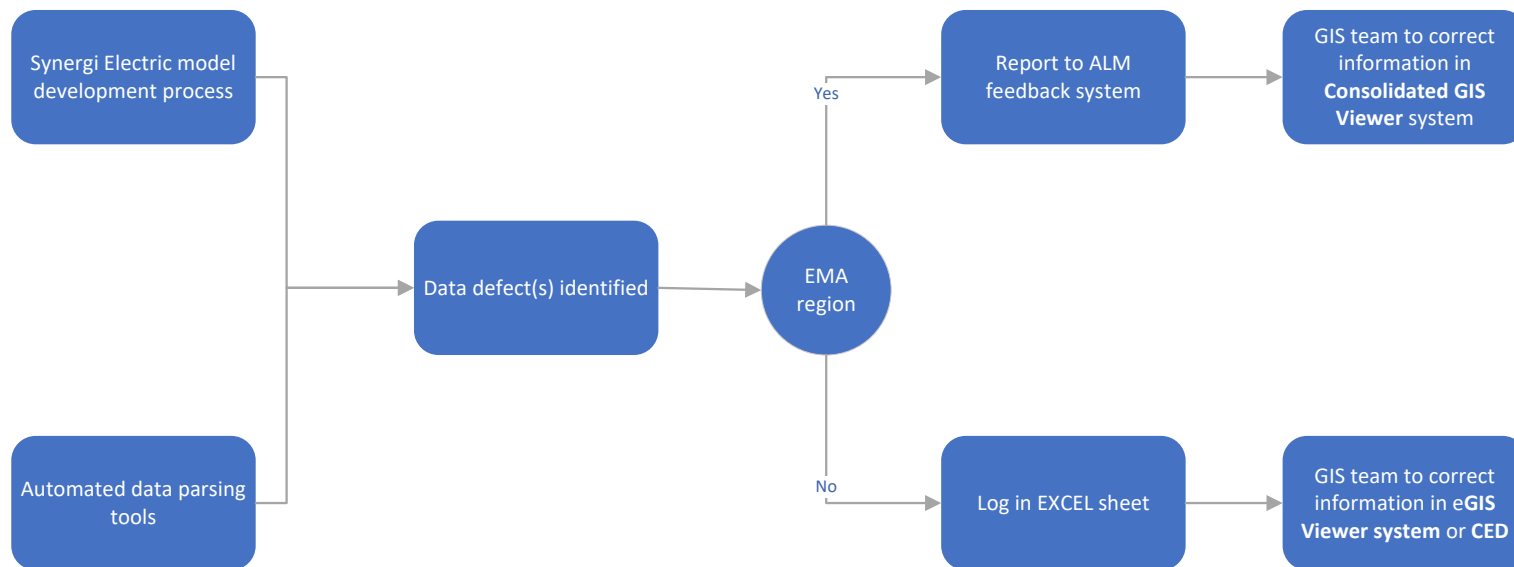
1. For large DER, 500 kW and above, it is recommended to run a simple effort monthly. It is necessary to combine CED and DERTS.
2. Get a list of DER from the CED, and then supplement the list with DER that are not in the CED but are in DERTS and where the feeder is listed in DERTS. This can be done in Excel. The expected effort is 4+ hours each month.

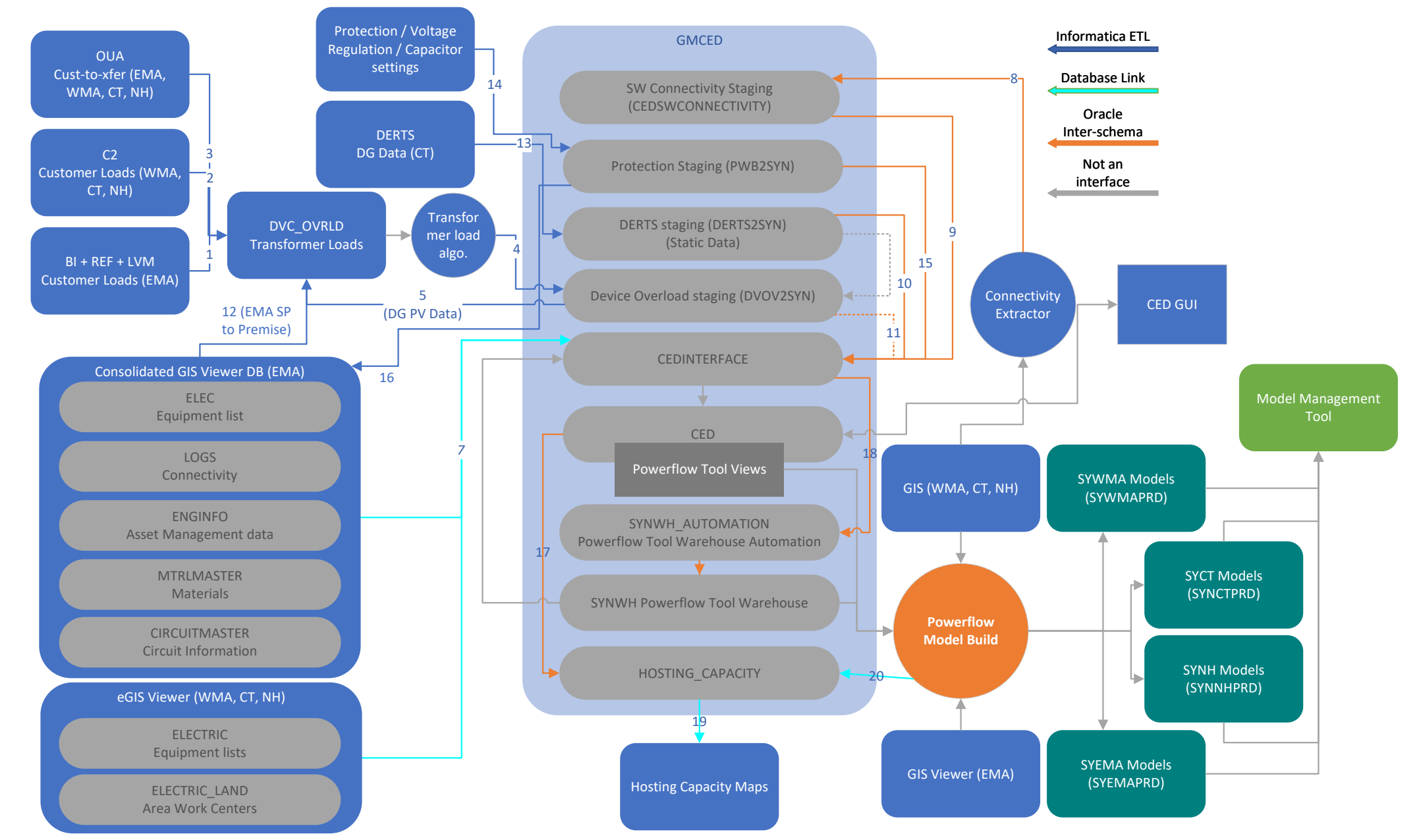
Option 2:

1. Take an Excel extract from the CED and map the circuit from the CED to an Excel extract from PowerClerk. In this way, the correct circuit numbers from the CED will be added to PowerClerk. The expected effort for that is 4+ hours. "Customer Care" needs to collaborate and update PowerClerk from the CED.

Small DER (< 500 kW)

1. Attach all small DER (< 500 kW) as a lump (difference-reconciliated) to each associated feeder head.
2. The field "Circuit" is important for this calculation and circuit is the missing information. For individual DER, circuit is sometimes shown in the CED but not in DERTS, and the circuit in the CED is always better than the circuit in DERTS. It is recommended to do a reconciliation as noted above using Excel extracts. The source-of-truth is not always clear and has to be determined.



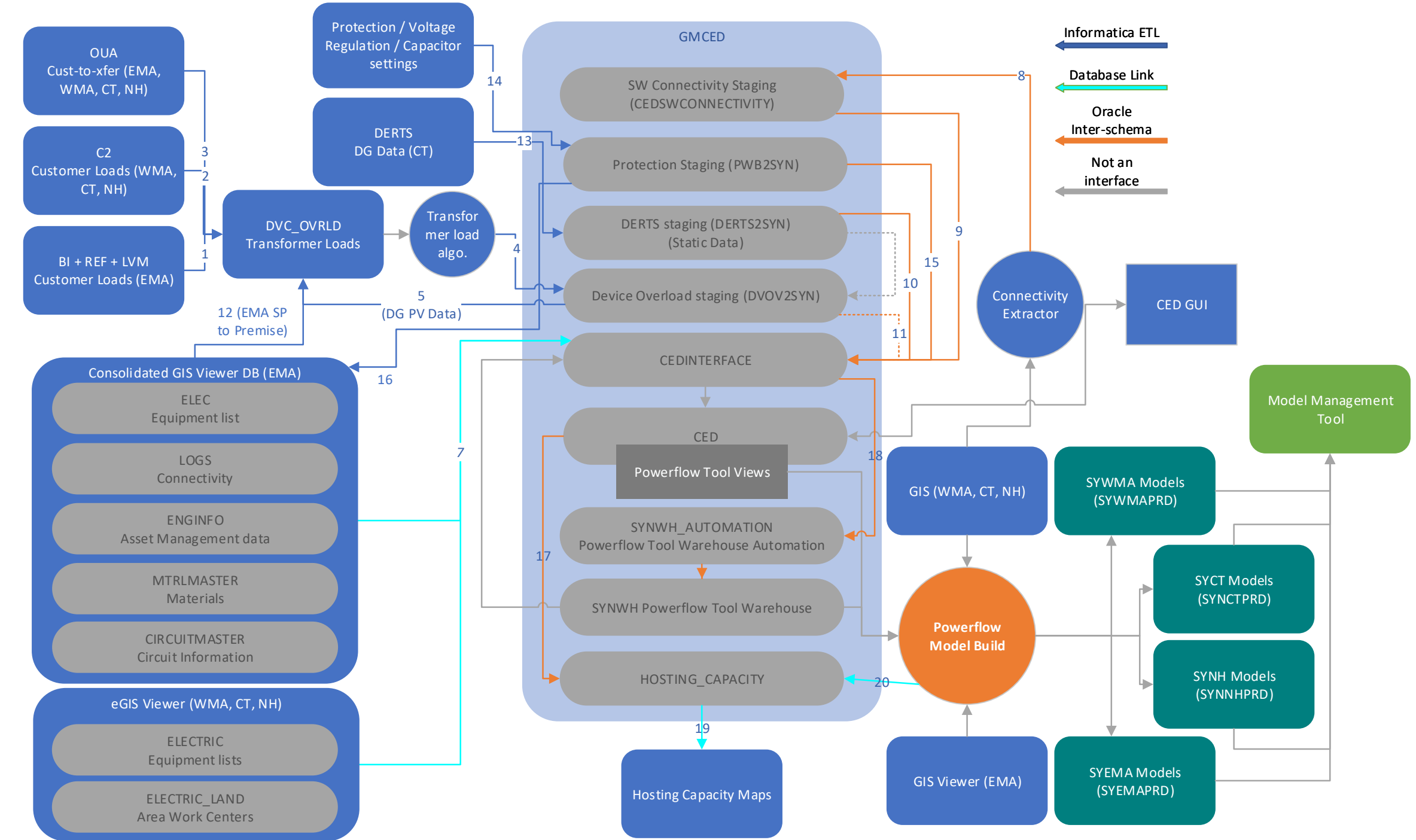


Definitions for:
 BASE MODEL
 PLANNING MODEL

Model Build Steps

#1 BASE							
#	STEP	KEY	SOURCE	VERIFICATION	DATA CURRENT STATE	COMMENT	ESTIMATED TIME
1	Impedance verification Sub-station TRX		ASPEN OneLiner	y	< 1 year		5.000%
2	Station Load Profile	Yearly <i>peak-day-X</i> for previous year		n	previous year		10.000%
3	Irradiance Load Profile	Yearly <i>peak-day-X</i> for previous year		y	previous year		10.000%
4	Station LTC settings		Methodology slide	y	previous year		5.000%
5	Capacitor and Regulator settings		Methodology slide	y	previous year		10.000%
6	Connectivity check	Forge pull is referenced to source	GIS and MapViewerOnline	y	previous year		10.000%
7	Large Customer data		GIS (1) and MVWeb	y	previous year	MV-Web is the last check to be made for L.C. Reach out to Distribution Engineering for unknown L.C.	10.000%
8	DER >= 500 kW check	PowerBI (from CED)	CED (1) and PowerClerk (2)	y	current		10.000%
9	"Unknown" Conductor check		OMS and EPOCH	y	current	Takes more time if DE is involved	15.000%
10	Exceptions	Phase corrections, changes of TRX type, Synergi issues, missing information			previous year/current	Time spent heavily varies from station to station.	5.000%
11	Meter Allocation	Forge pull is referenced to PI Data	PI Data	y	previous year		5.000%
12	Load Allocation check	Non-coincidental for <i>peak-day-X</i>	EXCEL from PI Data Links to Tag Access	y	previous year	Capacitors turned off before load allocation, then switched back on.	2.500%
13	Run Load Flow Analysis	Compare results to Meter demand (should be within given tolerance)		y	previous year	Capacitors can be turned on/off. DG can be turned on/off.	2.500%
14	Check Base Model into Adept						100.000%

#2 PLANNING							
1	Clean and up-to-date BASE MODEL required			y	< 180 days		30.000%
2	Step Load changes and upgrades	Verified with GIS, OMS and Google Maps	EXCEL reference documents (EMA and WMA)	y			10.000%
3	Reconductoring	Verified with GIS, OMS and Google Maps	EXCEL CIP sheet ("to" "from" info)	y	?	Who manages CIP spread sheets? How frequently are these updated, are they comprehensive?	10.000%
4	Equipment updates	Verified with GIS, OMS and Google Maps	EXCEL CIP sheet (location and conductor connection)	y	?		10.000%
5	Peak Load Forecast (10-year) for each year	Given per substation, but prorated to feeder	Dan Ludwig?		?	Ideally we use the forecasting teams 10 year forecast in the future when this data becomes available.	10.000%
6	Future DER (>= 500 kW). "In queue"	PowerBI from CED export to EXCEL. GIS, OMS and Google Maps used to verify.	CED (1) and PowerClerk (2)	y			20.000%
7	Feeder or circuit reconfigurations		Excel CIP sheet	y	y		10.000%
8	Check planning model into Adept						100.000%



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Massachusetts Grid Modernization Program Year 2022 Evaluation Report: Volt-VAR Optimization

Massachusetts Electric Distribution Companies

Submitted by:

Guidehouse Inc.
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Reference No.: 219514
June 30, 2023

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Table of Contents

1. Introduction to Massachusetts Grid Modernization	xx
1.1 Massachusetts Grid Modernization Plan Background.....	xx
1.2 VVO Investment Area Overview	1
2. VVO Evaluation Process	5
2.1 Infrastructure Metrics Analysis.....	6
2.2 Performance Metrics Analysis	9
3. VVO Infrastructure Metrics	11
3.1 Data Management.....	11
3.2 Deployment Progress and Findings.....	16
4. VVO Performance Metrics	68
4.1 Data Management.....	68
4.2 VVO Performance Metrics Analysis and Findings.....	69
5. Key Findings and Recommendations	118
5.1 Key Findings for VVO Infrastructure Metrics.....	118
5.2 Key Findings for VVO Performance Metrics	120
5.3 Recommendations	121
Appendix A. Additional Feeder Characteristics by EDC	A-1
A.1 Eversource Additional Feeder Characteristics.....	A-1
A.2 National Grid Additional Feeder Characteristics	A-4
A.3 Unifil Additional Feeder Characteristics.....	A-6
Appendix B. Detailed Information for Performance Metrics Analysis	B-8
B.1 Conservation Voltage Reduction Factor	B-8
B.2 Regression Methodology for Estimating VVO-Related Energy and Voltage Changes	B-
8	
B.3 Methodology for Estimating VVO Energy Savings for Feeders that Completed On/Off	B-12
Testing	
B.4 Regression Methodology for Estimating VVO-Related Peak Load Changes	B-13
B.5 Methodology for Estimating VVO-Related Peak Load Changes for Feeders that	B-15
Completed On/Off Testing	
B.6 Regression Methodology for Power Factor	B-15
B.7 Methodology for Estimating VVO-Related Power Factor Changes for Feeders that	B-16
Completed On/Off Testing	
B.8 Distribution Losses Methodology	B-16
B.9 Methodology for Estimating VVO-Related Distribution Loss Changes for Feeders that	B-17
Completed On/Off Testing	
B.10 Overall Data Attrition from Data Cleaning.....	B-17

B.11 Detailed Performance Metrics Results	B-28
B.12 Feeder MW Percent of Peak MVA	B-32
B.13 VVO Energy Savings and Voltage Reductions by Season	B-35
B.14 Seasonal Data Attrition from Data Cleaning	B-42

List of Tables

Table 1. VVO Evaluation Metrics	viii
Table 2. VVO Data Sources	viii
Table 3. Term 1 VVO Infrastructure Metrics Summary	x
Table 4. Term 1 Infrastructure Metrics for VVO Feeder Deployment Progress	x
Table 5. Term 2 VVO Infrastructure Metrics Summary	x
Table 6. Term 2 Infrastructure Metrics for VVO Feeder Deployment Progress	xi
Table 7. Performance Metrics Results for the Spring 2022 – Winter 2022/23 M&V Period	xvii
Table 8. Term 1 (2018-2021) Preauthorized Budget, \$M	xxi
Table 9. Overview of Term 2, Track 1 Investment Areas	xxii
Table 10. Overview of Term 2, Track 2 Investment Areas	xxiii
Table 11. Term 2 (2022-2025) Preauthorized Budget, \$M	xxiv
Table 12. Infrastructure Metrics Overview	xxv
Table 13. Performance Metrics Overview	xxvi
Table 14. GMP Preauthorized Budget for VVO	1
Table 15. VVO Deployment Phases	2
Table 16. Description of Devices Deployed Under VVO Investment	2
Table 17. VVO Evaluation Metrics	3
Table 18. VVO M&V Objectives and Associated Research Questions	3
Table 19. GMP Term 1 Infrastructure Metrics Overview – Eversource Only	6
Table 20. GMP Term 1 Infrastructure Metrics Overview by Feeder – Eversource Only	7
Table 21. GMP Term 2 Infrastructure Metrics Overview – All EDCs	7
Table 22. GMP Term 2 Infrastructure Metrics Overview by Feeder – All EDCs	8
Table 23. Performance Metrics Overview	9
Table 24. GMP Term 1 Deployment Categories Used for the EDC Plan	11
Table 25. GMP Term 2 Deployment Categories Used for the EDC Plan	12
Table 26. VVO Supplemental Data	13
Table 27. EDC Data Received for Analysis	14
Table 28. Term 1 EDC Device Deployment and Spending Data Legend – Eversource Only ...	15
Table 29. Term 2 EDC Device Deployment and Spending Data Legend	16
Table 30. Number of Feeders and Customers Covered by VVO	18
Table 31. VVO Substations and VVO On/Off Testing Start by EDC	19
Table 32. VVO Deployment Completion by Phase and EDC as of 12/31/2022	20
Table 33. Term 1 2022 Infrastructure Metrics for VVO	21
Table 34. 2022 Infrastructure Metrics for VVO Feeder Deployment – Term 1 Plan Feeders ...	22
Table 35. Term 2 2022 Infrastructure Metrics for VVO	23
Table 36. 2022 Infrastructure Metrics for VVO Feeder Deployment – Term 2 Plan Feeders ...	23
Table 37. Term 1 Eversource Cumulative VVO Feeder Deployment Year-over-Year Comparison	27
Table 38. Term 2 Eversource Cumulative VVO Feeder Deployment Year-over-Year Comparison	27
Table 39. Term 1 Eversource Cumulative VVO Investment Year-over-Year Comparison (\$M)*28	
Table 40. Term 2 Eversource Cumulative VVO Investment Year-over-Year Comparison (\$M)*28	
Table 41. 2022 Eversource VVO Feeder Characteristics	28
Table 42. Eversource Combined Plan Feeders Deployment Completion Dates	31
Table 43. Eversource VVO Enabled Progress by Substation	34
Table 44. Term 1 Eversource VVO Deployment Progress	36
Table 45. Term 1 Eversource Total Spend Comparison (2018–2022, \$M)	38

Table 46. Term 1 2022 Eversource Infrastructure Metrics for VVO Devices	38
Table 47. Term 1 2022 Eversource Infrastructure Metrics for VVO Feeders	39
Table 48. Term 2 Eversource VVO Deployment Progress	41
Table 49. Term 2 Eversource Total Spend Comparison (2022-2025, \$M).....	44
Table 50. Term 2 2022 Eversource Infrastructure Metrics for VVO Devices	44
Table 51. Term 2 2022 Eversource Infrastructure Metrics for VVO Feeders	45
Table 52. Term 2 National Grid Cumulative VVO Feeder Deployment Year-over-Year Comparison	47
Table 53. Term 2 National Grid Cumulative VVO Investment Year-over-Year Comparison (\$M)*	47
Table 54. Term 1 2022 National Grid VVO Feeder Characteristics	47
Table 55. National Grid Combined Plan Feeders Deployment Completion Dates	49
Table 56. 2022 National Grid VVO Enabled Progress by Substation.....	50
Table 57. Term 2 National Grid VVO Planned and Actual Device Deployment (2022-2025) ...	52
Table 58. Term 2 National Grid Total Spend Comparison (2022–2025, \$M)	54
Table 59. Term 2 2022 National Grid Infrastructure Metrics Findings	54
Table 60. 2022 National Grid Infrastructure Metrics for VVO Feeders	55
Table 61. Term 2 Unutil Cumulative VVO Feeder Deployment Year-over-Year Comparison....	57
Table 62. Unutil VVO Investment Year-over-Year Comparison (\$M)*.....	57
Table 63. 2022 Unutil VVO Feeder Characteristics	57
Table 64. Unutil VVO Deployment Completion Dates by Phase and Substation.....	59
Table 65. Unutil VVO Enabled Progress by Substation	60
Table 66. Term 2 Unutil VVO Deployment Progress	62
Table 67. Unutil Total Spend Comparison (2022–2025, \$M)	64
Table 68. Term 2 Unutil Infrastructure Metrics Findings	65
Table 69. 2022 Unutil Infrastructure Metrics for VVO Feeders.....	66
Table 70. VVO Supplemental Data	68
Table 71. Additional Data Required for Evaluation Performance Metrics.....	69
Table 72. Performance Metrics Results for the Spring 2022 – Winter 2022/23 M&V Period ...	70
Table 73. Data Cleaning Conducted for Eversource Analysis	75
Table 74. Count of VVO On, VVO Off, and Removed Quarter-Hours for Eversource.....	76
Table 75. Data Analysis Summary for Eversource	77
Table 76. Eversource VVO Energy Baseline	77
Table 77. Eversource VVO Net Energy Reduction during Actual VVO On Hours	78
Table 78. Eversource VVO Average Hourly Voltage Reduction*	80
Table 79. Eversource VVO CVR Factor	83
Table 80. Eversource VVO Average Reduction in Peak Demand	84
Table 81. Eversource VVO Distribution Losses.....	86
Table 82. Eversource VVO Average Hourly Power Factor Change	87
Table 83. Eversource VVO Emissions Reductions.....	90
Table 84. Count of Voltage Complaints for Agawam Substation	90
Table 85. Count of Voltage Complaints for Piper Substation	91
Table 86. Count of Voltage Complaints for Podick Substation.....	91
Table 87. Count of Voltage Complaints for Silver Substation	92
Table 88. Data Cleaning Conducted for National Grid Analysis.....	97
Table 89. Count of VVO On, VVO Off, and Removed Hours for National Grid*	98
Table 90. Data Analysis Summary for National Grid	99
Table 91. National Grid VVO Energy Baseline	100
Table 92. National Grid VVO Net Energy Reduction During Actual VVO On Hours.....	100

Table 93. National Grid VVO Average Hourly Voltage Reduction*	102
Table 94. National Grid VVO CVR Factor*	104
Table 95. National Grid Average Reduction in Peak Demand	106
Table 96. National Grid Reduction in Distribution Losses	108
Table 97. National Grid VVO Average Hourly Power Factor Change*	110
Table 98. National Grid VVO Emissions Reductions During Actual VVO On Hours	112
Table 99. Count of Voltage Complaints for Easton	112
Table 100. Count of Voltage Complaints for East Bridgewater	113
Table 101. Count of Voltage Complaints for East Methuen Substation	113
Table 102. Count of Voltage Complaints for Maplewood Substation	114
Table 103. Count of Voltage Complaints for Stoughton Substation	114
Table 104. Count of Voltage Complaints for West Salem Substation	115

List of Figures

Figure 1. VVO Term 1 Spend Comparison (2018-2022, \$M)	xii
Figure 2. VVO Term 2 Spend Comparison (2022-2025, \$M)	xiii
Figure 3. Term 1 Evaluation Timeline	5
Figure 4. Term 2 Evaluation Timeline	5
Figure 5. Performance Metrics Timeline	10
Figure 6. Term 1 VVO Spend Comparison (2018–2022, \$M)	22
Figure 7. Term 2 VVO Spend Comparison	24
Figure 8. Term 1 Eversource VVO Planned vs. Actual Spend (2018–2022, \$M)	35
Figure 9. Term 1 Eversource Planned vs Actual Deployment (2018–2022, Unit Count)	36
Figure 10. Term 1 Eversource VVO Spend Plan vs. Actual (2018-2022, \$M)	37
Figure 11. Term 2 Eversource VVO Planned vs. Actual Spend (2022–2025, \$M)	40
Figure 12. Term 2 Eversource Planned vs Actual Deployment (2022-2025, Unit Count)	41
Figure 13. Term 2 Eversource VVO Spend Plan vs. Actual (2022-2025, \$M)	43
Figure 14. Term 2 National Grid’s VVO Planned and Actual Spend Progression, \$M	51
Figure 15. Term 2 National Grid VVO Device Deployment (2022–2025)	52
Figure 16. Term 2 National Grid VVO Plan vs. Actual (2022–2025, \$M)	53
Figure 17. Term 2 Unitil VVO Planned and Actual Spend Progression, \$M	61
Figure 18. Term 2 Unitil VVO Device Deployment Comparison (2022–2025)	62
Figure 19. Term 2 Unitil VVO Plan vs. Actual (2022-2025, \$M)	63
Figure 20. Eversource Performance Metrics Analysis Timeline	73
Figure 21. Eversource Analysis Data Construction Flowchart	74
Figure 22. Net Energy Reduction (MWh) for Eversource VVO Feeders	79
Figure 23. Net Energy Reduction (%) for Eversource VVO Feeders	80
Figure 24. Average Hourly Voltage Reduction (V) for Eversource VVO Feeders	81
Figure 25. Average Hourly Voltage Reduction (%) for Eversource VVO Feeders	82
Figure 26. Eversource VVO CVR Factors*	83
Figure 27. Eversource Reduction in Peak Demand (kW)	84
Figure 28. Eversource Reduction in Peak Demand (%)	85
Figure 29. Eversource Reduction in Distribution Losses	87
Figure 30. Eversource Absolute Change in Power Factor	88
Figure 31. Eversource Percentage Change in Power Factor	89
Figure 32. VVO On/Off Testing at Feeder 16C11	93
Figure 33. VVO On/Off Testing at Feeder 18G7	93
Figure 34. National Grid Performance Metrics Analysis Timeline	95

Figure 35. National Grid Analysis Data Construction Flowchart	96
Figure 36. Net Energy Reduction (MWh) for National Grid VVO Feeders*	101
Figure 37. Net Energy Reduction (%) for National Grid VVO Feeders*	102
Figure 38. Average Hourly Voltage Reduction (kV) for National Grid VVO Feeders*	103
Figure 39. Average Hourly Voltage Reduction (%) for National Grid VVO Feeders*	104
Figure 40. National Grid VVO CVR Factors*	105
Figure 41. National Grid Reduction in Peak Load (kW)*	106
Figure 42. National Grid Reduction in Peak Demand (%)*	107
Figure 43. National Grid Reduction In Distribution Losses (%)*	109
Figure 44. National Grid Absolute Change in Power Factor*	110
Figure 45. National Grid Percentage Change in Power Factor*	111
Figure 46. VVO On/Off Testing at Feeder 74L1	115
Figure 47. VVO On/Off Testing at Feeder 29W1	116

Executive Summary

Introduction

As a part of their Grid Modernization Plans (GMPs), the Massachusetts Electric Distribution Companies (EDCs) are investing to enable Volt/VAR Optimization (VVO) on selected feeders across their distribution networks. VVO optimizes distribution voltage to reduce energy consumption and demand without the need for customer interaction or participation. The principle behind VVO is that power demand is reduced at voltages in the lower end of their allowable range for many end-use loads.

This evaluation focuses on the progress and effectiveness of each EDC's preauthorized VVO investments toward meeting the Department of Public Utilities (DPU) grid modernization objectives for Program Year (PY) 2022.

Evaluation Process

The DPU requires a formal evaluation process, including an evaluation plan and evaluation studies, for the EDCs' preauthorized grid modernization plan investments. Guidehouse is completing the evaluation to establish a uniform statewide approach and to facilitate coordination and comparability. The evaluation is to measure and assess progress toward achieving the DPU's grid modernization objectives. The evaluation uses the DPU-established Infrastructure Metrics and Performance Metrics along with a set of Case Studies to understand if the GMP investments are meeting the DPU's objectives.

The original Evaluation Plan developed by Guidehouse¹ was submitted to the DPU by the EDCs in a petition for approval on May 1, 2019. Modifications to this original Evaluation Plan were required to enable evaluation of PY 2022. These modifications included an 1) extension of the evaluation window from the four year term spanning 2018 – 2021² (hereon referred to as Term 1) to incorporate the new four year term spanning 2022 – 2025 (hereon referred to as Term 2), and 2) revisions required to reflect the new Term 2 investment activity. Modifications to the original Evaluation Plan were submitted to the EDCs for approval on March 1, 2023. The modified Evaluation Plan has been used to develop the analysis and evaluation provided below in this document.

Table 1 illustrates the key Infrastructure Metrics and Performance Metrics relevant for the VVO evaluation by EDC.

¹ Guidehouse had previously filed as "Navigant Consulting" and did so during the initial evaluation plan filing.

² On May 10, 2018, the Massachusetts DPU issued its Order regarding the individual GMPs filed by the three Massachusetts EDCs. In the Order, the DPU preauthorized grid-facing investments over 3 years (2018-2020) for each EDC and adopted a 3-year (2018-2020) regulatory review construct for preauthorization of grid modernization investments. On May 12, 2020, the DPU issued an Order extending the 3-year grid modernization plan investment term to a 4-year term, which introduced a 2021 program year. In addition, on July 1, 2020, Eversource filed a request for an extension of the budget authorization associated with grid modernization investments. The 2018-2021 GMP term results provided for Eversource reflect these changes.

Table 1. VVO Evaluation Metrics

Type	VVO Evaluation Metrics	ES	NG	UTL
IM-4	Number of Devices or Other Technologies Deployed	✓	✓	✓
IM-5	Cost for Deployment	✓	✓	✓
IM-6	Deviation between Actual and Planned Deployment for the Plan Year	✓	✓	✓
IM-7	Projected Deployment for the Remainder of the GMP Term	✓	✓	✓
PM-1	VVO Baseline	✓	✓	
PM-2	VVO Energy Savings	✓	✓	
PM-3	VVO Peak Load Impact	✓	✓	
PM-4	VVO Distribution Losses without Advanced Metering Functionality (AMF) (Baseline)	✓	✓	
PM-5	VVO Power Factor	✓	✓	
PM-6	VVO – GHG Emissions	✓	✓	
PM-7	Voltage Complaints	✓	✓	

IM = Infrastructure Metric, PM = Performance Metric, ES = Eversource, NG = National Grid, UTL = Unitil

* The EDCs are responsible for these metric calculations and the calculations are not addressed in this evaluation

Source: *Stamp Approved Performance Metrics, July 25, 2019*

Data Management

Guidehouse worked with the EDCs to collect data to complete the VVO evaluation for the assessment of Infrastructure Metrics and Performance Metrics. A consistent methodology was used across Investment Areas and EDCs for evaluating and illustrating EDC progress toward the GMP metrics.

Table 2 summarizes data sources used throughout the VVO evaluation for PY 2022. Section 3.1.1 details each of the data sources.

Table 2. VVO Data Sources

Data Source	Description
2021 Grid Modernization Plan Term Report ^{3,4,5}	Planned device deployment and cost information from each EDC's appendix to the <i>2021 GMP Term Report</i> (filed April 1, 2022). Data was used as the reference to track progress against the GMP targets and are referred to as the GMP Plan in summary tables and figures throughout the report.

³ Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30.

⁴ NSTAR Electric Company d/b/a Eversource Energy, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30. Note that Eversource Energy filed an updated Appendix 1 filing in December of 2021; however that update did not affect any of the data or results in the evaluation.

⁵ Fitchburg Gas and Electric Light Company d/b/a Unitil, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30.

Data Source	Description
2022 Grid Modernization Plan Annual Report ^{6,7,8}	All PM-related data are from these 2022 GMP Annual Report Appendices. In addition, data collected as part of EDC Data Template (below) was compared to the data submitted by the EDCs to the DPU in the 2021 Grid Modernization Plan Term Reports and associated Appendix 1 filings. The evaluation team confirmed the consistency of the data from the various sources and reconciled any differences
EDC Device Deployment Data Template	Captures planned and actual device deployment and spend data. Actual device deployment and cumulative spend information were provided by work order ID and specified at the feeder- or substation-level as appropriate. Device deployment information and estimated spend for 2022 were provided as well.
VVO Supplemental Data Template	Includes additional information unique to the VVO Investment Area spanning inputs required for the Infrastructure Metrics and the Performance Metrics. Data covers actual versus planned VVO schedule, IT work schedule, customer demand response events, system events, distributed generation information, and voltage complaints. Information was requested at the feeder-level where possible.
Eversource's 2021 DPU-Filed Plan ⁹	Eversource's GMP extension request was approved by the DPU on February 4, 2021. It includes budgets for PY 2021 deployment at the Investment Area level. This data source is included in the EDC Plan for Eversource planned spend at the Investment Area level.
2022-2025 Grid Modernization Plan Track 1 Order ¹⁰	The GMP Track 1 Order was filed by the DPU on October 7, 2022. It includes budgets for PY 2022-PY 2025 deployment at the Investment Area level. This data source is included in the EDC Plan for each EDC's planned spend at the Investment Area level.
EDC DOER Response Appendix ¹¹	Planned device deployment and cost information from each EDC's Appendix 1 filing was provided in response to DOER requests for information. Data was used as the reference to track progress against the GMP targets and are referred to as the GMP Plan in summary tables and figures throughout the report.

Source: Guidehouse analysis

Findings and Recommendations

Table 3 and Table 4 summarizes the Term 1 Infrastructure Metrics results for Eversource's VVO Investment Area through PY 2022.

⁶ Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, Grid Modernization Annual Report for Calendar Year 2022. Submitted to Massachusetts DPU on April 24, 2023, as part of DPU 23-30.

⁷ NSTAR Electric Company d/b/a Eversource Energy, Grid Modernization Annual Report for Calendar Year 2022. Submitted to Massachusetts DPU on April 24, 2023, as part of DPU 23-30.

⁸ Fitchburg Gas and Electric Light Company d/b/a Unitil, 2022 Grid Modernization Plan Annual Report. Submitted to Massachusetts DPU on April 24, 2023, as part of DPU 23-30.

⁹ Grid Modernization Program Extension and Funding Report. Submitted to Massachusetts DPU on July 1, 2020 as part of DPU 15-122.

¹⁰ Massachusetts DPU 21-80/DPU 21-81/DPU 21-82 Order on Previously Deployed Technologies issued October 7, 2022.

¹¹ Plan data is sourced from EDC responses to the first set of information requests issued by the Department of Energy Resources (DOER). These responses were filed on October 4th, December 2nd, and October 5th, 2021, for Eversource, National Grid, and Unitil under DPU dockets 21-80, 21-81, and 21-82.

Table 3. Term 1 VVO Infrastructure Metrics Summary

Infrastructure Metrics		Eversource	
GMP Plan Total, PY 2018-2022		Devices	1,142
		Spend, \$M	\$17.23
IM-4	Number of devices or other technologies deployed PY 2018-2022*	# Devices Deployed***	1,038
		% Devices Deployed	91%
IM-5	Cost for Deployment PY 2018-2022*	Total Spend, \$M	\$16.87
		% Spend	98%
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	70%
		% On Track (Spend)	85%
IM-7	Projected Deployment for the remainder of the GMP Term (i.e., Term 1)**	# Devices Remaining	0
		Spend Remaining, \$M	\$0.00

*The metric names have been slightly changed here to clarify the time span used in analysis.

** This metric has been interpreted here (i.e., within the context of the 2022 Program Year Evaluation) as the units and spending that the EDC plans to complete their most recent 4-year Term 1 plans. Additional Grid Modernization units and dollars incurred in 2022 are attributed to Term 2, as appropriate, and all units and dollars spent during 2023 through 2025 will be considered as part of Term 2 GMPs.

***Note that "Deployed" here refers to commissioned devices. For full definitions of deployment stages, see Docket 20-46 Response to Information Request DPU-AR-4-11, September 3, 2020.

Source: Guidehouse analysis of 2021 GMP Term Reports and 2022 EDC Data

Table 4. Term 1 Infrastructure Metrics for VVO Feeder Deployment Progress

IM	Parameter*	Eversource	National Grid	Unitil
IM-4	# Feeders with VVO Enabled	26	20	3
	% Feeders with VVO Enabled	81%	100%	100%
IM-6	% On Track (Feeders with VVO Enabled)	81%	100%	100%
IM-7	# Feeders Remaining for VVO Enablement**	0	0	0

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

** Does not include additional feeders that were not laid out in the original 3-Year Grid Modernization Plans.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Table 5 and Table 6 summarizes the Term 2 Infrastructure Metrics results for each EDC's VVO Investment Area through PY 2022.

Table 5. Term 2 VVO Infrastructure Metrics Summary

Infrastructure Metrics		Eversource	National Grid**	Unitil
GMP Plan Total, PY 2022-2025	# Devices Planned	2,629	987	180
	Spend, \$M	\$38.64	\$76.44	\$5.42
EDC Data Total, PY 2022-2025	# Devices Planned	1711	1715	143
	Spend, \$M	\$38.61	\$76.44	\$2.24

Infrastructure Metrics			Eversource	National Grid**	Unitil
IM-4	Number of devices or other technologies deployed thru PY 2022	# Devices Deployed	0	42	37
		% Devices Deployed	0%	4%	21%
IM-5	Cost for Deployment thru PY 2022	Total Spend, \$M	\$0.04	\$7.61	\$0.28
		% Spend	0%	10%	5%
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	0%	25%	119%
		% On Track (Spend)	0%	69%	105%
IM-7	Projected Deployment for the Remainder of the Term	# Devices Remaining	1711	1673	106
		Spend Remaining, \$M	\$38.58	\$68.83	\$1.96

*Note that "Deployed" here refers to commissioned devices. For full definitions of deployment stages, see Docket 20-46 Response to Information Request DPU-AR-4-11, September 3, 2020.

** To more closely align spend projections with DPU pre-authorized budgets, National Grid operations and maintenance (O&M) spend is included in actual and planned spend presented here. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 6. Term 2 Infrastructure Metrics for VVO Feeder Deployment Progress

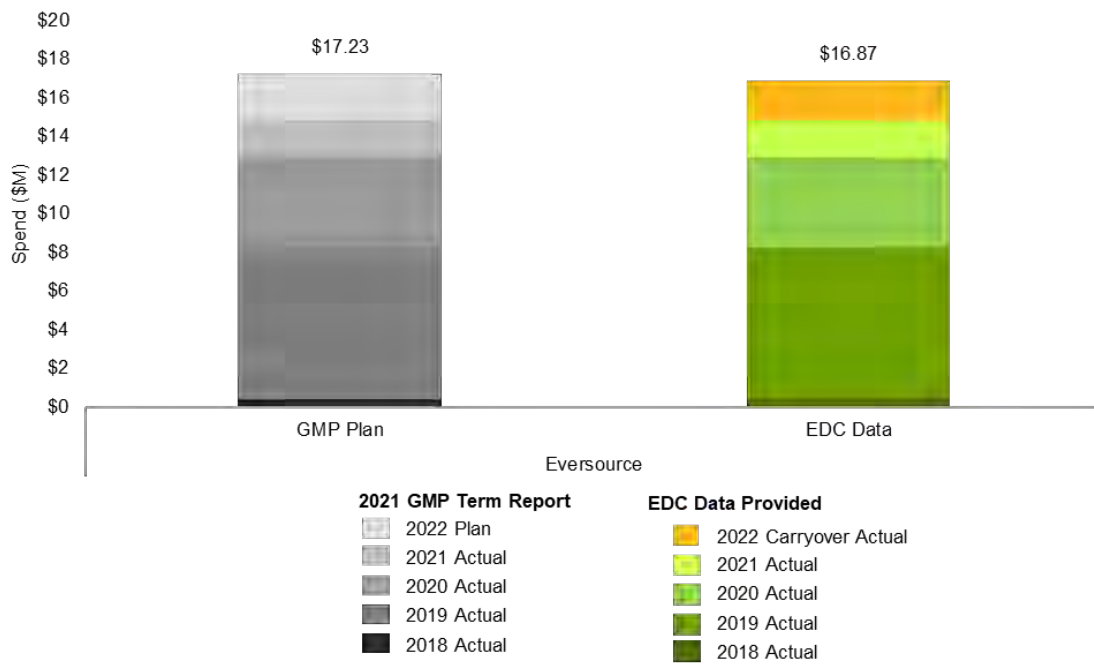
IM	Parameter*	Eversource	National Grid	Unitil
IM-4	# Feeders with VVO Enabled	0	18	4
	% Feeders with VVO Enabled	0%	35%	50%
IM-6	% On Track (Feeders with VVO Enabled)	0%	35%	50%
IM-7	# Feeders Remaining for VVO Enablement	95	34	4

*VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2022 EDC Data

Figure 1 compares the Term 1 GMP Plans and EDC Data totals and year-over-year spending for each EDC.

Figure 1. VVO Term 1 Spend Comparison (2018-2022, \$M)

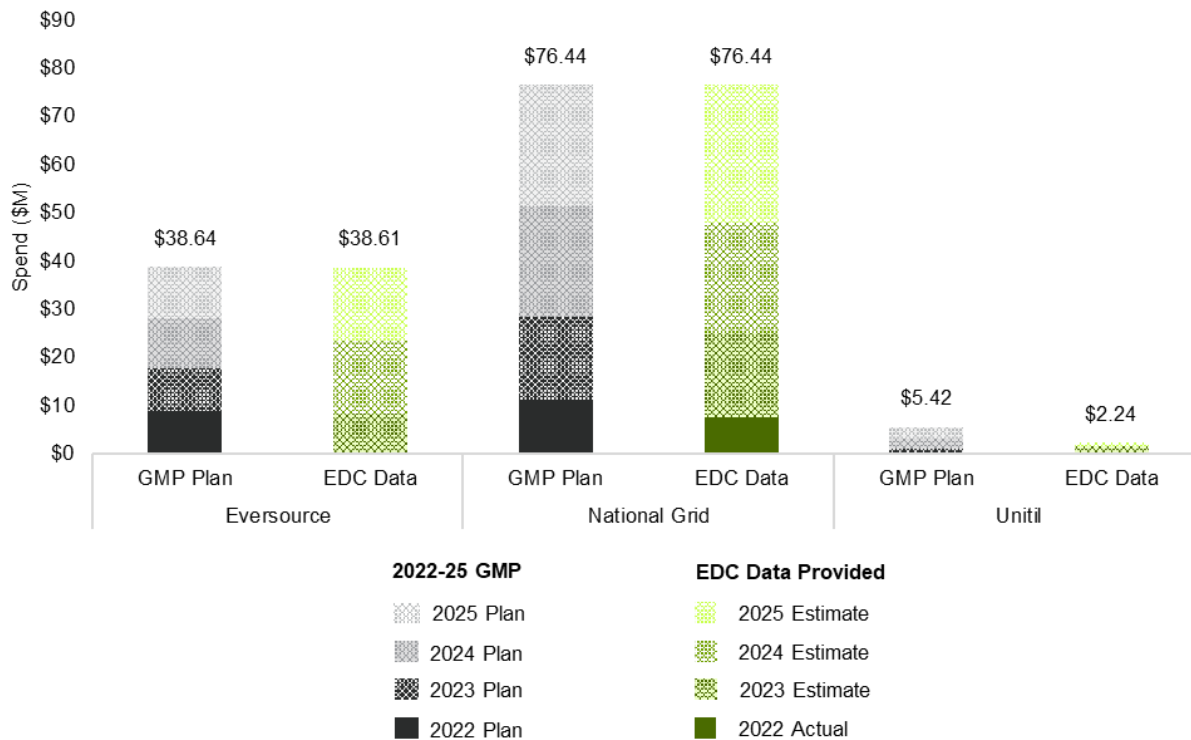


Note: Includes the Eversource planned spend on activity from 2021 that was transferred to 2022, set forth in Eversource's 2021 GMP Term Report, filed on April 1, 2022.

Source: Guidehouse analysis of 2021 GMP Term Report, "GMP Extension and Funding Report," and 2022 EDC Data

Figure 2 compares the Term 2 GMP Plans and EDC Data totals and year-over-year spending for each EDC.

Figure 2. VVO Term 2 Spend Comparison (2022-2025, \$M)



Note: To more closely align spend projections with DPU pre-authorized budgets, National Grid operations and maintenance (O&M) spend is included in actual and planned spend presented here. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of DPU Order (October 7, 2022) and 2022 EDC Data

Key Findings for VVO Infrastructure Metrics

Guidehouse’s review of Eversource’s VVO progress on Term 1 revealed that Eversource was approximately on-track with planned spend and deployment outlined in their *2021 GMP Term Report*. However, some spend and deployment remain in order to complete activities from Term 1. Key findings related to Eversource’s progress include:

Device Deployment

- Eversource made headway on deploying 2021 investments in 2022, with Capacitor Banks and Grid Monitoring Line Sensors comprising the bulk of deployed devices. Eversource exceeded plans (25 devices) for Capacitor Banks, as refinements made during the planning and design process placed more priority on Capacitor Banks, less on Regulators, for VVO operation. At the close of 2022, Eversource was awaiting delivery of 3 ordered VVO Regulators from its vendor. Line Sensor and Micro-capacitor deployment also fell short of plans.

Total Spend

- Eversource made substantial progress on PY 2021 work that was planned for 2022. Total spend through the end of 2022 was approximately on track with plans for all device types, with total spend on VVO (\$16.87M) being slightly below planned spend (\$17.23M) laid out for Term 1.

VVO Enablement

- Eversource completed deployment of VVO at four of its six Term 1 plan substations (Agawam, Piper, Podick, and Silver) by the end of 2021, and conducted On/Off testing at these substations throughout 2022. Eversource stopped VVO On/Off testing on these four substations in May 2023, transitioning towards leaving VVO in its enabled state moving forward. Meanwhile, the Gunn and Oswald substations will be VVO enabled in 2023, with On/Off testing to begin shortly thereafter.

PY 2022's VVO Infrastructure Metrics findings show that the EDCs are at varying stages in VVO deployment for Term 2. Details pertaining to device deployment progress, total spend, and VVO enablement progress are shown below:

Device Deployment:

- Eversource did not meet VVO deployment goals for PY 2022. Eversource progress on VVO investments targeted for 2022 through 2025 was comprised of progressing engineering/design work for all VVO device types, as well as planning for future VVO deployments, while awaiting DPU decisions on continued VVO investment for 2022 through 2025. Given limited deployment on Term 2 investments in 2022, Eversource has adjusted plans for the remainder of Term 2, with the majority of deployment and spend activity projected to occur in 2024 and 2025. At the technology-level, planned deployment has declined for Regulators, Line Sensors, and Microcapacitors, and planned Capacitor Bank deployment has increased slightly. Capacitor Bank deployment has been revised upwards to reflect refinements made during the planning and design process.
- National Grid conducted less deployment than initially planned in PY 2022. A late-2022 DPU decision on preauthorizing 2022 through 2025 investment activity, resource constraints, and vendor lead times were all key contributors to this outcome. In response to lower-than-expected deployment in 2022, National Grid has accelerated its deployment timeline for 2023 through 2025. National Grid has also adjusted total deployment plans for numerous device types, increasing projected deployment for Capacitor Banks, Line Sensors, and LTC Controls, while reducing projected deployment for Regulators. National Grid cites that these revisions are primarily due to the VVO planning work that has been conducted since the 2022-2025 GMP was filed.
- Unitil deployment was below plans for 2022, with variation by technology. Unitil was on-track with deployment of VVO Capacitor Banks and Line Sensors in 2022, deploying 100% and 210% of planned units, respectively. However, deployment was under plans for Regulators and LTC Controls. Lower deployment than plans for these technologies may be attributed to Unitil's efforts to resolve LTC radio and control issues and cancelation of 4 deployments that were found to be unnecessary. Unitil has adjusted deployment plans for the remainder of Term 2 to conduct most deployment during 2023 and 2025. Additionally, Unitil has reduced its planned deployments of VVO Regulators and Capacitor Banks, as Unitil reassessed deployment plans and determined there were fewer Regulator and Capacitor Bank deployments needed than initially planned. Work in 2024 will be limited to material orders in preparation for construction work at the Beech Street substation.

Total Spend:

- Eversource spend on Term 2 investments amounted to \$0.04M, short of the \$8.70M that was initially planned for 2022. Given limited deployment and spend on Term 2 investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. Eversource has projected that most spend activity will occur in 2024 and 2025.
- National Grid spend on VVO was below plans for 2022. The majority of spend occurred on Capacitor Banks, while spend on Regulators and Line Sensors was well below plans. Lower-than-anticipated spend on Line Sensors can, in part, be attributed to National Grid's previous line sensor vendor discontinuing their selected model. For VVO Regulators, vendor delays in fulfilling material orders was a key contributor to lower spend than initially planned. In response to its 2022 experience with Line Sensors and Regulators, National Grid has begun to increase diversification of vendors that it sources materials from.
- Unitil spend on VVO was below initial plans. Unitil met 48% of its planned spend for Regulators. Spend and deployment of all other devices met or exceeded initial plans. Spend plans for the remainder of Term 2 have been revised downwards across all device types. Reduced spend on Regulators and Capacitor Banks can be attributed to a reduction in the units that Unitil plans to deploy, as well as lower than expected costs for deployment of Regulators. Reduced spend on LTC Controls and Line Sensors may be tied to process efficiencies implemented in 2022 that brought unit costs below plans. Most spend is planned for 2023 and 2025, with work in 2024 limited to material orders in preparation for construction work at the Beech Street substation.

VVO Enablement:

- For its Term 2 substations, Eversource is currently in the VVO Investment phase, and is conducting engineering / design work for the selected substations. Eversource anticipates completing deployment during 2024 and 2025. Once VVO investments are deployed, Eversource plans to conduct VVO On/Off testing, with testing start dates ranging from July 2024 through July 2025. Once VVO On/Off testing has begun, Eversource anticipates conducting this testing for 9 – 12 months to collect one summer, one winter, and one shoulder season of testing data.
- National Grid conducted VVO On/Off testing at its East Methuen and Maplewood Term 1 substations throughout 2022. Among its Term 2 substations, National Grid conducted On/Off testing at the East Bridgewater substation throughout 2022, as VVO deployment was completed at the substation in 2021. Additionally, National Grid completed VVO deployment at the Easton and West Salem substations and began VVO On/Off for these substations in winter 2022/23 and spring 2022, respectively. National Grid projects that it will complete VVO deployment and enable VVO at its remaining Term 2 substations in 2023.
- Unitil completed VVO deployment for its Term 1 substation (Townsend) in 2021, enabling VVO on December 1, 2021, and On/Off testing is expected to begin in spring 2023. Among its Term 2 substations, Unitil completed deploying VVO investments at the Summer Street substation and enabled VVO in December 2022, with VVO On/Off testing projected to begin at the substation in December 2023. Lunenburg and West Townsend are currently receiving VVO investments and Unitil plans to enable VVO at the substations in January and

November 2024, respectively. Unitil then plans to conduct On/Off testing at the substations beginning in December 2024. For its remaining substations, Unitil is currently conducting planning and engineering/design work for its Beech Street, Pleasant Street, and Princeton Road substations. These substations are expected to be enabled after the close of Term 2 in 2026 and 2027.

Key Findings and Recommendations for VVO Performance Metrics

Table 7 includes the Performance Metrics results and key findings for the Spring 2022 – Winter 2022/23 M&V period. It can be difficult to compare the results from Performance Metrics analysis between Eversource and National Grid. For example, there are differences in the granularity of telemetry (e.g., 5-minute versus 15-minute), data quality at different times of the year (e.g., sustained pauses in VVO On/Off testing for one EDC, data outages during On/Off testing for another EDC). As such, certain portions of the M&V period, such as the Spring season, may be represented more for one EDC than the other. Additionally, there are numerous differences in DG penetration, customer types, and geographic areas served by Eversource and National Grid feeders that limit the ability to directly compare Eversource and National Grid VVO outcomes.

Table 7. Performance Metrics Results for the Spring 2022 – Winter 2022/23 M&V Period

Performance Metrics		Eversource		National Grid	
Feeders Included in Evaluation		26		34	
PM-1	Spring 2022 – Winter 2022/23 Baseline	524,992 MWh		882,631 MWh	
PM-2	Energy Savings – All Hours VVO On†	2,128 ± 476 MWh	0.41 ± 0.09%	6,769 ± 1,162 MWh	0.84 ± 0.15%
	Energy Savings – Actual VVO On Hours‡	879 ± 184 MWh	0.41 ± 0.09%	1,867 ± 302 MWh	0.84 ± 0.15%
-	Voltage Reduction	1.52 ± 0.01 V	1.24 ± 0.01%	0.08 ± <0.001 V	0.62 ± 0.01%
-	CVRf [^]	0.60		0.36	
PM-3 ^{^^}	Peak Load Reduction	-369 ± 245 kW	-0.70 ± 0.46%	-2,189 ± 1,173 kW	-2.41 ± 1.28%
PM-4	Reduction in Distribution Losses	0.01%		-1.95%¶¶	
PM-5	Change in Power Factor	<0.001 ± <0.001	0.06 ± 0.02%	-0.01 ± 0.002¶¶	-0.96 ± 0.2%¶¶
PM-6	GHG Reductions (CO ₂) All Hours VVO On†	723 ± 162 tons CO ₂		2,301 ± 395 tons CO ₂	
	GHG Actual VVO-On Hours‡	299 ± 63 tons CO ₂		645 ± 103 tons CO ₂	
		53		136	
PM-7	Voltage Complaints	(13% decrease from 2015 – 2017 baseline period average)		(16% decrease from 2016 – 2017 baseline period average)§	

* National Grid feeders at the Easton substation did not begin testing until mid-January, 2023. All overall estimates are inclusive of Easton feeders and only incorporate impact estimates from this feeder during the Winter period. Additionally, even-numbered Maplewood feeders underwent a prolonged period over which VVO On/Off testing was paused, resulting in their removal from analysis that informed PM-1 through PM-6.

† Calculation assumes VVO was enabled for all hours between March 1, 2022 and February 28, 2023.

‡ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged between March 1, 2022 and February 28, 2023 for each feeder.

[^]The CVR factor provided for each EDC is the load-weighted average of CVR factors estimated for each feeder with a voltage response to VVO On/Off testing.¹²

^{^^}Guidehouse evaluated the impact of VVO during peak load periods, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays.

¶¶ Changes in power factor and distribution losses could not be estimated for substations going through VVO On/Off testing during Spring 2022 through Winter 2022/23 due to data quality issues. Results presented for these metrics are based off of VVO substations that completed VVO On/Off testing prior to this evaluation period. For this evaluation period, the only substation to conclude On/Off testing is Stoughton.

§ National Grid did not start tracking voltage complaints until 2016.

Source: Guidehouse analysis

¹² All of Eversource's Podick 18G feeders and Silver feeders 30A2, 30A4, and 30A6 are removed from aggregated CVRf results due to unreliable voltage and energy responses to VVO On/off testing. National Grid's West Salem feeders 29W2, 29W4, and 29W6, as well as East Bridgewater feeders 797W1, 797W23, 797W29, and 797W42 are also removed from aggregated CVRf results due to unreliable voltage and energy responses to VVO On/off testing.

Findings from the evaluation of Performance Metrics indicate that VVO allowed Eversource and National Grid to realize energy savings and voltage reductions during the Spring 2022 – Winter 2022/23 M&V period.¹³ More specifically:

- During the Spring 2022 – Winter 2022/23 M&V period, Eversource’s Agawam, Piper, Podick, and Silver substations realized 879 MWh (0.41%) energy savings and 1.52 V (1.24%) voltage reduction associated with VVO. The CVR Factor, which provides an estimate of energy savings possible with voltage reductions, was 0.60.⁵⁰ During the same M&V period, National Grid’s East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem substations realized 1,867 MWh (0.84%) energy savings and 0.08 kV (0.62%) voltage reduction associated with VVO. National Grid’s CVR factor was 0.36.⁵⁰
- Eversource energy savings of 879 MWh yielded a 299 short ton reduction of CO₂ emissions. National Grid energy savings of 1,867 MWh yielded a 645 short ton reduction in CO₂ emissions.
- Eversource and National Grid VVO feeders experienced a minimal benefit associated with peak load, power factor, and distribution losses. Eversource VVO feeders experienced a statistically significant increase (0.70%) in peak load, a statistically significant decrease (0.06%) in power factor, and a minimal decrease in distribution losses when VVO was engaged. National Grid VVO feeders experienced a statistically significant increase in peak load (2.41%), a small increase (0.96%) in power factor, and a 1.95% increase in distribution losses when VVO was engaged.
- For Eversource, a total of 53 voltage complaints were received from customers connected to the Agawam, Piper, Podick, and Silver VVO feeders during the Spring 2022 – Winter 2022/23 M&V period. This is a 13% decrease relative to the average voltage complaints per year received between 2015 – 2017. For National Grid, a total of 136 voltage complaints were received from customers connected to the East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem VVO feeders during the period. This is a 16% decrease relative to the average voltage complaints per year received between 2016 – 2017. For both EDCs, there is not sufficient evidence to support changes in voltage complaints being attributed to VVO.

In 2023 and beyond, Guidehouse recommends that Eversource and National Grid:

- Ensure VVO On/Off testing is running according to plan, with limited pauses to the VVO On/Off testing schedule. Across the VVO feeders, one-quarter to one-half of data points were removed due to extended pauses in VVO On/Off testing. For some feeders, this resulted in the vast majority of provided data to be unusable for components of this evaluation (e.g., for estimation of distribution loss and power factor reductions). Sustained On/Off testing will increase the amount of usable data in the evaluation and improve the ability for Guidehouse to provide a comprehensive evaluation of VVO performance metrics.

¹³ It can be difficult to compare the results from Performance Metrics analysis between Eversource and National Grid. For example, there are differences in the granularity of telemetry (e.g., 15-minute versus 1 hour), data quality at different times of the year (e.g., sustained pauses in VVO testing, repeated data). As such, data cleaning can cause certain portions of the M&V period to be represented more for one EDC than the other. Additionally, there are numerous differences in DG penetration, customer types, and geographic areas served by Eversource and National Grid feeders that limit the ability to directly compare Eversource and National Grid VVO outcomes.

- Confirm adjustments to VVO On/Off testing schedule for any VVO feeders prior to implementation. VVO On/Off testing is designed similarly to a Randomized Controlled Trial (RCT), and adjustments to the testing schedule could, potentially, hinder the effectiveness of the testing design and cause biases to evaluation results. Ensuring there is proper balance in the number of VVO on and off hours throughout the evaluation period will allow for Guidehouse to provide a comprehensive and accurate evaluation of VVO performance metrics.
- Continue to investigate how to improve outcomes across VVO feeders. Many feeders across the EDCs underwent no material change in voltage. Correspondingly, energy reduction estimates were small-to-insignificant. These observations may indicate flaws in the VVO control scheme for these feeders. In order to improve VVO performance, Guidehouse recommends that the EDCs continue their efforts to investigate root causes to shortcomings in the VVO control schemes and work with distribution engineers and the VVO vendors to respond accordingly. If needed, Guidehouse can conduct in-depth case studies at these substations further understand shortcomings in the VVO control scheme.

1. Introduction to Massachusetts Grid Modernization

This section provides a brief background to the Grid Modernization Evaluation process and an overview of the Volt/VAR Optimization (VVO) Investment Area and specific VVO evaluation objectives. These are provided for context when reviewing the subsequent sections that address the specific evaluation process and findings.

1.1 Massachusetts Grid Modernization Plan Background

The following subsections summarize the progression of Massachusetts Grid Modernization Plans (GMPs) filed by the three Massachusetts Electric Distribution Companies (EDCs): Eversource, National Grid, and Unittel.

1.1.1 Grid Modernization Term 1 (2018-2021)

On May 10, 2018, the Massachusetts DPU issued its Order¹⁴ regarding the individual Grid Modernization Plans (GMPs) filed by the three Massachusetts EDCs.^{15,16} In the Order, the DPU preauthorized grid-facing investments over 3 years (2018-2020) for each EDC and adopted a 3-year (2018-2020) regulatory review construct for preauthorization of grid modernization investments. On May 12, 2020, the DPU issued an Order¹⁷ extending the 3-year grid modernization plan investment term to a 4-year term, which introduced a 2021 program year.

During the GMP term spanning 2018-2021 (hereon referred to as Term 1) the grid modernization investments were organized into six Investment Areas to facilitate understanding, consistency across EDCs, and analysis.

- Monitoring and Control (M&C)
- Advanced Distribution Automation (ADA)
- Volt/VAR Optimization (VVO)
- Advanced Distribution Management Systems/Advanced Load Flow (ADMS and ALF)
- Communications/IoT (Comms)
- Workforce Management (WFM)

A certain level of spending for each of these GMP Investment Areas was preauthorized by the DPU, with the expectation they would advance the achievement of DPU's grid modernization objectives:

¹⁴ Massachusetts DPU 15-120/DPU 15-121/DPU 15-122 (Grid Modernization) Order issued May 10, 2018 (DPU Order).

¹⁵ On August 19, 2015, National Grid, Unittel, and Eversource each filed a grid modernization plan with the DPU. The DPU docketed these plans as DPU 15-120, DPU 15-121, and DPU 15-122, respectively.

¹⁶ On June 16, 2016, Eversource and National Grid each filed updates to their respective grid modernization plans

¹⁷ Massachusetts DPU 15-120; DPU 15-121; DPU 15-122 (Grid Modernization) Order (1) Extending Current Three-Year Grid Modernization Plan Investment Term; and (2) Establishing Revised Filing Date for Subsequent Grid Modernization Plans (issued May 12, 2020).

- Optimize system performance by attaining optimal levels of grid visibility command and control, and self-healing
- Optimize system demand by facilitating consumer price responsiveness
- Interconnect and integrate distributed energy resources (DER)

For Term 1, the Massachusetts DPU's preauthorized budget for grid modernization varied by Investment Area and EDC. Eversource originally had the largest preauthorized budget at \$133 million, with ADA and M&C representing the largest share (\$44 million and \$41 million, respectively). National Grid's preauthorized budget was \$82.2 million, with ADMS representing over 50% (\$48.4 million). Unitil's preauthorized budget was \$4.4 million and VVO makes up 50% (\$2.2 million).

On July 1, 2020, Eversource filed a request for an extension of the budget authorization associated with grid modernization investments.¹⁸ The budget extension, approved by the DPU on February 4, 2021,¹⁹ included \$14 million for ADA, \$16 million for ADMS/ALF, \$5 million for Communications, \$15 million for M&C, and \$5 million for VVO.²⁰ These values are included in the Eversource total budget by Investment Area in Table 8.

Table 8. Term 1 (2018-2021) Preauthorized Budget, \$M

Investment Areas	Eversource	National Grid	Unitil	Total
ADA	\$58.00	\$13.40	N/A	\$71.40
ADMS/ALF	\$33.00	\$48.40	\$0.70	\$79.10
Comms	\$23.00	\$1.80	\$0.84	\$25.60
M&C	\$56.00	\$8.00	\$0.35	\$64.75
VVO	\$18.00	\$10.60	\$2.22	\$30.80
WFM	--	--	\$0.30	\$1.00
2018-2021 Total	\$188.00	\$82.20	\$4.41	\$272.65

Source: DPU Order, May 10, 2018, and Eversource filing "GMP Extension and Funding Report," July 1, 2020

1.1.2 Grid Modernization Term 2 (2022-2025)

On July 2, 2020, the Massachusetts DPU issued an Order²¹ that triggered further investigation into modernization of the electric grid. In the order, the DPU required that the EDCs file a grid modernization plan on or before July 1, 2021. In accordance with this order, the Massachusetts EDCs filed grid modernization plans for a 4-year period spanning 2022-2025 (hereby referred to as Term 2).²² In these plans, the EDCs outlined continued investment in the areas that received

¹⁸ Grid Modernization Program Extension and Funding Report. Submitted to Massachusetts DPU on July 1, 2020 as part of DPU 15-122

¹⁹ Massachusetts DPU 20-74 Order issued on February 4, 2021.

²⁰ The DPU allowed flexibility to these budgets to accommodate changing technologies and circumstances. For example, EDCs can shift funds across the different preauthorized investments if a reasonable explanation for these shifts is supplied.

²¹ Massachusetts DPU 20-69: Investigation by the Department of Public Utilities on its own Motion into the Modernization of the Electric Grid – Phase Two (issued July 2, 2020).

²² On July 1, 2021, Eversource, National Grid, and Unitil each filed a grid modernization plan with the DPU for the period spanning 2022-2025. The DPU docketed these plans as DPU 21-80, 21-81, and 21-82, respectively.

investment during Term 1 (referred to as Track 1 Investment Areas), and investment in new Investment Areas (Track 2 Investment Areas). The Track 2 grid modernization investments were organized into the following additional Investment Areas to facilitate understanding, consistency across EDCs, and analysis.

- Interconnection Automation
- Probabilistic Power Flow Modeling
- Distributed Energy Resource Mitigation (DER Mitigation)
- Distributed Energy Resource Management System (DERMS)
- Demonstration Projects

1.1.3 Investment Areas

Table 9 and Table 10 summarize the DPU pre-authorized GMP investments.

Table 9. Overview of Term 2, Track 1 Investment Areas

Investment Areas	Description	Objective
Monitoring and Control (M&C)	Remote monitoring and control of devices in the substation for feeder monitoring or online devices for enhanced visibility outside the substation	Enhancing grid visibility and control capabilities, reliability increase
Advanced Distribution Automation (ADA)	National Grid-only investment for Term 2. ADA allows for isolation of outage events with automated restoration of unaffected circuit segments	Reduces the impact of outages
Volt/VAR Optimization (VVO)	Control of line and substation equipment to optimize voltage, reduce energy consumption, and increase hosting capacity	Optimization of distribution voltage to reduce energy consumption and demand
Advanced Distribution Management Systems	New capabilities in real-time system control with investments in developing accurate system models and enhancing Supervisory control and data acquisition (SCADA) and outage management systems to control devices for system optimization and provide support for distribution automation and VVO with high penetration of DER	Enables high penetration of DER by supporting the ability to control devices for system optimization, ADA, and VVO
Communications/IoT	Fiber middle mile and field area communications systems	Enables the full benefits of grid modernization devices to be realized
Workforce Management (WFM)	Unitil-only investment for Term 2 to improve workforce and asset utilization related to outage management and storm response	Improves the ability to identify damage after storms

Source: *Grid Mod RFP – SOW (Final 8-8-18).pdf; Guidehouse*

Table 10. Overview of Term 2, Track 2 Investment Areas

Investment Areas	Description	Objective
Interconnection Automation	Eversource plans to integrate, into a single software, both their existing Distributed Generation (DG) tools and customer interconnection portal.	Improve the DG interconnection process with reductions in time & resources for a growing number of applications
Probabilistic Power Flow Modeling	Eversource plans to use a simulation of locational load and generation based on variables such as customer behavior and energy market prices.	Leverage GMP term 1 ALF investments into an automated approach to system modelling.
DER Mitigation	Unitil plans to install ground-fault overvoltage protection as well as upgrade either voltage regulators or load tap changers for three substations with reverse power flow issues	Address reverse power flow issues caused by DER saturation at three specific substations.
DERMS	Software that forms the hub of DER management functions and integrates with other applications such as a Demand Response Management System (“DRMS”) and ADMS, to create the DERMS Platform.	Cost-effectively optimize system performance and integrate DERS with more granularity
Demonstration Projects	Two demonstration projects proposed by National Grid to test new tools. Includes Active Resource Integration (ARI) and Local Export Power Control	Facilitates the interconnection of DG in certain areas of the EDC's distribution system that are approaching saturation
Project Management and Third-Party Evaluation	Investment into evaluation and project management. Evaluation includes third party evaluator budget, where the evaluator will conduct studies on appropriate topics related to the deployment of preauthorized investments. Project management includes portfolio management and reporting.	Assess and report on GMP deployment progress and performance of grid modernizing investments.

Source: Massachusetts DPU 21-80/DPU 21-81/DPU 21-82 Order on New Technologies and Advanced Metering Infrastructure Proposals issued November 30, 2022.

The Massachusetts DPU preauthorized budget for Track 1 investments and Track 2 investments on October 7, 2022²³ and November 30, 2022,²⁴ respectively. The preauthorized budget for grid modernization varies by Investment Area and EDC. National Grid has the largest preauthorized track one budget at \$300.8 million, with Communications and VVO representing the largest share (\$103 million and \$76 million, respectively). Eversource’s preauthorized Track 1 budget is \$176.6 million, with M&C representing about 50% (\$76.3 million). Unitil’s preauthorized track one budget is \$9.1 million with VVO making up more than 50% (\$5.4 million).

²³ Massachusetts DPU 21-80/DPU 21-81/DPU 21-82 Order on Previously Deployed Technologies issued October 7, 2022.

²⁴ Massachusetts DPU 21-80/DPU 21-81/DPU 21-82 Order on New Technologies and Advanced Metering Infrastructure Proposals issued November 30, 2022.

Table 11. Term 2 (2022-2025) Preauthorized Budget, \$M

Investment Areas	Eversource	National Grid	Unitil	Total
ADA	--	\$37.70	--	\$37.70
ADMS*	\$21.90	\$61.00	\$1.50	\$84.40
Comms**	\$38.00	\$102.80	\$0.82	\$141.62
M&C	\$76.30	\$4.10	\$1.10	\$81.50
VVO	\$40.40	\$76.40	\$5.40	\$122.20
WFM	--	--	\$0.25	\$0.25
IT/OT	--	\$18.80	--	\$18.80
Track 1 Total	\$176.60	\$300.80	\$9.07	\$486.47
Interconnection Automation	\$2.77	--	--	\$2.77
Probabilistic Power Flow	\$2.07	--	--	\$2.07
DER Mitigation	--	--	\$1.04	
DERMS	\$16.00	\$24.60	\$0.16	\$41.80
Demonstration Projects	--	\$6.40	--	\$6.40
Project Management and Third-Party Evaluation	\$8.00	\$4.40	\$0.30	\$12.70
Track 2 Total	\$29.00	\$35.40	\$1.50	\$65.90
2022-2025 Total	\$205.60***	\$336.20	\$10.57	\$552.37

* Given as \$1.50M minus DERMS cost from DPU Order, Oct. 7, 2022, and calculated from DPU Order, Nov. 30, 2022.

** Includes Communications Modernization for Eversource, with added budget taken from DPU Order, Nov. 30, 2022.

*** Budget includes \$16.3 million in funds remaining from the supplemental budget approved in D.P.U. 20-74 for DMS, substation automation, and VVO investments that Eversource sought to expend in calendar year 2022.

Source: DPU Order on Previously Deployed Technologies, October 7, 2022, and DPU Order on New Technologies, November 30, 2022 under docket 21-80, 21-81, and 21-82.

1.1.4 Evaluation Goals and Objectives

The DPU requires a formal evaluation process (including an evaluation plan and evaluation studies) for the EDCs' preauthorized GMP investments. Guidehouse is completing the evaluation to enable a uniform statewide approach and to facilitate coordination and comparability. The evaluation measures the progress made toward the achievement of DPU's grid modernization objectives. It uses the DPU-established Infrastructure Metrics and Performance Metrics, as well as Case Studies that illustrate the performance of specific technology deployments, to help determine if the investments are meeting the DPU's GMP objectives.

As previously noted, the Massachusetts DPU order on Track 2 technologies was released on November 30, 2022. The EDCs waited for DPU ruling on these technologies prior to commencing with significant investment, and thus were not able to complete deployment of

Track 2 technologies within the remaining 2022 calendar year.²⁵ Guidehouse has, therefore, not included evaluation findings for Track 2 technologies in this PY 2022 evaluation report, but instead will report GMP Track 2 evaluation findings for PY 2023 through PY 2025 in future program year reports.

1.1.5 Metrics for Evaluation

The DPU-required evaluation involves Infrastructure Metrics and Performance Metrics for each Investment Area. In addition, selected case studies have been added for some Investment Areas (e.g., M&C) as part of the evaluation to help facilitate understanding of how the technology performs in specific instances (e.g., in remediating the effects of a line outage).

1.1.5.1 Infrastructure Metrics

The Infrastructure Metrics assess the deployment of the GMP investments. Table 12 summarizes the Infrastructure Metrics.

Table 12. Infrastructure Metrics Overview

Metric	Description	Applicable IAs	Metric Responsibility*
IM-1	Grid Connected Distribution Generation Facilities Tracks the number and type of distributed generation facilities in service and connected to the distribution system	ADMS/ALF	EDC
IM-2	System Automation Saturation Measures the quantity of customers served by fully or partially automated devices.	M&C, ADA	EDC
IM-3	Number and Percent of Feeders with Installed Sensors Measures the total number of feeders with installed sensors which will provide information useful for proactive planning and intervention.	M&C	EDC
IM-4	Number of Devices or Other Technologies Deployed Measures how the EDC is progressing with its GMP from an equipment or device standpoint.	All IAs	Evaluator
IM-5	Cost for Deployment Measures the associated costs for the number of devices or technologies installed; designed to measure how the EDC is progressing under its GMP.	All IAs	Evaluator
IM-6	Deviation Between Actual and Planned Deployment for the Plan Year Measures how the EDC is progressing relative to its GMP on a year-by-year basis.	All IAs	Evaluator

²⁵ Within PY 2022, there was limited spend for Track 2 technologies for both Unitil and Eversource. Unitil reported approximately \$20k collectively across DER mitigation, workforce management, and Program Management and EM&V, while Eversource reported approximately \$6k for DERMS.

Metric	Description	Applicable IAs	Metric Responsibility*
IM-7	Projected Deployment for the Remainder of the GMP Term	Compares the revised projected deployment with the original target deployment as the EDC implements its GMP.	All IAs Evaluator

PM = Performance Metric, IA = Investment Area, ES = Eversource, NG = National Grid, UTL = Unifac

* Column indicates which EDC is responsible for calculating each metric, for statewide metrics, all EDCs are responsible

Source: Guidehouse Review of DPU Order, May 10, 2018²⁶

1.1.5.2 Performance Metrics

The Performance Metrics assess the performance of all the GMP investments. Table 13 summarizes the Performance Metrics used for the various Investment Areas. This report discusses Performance Metrics that pertain specifically to the M&C Investment Area.

Table 13. Performance Metrics Overview

Metric	Description	Applicable IAs	Metric Responsibility*
PM-1	VVO Baseline	Establishes a baseline impact factor for each VVO-enabled feeder which will be used to quantify the peak load, energy savings, and greenhouse gas (GHG) impact measures.	VVO All
PM-2	VVO Energy Savings	Quantifies the energy savings achieved by VVO using the baseline established for the feeder against the annual feeder load with the intent of optimizing system performance.	VVO All
PM-3	VVO Peak Load Impact	Quantifies the peak demand impact VVO/CVR has on the system with the intent of optimizing system demand.	VVO All
PM-4	VVO Distribution Losses without Advanced Metering Functionality (AMF) (Baseline)	Presents the difference between feeder load measured at the substation via the SCADA system and the metered load measured through advanced metering infrastructure.	VVO All
PM-5	VVO Power Factor	Quantifies the improvement that VVO/CVR is providing toward maintaining feeder power factors near unity.	VVO All

²⁶ Massachusetts DPU 15-120/DPU 15-121/DPU 15-122 (Grid Modernization) Order issued May 10, 2018 (DPU Order), pg. 198-201.

Metric	Description	Applicable IAs	Metric Responsibility*	
PM-6	VVO – GHG Emissions	Quantifies the overall GHG impact VVO/CVR has on the system.	VVO	All
PM-7	Voltage Complaints	Quantifies the prevalence of voltage-related complaints before and after deployment of VVO investments to assess customer experience, voltage stability under VVO.	VVO	All
PM-8	Increase in Substations with DMS Power Flow and Control Capabilities	Examines the deployment and data cleanup associated with deployment of ADMS, primarily by counting and tracking the number of feeders and substations per year.	ADMS/ ALF	All
PM-9	Control Functions Implemented by Feeder	Examines the control functions of DMS power flow and control capabilities, focused on the control capabilities including VVO-CVR and FLISR.	ADMS/ ALF	All
PM-10	Numbers of Customers that benefit from GMP funded Distribution Automation Devices	Shows the progress of ADA investments by tracking the number of customers that have benefitted from the installation of ADA devices.	ADA	ES, NG
PM-11	Grid Modernization investments' effect on outage durations	Provides insight into how ADA and M&C investments can reduce outage durations (CKAIDI). Compares the experience of customers on GMP M&C-enabled feeders as compared to the previous 3-year average for the same feeder.	M&C, ADA	All
PM-12	Grid Modernization investments' effect on outage frequency	Provides insight into how ADA and M&C investments can reduce outage frequencies (CKAIFI). Compares the experience of customers on M&C-enabled feeders as compared to the prior 3-year average for the same feeder.	M&C, ADA	All
PM-ES-1	Advanced Load Flow – Percent Milestone Completion	Examines the fully developed ALF capability across Eversource's feeder population.	ADMS/ ALF	ES
PM-ES-2	Protective Zone: Average Zone Size per Feeder	Measures Eversource's progress in sectionalizing feeders into protective zones designed to limit outages to customers located within the zone.	ADA	ES

Metric		Description	Applicable IAs	Metric Responsibility*
PM-UTL1	Customer Minutes of Outage Saved per Feeder	Tracks time savings from faster AMI outage notification than customer outage call, leading to faster outage response and reduced customer minutes of interruption.	M&C	UTL
PM-NG-1	Main Line Customer Minutes of Interruption Saved	Measures the impact of ADA investments on the customer minutes of interruption (CMI) for main line interruptions. Compares the CMI of GMP ADA-enabled feeders to the previous 3-year average for the same feeder.	ADA	NG

PM = Performance Metric, IA = Investment Area, ES = Eversource, NG = National Grid, UTL = Unitil

* Column indicates which EDC is responsible for calculating each metric, for statewide metrics, all EDCs are responsible

Source: Stamp Approved Performance Metrics, July 25, 2019.²⁷

²⁷ Massachusetts Department of Public Utilities, Grid Modernization Plan Performance Metrics. Submitted on July 25, 2019, as part of DPU 12-120, 15-121, & 15-122

1.2 VVO Investment Area Overview

As a part of grid modernization, the Massachusetts EDCs are investing to enable VVO on selected feeders across their distribution networks. VVO optimizes distribution voltage to reduce energy consumption and demand without the need for customer interaction or participation. The principle behind VVO is that power demand is reduced at voltages in the lower end of their allowable range for many end-use loads.

VVO reduces feeder demand and energy consumption by flattening and lowering the voltage profile on the feeder while maintaining customer service voltage standards. In addition, VVO systems allow for more gradual and responsive control of reactive power control devices, such as capacitors, which can improve the overall system power factor and reduce system losses. VVO allows customers to realize lower consumption without experiencing a reduction in their level of service.

The VVO investment will first be used to condition feeders, install equipment, and commission software. Once the software commissioning is complete, and as feeders complete their conditioning and equipment installation, they will become VVO enabled.

Table 14 summarizes preauthorized budget for VVO for Eversource, National Grid, and Unitil.

Table 14. GMP Preauthorized Budget for VVO

Period	Eversource	National Grid	Unitil	Total
Term 1 (2018 – 2021)	\$13.00	\$10.60	\$2.22	\$25.82
Term 2 (2022 – 2025)	\$40.40	\$76.40	\$5.40	\$122.20

Source: Term 1 preauthorized budgets were populated using DPU Order, May 10, 2018, and Eversource filing “GMP Extension and Funding Report,” July 1, 2020. Term 2 preauthorized budgets were populated using DPU Order, October 7, 2022, and DPU Order, November 30, 2022 under docket 21-80, 21-81, and 21-82.

The following subsection discusses EDC-specific approaches to VVO.

1.2.1 EDC Approach to VVO

The VVO investment process for each of the EDCs involves four core phases: VVO investment, VVO commissioning, VVO enablement, and VVO On/Off testing. Table 15 provides the four phases and a brief description of each phase, and Section 3 summarizes the status of each deployment phase by EDC.

Table 15. VVO Deployment Phases

Phase	Description
VVO Investment	Deployment and installation of VVO devices, including but not limited to capacitor banks, load tap changer (LTC) controls, and voltage regulators. Load rebalancing may occur during this time.
VVO Commissioning	Process of preparing VVO investments installed on conditioned feeders to begin VVO control.
VVO Enablement	Date at which the VVO system is enabled and managing voltage and reactive power.
VVO On/Off Testing Period	Dates over which the VVO system is cycled between the on and off states using a predetermined cycling schedule.

Source: Guidehouse

Table 16 defines the devices and technologies that each EDC has deployed as part of VVO investment. Sections 3 (Infrastructure Metrics) and 4 (Performance Metrics) below discuss specifics related to each EDCs' goals and objectives in the VVO Investment Area, while Section 2 below explains the evaluation process.

Table 16. Description of Devices Deployed Under VVO Investment

Device	Description	Term
Capacitor Bank Controls	Reactive compensation devices, equipment combined with two-way communications infrastructure, and remote-control capability to regulate reactive power (VAR) flows throughout the distribution network.	1 2
Inverter Demonstration*	Advanced inverters, which will be deployed at an Eversource-owned solar site in Western Massachusetts to support in coordination with VVO operations and set points.	2
Line Sensors	Voltage sensors, which relay verified field measurements to allow VVO algorithm to regulate voltage and reactive power appropriately.	1 2
Load Tap Changer (LTC) Controls	Transformer load tap changers, which automatically adjust feeder voltage based on local measurement. First of the two devices required to regulate voltage on a distribution feeder.	1 2
Voltage Regulators	Optimized for VVO and equipped with communications equipment to enable remote-control and monitoring of voltage; required to regulate voltage on a distribution feeder.	1 2
Micro-capacitors*	Installed at strategic locations in order to support system load, provide remote visibility and control of the devices, and prepare the feeder for conversion to VVO in the future. While not commissioned into the VVO system, microcapacitors enable additional voltage and power factor control on feeders.	1 2
Grid Monitoring Line Sensors*	Deployed at strategic locations like large side taps, step down transformers, and larger distributed generation sites that do not have SCADA reclosers. Grid monitoring line sensors also allow Eversource to gather additional telemetry from VVO enabled feeders.	1

* Microcapacitors and Grid Monitoring Line Sensors are VVO devices that are solely being deployed by Eversource. National Grid and Unitil have no plan to deploy these device types at this time.

Source: Guidehouse

1.2.2 VVO Evaluation Objectives

This evaluation focuses on the progress and effectiveness of the DPU preauthorized VVO investments for each EDC toward meeting the DPU’s grid modernization objectives.²⁸ Table 17 illustrates the key Infrastructure Metrics and Performance Metrics relevant for the VVO evaluation.

Table 17. VVO Evaluation Metrics

Metric Type	VVO Evaluation Metrics	ES	NG	UTL
IM	Number of devices or other technologies deployed	✓	✓	✓
IM	Cost for deployment	✓	✓	✓
IM	Deviation between actual and planned deployment for the plan year	✓	✓	✓
IM	Projected deployment for the remainder of the term	✓	✓	✓
PM	VVO Baseline	✓	✓	
PM	VVO Energy Savings	✓	✓	
PM	VVO Peak Load Impact	✓	✓	
PM	VVO Distribution Losses w/o AMF (Baseline)	✓	✓	
PM	VVO Power Factor	✓	✓	
PM	VVO GHG Emissions	✓	✓	
PM	Voltage Complaints	✓	✓	

Note: Unitil will not be receiving an evaluation of VVO Performance Metrics until VVO On/Off testing has begun. Unitil anticipates conducting VVO On/Off testing beginning in April 2023.

Source: Guidehouse Stage 3 Evaluation Plan submitted to EDCs on March 1, 2023

The EDCs provided data supporting the Infrastructure Metrics to the evaluation team. Guidehouse presents results from analysis of Infrastructure Metrics data in Section 3. The Performance Metrics will be based on statistical analyses performed by the evaluation team using data provided by each EDC.

Table 18 summarizes the VVO evaluation objectives and associated research questions that will be addressed in the report. The scope of the VVO measurement and verification (M&V) includes tracking the VVO infrastructure deployment against the plan (Infrastructure Metrics) and measuring the energy, peak demand, greenhouse gas (GHG), and voltage complaint impacts of installing the VVO investments and operating VVO (Performance Metrics).

Table 18. VVO M&V Objectives and Associated Research Questions

VVO M&V Objective	Associated Research Questions
Infrastructure Deployment	<ul style="list-style-type: none"> What is the extent, type, and cost of VVO investments? How well does each EDC’s deployment track the planned deployment?

²⁸ DPU Order, May 10, 2018, p.106.

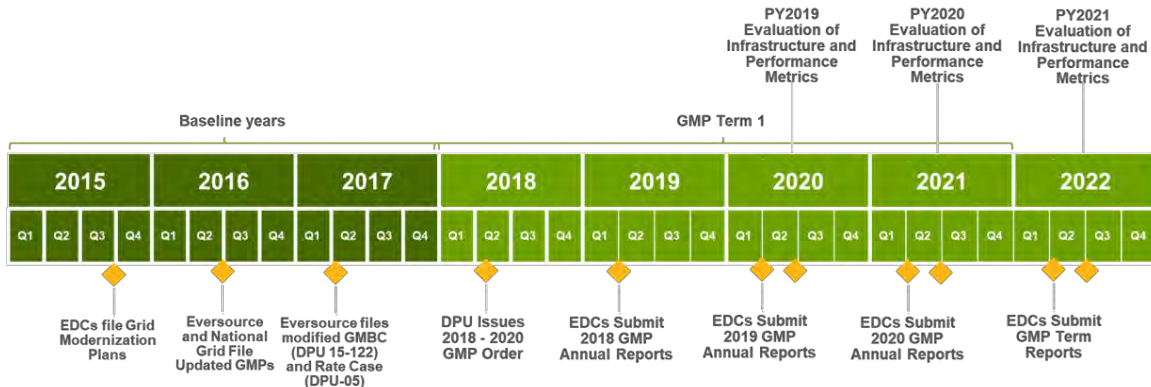
VVO M&V Objective	Associated Research Questions
Energy and Peak Savings by Feeder (Device Deployment)	<ul style="list-style-type: none"> • How many energy savings were realized from device deployment on VVO enabled feeders? • What is the impact on peak load from VVO investments operating on VVO enabled feeders? • How much GHG emissions reduction has been enabled from device deployment on VVO enabled feeders?
Energy and Peak Savings by Feeder (VVO-Operation)	<ul style="list-style-type: none"> • How many energy savings were realized from VVO operating on VVO enabled feeders? • What is the impact on peak load from VVO operating on VVO enabled feeders? • What is the impact on loss reductions and feeder-level power factor associated from VVO operating on VVO enabled feeders? • How much GHG emissions reduction was enabled from VVO operating on VVO enabled feeders?
Voltage Complaints	<ul style="list-style-type: none"> • What is the impact of VVO-related investments on the number of voltage complaints?

Source: Guidehouse Stage 3 Evaluation Plan submitted to EDCs on March 1, 2023

2. VVO Evaluation Process

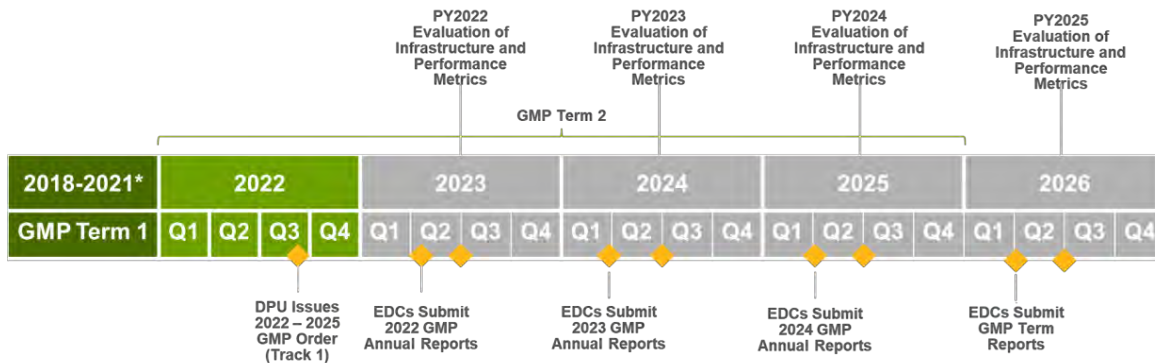
This section presents a high-level overview of the Guidehouse methodologies for the evaluation of Infrastructure Metrics and Performance Metrics. Figure 3 highlights the Term 1 filing background and timeline of the GMP Order and the evaluation process, and Figure 4 indicates the expected timeline for Term 2.

Figure 3. Term 1 Evaluation Timeline



Source: Guidehouse review of the DPU orders and GMP process

Figure 4. Term 2 Evaluation Timeline



Source: Guidehouse review of the DPU orders and GMP process

As a note, spend and deployment was conducted in PY 2022 to account for any spend and deployment from Term 1 (2018-2021 plan) as well as new spend to be included in Term 2 (2022 – 2025). Term 1 spend and deployment will be denoted separately within the analysis for Eversource, as Eversource provided data to support a comparison of Term 1 and Term 2 planned versus actual activity.

2.1 Infrastructure Metrics Analysis

Guidehouse annually assesses the progress of each of the EDCs toward deploying VVO on their feeders. Table 19 through Table 22 highlight the Infrastructure Metrics that were evaluated.

Table 19. GMP Term 1 Infrastructure Metrics Overview – Eversource Only

Infrastructure Metrics		Calculation	
IM-4	Number of devices or other technologies deployed thru. PY 2022	# Devices Deployed	$\sum_{PY=2018}^{2021} (Devices\ Commissioned)_{PY} + Devices\ Commissioned_{CY2022(T1)}$
		% Devices Deployed	$\frac{\sum_{PY=2018}^{2021} (Devices\ Commissioned)_{PY} + Devices\ Commissioned_{CY2022(T1)}}{\sum_{PY=2018}^{2021} (Devices\ Commissioned)_{PY} + (Planned\ Devices)_{CY2022(T1)}}$
IM-5	Cost through PY 2022	Total Spend, \$M	$\sum_{PY=2018}^{2021} (Actual\ Spend)_{PY} + Actual\ Spend_{CY2022(T1)}$
		% Spend	$\frac{\sum_{PY=2018}^{2021} (Actual\ Spend)_{PY} + Actual\ Spend_{CY2022(T1)}}{\sum_{PY=2018}^{2021} (Actual\ Spend)_{PY} + Planned\ Spend_{CY2022(T1)}}$
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	$\frac{(Devices\ Commissioned)_{CY2022(T1)}}{(Planned\ Devices)_{CY2022(T1)}}$
		% On Track (Spend)	$\frac{(Actual\ Spend)_{CY2022(T1)}}{(Planned\ Spend)_{CY2022(T1)}}$
IM-7	Projected Deployment for the remainder of the GMP Term (i.e., Term 1)*	# Devices Remaining	N/A*
		Spend Remaining, \$M	N/A*

Note: This table pertains to Infrastructure Metrics for Eversource only. Planned devices and spend are based on the 2021 GMP Term Report filing (filed on April 1, 2022 under DPU docket 21-80). All CY2022 spend and deployment data given above, to be calculated, includes only units/dollars dedicated to work intended for Term 1, and excludes any deployment and spend apportioned for Term 2.

* This metric has been interpreted here (i.e., within the context of the 2022 Program Year Evaluation) as the units and spending that the EDC plans to complete their most recent 4-year Term 1 plans. Additional Grid Modernization units and dollars incurred in 2022 are attributed to Term 2, as appropriate, and all units and dollars spent during 2023 through 2025 will be considered as part of Term 2 GMPs.

Source: Guidehouse

Table 20. GMP Term 1 Infrastructure Metrics Overview by Feeder – Eversource Only

Infrastructure Metrics*		Calculation	
IM-4	Number of Devices or Other Technologies Deployed through PY 2022	# Feeders with VVO Enabled	$(VVO \text{ Enabled Feeders})_{CY2022(T1)}$
		% Feeders with VVO Enabled	$\frac{(VVO \text{ Enabled Feeders})_{CY2022(T1)}}{\sum_{PY=2018}^{2021} (Actual \ VVO \text{ Enabled Feeders})_{PY} + (VVO \text{ Enabled Feeders})_{CY2022(T1)}}$
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (VVO Enabled Feeders)	$\frac{(VVO \text{ Enabled Feeders})_{CY2022(T1)}}{(Planned \ VVO \text{ Enabled Feeders})_{CY2022(T1)}}$
IM-7	Projected Deployment for the remainder of the GMP Term (i.e., Term 1)**	# VVO Enabled Feeders Remaining	N/A *

Note: This table pertains to Infrastructure Metrics for Eversource. All CY2022 feeder status includes only feeders identified as receiving VVO within GMP Term 1 plans and excludes activity on any feeders planned for GMP Term 2.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

** This metric has been interpreted here (i.e., within the context of the 2022 Program Year Evaluation) as the feeders that the EDC plans to complete their most recent 4-year Term 1 plans. Additional VVO feeders that were enabled 2022 are attributed to Term 2, as appropriate, and all VVO feeders that will be enabled during 2023 through 2025 will be considered as part of Term 2 GMPs.

Source: Guidehouse

Table 21. GMP Term 2 Infrastructure Metrics Overview – All EDCs

Infrastructure Metrics		Calculation	
IM-4	Number of devices or other technologies deployed thru. PY 2022	# Devices Planned	$(Devices \ Commissioned)_{PY2022}$
		% Devices Deployed	$\frac{(Devices \ Commissioned)_{PY2022}}{(Devices \ Commissioned)_{PY2022} + \sum_{PY=2023}^{2025} (Planned \ Devices)_{PY}}$
IM-5	Cost through PY 2022	Total Spend, \$M	$(Actual \ Spend)_{PY2022}$
		% Spend	$\frac{(Actual \ Spend)_{PY2022}}{\sum_{PY=2022}^{2025} (Planned \ Spend)_{PY}}$
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	$\frac{(Devices \ Commissioned)_{PY2022}}{(Planned \ Devices)_{PY2022}}$
		% On Track (Spend)	$\frac{(Actual \ Spend)_{PY2022}}{(Planned \ Spend)_{PY2022}}$

Infrastructure Metrics		Calculation
IM-7	Projected Deployment for the remainder of the GMP Term	$\sum_{PY=2022}^{2025} (Planned\ Devices)_{PY} - (Devices\ Comissioned)_{PY2022}$
	Spend Remaining, \$M	$\sum_{PY=2022}^{2025} (Planned\ Spend)_{PY} - (Actual\ Spend)_{PY2022}$

Note: CY2022 spend and deployment data given above includes only units/dollars within Term 2 plans, and excludes any deployment and spend apportioned for Term 1 (carryover).

Source: Guidehouse

Table 22. GMP Term 2 Infrastructure Metrics Overview by Feeder – All EDCs

Infrastructure Metrics*		Calculation
IM-4	Number of Devices or Other Technologies Deployed through PY 2022	$\frac{(VVO\ Enabled\ Feeders)_{PY2022}}{(VVO\ Enabled\ Feeders)_{PY2022} + \sum_{PY=2023}^{2025} (Planned\ VVO\ Enabled\ Feeders)_{PY}}$
	Deviation Between Actual and Planned Deployment for PY 2022	$\frac{(VVO\ Enabled\ Feeders)_{PY2022}}{(Planned\ VVO\ Enabled\ Feeders)_{PY2022}}$
IM-6	Projected Deployment for the remainder of the GMP Term*	$\sum_{PY=2022}^{2025} (Planned\ VVO\ Enabled\ Feeders)_{PY} - (VVO\ Enabled\ Feeders)_{PY2022}$

Note: CY2022 feeder data given above includes only feeders within Term 2 plans, and excludes any VVO feeders apportioned for Term 1 (carryover). These most recent plan totals were included in each EDC's VVO Supplemental data submissions, provided February 2022. These submissions listed the date in which each Term 1 and Term 2 feeder were slated to have full VVO capability.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse

Section 3.2 provides the results from the evaluation of Infrastructure Metrics. To evaluate Infrastructure Metrics, Guidehouse:

- Reviewed the data provided by the EDCs to confirm their progress through PY 2022 (see Section 3.1.2, "Data QA/QC Process")
- Interviewed representatives from each EDC to understand the status of the VVO investments, including:
 - Updates to their planned VVO investments
 - Reasons for deviation between actual and planned deployment and spend

2.2 Performance Metrics Analysis

Guidehouse evaluated Performance Metrics for two of the three EDCs, focusing on the utility and customer experience with VVO. Table 23 describes the Performance Metrics evaluated in PY 2022.

Table 23. Performance Metrics Overview

PM	Performance Metrics	Description
PM-1	VVO – Baseline	Establishes a baseline impact factor for each VVO enabled feeder which will be used to quantify the peak load, energy savings, and GHG impact measures
PM-2	VVO – Energy Savings	Quantifies the energy savings achieved by VVO using the baseline established for the feeder against the annual feeder load with the intent of optimizing system performance
PM-3	VVO – Peak Load Impact	Quantifies the peak demand impact VVO/CVR has on the system with the intent of optimizing system demand
PM-4	VVO – Distribution Losses without AMF (Baseline)	Presents the difference between feeder load measured at the substation via the SCADA system and the metered load measured through advanced metering infrastructure
PM-5	VVO – Power Factor	Quantifies the improvement that VVO/CVR is providing toward maintaining feeder power factors near unity
PM-6	VVO – GHG Emissions	Quantifies the overall GHG impact VVO/CVR has on the system
PM-7	Voltage Complaints	Quantifies the prevalence of voltage-related complaints before and after deployment of VVO investments to assess customer experience, voltage stability under VVO

Source: Stamp Approved Performance Metrics, July 25, 2019.

The metrics in Table 22 are based on a M&V process, which uses statistical analysis to quantify the impacts the VVO system has on the customers it serves. Quantifying VVO Performance Metrics requires interval measurements of feeder-level voltage and power demand while the voltage and reactive power controls are operated in both baseline (non-VVO) and VVO modes.

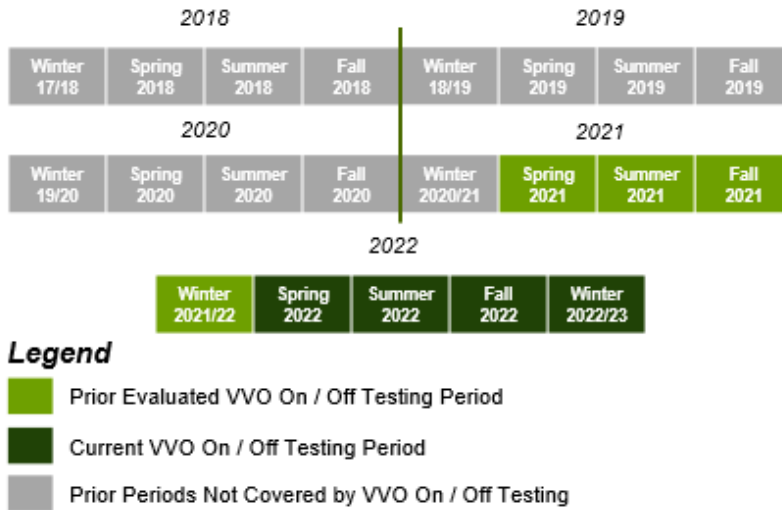
For changes associated with VVO being enabled to be quantified, Guidehouse and the EDCs have agreed to the plan for VVO On/Off testing to continue for at least 9 months, covering summer (June, July, and August), winter (December, January, and February), and one of the spring (March, April, and May) or fall (September, October, November) shoulder seasons.

2.2.1 Performance Metrics Timeline

Figure 5 highlights the key Performance Metrics analysis periods for Eversource. The Performance Metrics analysis provided for this report will be focused on results from VVO On/Off testing conducted during Spring 2022 – Winter 2022/23. Results from VVO On/Off

testing conducted during Spring 2021 – Winter 2021/22 were provided in the Massachusetts Grid Modernization Program Year 2021 Evaluation Report for Volt-VAR Optimization.²⁹

Figure 5. Performance Metrics Timeline



Source: Guidehouse analysis

²⁹ All Massachusetts Grid Modernization Program Year 2021 Evaluation Reports were filed on July 1, 2022 under DPU dockets 22-40, 22-41, and 22-42.

3. VVO Infrastructure Metrics

3.1 Data Management

Guidehouse worked with the EDCs to collect data to complete the evaluation for the assessment of VVO Infrastructure Metrics and Performance Metrics. The sections that follow highlight Guidehouse’s data sources and data QA/QC processes used in the evaluation of Infrastructure Metrics.

3.1.1 Data Sources

Guidehouse used a consistent methodology (across Investment Areas and EDCs) for evaluating and illustrating EDC progress indicated by the GMP metrics. The subsections that follow summarize each of the data sources used to evaluate Infrastructure Metrics.

3.1.1.1 Term 1 Planned Deployment and Spend for PY 2022

To assess progress against planned carryover deployment and spend for Eversource, Guidehouse used the planned device deployment and cost information from each its *2021 GMP Term Report*^{30,31,32}, which were filed on April 1, 2022. These filings served as the sources for planning data in this report and are referred collectively as the *GMP Term 1 Plan* each EDC in summary tables and figures throughout this report.

Table 24 lists the sources for the planned and actual quantities reviewed, and it specifies the color/shade used to represent these quantities in graphics throughout the rest of the report.

Table 24. GMP Term 1 Deployment Categories Used for the EDC Plan

Representative Color	Data	Description
	2022 Plan	Projected 2022 Term 1 unit deployment and spend
	2021 Actual	Actual 2021 unit deployment and spend
	2020 Actual	Actual 2020 unit deployment and spend
	2019 Actual	Actual reported unit deployment and spend in 2018
	2018 Actual	Actual reported unit deployment and spend in 2018

Source: Plan and actual data is sourced from the EDCs’ 2021 GMP Term Report Appendix 1 filed April 1, 2022.

³⁰ Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30.

³¹ NSTAR Electric Company d/b/a Eversource Energy, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30. Note that Eversource Energy filed an updated Appendix 1 filing in December of 2021; however that update did not affect any of the data or results in the evaluation.




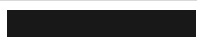
³² Fitchburg Gas and Electric Light Company d/b/a Unitil, Grid Modernization Plan Annual Report 2020. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 21-30.

Guidehouse used the Feeder Status tab of the 2022 GMP Annual Report Appendix 1^{33,34,35} to obtain feeder characteristics including system voltage, total feeder count, customer count, feeder length, and annual peak load.

3.1.1.2 Term 2 Planned Deployment and Spend for PY 2022

Guidehouse used the planned device deployment and cost information from each EDCs' filed responses to the first set of information requests issued by the Department of Energy Resources (DOER).³⁶ These responses were filed on October 4th, October 5th, and December 2nd, 2021, for Eversource, Unitil, and National Grid respectively. These filings served as the sources for planning data in this report and are referred collectively as the *DOER Responses* for each EDC in summary tables and figures throughout this report. Table 25 lists the different sources for the planned and actual quantities reviewed, and it specifies the color/shade used to represent these quantities in graphics throughout the rest of the report.

Table 25. GMP Term 2 Deployment Categories Used for the EDC Plan

Representative Color	Data	Description
	2025 Plan	Projected 2025 unit deployment and spend
	2024 Plan	Projected 2024 unit deployment and spend
	2023 Plan	Projected 2023 unit deployment and spend
	2022 Plan	Projected 2022 unit deployment and spend

Source: Plan data is sourced from EDC responses to the first set of information requests issued by the Department of Energy Resources, filed October 4, October 5, and December 2, 2021 under DPU dockets 21-80, 21-82, and 21-81 for Eversource, Unitil, and National Grid, respectively.

3.1.1.3 PY 2022 Actual Deployment and Spend, Planned Deployment and Spend for the Remainder of Term 2

Guidehouse collected device deployment data and VVO schedule information at the feeder-level using standardized data collection templates. Guidehouse developed these templates for all EDCs: the All Device Deployment data and VVO Supplemental workbooks, respectively.

Guidehouse collected data using standardized data collection templates (e.g., All Device Deployment) for all EDCs in January through March 2023. The data collected provides an update of planned and actual deployment, in dollars, device units, substations, and feeders through the end of PY 2022. Data from these sources are referred to as EDC Data in summary tables and figures throughout the report.

³³ Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, Grid Modernization Plan Annual Report 2022. Submitted to Massachusetts DPU on April 1, 2023 as part of DPU 22-41

³⁴ NSTAR Electric Company d/b/a Eversource Energy, Grid Modernization Plan Annual Report 2022. Submitted to Massachusetts DPU on April 1, 2023 as part of DPU 22-40

³⁵ Fitchburg Gas and Electric Light Company d/b/a Unitil, Grid Modernization Plan Annual Report 2022. Submitted to Massachusetts DPU on April 1, 2023 as part of DPU 22-42

³⁶ Plan data is sourced from EDC responses to the first set of information requests issued by the Department of Energy Resources (DOER). These responses were filed on October 4th, December 2nd, and October 5th, 2021, for Eversource, National Grid, and Unitil under DPU dockets 21-80, 21-81, and 21-82.

The EDC device deployment data (collected in the All Device Deployment workbook) captured planned and actual device deployment and spend data. Actual device deployment and cumulative spend information were provided by work order ID and specified at the feeder- or substation-level, as appropriate. The evaluation team also collected the current implementation stage of the work order (commissioned, construction, or design), the commissioned date (if applicable), and all cumulative costs associated with the work order.

The VVO supplemental data collection template includes additional information unique to the VVO Investment Area. Table 26 summarizes the information requested. Data was provided in the data collection template or submitted in a separate file. Information was requested at the feeder-level where possible (except for IT work). The VVO schedule information and the IT work information are the only data within this template that are applicable to the Infrastructure Metrics. All additional information is applicable to the Performance Metrics.

Table 26. VVO Supplemental Data

Information	Description
Actual/Planned VVO Schedule	Actual and updated planned VVO deployment start/end dates by feeder, including feeder conditioning, load rebalancing, phase balancing, VVO commissioning, VVO enabled, and On/Off testing.
IT Work	Actual and updated planned IT work progress start/end dates and cost information. ³⁷
Customer Demand Response (DR) Events	Demand response events (time-stamped log of any systemwide demand response (or similar), for example: ISO-NE DR, EDC direct load control programs, EDC behavioral demand response programs).
System Events	Operational changes, a time-stamped log of changes to substation and feeders away from normal operating state (temporary or permanent), and power outages.
DG Log	Log of distributed generation facilities connected to VVO feeders (e.g., type, size, installation date, feeder).
Voltage Complaints	Voltage-related complaints based on voltage perturbation (e.g., high voltage, low voltage, flicker), duration (e.g., multiple days, sporadic).

Source: Guidehouse Stage 3 Evaluation Plan submitted March 1, 2023

Table 27 summarizes the file versions used for the evaluation, and the following subsections provide additional detail surrounding requested inputs in each workbook. The collected data was compared to the data submitted by the EDCs to the DPU in the 2021 Grid Modernization Plan Term Reports and associated Appendix 1 filings.^{38,39,40} The evaluation team confirmed the consistency of the data from the various sources and reconciled any differences.

³⁷ IT work progress includes: planning, procurement, development, deployment, and go-live

³⁸ Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, Grid Modernization Plan Annual Report 2022. Submitted to Massachusetts DPU on April 1, 2021 as part of DPU 22-41

³⁹ NSTAR Electric Company d/b/a Eversource Energy, Grid Modernization Plan Annual Report 2021. Submitted to Massachusetts DPU on April 1, 2022 as part of DPU 22-40

⁴⁰ Fitchburg Gas and Electric Light Company d/b/a Unitil, Grid Modernization Plan Annual Report 2021. Submitted to Massachusetts DPU on April 1, 2022 as part of DPU 22-42

Table 27. EDC Data Received for Analysis










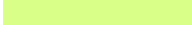


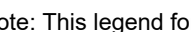
Company	File Version Used for Analysis ⁴¹	
	All Device Deployment	VVO Supplemental
Eversource	Received 3/20/2023	Received 3/31/2023
National Grid	Received 3/29/2023	Received 3/20/2023
Unitil	Received 3/30/2023	Received 2/14/2023

Source: Guidehouse

Table 28 and Table 29 summarize the categories used for the revised planned and actual deployment and spend and specifies the color and pattern used in bar graphs to represent each in the remainder of the report.

⁴¹ Some minor additional updates to specific work orders were addressed after these dates via email.












Table 28. Term 1 EDC Device Deployment and Spending Data Legend – Eversource Only

Representative Color	Data	Description
Device Deployment Data		
	2022 Design/Engineering	Detailed design and engineering is in progress, but the device is not yet in construction (from All Device Deployment workbook)
	2022 Construction	Field construction is in progress, but the device is not yet in-service (from All Device Deployment workbook)
	2022 In-Service	Device is installed and “used and useful” but not yet commissioned to enable all Grid Modernization functionalities (from All Device Deployment workbook)
	2022 Commissioned	Device is fully operational with all Grid Mod functionalities, and thus is considered “deployed” in PY 2022 (from All Device Deployment workbook)
	2021 Actual	Actual 2021 deployment (units) (provided in 2022 Appendix 1 filings)
	2020 Actual	Actual 2020 deployment (units) (provided in 2021 Appendix 1 filings)
	2019 Actual	Actual 2019 deployment (units) (provided in 2020 Appendix 1 filings)
	2018 Actual	Actual 2018 deployment (units) (provided in 2019 Appendix 1 filings)
Spend Data		
	2022 Actual	Actual 2022 spend (provided in All Device Deployment workbook)
	2021 Actual	Actual 2021 spend (\$) (provided in 2022 Appendix 1 filings)
	2020 Actual	Actual 2020 spend (\$) (provided in 2021 Appendix 1 filings)
	2019 Actual	Actual 2019 spend (\$) (provided in 2020 Appendix 1 filings)
	2018 Actual	Actual 2018 spend (\$) (provided in 2019 Appendix 1 filings)

Note: This legend for deployment and spend data summaries are provided for Eversource only, as National Grid and Unifil tracked all spending and all deployment for all of 2022, independent of Term status (i.e., whether the work was carried over from PY 2021 of Term 1).

Source: Guidehouse

Table 29. Term 2 EDC Device Deployment and Spending Data Legend

Representative Color	Data	Description
Device Deployment Data (from All Device Deployment workbook)		
	2025 Plan	Planned 2025 Deployment
	2024 Plan	Planned 2024 Deployment
	2023 Plan	Planned 2023 Deployment
	2022 Commissioned	Device is fully operational with all Grid Mod functionalities, and thus is considered “deployed” in PY 2021
	2022 In-Service	Device is installed and “used and useful” but not yet commissioned to enable all Grid Modernization functionalities
	2022 Construction	Field construction is in progress but the device is not yet in-service
	2022 Design / Engineering	Detailed design and engineering is in progress but the device is not yet in construction
Spend Data (from All Device Deployment workbook)		
	2025 Estimate	Planned 2025 spend
	2024 Estimate	Planned 2024 spend
	2023 Estimate	Planned 2023 spend
	2022 Actual	Actual 2022 spend

Source: Guidehouse

3.1.2 Data QA/QC Process

Guidehouse reviewed all data provided for Infrastructure Metrics analysis upon receipt of requested data. To ensure accuracy, Guidehouse conducted a QA/QC of all device deployment data received. This review involved following up with the EDCs for explanations regarding the following:

- Potential errors in how the forms were filled out (e.g., feeder information provided in the wrong field)
- Missing or incomplete information
- Large variation in the unit cost of commissioned devices
- Variance between the aggregated totals by device/technology and work order-level data
- Variance between the actual unit costs and planned unit costs

3.2 Deployment Progress and Findings

Guidehouse presents findings from the Infrastructure Metrics analysis for the VVO Investment Area in the following subsections. Throughout this section, Guidehouse will reference Term 1 feeders and Term 2 feeders. Term 1 feeders are the feeders identified by each of the EDCs Grid Modernization Plans as receiving full VVO functionality in 2018 through 2021. Term 2 feeders are feeders that are currently planned to receive VVO investments in Term 2 spanning 2022 through 2025. The number of Term 1 plan feeders that received VVO for Eversource,

National Grid, and Unitil total to 26, 20, and 0, respectively. As of the end of 2022, the number of Term 2 feeders planned for full VVO functionality for Eversource, National Grid, and Unitil total to 6, 52, and 11, respectively. The number of feeders slated to receive VVO functionality is expected to grow as Term 2 progresses, as the EDCs were continuing to assess which substations should be prioritized during this term at the end of 2022.

3.2.1 Statewide Comparison

This section discusses the current scope of VVO investments relative to the number of feeders and customers within the EDCs in Massachusetts and it summarizes the deployment progress and findings across all three EDCs.

3.2.1.1 Anticipated Impact on Massachusetts

VVO deployment is anticipated to impact 191 feeders serving 323,944 customers (11.7% of all EDC customers) throughout Massachusetts by the end of 2025. This includes 55 Term 1 feeders and 137 Term 2 feeders. Table 30 highlights the anticipated impact by EDC. VVO investments are expected to be complete by the end of 2025 at the following substations:

- **Eversource:** Agawam, Piper, Podick, Silver, Gunn, and Oswald (Term 1 feeders); Amherst, Breckwood, Cross Road, Cumberland, Doreen, Duxbury, Franconia, Industrial Park, Mashpee, Montague, Orchard, Wareham (Term 2 feeders)
- **National Grid:** East Methuen, Maplewood, and Stoughton (Term 1 feeders, VVO capability active in 2021); Billerica, Depot Street, East Bridgewater, East Dracut, Easton, Melrose, Parkview, Westboro, and West Salem (Term 2 feeders)
- **Unitil:** Townsend (Term 1 feeders); Beech Street, Lunenburg, Pleasant Street, Princeton Road, Summer Street, West Townsend, (Term 2 feeders)

Table 30. Number of Feeders and Customers Covered by VVO

VVO Impact	Eversource		National Grid		Unitil		Total	
	Feeders	Customers	Feeders	Customers	Feeders	Customers	Feeders	Customers
Systemwide Total	2,278	1,352,952	1,141	1,346,266	44	61,214	3,463	2,760,432
Term 1 Feeders								
Count	32	55,491	20	53,204	3	2,109	55	110,804
% System Total	1.4%	4.1%	1.8%	4.0%	6.8%	3.4%	1.6%	4.0%
Term 2 Feeders								
Count	95	127,403	34	74,920	8	10,367	137	212,690
% System Total	4.2%	9.4%	3.0%	5.6%	18.2%	16.9%	4.0%	7.7%
Term 1 and Term 2 Total								
Count	126	183,344	54	128,124	11	12,476	191	323,944
% System Total	5.5%	13.6%	4.7%	9.5%	25.0%	20.4%	5.5%	11.7%

Source: Guidehouse analysis of 2022 GMP Annual Report Appendix 1, filed April 24, 2023

3.2.1.2 Approach to VVO

Each EDC has a unique approach to selecting feeders for VVO, deploying VVO devices, and implementing VVO control. Table 31 highlights the substations covered by VVO investment and the planned VVO On/Off testing period start date for each EDC. The following subsections include specifics related to each EDC's approach to VVO.

Table 31. VVO Substations and VVO On/Off Testing Start by EDC

Company	Substations (Feeder Count)	VVO On/Off Testing Start	
Term 1 Feeders			
Eversource	Agawam (7)	Winter 2020/21	
	Piper (6)	Winter 2020/21	
	Podick (7)	Spring 2021	
	Silver (6)	Winter 2020/21	
	Gunn (4)	Spring 2022	
	Oswald (2)	Summer 2022	
National Grid	E. Methuen (6)	Spring 2021	
	Maplewood (8)	Winter 2021/22	
	Stoughton (6)	Winter 2020/21	
Unitil	Townsend (3)	Spring 2023	
Term 2 Feeders			
Eversource⁴²	Amherst (8)	Winter 2024/25	
	Breckwood (12)	Winter 2024/25	
	Cross Road (5)	Fall 2024	
	Cumberland (8)	Fall 2024	
	Doreen (10)	Fall 2024	
	Duxbury (4)	Spring 2025	
	Franconia (8)	Fall 2024	
	Industrial Park (10)	Fall 2025	
	Mashpee (4)	Winter 2024/25	
	Montague (8)	Winter 2024/25	
	Orchard (14)	Winter 2024/25	
	Wareham (4)	Winter 2024/25	
	National Grid	E. Bridgewater (7)	Summer 2021
		East Dracut (6)	Summer 2022
Easton (5)		Winter 2022/23	
Melrose (5)		Winter 2022/23	
Westboro (5)		Winter 2022/23	
West Salem (6)		Summer 2022	
Unitil	Lunenburg (2)	Winter 2024/25	
	Summer St. (4)	Winter 2023/24	
	W. Townsend (2)	Winter 2024/25	

Source: Guidehouse analysis of 2022 EDC Data

⁴² The feeder count is the total number of feeders supplied by the substation. For various technical reasons that become apparent during the VVO equipment locational analyses, not all feeders will be enabled with VVO.

3.2.1.3 VVO Timeline

Table 32 summarizes the expected timelines for completion of each of the four VVO investment phases for each EDC. Further detail surrounding these timelines follows.

Table 32. VVO Deployment Completion by Phase and EDC as of 12/31/2022

Deployment Phase	Number of Feeders*					
	Eversource		National Grid		Unitil	
	Complete	Remaining	Complete	Remaining	Complete	Remaining
Term 1 Feeders						
VVO Investment	32	0	20	0	3	0
VVO Commissioning	26	6	20	0	3	0
VVO Enabled**	26	6	20	0	3	0
VVO On/Off Testing	26	6	20	0	0	3
Term 2 Feeders						
VVO Investment	0	95	18	34	4	4
VVO Commissioning	0	95	18	34	4	4
VVO Enabled**	0	95	18	34	4	4
VVO On/Off Testing	0	95	18	34	0	8

*The count of feeders remaining for each deployment phase is based on deployment plans received in early 2023. As a part of the VVO planning process, additional feeders may be identified by the EDCs for VVO deployment in subsequent years of Term 2 (2023 through 2025).

** VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2022 EDC Data

Among Eversource's Term 1 feeders, VVO is enabled and VVO On/Off testing is ongoing at 26 feeders. Eversource began VVO On/Off testing at these feeders in winter 2020/21 for the Agawam, Piper, and Silver substations (19 feeders) and in spring 2021 for the Podick substation (7 feeders). For its Term 1 feeders yet to begin VVO On/Off testing, Eversource is finalizing commissioning of VVO investments and is expected to begin VVO On/Off testing at the Gunn and Oswald substations (6 feeders) in summer 2023 and winter 2023/24, respectively. Among its Term 2 feeders, Eversource is in the process of deploying VVO investments across all 95 currently identified feeders.

All 20 National Grid Term 1 plan feeders are VVO enabled. National Grid completed On/Off testing at the Stoughton substation (6 feeders) in winter 2021/22, and VVO On/Off testing is

ongoing at the East Methuen and Maplewood substations (14 feeders). Of its Term 2 plan feeders, National Grid has completed VVO On/Off testing at the East Bridgewater substation (7 feeders) in winter 2022/23, and VVO On/Off testing is ongoing at the Easton and West Salem substations (11 feeders). National Grid is in the process of deploying VVO investments across the remainder of feeders in National Grid’s current Term 2 plan (34 feeders).

Unitil has adjusted plans for its Summer Street, Lunenburg, and West Townsend substations (8 feeders) to have these substations receive VVO capability during Term 2, as Unitil was not able to complete VVO investments at these substations during Term 1. Unitil enabled VVO at the Townsend substation (3 feeders), the one substation remaining attributed to Term 1, in winter 2022/23. However, as is described in Section 3.2.4, Unitil was not able to conduct On/Off testing during 2022 due to ongoing vendor software troubleshooting. For the Term 2 feeders connected to the Summer Street, Lunenburg, and West Townsend substations (8 feeders), Unitil has completed VVO deployment at the Summer Street substation (4 feeders), with VVO currently enabled at this substation. VVO On/Off testing will not begin at the substation until winter 2023/24. Unitil is in the progress of deploying VVO investments across the remainder of feeders in Unitil’s current Term 2 plan (4 feeders).

3.2.1.4 Term 1 Infrastructure Metrics Results

At the request of Eversource, Guidehouse provided analysis of Eversource’s Term 1 spend and deployment. Table 33 summarizes the Infrastructure Metrics results for Eversource’s M&C Investment Area through PY 2022. Subsequent sections explain each EDC’s progress and plans in greater detail.

Table 33. Term 1 2022 Infrastructure Metrics for VVO

Infrastructure Metrics		Eversource	
GMP Plan Total, PY-2018-2022*		# Devices Planned	1,142
		Spend, \$M	\$17.23
IM-4 Number of devices or other technologies deployed thru PY 2018-2022*		# Devices Deployed***	1,038
		% Devices Deployed	91%
IM-5 Cost for Deployment thru PY 2018 – 2022*		Total Spend, \$M	\$16.87
		% Spend	98%
IM-6 Deviation Between Actual and Planned Deployment for PY 2022		% On Track (Devices)	70%
		% On Track (Spend)	85%
IM-7 Projected Deployment for the remainder of the GMP Term (i.e., Term 1)*		# Devices Remaining	0
		Spend Remaining, \$M	\$0.00

*The metric names have been slightly changed here to clarify the time span used in analysis.

** This metric has been interpreted here (i.e., within the context of the 2022 Program Year Evaluation) as the units and spending that the EDC plans to complete their most recent 4-year Term 1 plans. Additional Grid Modernization units and dollars incurred in 2022 are attributed to Term 2, as appropriate, and all units and dollars spent during 2023 through 2025 will be considered as part of Term 2 GMPs.

***Note that “Deployed” here refers to commissioned devices. For full definitions of deployment stages, see Docket 20-46 Response to Information Request DPU-AR-4-11, September 3, 2020.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Table 34 summarizes the total number of Term 1 feeders that were VVO enabled by the end of Term 1. National Grid and Eversource have completed deployment of VVO at 4 substations (26 feeders) and 3 substations (20 feeders), respectively. Two Eversource substations (6 feeders) will receive VVO capability later in 2023. Unitil had completed VVO deployment at 1 substation (3 feeders) of the 3 substations (8 feeders) that were initially planned to receive VVO during Term 1. Unitil has shifted the feeders that remain for deployment to its deployment plans for Term 2. As such, Unitil deployment of Term 1 feeders is presented as 100% complete.

Table 34. 2022 Infrastructure Metrics for VVO Feeder Deployment – Term 1 Plan Feeders

IM	Parameter*	Eversource	National Grid	Unitil
IM-4	# Feeders with VVO Enabled	26	20	3
	% Feeders with VVO Enabled	81%	100%	100%
IM-6	% On Track (Feeders with VVO Enabled)	81%	100%	100%
IM-7	# Feeders Remaining for VVO Enablement	0	0	0

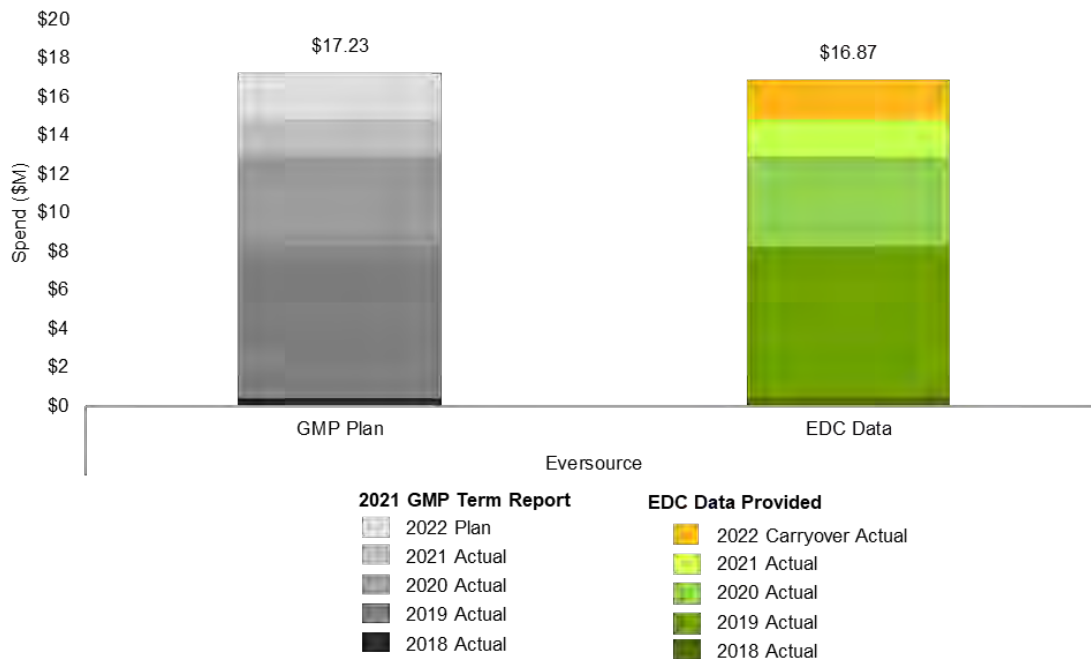
Note: This table considers Term 1 feeders for the three EDCs. Plan feeders for Term 1 may be found in Table 31.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Figure 6 highlights planned versus actual spend on VVO for Eversource.

Figure 6. Term 1 VVO Spend Comparison (2018–2022, \$M)



Note: Includes the Eversource planned spend on activity from 2021 that was transferred to 2022, set forth in Eversource's 2021 GMP Term Report, filed on April 1, 2022.

Source: Guidehouse analysis of 2021 GMP Term Report, "GMP Extension and Funding Report," and 2021 EDC Data

In addition to the capital costs Figure 6 shows, Eversource incurred approximately \$27,948 in Term 1 operations and maintenance (O&M) costs toward the VVO Investment Area in PY 2022. Further details on the differences between planned and actual spend are provided in the Eversource results subsections.

3.2.1.5 Term 2 Infrastructure Metrics Results

Table 35 and Table 36 summarize the Infrastructure Metrics results for each EDC's VVO Investment Area through PY 2022. Subsequent sections explain each EDC's progress and plans in greater detail.

Table 35. Term 2 2022 Infrastructure Metrics for VVO

Infrastructure Metrics		Eversource	National Grid**	Unitil
GMP Plan Total, PY 2022-2025	# Devices Planned	2,629	987	180
	Spend, \$M	38.64	\$76.44	\$5.42
EDC Data Total, PY 2022-2025	# Devices Planned	1,711	1,715	143
	Spend, \$M	\$38.61	\$76.44	\$2.24
IM-4 Number of devices or other technologies deployed thru. PY 2022	# Devices Deployed*	0	42	37
	% Devices Deployed	0%	4%	21%
IM-5 Cost for Deployment thru. PY 2022	Total Spend, \$M	\$0.04	\$7.61	\$0.28
	% Spend	0%	10%	5%
IM-6 Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	0%	25%	119%
	% On Track (Spend)	0%	69%	105%
IM-7 Projected Deployment for the Remainder of the GMP Term	# Devices Remaining	1,711	1,673	106
	Spend Remaining, \$M	\$38.58	\$68.83	\$1.96

*Note that "Deployed" here refers to commissioned devices. For full definitions of deployment stages, see Docket 20-46 Response to Information Request DPU-AR-4-11, September 3, 2020.

**To more closely align spend projections with DPU pre-authorized budgets, National Grid operations and maintenance (O&M) spend is included in actual and planned spend presented here. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 36. 2022 Infrastructure Metrics for VVO Feeder Deployment – Term 2 Plan Feeders

IM	Parameter*	Eversource	National Grid	Unitil
IM-4	# Feeders with VVO Enabled	0	18	4
	% Feeders with VVO Enabled	0%	35%	50%
IM-6	% On Track (Feeders with VVO Enabled)	0%	35%	50%
IM-7	# Feeders Remaining for VVO Enablement	95	34	4

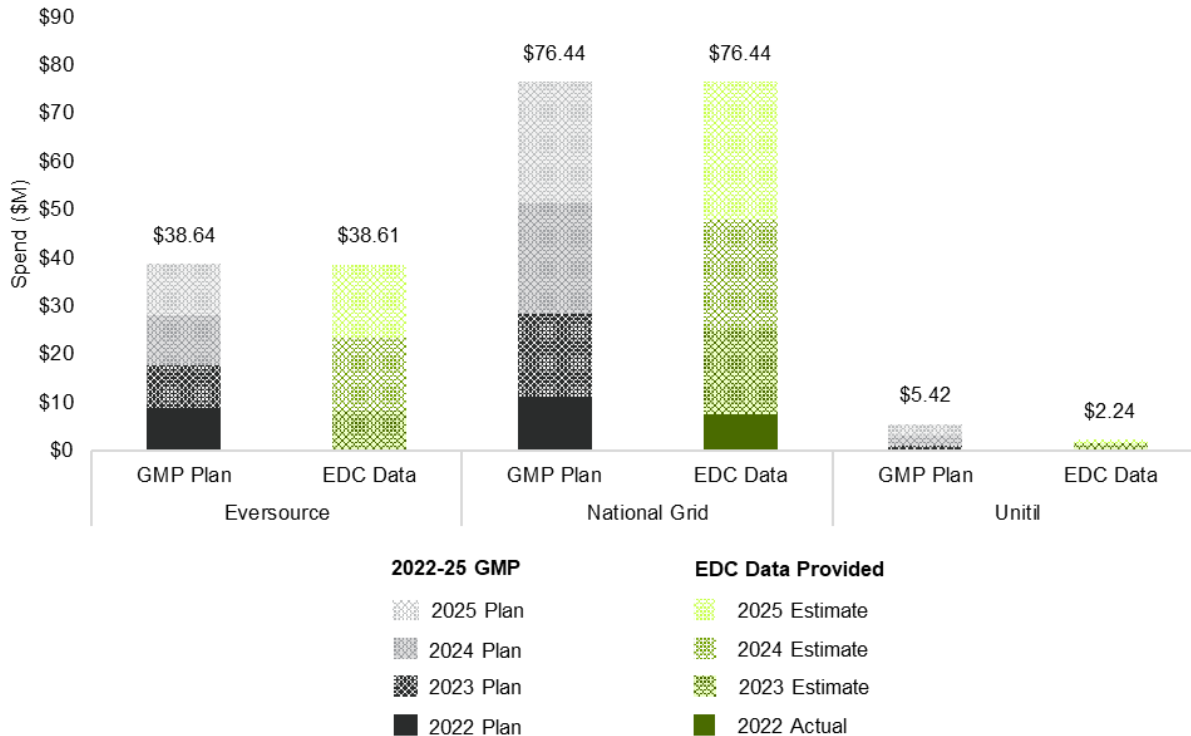
Note: This table considers Term 2 feeders for the three EDCs. Plan feeders for Term 2 may be found in Table 31.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2022 EDC Data

Figure 7 compares the GMP plans and EDC data totals and year-over-year spending for each EDC.

Figure 7. Term 2 VVO Spend Comparison



Note: To more closely align spend projections with DPU pre-authorized budgets, National Grid operations and maintenance (O&M) spend is included in actual and planned spend presented here. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

PY 2022’s VVO Infrastructure Metrics findings show that the EDCs are at varying stages in VVO deployment for Term 2. Details pertaining to device deployment progress, total spend, and VVO enablement progress are shown below:

Device Deployment:

- Eversource did not meet VVO deployment goals for PY 2022. Eversource progress on VVO investments targeted for 2022 through 2025 was comprised of progressing engineering/design work for all VVO device types, as well as planning for future VVO deployments, while awaiting DPU decisions on continued VVO investment for 2022 through 2025. Given limited deployment on Term 2 investments in 2022, Eversource has adjusted plans for the remainder of Term 2, with the majority of deployment and spend activity projected to occur in 2024 and 2025. At the technology-level, planned deployment has declined for Regulators, Line Sensors, and Microcapacitors, and planned Capacitor Bank deployment has increased slightly. Capacitor Bank deployment has been revised upwards to reflect refinements made during the planning and design process.

- National Grid conducted less deployment than initially planned in PY 2022. A late-2022 DPU decision on preauthorizing 2022 through 2025 investment activity, resource constraints, and vendor lead times were all key contributors to this outcome. In response to lower-than-expected deployment in 2022, National Grid has accelerated its deployment timeline for 2023 through 2025. National Grid has also adjusted total deployment plans for numerous device types, increasing projected deployment for Capacitor Banks, Line Sensors, and LTC Controls, while reducing projected deployment for Regulators. National Grid cites that these revisions are primarily due to the VVO planning work that has been conducted since the 2022-2025 GMP was filed.
- Until deployment was below plans for 2022, with variation by technology. Until was on-track with deployment of VVO Capacitor Banks and Line Sensors in 2022, deploying 100% and 210% of planned units, respectively. However, deployment was under plans for Regulators and LTC Controls. Lower deployment than plans for these technologies may be attributed to Until's efforts to resolve LTC radio and control issues and cancellation of 4 deployments that were found to be unnecessary. Until has adjusted deployment plans for the remainder of Term 2 to conduct most deployment during 2023 and 2025. Additionally, Until has reduced its planned deployments of VVO Regulators and Capacitor Banks, as Until reassessed deployment plans and determined there were fewer Regulator and Capacitor Bank deployments needed than initially planned. Work in 2024 will be limited to material orders in preparation for construction work at the Beech Street substation.

Total Spend:

- Eversource spend on Term 2 investments amounted to \$0.04M, short of the \$8.70M that was initially planned for 2022. Given limited deployment and spend on Term 2 investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. Eversource has projected that most spend activity will occur in 2024 and 2025.
- National Grid spend on VVO was below plans for 2022. The majority of spend occurred on Capacitor Banks, while spend on Regulators and Line Sensors was well below plans. Lower-than-anticipated spend on Line Sensors can, in part, be attributed to National Grid's previous line sensor vendor discontinuing their selected model. For VVO Regulators, vendor delays in fulfilling material orders was a key contributor to lower spend than initially planned. In response to its 2022 experience with Line Sensors and Regulators, National Grid has begun to increase diversification of vendors that it sources materials from.
- Until spend on VVO was below initial plans. Until met 48% of its planned spend for Regulators. Spend and deployment of all other devices met or exceeded initial plans. Spend plans for the remainder of Term 2 have been revised downwards across all device types. Reduced spend on Regulators and Capacitor Banks can be attributed to a reduction in the units that Until plans to deploy, as well as lower than expected costs for deployment of Regulators. Reduced spend on LTC Controls and Line Sensors may be tied to process efficiencies implemented in 2022 that brought unit costs below plans. Most spend is planned for 2023 and 2025, with work in 2024 limited to material orders in preparation for construction work at the Beech Street substation.

VVO Enablement:

- Eversource conducted VVO On/Off testing at four of six of its Term 1 substations (Agawam, Piper, Podick, and Silver) in 2022. Meanwhile, Eversource has shifted VVO deployment plans for its remaining Term 1 substations, shifting VVO enabled dates for the Gunn and Oswald substations by approximately 14 months and 19 months, respectively. The Gunn substation is now expected to be VVO enabled by June 2023, and Eversource plans to begin VVO On/Off testing by late June 2023. The Oswald substation is now expected to be VVO enabled by December 2023, and Eversource plans to begin VVO On/Off testing by late December 2023. Among its Term 2 feeders, Eversource is in the process of deploying VVO investments across all 95 currently identified feeders.
- National Grid conducted VVO On/Off testing at its East Methuen and Maplewood Term 1 substations throughout 2022. Among its Term 2 substations, National Grid conducted On/Off testing at the East Bridgewater substation throughout 2022, as VVO deployment was completed at the substation in 2021. Additionally, National Grid completed VVO deployment at the Easton and West Salem substations and began VVO On/Off for these substations in winter 2022/23 and spring 2022, respectively. National Grid projects that it will complete VVO deployment and enable VVO at its remaining Term 2 substations in 2023.
- Unitil completed VVO deployment for its Term 1 substation (Townsend) in 2021, enabling VVO on December 1, 2021, and On/Off testing is expected to begin in spring 2023. Among its Term 2 substations, Unitil completed deploying VVO investments at the Summer Street substation and enabled VVO in December 2022, with VVO On/Off testing projected to begin at the substation in December 2023. Lunenburg and West Townsend are currently receiving VVO investments and Unitil plans to enable VVO at the substations in January and November 2024, respectively. Unitil then plans to conduct On/Off testing at the substations beginning in December 2024. For its remaining substations, Unitil is currently conducting planning and engineering/design work for its Beech Street, Pleasant Street, and Princeton Road substations. These substations are expected to be enabled after the close of Term 2 in 2026 and 2027.

3.2.2 Eversource

This section discusses Eversource's VVO investment progress through PY 2022 in two subsections:

- **Term 1 Progress:** a comparison of progress Eversource made in 2022 against plans detailed in its *2021 GMP Term Report*. These results consider only the deployment and spending that were planned in 2021 to be carried over into 2022.
- **Term 2 Progress:** a comparison of progress Eversource made towards its 2022 plans outlined in its *2022-2025 GMP Plan*. These results do not consider deployment or spending that were planned in 2021 to be carried over into 2022.

3.2.2.1 Overview of GMP Deployment Plan

Approach to VVO

In Term 1, Eversource deployed full VVO functionality across four substations, amounting to 26 feeders. Eversource is also completing VVO investments at its two remaining Term 1 substations, amounting to 6 feeders. In deployment planning, all substations and feeders were selected based on whether they could be controlled from a single control room, cover a mix of

residential, commercial, and industrial customers, and cover a range of distributed generation capacities. Substation selections were based on engineering analysis and coordination with grid modernization teams.

Table 37 through Table 40 summarize the planned and actual deployment and spend for VVO for Term 1 and Term 2.

Table 37. Term 1 Eversource Cumulative VVO Feeder Deployment Year-over-Year Comparison

Data	2018	2019	2020	2021	2022	2018-2022
EDC Actual Progress	0	0	26	26	26	26
EDC Plan	26	26	26	26	32	32
% EDC Actual Progress/EDC Plan	0%	0%	100%	100%	81%	81%

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Table 38. Term 2 Eversource Cumulative VVO Feeder Deployment Year-over-Year Comparison

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	0	N/A	N/A	N/A	N/A
EDC Plan	95	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	0%	N/A	N/A	N/A	N/A

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2022 EDC Data

Table 39. Term 1 Eversource Cumulative VVO Investment Year-over-Year Comparison (\$M)*

Data	2018	2019	2020	2021	2022	2018-2022
EDC Actual Progress	\$0.4	\$8.2	\$12.9	\$14.8	\$16.9	\$16.9
EDC Plan	\$13.0	\$13.0	\$17.4	\$18.9	\$17.2	\$17.2
% EDC Actual Progress/EDC Plan	3%	63%	74%	78%	98%	98%

Note: Due to a rounding error, manual calculations of % EDC Actual Progress / EDC Plan and % EDC Revised Plan / EDC Original Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2021 GMP Term Report, 2022 EDC Data

Table 40. Term 2 Eversource Cumulative VVO Investment Year-over-Year Comparison (\$M)*

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	\$0.04	N/A	N/A	N/A	N/A
EDC Plan	\$38.6	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	0.1%	N/A	N/A	N/A	N/A

Note: Due to a rounding error, manual calculations of % EDC Actual Progress / EDC Plan and % EDC Revised Plan / EDC Original Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Across its Term 1 substations, Eversource has completed VVO deployment and VVO On/Off testing across 26 feeders connected to the Agawam, Piper, Podick, and Silver substations. Additionally, Eversource is in the process of deploying VVO investments at the Gunn and Oswald substations. Eversource expects VVO deployment to be complete at these substations by June and December of 2023, respectively. Through the end of 2022, Eversource spent roughly \$16.9M of its final estimated budget for Term 1 of \$17.2M, approximately 98% of plans, on completing activity from 2021. Through the end of 2022, Eversource has spent less than 1% of its planned spend for Term 2, as much of 2022 activity was comprised of completing work from Term 1.

Table 41 highlights Eversource feeder characteristics as of the end of 2022. Feeder lengths and customer counts vary considerably across VVO feeders. Selected substations also present a mix of distributed generation capacity across feeders, with distributed generation capacity ranging from 0.0 MW to 14.3 MW. Table 41 contains additional information related to the VVO feeders. Appendix A contains additional information related to the VVO feeders.

Table 41. 2022 Eversource VVO Feeder Characteristics

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Term 1 Feeders					
Agawam (13.8 kV)	16C11	24	1,350	5.8	2.2
	16C12	6	80	4.4	2.0
	16C14	15	1,632	6.2	0.2
	16C15	11	1,270	4.1	0.1
	16C16	22	2,563	7.4	2.5

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Piper (13.8 kV)	16C17	29	2,388	7.0	1.3
	16C18	21	3,054	6.3	0.8
	21N4	33	2,299	6.8	1.7
	21N5	15	829	8.4	0.2
	21N6	15	787	4.3	0.5
	21N7	5	2	4.8	0.0
	21N8	9	557	6.8	0.1
	21N9	24	2,404	6.4	1.0
	Podick (13.8 kV)	18G2	5	9	0.5
18G3		37	2,141	4.0	2.2
18G4		35	2,347	4.7	5.7
18G5		40	1,778	5.8	5.9
18G6		38	1,289	5.0	3.6
18G7		64	2,226	4.5	11.6
18G8		47	1,089	7.5	8.7
Silver (13.8 kV)		30A1	37	2,519	6.8
	30A2	12	2,286	8.8	0.4
	30A3	12	239	7.8	5.1
	30A4	11	801	4.6	0.3
	30A5	21	1,659	4.4	0.9
	30A6	20	1,007	5.5	2.3
Gunn (23 kV)	15A1	78	3,142	8.2	5.5
	15A2	22	2,143	8.3	4.1
	15A3	96	3,755	8.4	10.1
	15A5	31	3,427	6.5	2.1
Oswald (23 kV)	30B5	34	2,462	4.4	5.0
	30B7	84	1,957	7.7	14.3
Term 2 Feeders					
Amherst (13.8 kV)	17K1	12.25	1,046	2.58	6.76
	17K2	51.41	2,069	4.66	3.94
	17K3	3.59	396	0.88	0.18
	17K4	9.20	1,076	4.49	4.20
	17K5	28.56	1,628	7.25	1.09
	17K6	13.44	868	4.89	2.61
	17K7	11.46	874	1.27	0.33
	17K8	34.41	1,652	3.64	2.38
Breckwood (13.8 kV)	20A11	1.19	0	1.90	0.00
	20A12	9.52	841	2.30	0.22
	20A13	9.63	1,430	3.30	0.76
	20A14	22.19	1,949	6.00	2.25
	20A21	27.76	2,656	7.60	1.75
	20A22	17.03	2,166	5.60	1.02
	20A23	7.07	710	1.70	0.34
	20A31	15.10	1,590	4.30	0.31
	20A32	21.90	2,602	5.90	2.08
	20A33	22.05	2,872	9.70	1.72
20A34	24.59	2,081	6.50	2.25	

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Cross Road (13.2 kV)	20A35	17.25	1,749	4.80	1.12
	2-522-522	34.10	872	3.08	3.49
	2-523-523	116.25	3,112	8.47	6.13
	2-524-524	45.71	751	1.21	1.20
	2-525-525	3.55	3	4.96	6.00
	2-528-528	118.70	0	7.06	3.55
Cumberland (13.8 kV)	22B1	46.79	1,220	7.44	2.19
	22B2	13.87	1,411	3.73	0.75
	22B3	25.59	969	3.11	2.76
	22B4	26.31	1,319	4.15	5.24
	22B5	66.47	1,110	2.22	8.20
	22B6	1.65	0	1.27	0.00
	22B7	90.79	2,187	6.73	2.56
	22B8	18.00	2,247		0.84
Doreen (23 kV)	19A1	27.89	1,900	2.50	1.60
	19A2	16.06	1,225	1.80	0.76
	19A3	8.64	99	1.80	2.41
	19A4	2.41	64	1.80	2.01
	19A5	22.99	999	4.50	1.72
	19A6	5.50	3	4.10	1.76
	19A7	25.53	3,390	4.60	0.82
	19A8	10.47	1,407	1.60	0.45
Duxbury (4.16 kV)	3-24A-34J1	14.05	662	14.04	0.38
	3-24A-34J2	1.08	61	3.16	0.01
	3-24A-35J1	7.56	250	5.13	0.07
	3-24A-35J2	0.08	0	0.00	0.00
Franconia (13.8 kV)	22H11	0.93	0	0.00	0.01
	22H12	13.29	837	3.50	1.11
	22H13	27.50	1,666	7.20	0.73
	22H14	32.70	3,691	9.70	0.97
	22H15	19.53	3,515	7.20	0.87
	22H16	19.37	3,498	7.00	1.05
	22H17	21.90	1,932	6.30	0.45
	22H18	4.61	1,534	6.50	0.07
Industrial Park (13.2 kV)	2-101-101	4.33	25	8.7	2.30
	2-102-102	34.68	1,757	11.5	11.72
	2-102-608	15.84	739	2.3	0.68
	2-103-103	8.87	19	6.5	5.52
	2-104-104	14.96	1,239	4.8	1.85
	2-105-105	21.53	2,557	8.0	1.76
	2-106-106	2.24	5	7.5	0.00
	2-106-160	15.34	1,251	1.4	0.91
	2-106-161	11.97	1,008	2.9	0.92
	2-107-107	30.66	531	6.6	13.59
	2-108-108	50.57	0	14.5	17.20
	2-151-151	1.24	6	1.9	2.64
2-152-152	0.45	0	1.6	0.00	

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Mashpee (22.8 kV)	4-71-455	94.17	3,408	7.26	4.20
	4-71-71	0.21	9	13.84	0.00
	4-77B-456	31.65	1,381	4.81	0.68
	4-77B-77B	7.56	294	12.15	0.01
Montague (13.8 kV)	21C1	58.52	1,475	7.19	6.68
	21C2	24.27	1,086	7.53	9.57
	21C3	0.44	0	0.00	0.00
	21C4	16.66	1,852	7.36	1.26
	21C5	41.76	1,387	2.79	0.61
	21C6	4.52	461	0.84	7.29
	21C7	69.68	1,730	3.42	1.50
	21C8	25.50	1,130	3.44	10.41
	27A10	10.41	1,301	2.60	3.96
Orchard (13.8 kV)	27A11	1.58	1	4.60	0.00
	27A12	1.56	6	4.60	7.62
	27A13	12.25	2,002	7.60	4.12
	27A14	0.60	0	1.10	0.00
	27A15	9.44	1	0.20	0.00
	27A16	0.66	0	1.10	0.00
	27A17	0.65	0	1.10	0.00
	27A4	12.72	1,337	3.90	0.82
	27A5	17.18	723	5.90	2.56
	27A6	18.32	2,969	7.10	4.74
Wareham (22.8 kV)	3-85-85	76.51	2,469	15.78	6.45
	3-85-928	16.90	488	2.80	3.75
	3-85-957	11.43	278	0.99	0.26
	3-86-966	33.26	1,383	8.13	4.81

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: 2022 GMP Annual Report, Appendix 1 filed April 24, 2023

3.2.2.2 VVO Timeline

Table 42 summarizes substation-specific progress in each of the four VVO investment phases.

Table 42. Eversource Combined Plan Feeders Deployment Completion Dates

Substation	VVO Investment	VVO Commissioning ⁴³	VVO Enabled ⁴⁴	VVO On/Off Testing
Term 1 Plan Substations				

⁴³ VVO Commissioning is the time at which VVO devices are controlled by and have data visible to each EDC.

⁴⁴ VVO Enabled is the time at which the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Substation	VVO Investment	VVO Commissioning ⁴³	VVO Enabled ⁴⁴	VVO On/Off Testing
Agawam	1/14/2019 - 12/31/2019 (Complete)	11/1/2019 - 12/31/2019 (Complete)	12/2/2020 (Complete)	12/2/2020 - May 2023 (Complete)
Piper	1/14/2019 - 12/31/2019 (Complete)	11/1/2019 - 12/31/2019 (Complete)	12/2/2020 (Complete)	12/2/2020 - May 2023 (Complete)
Podick	3/29/2019 - 12/31/2019 (Complete)	11/1/2019 - 12/31/2019 (Complete)	12/2/2020 (Complete)	3/4/2021 - May 2023 (Complete)
Silver	1/14/2019 - 12/31/2019 (Complete)	11/1/2019 - 12/31/2019 (Complete)	12/2/2020 (Complete)	12/2/2020 - May 2023 (Complete)
Gunn	1/1/2021 - 6/1/2023 (In-Progress)	9/1/2022 - 6/1/2023 (In-Progress)	6/15/2023 (Planned)	6/30/2023 - TBD (Planned)
Oswald	1/1/2021 - 12/1/2023 (In-Progress)	9/1/2022 - 12/1/2023 (In-Progress)	12/15/2023 (Planned)	12/31/2023 - TBD (Planned)
Term 2 Plan Substations				
Amherst	TBD	TBD	TBD	1/1/2025 – TBD (Planned)
Breckwood	TBD	TBD	TBD	10/1/2024 – TBD (Planned)
Cross Road	TBD	TBD	TBD	7/1/2024 – TBD (Planned)
Cumberland	TBD	TBD	TBD	7/1/2024 – TBD (Planned)
Doreen	TBD	TBD	TBD	7/1/2024 – TBD (Planned)
Duxbury	TBD	TBD	TBD	4/1/2025 – TBD (Planned)
Franconia	TBD	TBD	TBD	7/1/2024 – TBD (Planned)
Industrial Park	TBD	TBD	TBD	7/1/2025 – TBD (Planned)

Substation	VVO Investment	VVO Commissioning ⁴³	VVO Enabled ⁴⁴	VVO On/Off Testing
Mashpee	TBD	TBD	TBD	10/1/2024 – TBD (Planned)
Montague	TBD	TBD	TBD	10/1/2024 – TBD (Planned)
Orchard	TBD	TBD	TBD	10/1/2024 – TBD (Planned)
Wareham	TBD	TBD	TBD	10/1/2024 – TBD (Planned)

Note: Term 2 feeder schedules were provided in quarterly form (e.g., Q4 2024). As such, Guidehouse has assigned VVO On/Off testing start dates as the first day of the quarter in which VVO On/Off testing is anticipated to begin.

Source: Guidehouse analysis of 2022 EDC Data

Eversource conducted VVO On/Off testing at four of its Term 1 substations throughout 2022. In tandem, Eversource conducted deployment of VVO devices across the Gunn and Oswald substations. In 2022, Eversource found that the existing LTC controls at the Oswald substation were incompatible with VVO and needed replacement and commissioning before being fully deployed. Additionally, Eversource is working through troubleshooting communications equipment before the Gunn substation will have full VVO capability. Eversource expects to complete LTC deployment and resolve communications issues in 2023. VVO On/Off testing is then expected to begin at the Gunn and Oswald substations in June and December 2023, respectively.

For its Term 2 substations, Eversource is currently in the VVO Investment phase, and is conducting engineering / design work for the selected substations. Eversource anticipates completing deployment during 2024 and 2025. Once VVO investments are deployed, Eversource plans to conduct VVO On/Off testing, with testing start dates ranging from July 2024 through July 2025. Once VVO On/Off testing has begun, Eversource anticipates conducting this testing for 9 – 12 months to collect one summer, one winter, and one shoulder season of testing data.

Table 43 presents an additional VVO enablement progress by substation, including actual and planned VVO enabled dates and notes on the status of VVO deployment.

Table 43. Eversource VVO Enabled Progress by Substation

Substation	January 2022 Planned/Actual VVO Enabled Date	January 2023 Planned/Actual VVO Enabled Date**	Current Status⁴⁵
Term 1 Feeders			
Agawam	12/2/2020 (actual)	12/2/2020 (actual)	VVO On/Off testing complete
Piper	12/2/2020 (actual)	12/2/2020 (actual)	VVO On/Off testing complete
Podick	3/4/2021 (actual)	3/4/2021 (actual)	VVO On/Off testing complete
Silver	12/2/2020 (actual)	12/2/2020 (actual)	VVO On/Off testing complete
Gunn	4/15/2022 (planned)	6/15/2023 (planned)	VVO Commissioning in progress
Oswald	5/15/2022 (planned)	12/15/2023 (planned)	VVO Commissioning in progress
Term 2 Feeders			
Amherst	N/A*	1/1/2025 (planned)	VVO Investment in progress
Breckwood	N/A*	10/1/2024 (planned)	VVO Investment in progress
Cross Road	N/A*	7/1/2024 (planned)	VVO Investment in progress
Cumberland	N/A*	7/1/2024 (planned)	VVO Investment in progress
Doreen	N/A*	7/1/2024 (planned)	VVO Investment in progress
Duxbury	N/A*	4/1/2025 (planned)	VVO Investment in progress
Franconia	N/A*	7/1/2024 (planned)	VVO Investment in progress
Industrial Park	N/A*	7/1/2025 (planned)	VVO Investment in progress
Mashpee	N/A*	10/1/2024 (planned)	VVO Investment in progress
Montague	N/A*	10/1/2024 (planned)	VVO Investment in progress
Orchard	N/A*	10/1/2024 (planned)	VVO Investment in progress
Wareham	N/A*	10/1/2024 (planned)	VVO Investment in progress

* Guidehouse did not previously report on VVO schedules for Term 2 feeders in its PY 2021 report, and so all information has been listed as not applicable.

** Term 2 feeder schedules were provided in quarterly form (e.g., Q4 2024). As such, Guidehouse has assigned VVO On/Off testing start dates as the first day of the quarter in which VVO On/Off testing is anticipated to begin.

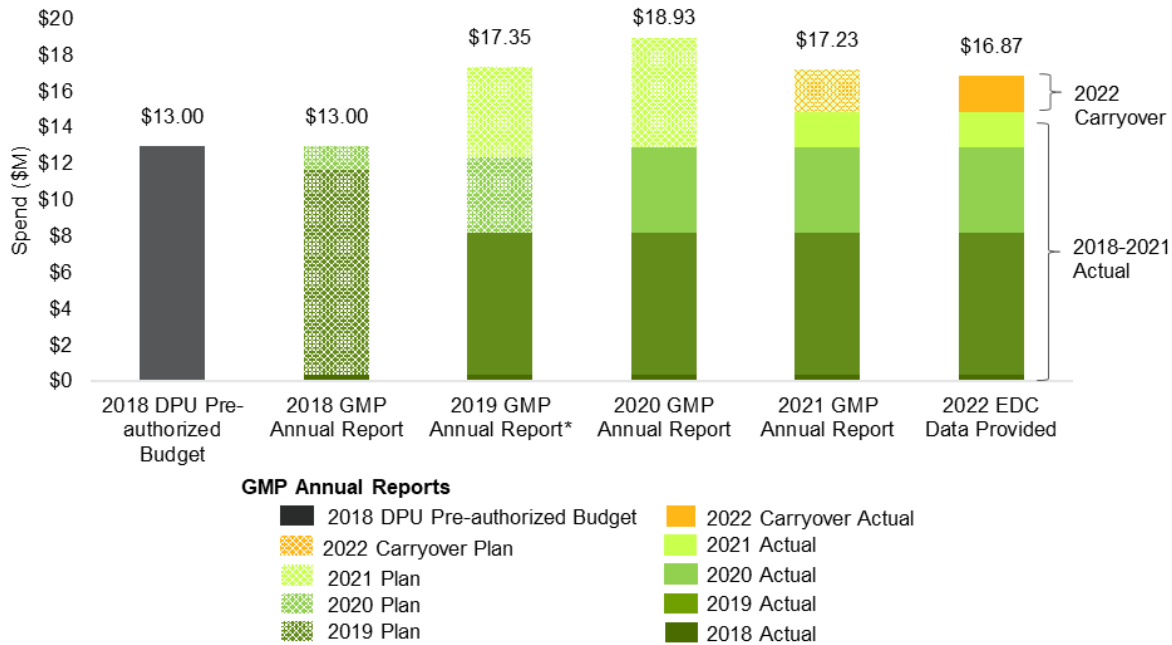
Source: Guidehouse analysis of 2021 and 2022 EDC Data

3.2.2.3 Term 1 VVO Deployment Plan Progression

Figure 8 shows the progression of Eversource’s VVO deployment plans from DPU-approval in 2018 through PY 2022.

⁴⁵ Status can be: planning, design, construction, device deployment complete, VVO commissioning in process, or VVO enabled. VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Figure 8. Term 1 Eversource VVO Planned vs. Actual Spend (2018–2022, \$M)



*Note that Eversource received pre-authorization from the Department for another \$5 million in spending for its VVO investment area in late 2020.

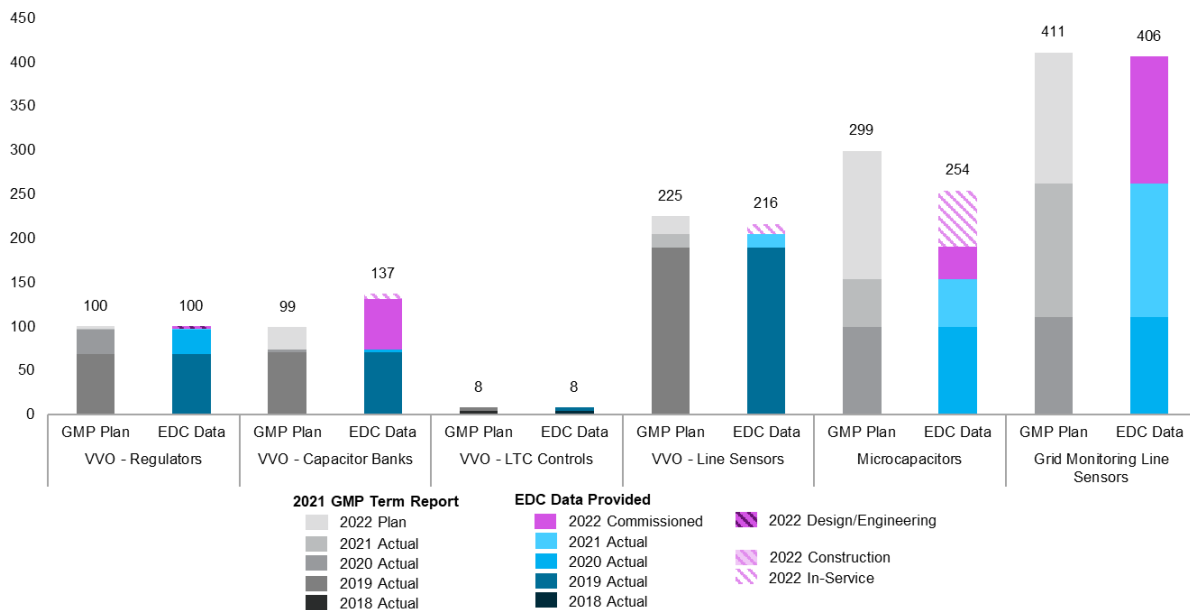
Source: Guidehouse analysis of DPU Order (May 10, 2018), 2021 GMP Term Report, Eversource GMP Extension and Funding Report filed on July 1, 2020, Eversource extension filing, and 2022 EDC Data

Eversource made progress towards meeting planned PY 2021 deployment and spend that was carried over to 2022. As of the end of 2022, total spend (\$16.87M) was slightly below plans (\$17.23M). This is largely attributed to vendor delays in fulfilling material orders.

3.2.2.4 Term 1 VVO Device Type Progress through PY 2022

Figure 9 shows the progress and details of each device type for the 2018-2022 period.

Figure 9. Term 1 Eversource Planned vs Actual Deployment (2018–2022, Unit Count)



Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

The EDC Data presented in Figure 9 is also shown in tabular form in Table 44. to provide the specific deployment units in each category.

Table 44. Term 1 Eversource VVO Deployment Progress

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	Micro-capacitors	Grid Monitoring Line Sensors
2018-2022 Total	97	131	8	205	0	191
Engineering/Design during PY 2022*	0	0	0	0	0	0
Construction during PY 2022*	0	6	0	11	0	63
In-Service during PY 2022*	0	57	0	0	0	37
Commissioned in PY 2022	1	0	0	16	0	55
Commissioned in PY 2021	27	3	0	0	0	99
Commissioned in PY 2020	69	71	4	189	0	0
Commissioned in PY 2019	0	0	4	0	0	0
Commissioned in PY 2018	97	131	8	205	0	191

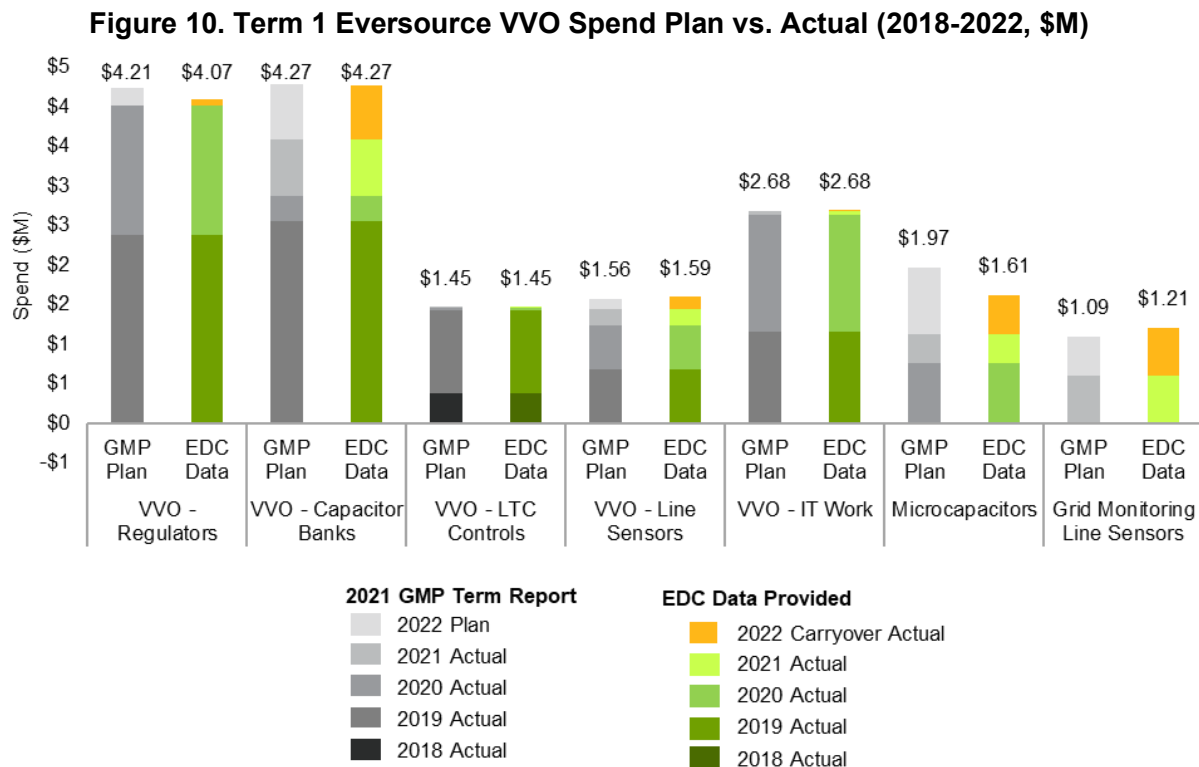
*Deployment of these devices began during PY 2022, but was not completed during the program year. All units and dollars spent to deploy remaining units during 2023 through 2025 will be considered as part of Term 2 GMPs.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Eversource made headway on deploying 2021 investments in 2022, with Capacitor Banks and Grid Monitoring Line Sensors comprising the bulk of deployed devices. Eversource exceeded plans (25 devices) for Capacitor Banks, deploying 57 devices, as refinements made during the planning and design process placed more priority on Capacitor Banks, less on Regulators, for VVO operation. Grid Monitoring Line Sensors deployed (141 devices) were approximately in-line with plans (148 devices).

Eversource had anticipated deploying three VVO Regulators during 2022, and ultimately was not able to meet this goal due to vendor delays on material orders. As of the end of 2022, Eversource was awaiting delivery of 3 ordered VVO Regulators from its vendor. Line Sensor and Micro-capacitor deployment also fell short of plans.

Figure 10 shows Eversource’s corresponding planned versus actual spend over the 2018-2022 Term period, broken out by device type.



Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

The EDC Data presented in Figure 10 is also shown in Table 45 to provide the specific dollar spend in each category.

Table 45. Term 1 Eversource Total Spend Comparison (2018–2022, \$M)

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - IT Work	Microcapacitors	Grid Monitoring Line Sensors
2018-2022 Total	\$4.07	\$4.27	\$1.45	\$1.59	\$2.68	\$1.61	\$1.21
PY 2022 Actual	\$0.08	\$0.69	\$0.00	\$0.16	\$0.00	\$0.50	\$0.61
PY 2021 Actual	-\$0.02	\$0.71	\$0.00	\$0.20	\$0.05	\$0.36	\$0.59
PY 2020 Actual	\$1.63	\$0.31	\$0.03	\$0.56	\$1.47	\$0.75	\$0.00
PY 2019 Actual	\$2.38	\$2.55	\$1.04	\$0.68	\$1.16	\$0.00	\$0.00
PY 2018 Actual	\$0.00	\$0.00	\$0.38	\$0.00	\$0.00	\$0.00	\$0.00

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Eversource made substantial progress on PY 2021 work that was planned for 2022. Total spend through the end of 2022 was approximately on track with plans for all device types. The largest variance from plans identified was for microcapacitors (\$0.36M below plan). While total spend through 2022 exceeded plans for Grid Monitoring Line Sensors, spend being on-track for Capacitor Banks and lower than plans for other device types led to total spend on VVO (\$16.87M) being slightly below planned spend (\$17.23M).

3.2.2.5 Term 1 Infrastructure Metrics Results and Key Findings

Table 46 and Table 47 present the Infrastructure Metrics results through PY 2022 for each device type related to Eversource’s VVO Investment Area.

Table 46. Term 1 2022 Eversource Infrastructure Metrics for VVO Devices

Infrastructure Metrics		VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - IT Work	Microcapacitors	Grid Monitoring Line Sensors
GMP Plan Total, 2018-2022	Devices	100	99	8	225	0	299	411
	Spend, \$M	\$4.21	\$4.27	\$1.45	\$1.56	\$2.68	\$1.97	\$1.09
IM-4 Number of devices or other technologies deployed PY 2018-2022*	# Devices Deployed	97	131	8	205	0	191	406
	% Devices Deployed	97%	132%	100%	91%	N/A	64%	99%
IM-5 Cost for Deployment PY 2018-2022*	Total Spend, \$M	\$4.07	\$4.27	\$1.45	\$1.59	\$2.68	\$1.61	\$1.21
	% Spend	97%	100%	100%	102%	100%	82%	110%
IM-6 Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	0%	228%	N/A	0%	N/A	26%	97%
	% On Track (Spend)	36%	99%	N/A	120%	N/A	59%	123%

Infrastructure Metrics			VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - IT Work	Microcapacitors	Grid Monitoring Line Sensors
IM-7	Projected Deployment for the remainder of the GMP Term (i.e., Term 1)**	# Devices Remaining	0	0	0	0	0	0	0
		Spend Remaining, \$M	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

*The metric names have been slightly changed here to clarify the time span used in analysis.

** This metric has been interpreted here (i.e., within the context of the 2022 Program Year Evaluation) as the units and spending that the EDC plans to complete their most recent 4-year Term 1 plans. Additional Grid Modernization units and dollars incurred in 2022 are attributed to Term 2, as appropriate, and all units and dollars spent during 2023 through 2025 will be considered as part of Term 2 GMPs.

Source: Guidehouse analysis of 2021 GMP Term Report and 2022 EDC Data

Table 47. Term 1 2022 Eversource Infrastructure Metrics for VVO Feeders

IM	Metric	Parameter*	Number of Feeders
IM-4	Number of Devices/Technologies Deployed thru. 2022	# Feeders with VVO Enabled	26
		% Feeders with VVO Enabled	81%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	81%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	0

Note: This table considers Term 1 plan feeders for Eversource. Feeders that were projected to receive VVO capability during Term 1 may be found in Table 31.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Guidehouse’s review of Eversource’s VVO progress on Term 1 revealed that Eversource was approximately on-track with planned spend and deployment outlined in their *2021 GMP Term Report*. However, some spend and deployment remain in order to complete activities from Term 1. Key findings related to Eversource’s progress include:

Device Deployment

- Eversource made headway on deploying 2021 investments in 2022, with Capacitor Banks and Grid Monitoring Line Sensors comprising the bulk of deployed devices. Eversource exceeded plans (25 devices) for Capacitor Banks, as refinements made during the planning and design process placed more priority on Capacitor Banks, less on Regulators, for VVO operation. At the close of 2022, Eversource was awaiting delivery of 3 ordered VVO Regulators from its vendor. Line Sensor and Micro-capacitor deployment also fell short of plans.

Total Spend

- Eversource made substantial progress on PY 2021 work that was planned for 2022. Total spend through the end of 2022 was approximately on track with plans for all device types,

with total spend on VVO (\$16.87M) being slightly below planned spend (\$17.23M) laid out for Term 1.

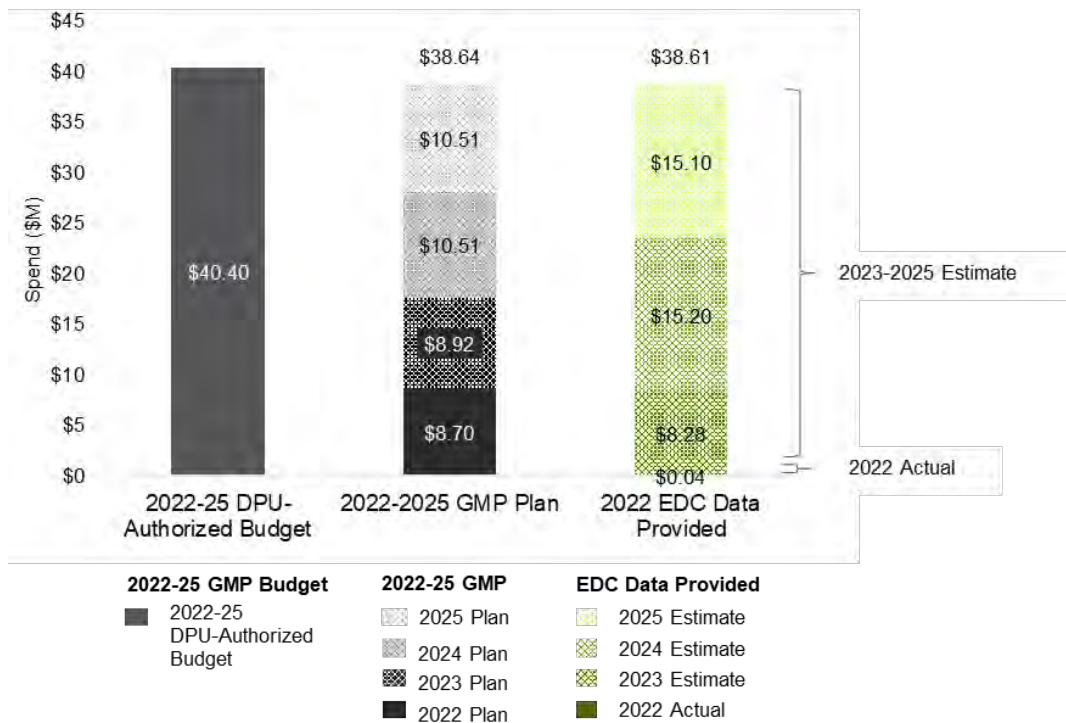
VVO Enablement

- Eversource completed deployment of VVO at four of its six Term 1 plan substations (Agawam, Piper, Podick, and Silver) by the end of 2021, and conducted On/Off testing at these substations throughout 2022. Eversource stopped VVO On/Off testing on these four substations in May 2023, transitioning towards leaving VVO in its enabled state moving forward. Meanwhile, the Gunn and Oswald substations will be VVO enabled in 2023, with On/Off testing to begin shortly thereafter.

3.2.2.6 Term 2 VVO Deployment Plan Progression

Figure 11 shows how Eversource's Term 2 VVO deployment spend has progressed since the Term 2 GMP was approved in late 2022.

Figure 11. Term 2 Eversource VVO Planned vs. Actual Spend (2022–2025, \$M)



Source: Guidehouse analysis of DPU Order on Previously Deployed Technologies (October 7, 2022), 2021 DOER Responses, and 2022 EDC Data

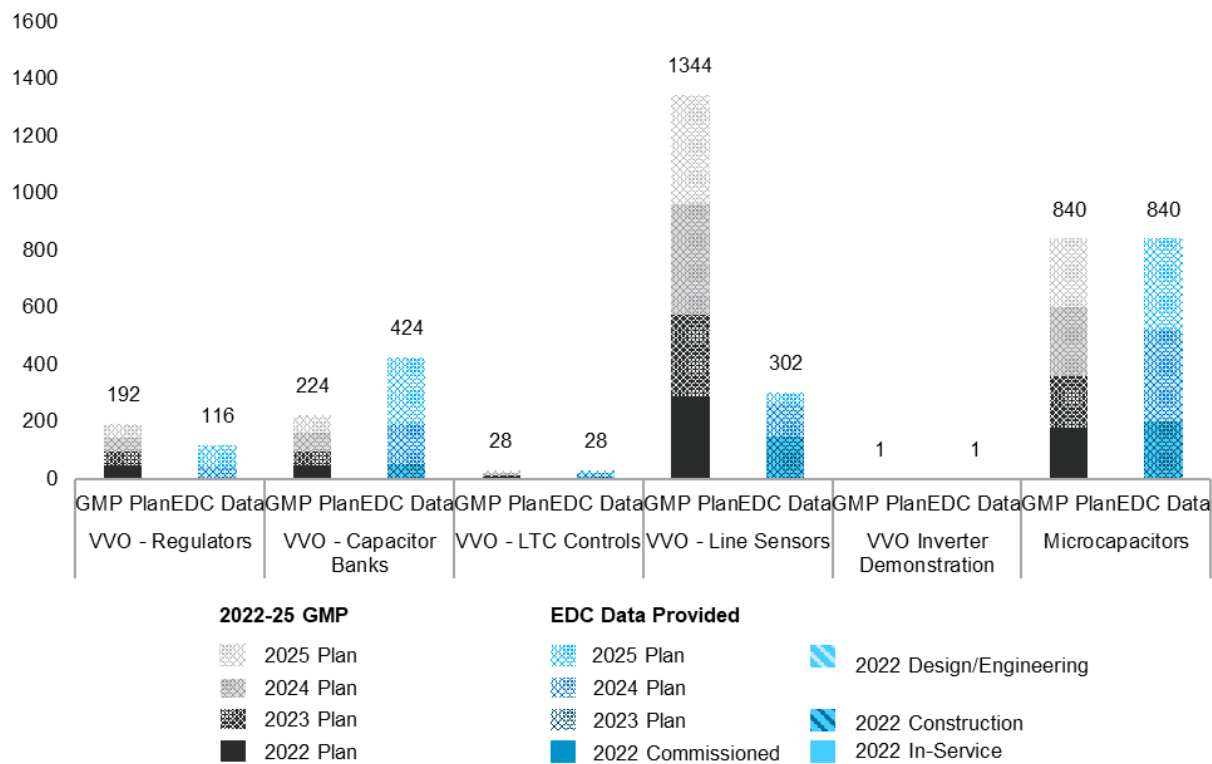
Eversource progress on VVO investments targeted for 2022 through 2025 was comprised of progressing engineering/design work for all VVO device types. Spend on Term 2 investments amounted to \$0.04M, short of the \$8.70M that was initially planned for 2022. Lower deployment and spend relative to plans can primarily be attributed to the timing of the DPU's rulings on Track 1 investments (Oct. 7, 2022) and Track 2 investments (Nov. 30, 2022). Engineering / design work conducted in 2022 enabled Eversource to begin submitting material orders once DPU decision was released. Given limited deployment and spend on Term 2

investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. To account for ongoing vendor delays, Eversource has projected that the majority of deployment and spend activity will occur in 2024 and 2025.

3.2.2.7 Term 2 VVO Device Type Progress through PY 2022

Figure 12 shows planned versus actual device deployment progress for PY 2022, as well as planned investment for PY 2023 through PY 2025.

Figure 12. Term 2 Eversource Planned vs Actual Deployment (2022-2025, Unit Count)



Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

The EDC Data presented in Figure 12 is also shown in tabular form in Table 48 to provide the specific deployment units in each category.

Table 48. Term 2 Eversource VVO Deployment Progress

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - Inverter Demo	Micro-capacitors
2022-2025 Planned Deployment	116	424	28	302	1	840
PY 2025 Planned	72	234	10	39	0	320

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - Inverter Demo	Micro- capacitors
PY 2024 Planned	44	140	10	117	0	320
PY 2023 Planned	0	50	8	146	1	200
Commissioned in PY 2022	0	0	0	0	0	0
In-Service during PY 2022	0	0	0	0	0	0
Construction during PY 2022	0	0	0	0	0	0
Engineering/Design during PY 2022	116	424	28	302	1	840

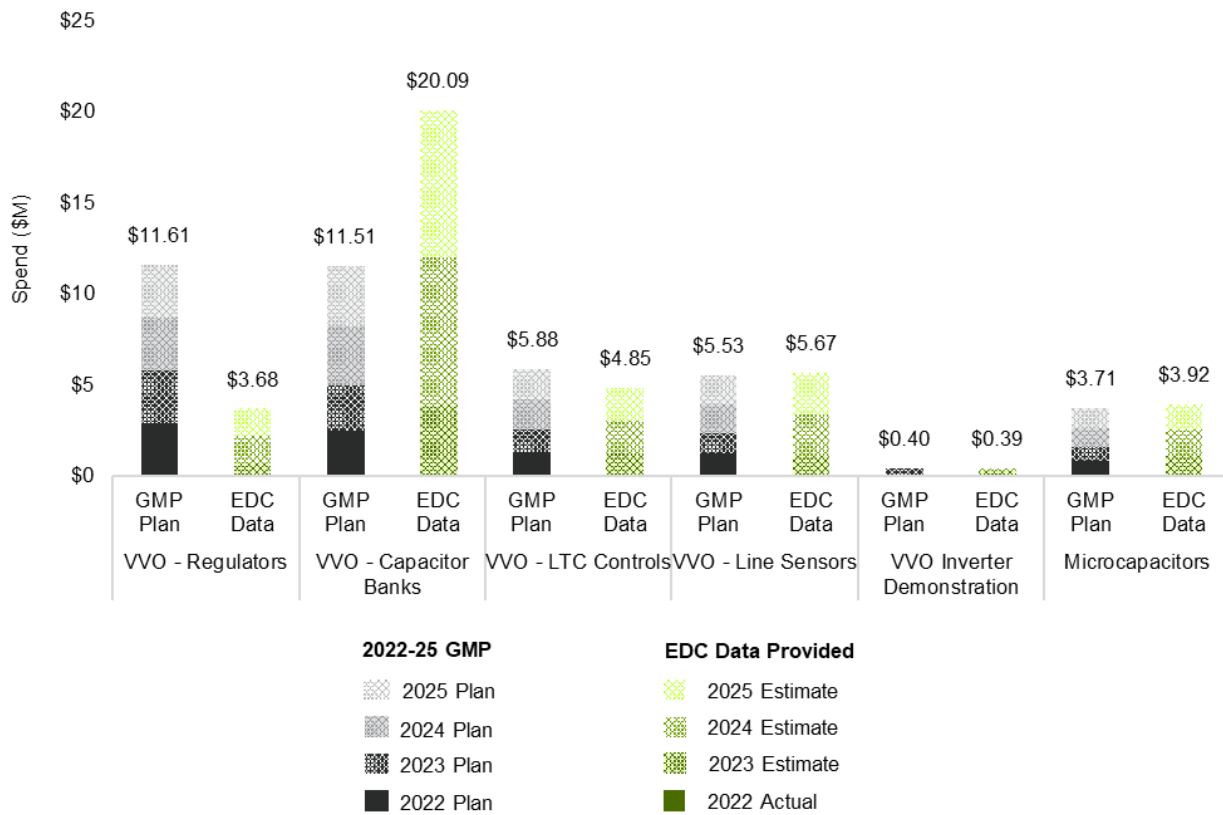
Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

During PY 2022, Eversource was not able to deploy VVO investments targeted for Term 2. Work on Term 2 investments was focused on engineering/design, as well as identification of substations to receive VVO during Term 2. Engineering/design work conducted in 2022 enabled Eversource to begin submitting material orders once DPU decisions were released in late 2022.

Since Eversource filed its 2022-2025 GMP, planned deployment has declined for Regulators, Line Sensors, and Microcapacitors. Meanwhile, planned deployment for LTC controls has not changed, and Capacitor Bank planned deployment has increased slightly. Capacitor Bank deployment has been revised upwards to reflect refinements made during the planning and design process, which placed more priority on Capacitor Banks, less on Regulators, for VVO operation. Vendor delays continued through 2022, with average lead times for Regulators and Capacitor Banks at around 56 weeks. Eversource has adjusted plans to conduct the most deployment in 2024 and 2025 to account for ongoing vendor delays and ongoing design work.

Figure 13 shows Eversource's corresponding planned versus actual spend for PY 2022, as well as planned investment for PY 2023 through PY 2025, broken out by device type.

Figure 13. Term 2 Eversource VVO Spend Plan vs. Actual (2022-2025, \$M)



Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

The EDC Data presented in Figure 13 is also shown in Table 49 to provide the specific dollar spend in each category.

Table 49. Term 2 Eversource Total Spend Comparison (2022-2025, \$M)

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO - Inverter Demo	Micro-capacitors
2022-2025 Total	\$3.68	\$20.09	\$4.85	\$5.67	\$0.39	\$3.92
PY 2025 Estimate	\$1.50	\$8.10	\$1.80	\$2.30	\$0.00	\$1.40
PY 2024 Estimate	\$1.50	\$8.10	\$1.80	\$2.30	\$0.10	\$1.40
PY 2023 Estimate	\$0.68	\$3.88	\$1.23	\$1.07	\$0.29	\$1.12
PY 2022 Actual	\$0.00	\$0.01	\$0.02	\$0.00	\$0.00	\$0.00

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Eversource has reduced planned spend for Regulators while increasing planned spend for Capacitor Banks. This shift in planned spend is consistent with a shift in deployment plans for Regulators and Capacitor Banks. However, Eversource has not changed planned spend for Line Sensors, despite a marked reduction in planned deployment of Line Sensors. In response to vendor delays and design work being in progress for numerous device types, Eversource has reduced spend plans for 2023, increased spend plans for 2024 and 2025.

3.2.2.8 Term 2 Infrastructure Metrics Results and Key Findings

Table 50 and Table 51 present the Infrastructure Metrics results through PY 2022 for each device type in Eversource’s VVO Investment Area.

Table 50. Term 2 2022 Eversource Infrastructure Metrics for VVO Devices

Infrastructure Metrics		VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	VVO Inverter Demo	Micro-capacitors
GMP Plan Total, 2022-2025	# Devices Planned	192	224	28	1344	1	840
	Spend, \$M	\$11.61	\$11.51	\$5.88	\$5.53	\$0.40	\$3.71
EDC Data Total, 2022-2025	# Devices Planned	116	424	28	302	1	840
	Spend, \$M	\$3.68	\$20.09	\$4.85	\$5.67	\$0.39	\$3.92
IM-4	Number of devices or other technologies deployed thru. PY 2022	# Devices Deployed	0	0	0	0	0
		% Devices Deployed	0%	0%	0%	0%	0%
IM-5	Cost for Deployment thru PY 2022	Total Spend, \$M	\$0.00	\$0.01	\$0.02	\$0.00	\$0.00
		% Spend	0%	0%	0%	0%	0%

Infrastructure Metrics			VVO - Regulators	VVO - Capacit or Banks	VVO - LTC Control s	VVO - Line Sensor s	VVO Inverter Demo	Micro- capacit ors
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	0%	0%	0%	0%	N/A	0%
		% On Track (Spend)	0%	0%	2%	0%	N/A	N/A
IM-7	Projected Deployment for the Remainder of the GMP Term*	# Devices Remaining	116	424	28	302	1	840
		Spend Remaining, \$M	\$3.68	\$20.08	\$4.83	\$5.67	\$0.39	\$3.92

*The metric names have been slightly changed here to clarify the time span used in analysis.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 51. Term 2 2022 Eversource Infrastructure Metrics for VVO Feeders

IM	Metric	Parameter*	Number of Feeders
IM-4	Number of Devices/Technologies Deployed	# Feeders with VVO Enabled	0
		% Feeders with VVO Enabled	0%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	0%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	95

Note: This table considers Term 2 plan feeders for Eversource. Feeders currently projected to receive VVO capability during Term 2 may be found in Table 31.

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Guidehouse’s review of Eversource’s VVO progress revealed that Eversource were below planned spend and deployment outlined in their 2022-2025 GMP. Key findings related to Eversource’s progress include:

Device Deployment

- During PY 2022, Eversource was not able to deploy VVO investments targeted for Term 2. Lower deployment and spend relative to plans can primarily be attributed to the timing of the DPU’s rulings on Track 1 investments (Oct. 7, 2022) and Track 2 investments (Nov. 30, 2022). Eversource progress on VVO investments targeted for 2022 through 2025 was comprised of progressing engineering/design work for all VVO device types, as well as planning for future VVO deployments. Engineering/design work conducted in 2022 enabled Eversource to begin submitting material orders once DPU decisions were released in late 2022.
- Given limited deployment and spend on Term 2 investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. To account for ongoing vendor delays, Eversource has projected that the majority of deployment and spend activity will occur in 2024 and 2025.

- In addition to an accelerated deployment timeline as compared to its 2022-2025 GMP, planned deployment has declined for Regulators, Line Sensors, and Microcapacitors. Meanwhile, Capacitor Bank deployment has been revised upwards to reflect refinements made during the planning and design process, which placed more priority on Capacitor Banks, less on Regulators, for VVO operation.

Total Spend

- Spend on Term 2 investments amounted to \$0.04M, short of the \$8.70M that was initially planned for 2022. Given limited deployment and spend on Term 2 investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. Eversource has projected that most spend activity will occur in 2024 and 2025.
- Consistent with shifts in planned deployment for Regulators and Capacitor Banks, Eversource has reduced planned spend for Regulators while increasing planned spend for Capacitor Banks.

VVO Enablement:

- For its Term 2 substations, Eversource is currently in the VVO Investment phase, and is conducting engineering / design work for the selected substations. Eversource anticipates completing deployment during 2024 and 2025. Once VVO investments are deployed, Eversource plans to conduct VVO On/Off testing, with testing start dates ranging from July 2024 through July 2025. Once VVO On/Off testing has begun, Eversource anticipates conducting this testing for 9 – 12 months to collect one summer, one winter, and one shoulder season of testing data.

3.2.3 National Grid

This section discusses National Grid's planned and actual VVO investment progress through PY 2022.

3.2.3.1 Overview of GMP Deployment Plan

During Term 1, National Grid completed deployment of VVO investments across the East Methuen, Stoughton, and Maplewood substations, amounting to 20 feeders. For Term 2, National Grid has currently identified 52 feeders for VVO investment. National Grid selected substations for VVO primarily based on whether they yielded the greatest customer savings. Other considerations in the selection process included the future or ongoing planned work scopes, resourcing availability, and a load flow and power quality analysis.

Table 52 and Table 53 summarize the planned and actual deployment and spending on VVO as of the end of 2022. In 2022, National Grid had identified 52 feeders to receive VVO functionality during Term 2. As of the end of 2022, National Grid has enabled VVO at 18 feeders, 35% of the feeders outlined in its Term 2 plans. To date, National Grid has spent roughly 10% of its Term 2 planned spend of \$76.44M.

Table 52. Term 2 National Grid Cumulative VVO Feeder Deployment Year-over-Year Comparison

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	18	N/A	N/A	N/A	N/A
EDC Plan	52	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	35%	N/A	N/A	N/A	N/A

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2022-2025 GMPs and 2022 EDC Data

Table 53. Term 2 National Grid Cumulative VVO Investment Year-over-Year Comparison (\$M)*

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	\$7.6	N/A	N/A	N/A	N/A
EDC Plan	\$76.4	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	10%	N/A	N/A	N/A	N/A

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2021 Responses to DOER IRs and 2022 EDC Data

Table 54 highlights National Grid VVO feeder characteristics as of the end of 2022. Feeder lengths and customer counts vary considerably across VVO feeders. Selected substations also present a mix of distributed generation capacity across feeders, with distributed generation capacity ranging from 0.6 MW to 7.9 MW. Appendix A contains additional information related to the VVO feeders.

Table 54. Term 1 2022 National Grid VVO Feeder Characteristics

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Original 2018–2020 Plan Feeders					
East Methuen (13.2 kV)	74L1	39	3,088	12.1	5.9
	74L2	17	1,574	6.7	0.9
	74L3	20	3,355	8.2	2.0
	74L4	9	1,609	6.6	1.2
	74L5	55	3,162	10.7	1.3
	74L6	8	1,781	5.0	0.7
Stoughton (13.8 kV)	913W17	14	1,350	5.5	1.8
	913W18	12	1,504	4.6	0.7
	913W43	32	2,132	7.1	1.5
	913W47	16	1,796	5.8	0.6
	913W67	13	755	3.0	1.0
Maplewood	913W69	32	3,603	9.9	1.7
	16W1	17	3,683	9.6	1.4

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
(13.8 kV)	16W2	11	4,674	8.6	1.1
	16W3	13	3,352	7.6	0.7
	16W4	8	1,131	9.2	0.9
	16W5	7	1,710	5.7	1.0
	16W6	24	5,627	14.3	2.0
	16W7	14	3,891	10.9	2.0
	16W8	16	3,427	9.6	1.9
	East Bridgewater (13.8 kV)	797W1	36	2,821	10.4
797W19		38	2,563	8.3	2.8
797W20		31	1,717	9.7	0.6
797W23		41	2,650	9.7	1.7
797W24		54	2,583	9.7	1.5
797W29		37	2,338	8.3	2.7
797W42		21	1,239	4.5	1.9
East Dracut (13.2 kV)	75L1	17	3,041	7.6	1.0
	75L2	39	2,613	8.4	1.1
	75L3	50	2,328	9.7	2.3
	75L4	9	387	3.3	0.2
	75L5	19	3,556	7.7	1.1
	75L6	25	1,485	6.5	0.9
Easton (13.8 kV)	92W43	28	1,973	7.1	1.2
	92W44	26	1,779	9.0	1.3
	92W54	34	2,284	7.3	7.9
	92W78	38	1,993	7.9	0.9
	92W79	24	1,655	6.4	5.3
Melrose (13.8 kV)	25W1	19	1,575	6.1	2.3
	25W2	17	1,245	6.1	0.8
	25W3	9	729	8.3	0.8
	25W4	22	4,770	11.5	1.3
	25W5	20	3,832	11.4	1.4
Westboro (13.8 kV)	312W1	30	2,278	9.8	2.0
	312W2	9	177	6.0	3.0
	312W3	21	1,492	8.0	0.9
	312W4	54	2,625	9.0	5.5
	312W5	14	424	9.6	0.9
West Salem (13.8 kV)	29W1	23	3,788	10.7	2.4
	29W2	16	1,653	6.0	0.7
	29W3	15	4,286	10.3	1.4
	29W4	18	2,700	8.2	2.1
	29W5	12	2,915	10.5	1.3
	29W6	17	1,426	6.8	1.3

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: 2022 GMP Annual Report, Appendix 1 filed April 24, 2023.

3.2.3.2 VVO Timeline

Table 55 and Table 56 summarize substation-specific progress in each of the four VVO investment phases. The evaluation of Infrastructure Metrics spans spending and deployment under the VVO investment and VVO commissioning stages.

Table 55. National Grid Combined Plan Feeders Deployment Completion Dates

Substation	VVO Investment	VVO Commissioning	VVO Enabled Date	VVO On/Off Testing Period
Term 1 Plan Substations				
E. Methuen	2/1/2020 - 8/31/2020 (Complete)	7/27/2020 - 1/22/2021 (Complete)	2/8/2021 (Complete)	3/1/2021 - 1/6/2023 (Complete)
Maplewood	1/15/2020 - 8/31/2020 (Complete)	9/1/2021 - 12/15/2021 (Complete)	12/16/2021 (Complete)	12/16/2021 - TBD (In-Progress)
Stoughton	11/15/2019 - 3/31/2020 (Complete)	5/1/2020 - 7/23/2020 (Complete)	7/24/2020 (Complete)	12/1/2020 - 9/15/2021 (Complete)
Term 2 Plan Substations				
Billerica	1/1/2022 - 7/1/2023 (in progress)	1/1/2023 - 8/1/2023 (planned)	9/1/2023 (in progress)	TBD (in progress)
Depot Street	1/1/2022 - 7/1/2023 (in progress)	1/1/2023 - 8/1/2023 (planned)	9/1/2023 (in progress)	TBD (in progress)
E. Bridgewater	5/15/2020 - 6/1/2021 (Complete)	6/1/2021 - 7/29/2021 (Complete)	7/29/2021 (Complete)	7/30/2021 - 1/6/2023 (Complete)
E. Dracut	1/1/2021 - 12/15/2022 (Complete)	12/15/2022 - 3/1/2023 (Planned)	3/1/2023 (Planned)	3/1/2023 - 2/1/2024 (Planned)
Easton	1/1/2021 - 6/13/2022 (Complete)	6/13/2022 - 12/1/2022 (Complete)	12/1/2022 (Complete)	12/31/2022 - 12/31/2023 (In-Progress)
Melrose	1/1/2021 – TBD (In-Progress)	3/1/2023 - 4/1/2023 (Planned)	5/1/2023 (Planned)	TBD (Planned)
Parkview	1/1/2022 - 7/1/2023 (in progress)	1/1/2023 - 8/1/2023 (planned)	9/1/2023 (in progress)	TBD (in progress)

Substation	VVO Investment	VVO Commissioning	VVO Enabled Date	VVO On/Off Testing Period
Westboro	1/1/2021 – 10/17/2022 (In-Progress)	10/17/2022 - 3/31/2023 (In-Progress)	3/31/2023 (Planned)	TBD (Planned)
W. Salem	1/1/2021 - 5/1/2022 (Complete)	5/1/2022 - 6/1/2022 (Complete)	6/1/2022 (Complete)	6/1/2022 - TBD (In-Progress)

Source: Guidehouse analysis of 2022 EDC Data

Table 56. 2022 National Grid VVO Enabled Progress by Substation

Substation	January 2022 Planned/Actual VVO Enabled Date	January 2023 Planned/Actual VVO Enabled Date	Current Status ⁴⁶
Term 1 Plan Feeders			
E. Methuen	2/8/2021 (actual)	2/8/2021 (actual)	VVO On/Off Testing complete
Maplewood	12/16/2021 (actual)	12/16/2021 (actual)	VVO On/Off testing in progress
Stoughton	7/24/2020 (actual)	7/24/2020 (actual)	VVO On/Off Testing complete
Term 2 Plan Feeders			
Billerica	N/A	9/1/2023 (planned)	VVO Investment in-progress
Depot Street	N/A	9/1/2023 (planned)	VVO Investment in-progress
E. Bridgewater	7/29/2021 (actual)	7/29/2021 (actual)	VVO On/Off Testing complete
E. Dracut	6/1/2022 (planned)	3/1/2023 (planned)	VVO Investment complete
Easton	11/15/2022 (planned)	12/1/2022 (actual)	VVO On/Off testing in progress
Melrose	11/15/2022 (planned)	5/1/2023 (planned)	VVO Investment in progress
Parkview	N/A	9/1/2023 (planned)	VVO Investment in-progress
Westboro	11/15/2022 (planned)	3/31/2023 (planned)	Commissioning in progress
W. Salem	6/1/2022 (planned)	6/1/2022 (actual)	VVO On/Off testing in progress

Source: Guidehouse analysis of 2021 and 2022 EDC VVO supplemental data submissions

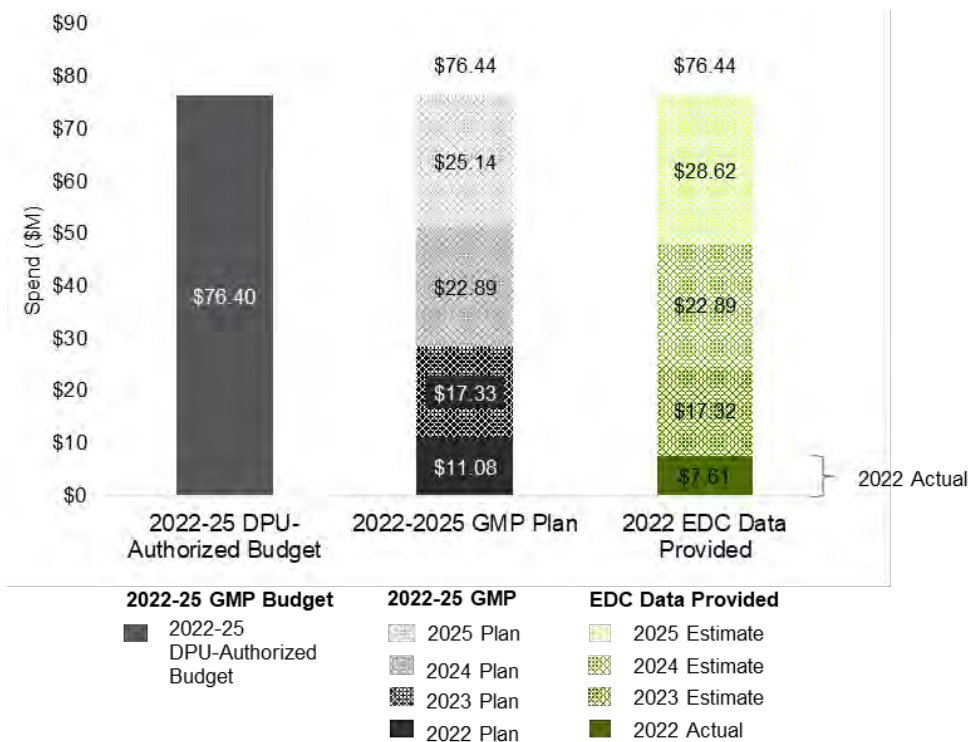
National Grid conducted VVO On/Off testing at its East Methuen and Maplewood Term 1 substations throughout 2022. Among its Term 2 substations, National Grid conducted On/Off testing at the East Bridgewater substation throughout 2022, as VVO deployment was completed at the substation in 2021. Additionally, National Grid completed VVO deployment at the Easton and West Salem substations and began VVO On/Off for these substations in winter 2022/23 and spring 2022, respectively. National Grid projects that it will complete VVO deployment and enable VVO at its remaining Term 2 substations in 2023.

3.2.3.3 Term 2 VVO Deployment Plan Progression

Figure 14 shows how National Grid’s Term 2 VVO deployment spend has progressed in 2022.

⁴⁶ Status can be: planning, design, construction, device deployment complete, VVO commissioning in process, or VVO enabled. VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Figure 14. Term 2 National Grid’s VVO Planned and Actual Spend Progression, \$M



Note: To more closely align spend projections with DPU pre-authorized budgets, National Grid operations and maintenance (O&M) spend is included in actual and planned spend presented here. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

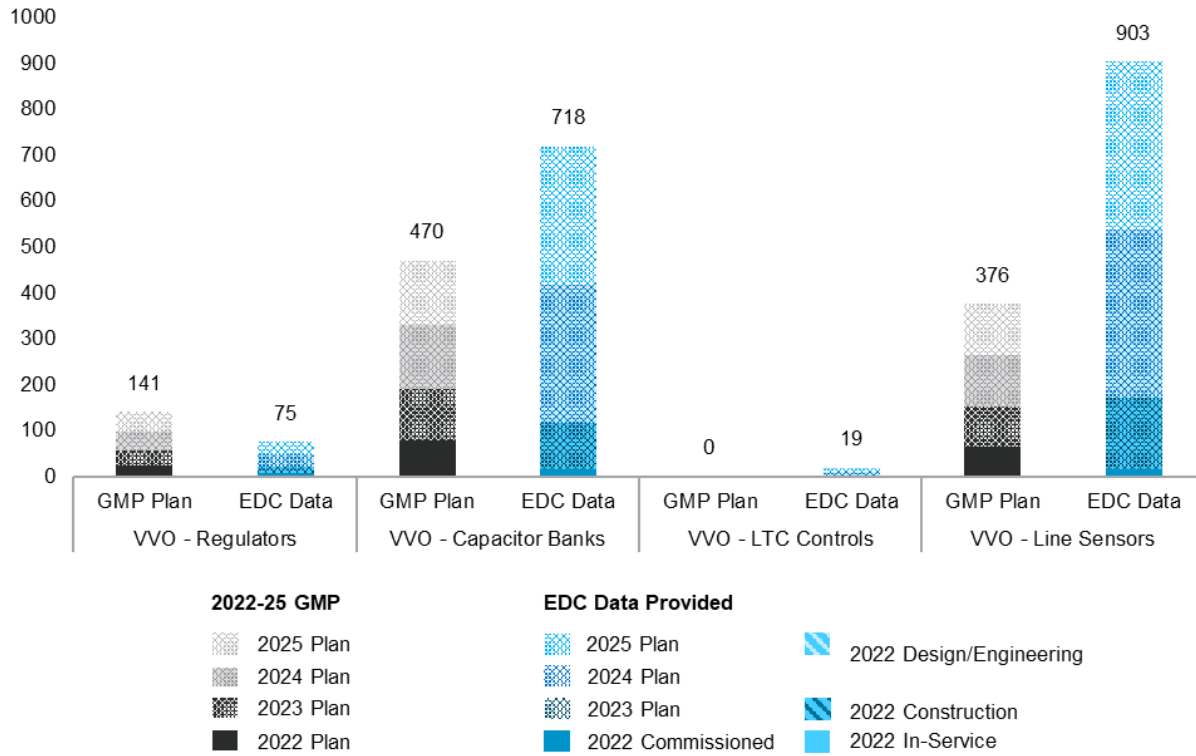
Source: Guidehouse analysis of DPU Order (October 7, 2022), DOER Responses and 2022 EDC Data

National Grid spend and deployment were below plans for 2022, and progress was affected by a number of factors. National Grid’s resourcing constraints led to shortfall of in-house planning and engineering resources to draw on, so National Grid needed to supplement in-house resources with incremental resources to maintain GMP progress. In addition, National Grid’s previous line sensor vendor discontinued their model, requiring identification of a new vendor. In some cases, work that had previously passed the engineering/design phase required re-design. Lastly, procuring materials continues to be a difficult task for National Grid. Longer vendor lead times, present during PY 2021, continued into PY 2022, with Line Sensors and Regulators most affected by delays.

3.2.3.4 Term 2 VVO Investment Progress through PY 2022

Figure 15 and Table 57 show planned versus actual device deployment progress for PY 2022, as well as planned investment for PY 2023 through PY 2025.

Figure 15. Term 2 National Grid VVO Device Deployment (2022–2025)



Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 57. Term 2 National Grid VVO Planned and Actual Device Deployment (2022-2025)

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors
2022-2025 Planned Deployment	75	718	19	903
PY 2025 Planned	27	300	8	365
PY 2024 Planned	27	300	8	365
PY 2023 Planned	12	102	3	156
Commissioned in PY 2022	9	16	0	17
In-Service during PY 2022	0	54	0	0
Construction during PY 2022	3	57	0	26
Engineering/Design during PY 2022	9	25	0	3

Source: Guidehouse analysis of 2022 EDC Data

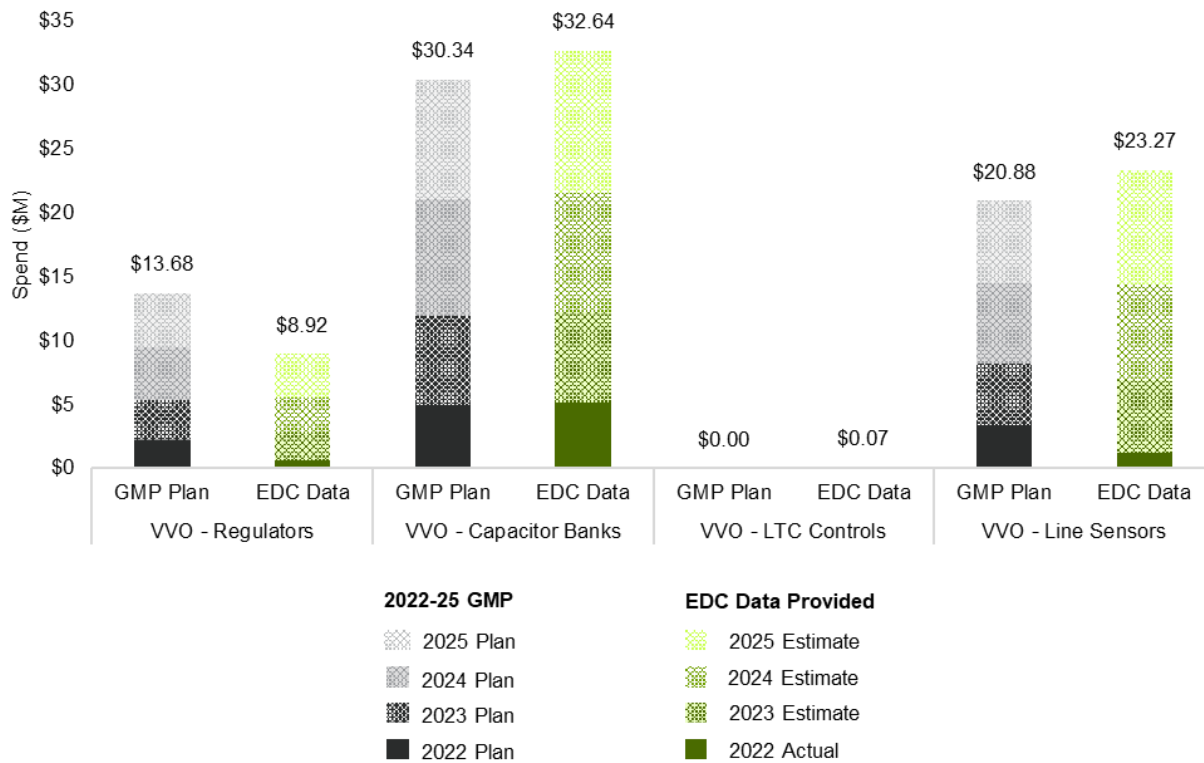
During PY 2022, National Grid deployed fewer devices than initially planned. National Grid deployed 20% of Capacitor Banks, 27% of Line Sensors, and 38% of Regulators that were initially planned for deployment during 2022. A late-2022 DPU decision, resource constraints, and vendor lead times were all key contributors to this outcome.

To account for a shortfall in deployment, National Grid has accelerated its deployment timeline for 2023 through 2025. Process improvements have increased rate of progress, which will enable National Grid to continue progressing with VVO deployment on this accelerated timeline. However, meeting deployment goals will require engineering/design and construction work on devices to be accelerated. National Grid will also need to coordinate schedules with vendors to ensure material orders can be fulfilled on its accelerated deployment schedule.

In addition to accelerating deployment plans for 2023 through 2025, National Grid has adjusted deployment plans for numerous device types. Similar to Eversource, National Grid has increased projected deployment for Capacitor Banks while reducing projected deployment for Regulators. In addition, National Grid has increased deployment plans for Line Sensors and LTC Controls. National Grid cites that these revisions are primarily due to the VVO planning work that has been conducted since the 2022-2025 GMP was filed.

Figure 16 shows National Grid’s planned versus actual spend for PY 2022, as well as planned investment for PY 2023 through PY 2025.

Figure 16. Term 2 National Grid VVO Plan vs. Actual (2022–2025, \$M)



Note: O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

The EDC Data presented in Figure 16 is also shown in Table 58 to provide the specific dollar spend in each category.

Table 58. Term 2 National Grid Total Spend Comparison (2022–2025, \$M)

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors
2022-2025 Planned Spend	\$8.92	\$32.64	\$0.07	\$23.27
PY 2025 Planned	\$3.35	\$11.17	\$0.00	\$8.94
PY 2024 Planned	\$2.78	\$9.27	\$0.00	\$7.42
PY 2023 Planned	\$2.13	\$7.09	\$0.00	\$5.67
PY 2022 Actual	\$0.66	\$5.11	\$0.07	\$1.24

Note: O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

National Grid spend on VVO (\$7.6M) was below plans for 2022 (\$11.1M). The majority of spend occurred on Capacitor Banks (\$5.1M), while spend on Regulators and Line Sensors was well below plans. Lower-than-anticipated spend on Line Sensors can, in part, be attributed to National Grid’s previous line sensor vendor discontinuing their selected model. In response, National Grid identified a new vendor for its Line Sensors, but National Grid needed to restart some work that had previously passed the engineering/design phase. For VVO Regulators, National Grid cites that vendor delays in fulfilling material orders was a key contributor to lower spend than initially planned. In response to its 2022 experience with Line Sensors and Regulators, National Grid has begun to increase diversification of vendors that it sources materials from.

3.2.3.5 Term 2 Infrastructure Metrics Results and Key Findings

Table 59 and Table 60 summarize the Term 2 Infrastructure Metrics results through PY 2022 for each investment type related to National Grid’s VVO Investment Area.

Table 59. Term 2 2022 National Grid Infrastructure Metrics Findings

Infrastructure Metrics		VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	
GMP Plan Total, 2022-2025	# Devices Planned	141	470	0	376	
	Spend, \$M	\$13.68	\$30.34	\$0.00	\$20.88	
EDC Data Total, 2022-2025	# Devices Planned	75	718	19	903	
	Spend, \$M	\$8.92	\$32.64	\$0.07	\$23.27	
IM-4	Number of devices or other technologies deployed thru. PY 2022	# Devices Deployed*	9	16	0	17
		% Devices Deployed	6%	3%	N/A	5%
IM-5	Cost for Deployment thru PY 2022	Total Spend, \$M	\$0.66	\$5.11	\$0.07	\$1.24
		% Spend	5%	17%	0%	6%
IM-6	Deviation Between Actual and Planned	% On Track (Devices)	38%	20%	N/A	27%

Infrastructure Metrics		VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	
	Deployment for PY 2022	% On Track (Spend)	30%	104%	N/A	36%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Devices Remaining	66	702	19	886
		Spend Remaining, \$M	\$8.26	\$27.53	\$0.00	\$22.03

Note: The metric names have been slightly changed here to clarify the time span used in analysis. O&M spend is provided in aggregate for each investment area and is therefore excluded from device-specific summaries of spend. *Note that "Deployed" here refers to commissioned devices. For full definitions of commissioned and in-service, see Docket 20-46 Response to Information Request DPU-AR-4-11, September 3, 2020. Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 60. 2022 National Grid Infrastructure Metrics for VVO Feeders

IM	Metric	Parameter*	Number of Feeders
Term 1 Plan Feeders			
IM-4	Number of Devices/Technologies Deployed	# Feeders with VVO Enabled	20
		% Feeders with VVO Enabled	100%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	100%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	0
Term 2 Plan Feeders			
IM-4	Number of Devices/Technologies Deployed	# Feeders with VVO Enabled	18
		% Feeders with VVO Enabled	35%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	35%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	34

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of EDC Data

Guidehouse's review of National Grid's deployment and spend revealed that National Grid was below initial plans for 2022 outlined in National Grid's 2022-2025 GMP. Key findings related to National Grid's progress include:

Device Deployment

- During PY 2022, National Grid deployed fewer devices than initially planned. National Grid deployed 20% of Capacitor Banks, 27% of Line Sensors, and 38% of Regulators that were initially planned for deployment during 2022. A late-2022 DPU decision, resource constraints, analysis that fewer devices were needed, and vendor lead times were all key contributors to this outcome.
- National Grid has accelerated its deployment timeline for 2023 through 2025. Process improvements have increased rate of progress, which will enable National Grid to continue progressing with VVO deployment on this accelerated timeline. National Grid has adjusted

total deployment plans for numerous device types, increasing projected deployment for Capacitor Banks while reducing projected deployment for Regulators. In addition, National Grid has increased deployment plans for Line Sensors and LTC Controls. National Grid cites that these revisions are primarily due to the VVO planning work that has been conducted since the 2022-2025 GMP was filed.

Total Spend

- National Grid spend on VVO was below plans for 2022. The majority of spend occurred on Capacitor Banks, while spend on Regulators and Line Sensors was well below plans. Lower-than-anticipated spend on Line Sensors can, in part, be attributed to National Grid's previous line sensor vendor discontinuing their selected model. For VVO Regulators, vendor delays in fulfilling material orders was a key contributor to lower spend than initially planned. In response to its 2022 experience with Line Sensors and Regulators, National Grid has begun to increase diversification of vendors that it sources materials from.

VVO Enablement

- National Grid conducted VVO On/Off testing at its East Methuen and Maplewood Term 1 substations throughout 2022. Among its Term 2 substations, National Grid conducted On/Off testing at the East Bridgewater substation throughout 2022, as VVO deployment was completed at the substation in 2021. Additionally, National Grid completed VVO deployment at the Easton and West Salem substations and began VVO On/Off for these substations in winter 2022/23 and spring 2022, respectively. National Grid projects that it will complete VVO deployment and enable VVO at its remaining Term 2 substations in 2023.

3.2.4 Unutil

This section discusses Unutil's planned and actual VVO investment progress through PY 2022.

3.2.4.1 Overview of GMP Deployment Plan

Approach to VVO

Unutil's approach to VVO investment is unique. Unutil initially planned to enable VVO for the Townsend substation in 2019, the Lunenburg substation in 2020, and the Summer Street substation in 2021. This timeline was revised to allow Unutil to complete all grid modernization activities at a single substation before moving to another, as VVO is tied to the ADMS and M&C Investment Areas. For instance, deployment of VVO relies on the SCADA system being in place, tying the VVO deployment to the M&C Investment Area. The VVO project is also tied with the FAN deployment plan which will allow communication from the ADMS to the field devices. Given VVO progress was ultimately tied to the ADMS and M&C progress made during Term 1, Unutil ultimately revised plans to deploy VVO across 3 feeders during Term 1. Unutil met this plan, deploying VVO at the Townsend substation in 2021.

Table 61 and Table 62 summarize the planned deployment and spending on VVO from 2022 through 2025.

Table 61. Term 2 Unutil Cumulative VVO Feeder Deployment Year-over-Year Comparison

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	4	N/A	N/A	N/A	N/A
EDC Plan	8	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	50%	N/A	N/A	N/A	N/A

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2022-2025 GMPs and 2022 EDC Data

Table 62. Unutil VVO Investment Year-over-Year Comparison (\$M)*

Data	2022	2023	2024	2025	2022-2025
EDC Actual Progress	\$0.3	N/A	N/A	N/A	N/A
EDC Plan	\$5.4	N/A	N/A	N/A	N/A
% EDC Actual Progress/EDC Plan	5%	N/A	N/A	N/A	N/A

Note: Due to rounding error, manual calculations of % EDC Actual Progress / EDC Plan will not precisely match calculated numbers provided in this table.

Source: Guidehouse analysis of 2021 Responses to DOER IRs and 2022 EDC Data

For Term 2, Unutil plans to deploy VVO across the Summer Street, Lunenburg, and West Townsend substations, amounting to 8 feeders. By the end of 2022, Unutil completed deployment of VVO at the Summer Street substation and its associated 4 feeders. Spend on VVO deployment has amounted to approximately \$0.3M, or about 5% of planned spend for Term 2.

Table 63 highlights Unutil feeder characteristics for Term 1 and Term 2 plan feeders. Feeder lengths and customer counts vary considerably. Selected substations also present a mix of distributed generation capacity. Appendix A contains additional information related to the VVO feeders.

Table 63. 2022 Unutil VVO Feeder Characteristics

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
Term 1 Feeders					
Townsend (13.8 kV)	15W15	1	1	3.9	0.0
	15W16	42	1,535	5.2	1.8
	15W17	11	574	1.5	0.5
Term 2 Feeders					
Lunenburg (13.8 kV)	30W30	46	1,428	5.5	1.8
	30W31	46	1,695	4.4	4.1
Summer Street (13.8 kV)	40W38	1	67	0.1	0.0
	40W39	8	369	5.1	1.1
	40W40	18	1,578	7.5	1.7

Substation	Feeder	Feeder Length (mi.)	Customer Count	Annual Peak Load (MVA)	Distributed Generation (MW)
	40W42	13	1,920	3.6	0.7
West Townsend (13.8 kV)	39W18	51	1,974	0.0	3.2
	39W19	62	1,336	3.0	0.0

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: 2022 GMP Annual Report, Appendix 1 filed April 24, 2023

3.2.4.2 VVO Timeline

Table 64 and Table 65 summarize substation-specific progress in each of the four VVO investment phases, including anticipated and actual VVO enabled dates and notes on the current status of VVO deployment. The evaluation of Infrastructure Metrics spans spending and deployment under the VVO investment and VVO commissioning phases.

Table 64. Unitil VVO Deployment Completion Dates by Phase and Substation

Phase	VVO Investment	VVO Commissioning⁴⁷	VVO Enabled Date⁴⁸	VVO On/Off Testing Period
Term 1 Plan Substations				
Townsend	1/1/2019 – 6/1/2021 (Complete:)	6/1/2021 - 12/1/2021 (Complete)	12/1/2021 (Complete)	4/1/2023 - 3/1/2024 (Planned)
Term 2 Plan Substations				
Beech St.	1/1/2024 - 9/1/2026 (Planned:)	9/1/2026 - 10/1/2026 (Planned:)	11/1/2026 (Planned)	12/1/2026 - 9/1/2027 (Planned)
Lunenburg	1/1/2019 - 9/1/2023 (In Progress:)	10/1/2023 - 12/1/2023 (Planned)	1/1/2024 (Planned)	12/1/2024 - 9/1/2025 (Planned)
Pleasant St.	1/1/2025 - 9/1/2027 (Planned:)	9/1/2027 - 10/1/2027 (Planned:)	11/1/2027 (Planned)	12/1/2027 - 9/1/2028 (Planned)
Princeton Road	1/1/2025 - 9/1/2027 (Planned:)	9/1/2027 - 10/1/2027 (Planned:)	11/1/2027 (Planned)	12/1/2027 - 9/1/2028 (Planned)
Summer St.	1/1/2020 - 12/1/2022 (Complete:)	5/1/2022 - 12/13/2022 (Complete)	12/13/2022 (Complete)	12/1/2023 - 9/1/2024 (Planned)
W. Townsend	12/1/2020 - 11/1/2023 (In Progress:)	10/1/2023 - 12/1/2023 (Planned)	1/1/2024 (Planned)	12/1/2024 - 9/1/2025 (Planned)

Source: Guidehouse analysis of 2022 EDC Data

⁴⁷ VVO Commissioning is the time at which VVO devices are controlled by and have data visible to each EDC.

⁴⁸ VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Table 65. Unitil VVO Enabled Progress by Substation

Substation	January 2022 Actual/Planned VVO Enabled Date	January 2023 Actual/Planned VVO Enabled Date	Current Status⁴⁹
Term 1 Plan Feeders			
Townsend	12/1/2021 (actual)	12/1/2021 (actual)	VVO Enabled
Term 2 Plan Feeders			
Beech St.	11/1/2026 (planned)	11/1/2026 (planned)	VVO Investment
Lunenburg	11/1/2023 (planned)	1/1/2024 (planned)	VVO Investment
Pleasant St.	11/1/2027 (planned)	11/1/2027 (planned)	VVO Investment
Princeton Road	11/1/2027 (planned)	11/1/2027 (planned)	VVO Investment
Summer St.	11/1/2022 (planned)	12/13/2022 (actual)	VVO Enabled
W. Townsend	11/1/2024 (planned)	11/1/2024 (planned)	VVO Investment

Source: Guidehouse analysis of 2021 and 2022 EDC VVO supplemental data submissions

For its Term 1 substation (Townsend) Unitil completed VVO deployment in 2021, enabling VVO on December 1, 2021, and had expected to begin On/Off testing at the Townsend substation in April 2022. However, testing was delayed for the Townsend substation, as Unitil worked with Hitachi to improve the results from the algorithm as the quantity of Regulators and Capacitor Banks increased on a given feeder. The issue has been resolved, and VVO On/Off testing is expected to begin in spring 2023 at the Townsend substation. For Unitil's future planned deployments, Unitil has factored in the additional time needed for internal unit testing prior to formal On/Off testing.

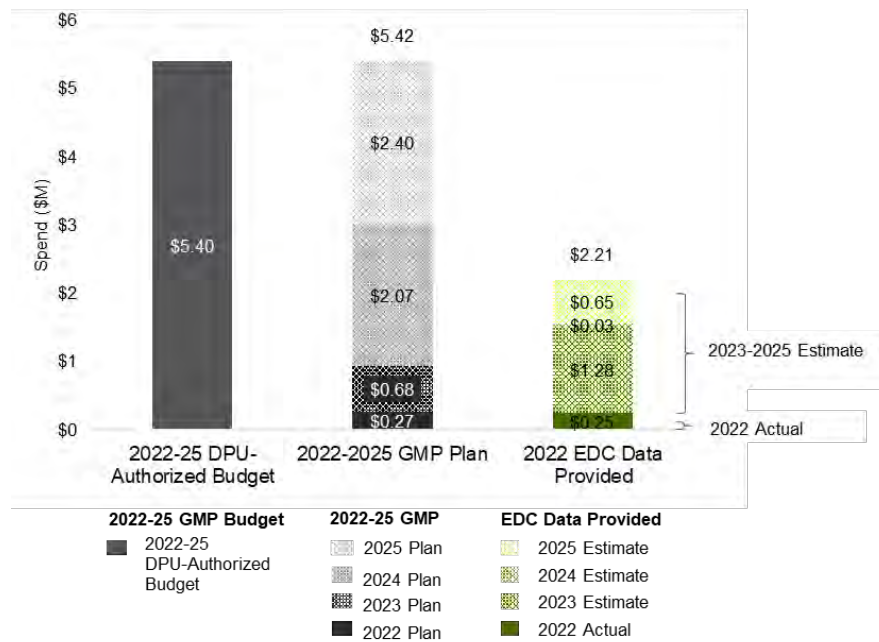
Among its Term 2 substations, Unitil completed deploying VVO investments at the Summer Street substation and enabled VVO after commissioning was completed in December 2022. VVO On/Off testing is projected to begin at the substation in December 2023. Lunenburg and West Townsend are currently receiving VVO investments and Unitil plans to enable VVO at the substations in January and November 2024, respectively. Unitil then plans to conduct On/Off testing at the substations beginning in December 2024. For its remaining substations, Unitil is currently conducting planning and engineering/design work for its Beech Street, Pleasant Street, and Princeton Road substations. These substations are expected to be enabled after the close of Term 2 in 2026 and 2027.

3.2.4.3 Term 2 VVO Deployment Plan Progression

Figure 17 shows the progression of Unitil's M&C Term 2 deployment plans from DPU pre-authorization in PY 2022 through PY 2025.

⁴⁹ Status can be: planning, design, construction, device deployment complete, VVO commissioning in process, or VVO enabled. VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Figure 17. Term 2 Unutil VVO Planned and Actual Spend Progression, \$M



Source: Guidehouse analysis of DPU Order (October 7, 2022), 2021 DOER Responses and 2022 EDC Data

Deployment and spend for 2022 investments were approximately on-track with initial plans, with Unutil spending roughly \$0.25M on VVO deployment as compared to its plan of \$0.27M. Accomplishments in 2022 included resolution of LTC radio and control issues, as well as process efficiencies that brought unit costs below plans.

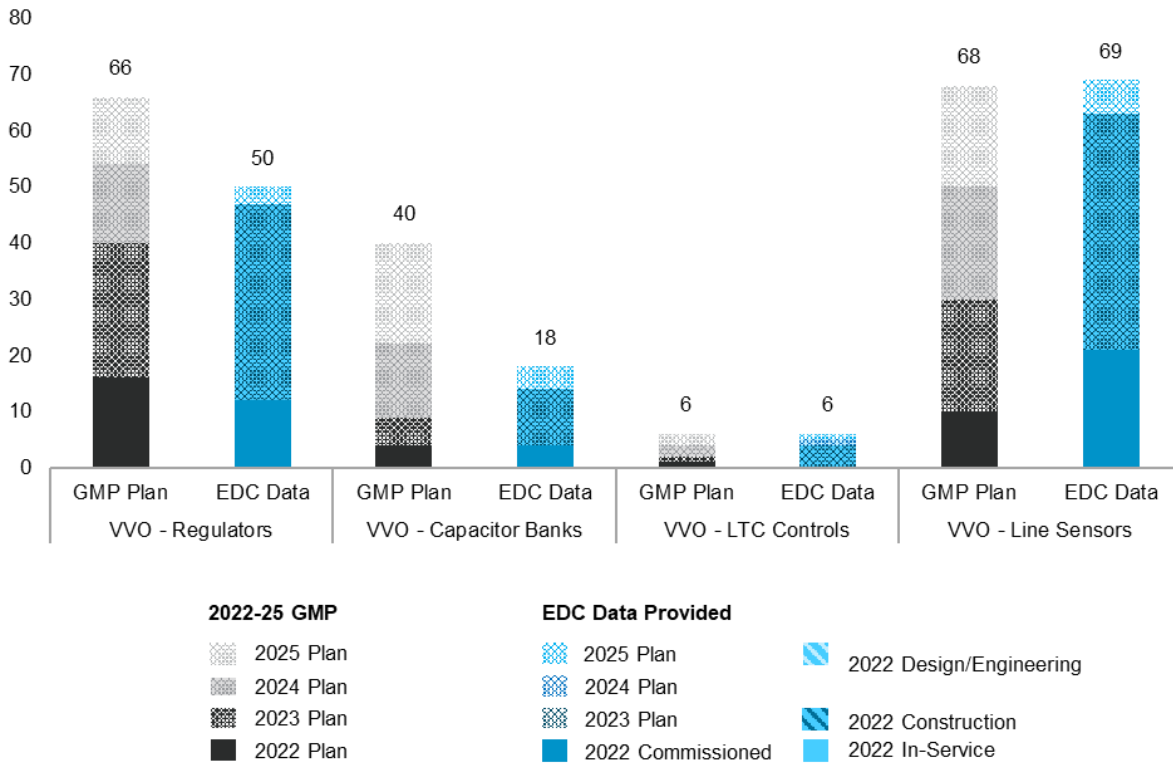
Unutil has reduced plans from what was filed in its 2022-2025 GMP, with spend plans for Term 2 revised downwards from \$5.40M to \$2.21M. Unutil projects spending most dollars in 2023 and 2025, with a small number of dollars planned for 2024. Most work in 2024 will be limited to engineering / design while Unutil awaits material shipments for orders submitted in 2023. Deployment and spend are projected to be below the DPU pre-authorized budget by the end of 2025.

Not reflected in spend data are challenges that Unutil faced with its VVO scheme. Although initially planned for VVO On/Off testing, testing was delayed for the Townsend substation, as Unutil worked with Hitachi to improve the results from the algorithm as the quantity of Regulators and Capacitor Banks increased on a given feeder. VVO On/Off testing is expected to begin in spring 2023 at the Townsend substation. Lessons learned included awareness of level of testing prior to putting VVO for feeders and substations into service. For Unutil's future planned deployments, Unutil has factored in the additional time needed for internal unit testing prior to formal On/Off testing.

3.2.4.4 Term 2 VVO Investment Progress through PY 2022

Figure 18 shows Unutil's planned versus actual device deployment progress for PY 2022, as well as planned investment for PY 2023 through PY 2025.

Figure 18. Term 2 Unutil VVO Device Deployment Comparison (2022–2025)



Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

The EDC Data presented in Figure 18 is also shown in tabular form in Table 66, to provide the specific deployment units in each category.

Table 66. Term 2 Unutil VVO Deployment Progress

	VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors
2022-2025 Planned Deployment	50	18	6	69
PY 2025 Planned	3	4	1	6
PY 2024 Planned	0	0	1	0
PY 2023 Planned	35	10	4	42
Commissioned in PY 2022	12	4	0	21
In-Service during PY 2022	0	0	0	9
Construction during PY 2022	31	9	3	36
Engineering/Design during PY 2022	0	0	1	0

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

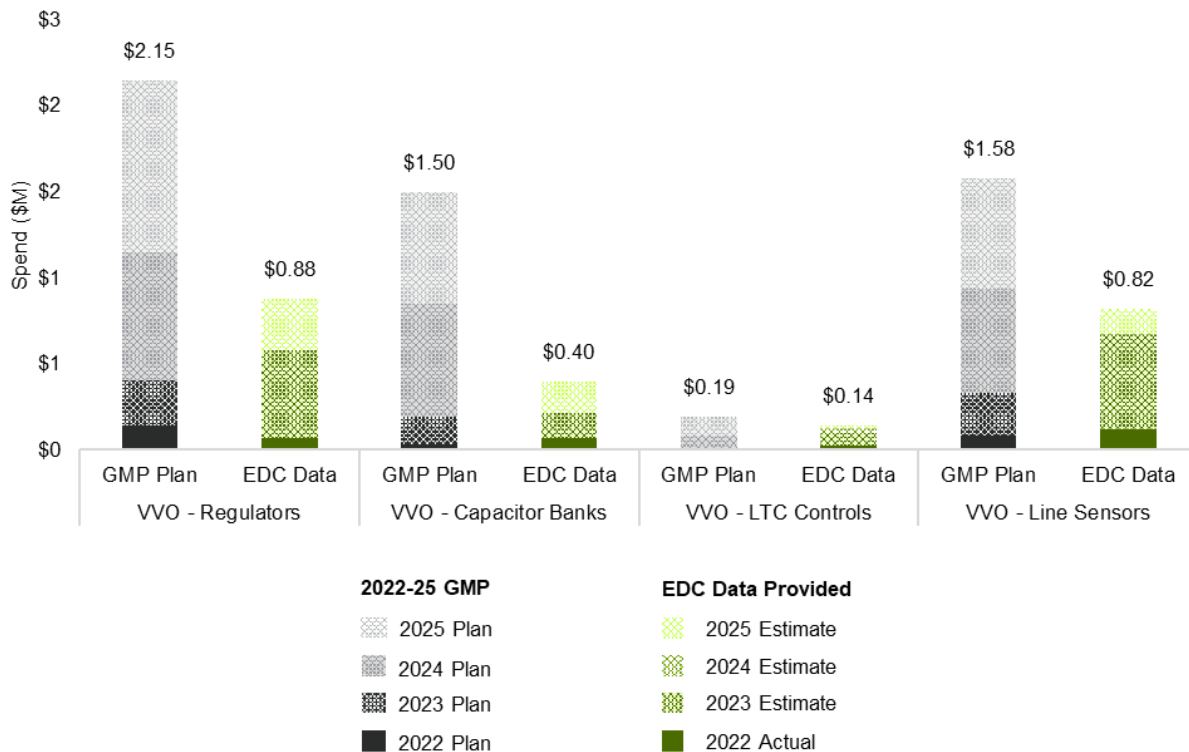
Unutil device deployment was slightly below initial plans for 2022 outlined in Unutil’s 2022-2025 GMP. Work conducted in 2022 included deployment of VVO devices at the Summer Street and Lunenburg substations, construction work for the Princeton Road substation, and

design/engineering work for the Canton Street substation. Until was on-track with deployment of VVO Capacitor Banks and Line Sensors in 2022, deploying 100% and 210% of planned units, respectively. However, deployment was under plans for Regulators and LTC Controls. Lower deployment than plans for LTC Controls may be attributed to Unutil's efforts to resolve LTC radio and control issues. Lower deployment than plans for Regulators can be attributed to cancelation of 4 deployments that were found to be unnecessary.

While deployment was initially projected to be evenly spread over Term 2, Unutil has adjusted deployment plans to conduct most deployment during 2023 and 2025. Additionally, Unutil has reduced its planned spend and deployment of VVO Regulators and Capacitor Banks, as Unutil reassessed deployment plans and determined there were fewer Regulator and Capacitor Bank deployments needed than initially planned. Work in 2024 will be limited to material orders in preparation for construction work at the Beech Street substation.

Figure 19 shows Unutil's planned versus actual spend for PY 2022, as well as planned investment for PY 2023 through PY 2025.

Figure 19. Term 2 Unutil VVO Plan vs. Actual (2022-2025, \$M)



Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

The EDC Data presented in Figure 19 is also shown in Table 67 to provide the specific dollar spend in each category.

Table 67. Unutil Total Spend Comparison (2022–2025, \$M)

	VVO – Regulators	VVO – Capacitor Banks	VVO – LTC Controls	VVO – Line Sensors
2022-2025 Planned Spend	\$0.88	\$0.40	\$0.14	\$0.82
PY 2025 Planned	\$0.30	\$0.18	\$0.02	\$0.15
PY 2024 Planned	\$0.00	\$0.00	\$0.03	\$0.00
PY 2023 Planned	\$0.51	\$0.15	\$0.07	\$0.55
PY 2022 Actual	\$0.07	\$0.07	\$0.03	\$0.12

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Unutil spend on VVO (\$0.25M) was below initial plans (\$0.27M), with variation in spend at the device level. Unutil met 48% of its planned spend for Regulators, which Unutil states was due to a reduction in work required to deploy Regulators. Spend and deployment of all other devices met or exceeded initial plans: Unutil met 100% of planned spend for Line Sensors and exceeded planned spend for Capacitor Banks (198%) and LTC Controls (289%).

In 2022, Unutil’s costs incurred per Regulator and Line Sensor were lower than initially projected. Initial projections, estimated using the deployment experience from the prior GMP term, indicated a larger level of effort for deployment and larger overhead costs. Unutil credits internal process improvements for lower costs (e.g., revised control work process reducing commissioning costs for capacitor banks). Costs incurred for LTC Controls, at 289% of planned costs in 2022, may be attributed to Unutil’s troubleshooting of radio and control issues, which have now been resolved.

Spend plans for the remainder of Term 2 have been revised downwards across all device types. Reduced spend on Regulators and Capacitor Banks can be attributed to a reduction in the units that Unutil plans to deploy, as well as lower than expected costs for deployment of Regulators. Reduced spend on LTC Controls and Line Sensors may be tied to process efficiencies implemented in 2022 that brought unit costs below plans. Most spend is planned for 2023 and 2025, with work in 2024 limited to material orders in preparation for construction work at the Beech Street substation.

3.2.4.5 Term 2 Infrastructure Metrics Results and Key Findings

Table 68 and Table 69 summarize the Term 2 Infrastructure Metrics results through PY 2022 for each investment type related to Unutil’s VVO Investment Area.

Table 68. Term 2 Unitil Infrastructure Metrics Findings

Infrastructure Metrics		VVO - Regulators	VVO - Capacitor Banks	VVO - LTC Controls	VVO - Line Sensors	
GMP Plan Total, 2022-2025	# Devices Planned	66	40	6	68	
	Spend, \$M	\$2.15	\$1.50	\$0.19	\$1.58	
EDC Data Total, 2022-2025	# Devices Planned	50	18	6	69	
	Spend, \$M	\$0.88	\$0.40	\$0.14	\$0.82	
IM-4	Number of devices or other technologies deployed thru. PY 2022	# Devices Deployed	12	4	0	21
		% Devices Deployed	18%	10%	0%	31%
IM-5	Cost for Deployment thru PY 2022	Total Spend, \$M	\$0.07	\$0.07	\$0.03	\$0.12
		% Spend	3%	5%	13%	8%
IM-6	Deviation Between Actual and Planned Deployment for PY 2022	% On Track (Devices)	75%	100%	0%	210%
		% On Track (Spend)	48%	198%	289%	139%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Devices Remaining	38	14	6	48
		Spend Remaining, \$M	\$0.81	\$0.33	\$0.12	\$0.70

Note: The metric names have been slightly changed here to clarify the time span used in analysis.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Table 69. 2022 Unitil Infrastructure Metrics for VVO Feeders

IM	Metric	Parameter*	Number of Feeders
Term 1 Plan Feeders			
IM-4	Number of Devices/Technologies Deployed	# Feeders with VVO Enabled	3
		% Feeders with VVO Enabled	100%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	100%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	0
Term 2 Plan Feeders			
IM-4	Number of Devices/Technologies Deployed	# Feeders with VVO Enabled	4
		% Feeders with VVO Enabled	50%
IM-6	Deviation Between Actual and Planned Deployment	% On Track (Feeders with VVO Enabled)	50%
IM-7	Projected Deployment for the Remainder of the GMP Term	# Feeders Remaining for VVO Enablement	4

* VVO Enabled denotes that the VVO system is commissioned and VVO is engaged. Feeders presented with VVO enabled may not be actively employing CVR.

Source: Guidehouse analysis of 2021 DOER Responses and 2022 EDC Data

Guidehouse’s review of Unitil’s deployment and spend revealed that Unitil was below initial plans for 2022 outlined in Unitil’s 2022-2025 GMP, as several deployment plans were on hold until the late 2022 DPU approval of 2022-2025 GMPs. Key findings related to Unitil’s progress include:

Device Deployment

- Unitil deployment was slightly below plans for 2022, with variation by device type. Unitil was on-track with deployment of VVO Capacitor Banks and Line Sensors in 2022, deploying 100% and 210% of planned units, respectively. However, deployment was under plans for Regulators and LTC Controls. Lower deployment than plans for LTC Controls may be attributed to Unitil’s efforts to resolve LTC radio and control issues. Lower deployment than plans for Regulators can be attributed to cancelation of 4 deployments that were found to be unnecessary.
- While deployment was initially projected to be evenly spread over Term 2 in its 2022-2025 GMP filing, Unitil has adjusted deployment plans to conduct most deployment during 2023 and 2025. Additionally, Unitil has reduced its planned deployments of VVO Regulators and Capacitor Banks, as Unitil reassessed deployment plans and determined there were fewer Regulator and Capacitor Bank deployments needed than initially planned. Work in 2024 will be limited to material orders in preparation for construction work at the Beech Street substation.

Total Spend

- Unitil spend on VVO (\$0.25M) was below initial plans (\$0.27M), with variation in spend at the device level. Unitil met 48% of its planned spend for Regulators. Spend and deployment of all other devices met or exceeded initial plans: Unitil met 100% of planned

spend for Line Sensors, and exceeded planned spend for Capacitor Banks (198%) and LTC Controls (289%). Initial plans, informed by the deployment experience from Term 1, overestimated the level of effort and overhead costs for Regulators and Line Sensors, reducing unit costs for these devices. Costs overruns on LTC Controls, at 289% of planned costs in 2022, may be attributed to Unitil's troubleshooting of radio and control issues, which have now been resolved.

- Spend plans for the remainder of Term 2 have been revised downwards across all device types. Reduced spend on Regulators and Capacitor Banks can be attributed to a reduction in the units that Unitil plans to deploy, as well as lower than expected costs for deployment of Regulators. Reduced spend on LTC Controls and Line Sensors may be tied to process efficiencies implemented in 2022 that brought unit costs below plans. Most spend is planned for 2023 and 2025, with work in 2024 limited to material orders in preparation for construction work at the Beech Street substation.

VVO Enablement

- For its Term 1 substation (Townsend) Unitil completed VVO deployment in 2021, enabling VVO on December 1, 2021, and On/Off testing is expected to begin in spring 2023. Among its Term 2 substations, Unitil completed deploying VVO investments at the Summer Street substation and enabled VVO in December 2022, with VVO On/Off testing projected to begin at the substation in December 2023. Lunenburg and West Townsend are currently receiving VVO investments and Unitil plans to enable VVO at the substations in January and November 2024, respectively. Unitil then plans to conduct On/Off testing at the substations beginning in December 2024. For its remaining substations, Unitil is currently conducting planning and engineering/design work for its Beech Street, Pleasant Street, and Princeton Road substations. These substations are expected to be enabled after the close of Term 2 in 2026 and 2027.

4. VVO Performance Metrics

4.1 Data Management

Guidehouse worked with the EDCs to collect data to complete the evaluation for the assessment of VVO Infrastructure Metrics and Performance Metrics. The sections that follow highlight Guidehouse’s data sources and data QA/QC processes used in the evaluation of Performance Metrics.

4.1.1 Data Sources

Guidehouse used numerous datasets to evaluate Performance Metrics. The subsections that follow summarize the data sources used to evaluate Performance Metrics.

4.1.1.1 VVO Supplemental Data Template

The VVO supplemental data collection template includes additional information unique to the VVO Investment Area. Table 70 summarizes the information requested and included in the analysis. The EDCs provided data to the team in the data collection template or submitted it in a separate file. Guidehouse requested information at the feeder level where possible.

Table 70. VVO Supplemental Data

Information	Description
Actual/Planned VVO Schedule	Actual and updated planned VVO deployment start/end dates by feeder, including feeder conditioning, load rebalancing, phase balancing, VVO commissioning, VVO enabled, and On/Off testing.
Customer DR Events	DR events (time-stamped log of any systemwide DR (or similar), for example: ISO-NE DR, EDC direct load control programs, EDC behavioral DR programs).
Voltage Complaints	Voltage-related complaints based on voltage perturbation (e.g., high voltage, low voltage, flicker) and duration (e.g., multiple days, sporadic).

Source: Guidehouse Stage 3 Evaluation Plan submitted to EDCs on March 1, 2023

4.1.1.2 Additional VVO Data Required for Performance Metrics Evaluation

Table 71 summarizes the additional data inputs required for Performance Metrics analysis. Except for the weather data, the team obtained all fields from the EDCs.

Table 71. Additional Data Required for Evaluation Performance Metrics

Data Type	Description
EDC system information	<ul style="list-style-type: none"> Feeder characteristics (e.g., rated primary voltage, rated capacity, feeder length, number of customers [residential, commercial, industrial, etc.]), load factor (ratio of average load to peak load), ZIP code or town, number of capacitors, number of regulators
Time series data (hourly)	<ul style="list-style-type: none"> Feeder head end data (voltage, real power, current, apparent power or reactive power, power factor) VVO status flags (e.g., VVO On/Off)
VVO system information	<ul style="list-style-type: none"> Time-stamped log of VVO state changes between on and off states and any other VVO modes
Weather data	<ul style="list-style-type: none"> Hourly temperature data from selected weather stations and collected by the National Oceanic and Atmospheric Administration (NOAA)

Source: Guidehouse Stage 3 Evaluation Plan submitted to EDCs on March 1, 2023

4.1.2 Data QA/QC Process

Guidehouse reviewed all data provided for Performance Metrics analysis upon receipt of requested data. The QA/QC of Performance Metrics data included checks to confirm each of the required data inputs could be incorporated within the Performance Metrics analysis. Examples of the QA/QC include the following criteria:

- Time series data cover each feeder receiving VVO investments and include variables needed to facilitate analysis of Performance Metrics, including voltage, real power, and reactive or apparent power
- Time series data are complete in time and extent of devices and do not include erroneous data (e.g., interpolated values and outliers)
- Voltage complaints data have been received for each feeder receiving VVO investments and are at an adequate level of detail for analysis

After Performance Metrics data are received at the end of every season, Guidehouse provides status update memos that summarize the QA/QC to the EDCs, confirming receipt of the datasets and indicating quality. Any additional follow-up based on standing questions is required to confirm all EDC-provided data can be applied to Performance Metrics analysis.

4.2 VVO Performance Metrics Analysis and Findings

Guidehouse presents findings from the Performance Metrics analysis for the VVO Investment Area in the following subsections.

4.2.1 Statewide Comparison

This section summarizes the Performance Metrics analysis results and key findings for Eversource and National Grid. Results and key findings are provided for the Spring 2022 – Winter 2022/23 M&V period. It can be difficult to compare the results from Performance Metrics analysis between Eversource and National Grid. For example, there are differences in data quality at different times of the year (e.g., sustained pauses in VVO On/Off testing for one EDC,

data outages during On/Off testing for another EDC). As such, certain portions of the M&V period, such as the Spring season, may be represented more for one EDC than the other. Additionally, there are numerous differences in DG penetration, customer types, and geographic areas served by Eversource and National Grid feeders that limit the ability to directly compare Eversource and National Grid VVO outcomes.

4.2.1.1 Performance Metrics Analysis Results

Table 72 includes the Performance Metrics results for Spring 2022 – Winter 2022/23 for Eversource and National Grid. The following EDC-specific subsections provide further detail.

Table 72. Performance Metrics Results for the Spring 2022 – Winter 2022/23 M&V Period

Performance Metrics		Eversource		National Grid*	
Feeders Included in Evaluation		26		34	
PM-1	Spring 2022 – Winter 2022/23 Baseline	524,992 MWh		882,631 MWh	
PM-2	Energy Savings – All Hours VVO On†	2,128 ± 476 MWh	0.41 ± 0.09%	6,769 ± 1,162 MWh	0.84 ± 0.15%
	Energy Savings – Actual VVO On Hours‡	879 ± 184 MWh	0.41 ± 0.09%	1,867 ± 302 MWh	0.84 ± 0.15%
-	Voltage Reduction	1.52 ± 0.01 V	1.24 ± 0.01%	0.08 ± <0.001 kV	0.62 ± 0.01%
-	CVRf [^]	0.60		0.36	
PM-3 ^{^^}	Peak Demand Reduction	-369 ± 245 kW	-0.70 ± 0.46%	-2,189 ± 1,173 kW	-2.41 ± 1.28%
PM-4	Reduction in Distribution Losses	0.01%		-1.95%¶¶	
PM-5	Change in Power Factor	<0.001 ± <0.001	0.06 ± 0.02%	-0.01 ± 0.002¶¶	-0.96 ± 0.2%¶¶
PM-6	GHG Reductions (CO ₂) All Hours VVO On†	723 ± 162 tons CO ₂		2,301 ± 395 tons CO ₂	
	GHG Actual VVO-On Hours‡	299 ± 63 tons CO ₂		645 ± 103 tons CO ₂	
PM-7	Voltage Complaints	53		136	
		(13% decrease from 2015 – 2017 baseline period average)		(16% decrease from 2016 – 2017 baseline period average)§	

* National Grid feeders at the Easton substation did not begin testing until mid-January, 2023. Unless otherwise noted, all overall estimates are inclusive of Easton feeders and only incorporate impact estimates from this substation during the Winter period. National Grid feeders at the West Salem substation did not begin testing until early June, 2022. Unless otherwise noted, all overall estimates are inclusive of West Salem feeders and only incorporate impact estimates from this substation during the Summer 2022 – Winter 2023 period. Additionally, even-numbered Maplewood feeders underwent a prolonged period over which VVO on/off testing was paused, resulting in their removal from analysis that informed PM-1 through PM-6. Lastly, although the Stoughton substation ended VVO testing prior to this current evaluation, impact estimates for several performance metrics were calculated for Stoughton and, unless otherwise noted, these estimates are included in the aggregate estimates provided in this report.

† Calculation assumes VVO was enabled for all hours between March 1, 2022 and February 28, 2023.

‡ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged between March 1, 2022 and February 28, 2023 for each feeder.

[^]The CVR factor provided for each EDC is the load-weighted average of CVR factors estimated for each feeder with a voltage response to VVO On/Off testing.⁵⁰

^{^^}Guidehouse evaluated the impact of VVO during peak demand periods, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. Aggregate peak demand reduction is calculated only for feeders with statistically significant reductions in voltage.

[¶] Changes in power factor and distribution losses could not be estimated for any substations going through VVO On/Off testing during Spring 2022 through Winter 2022/23 due to data quality issues. Results presented for these metrics are based off of VVO substations that completed VVO On/Off testing prior to this evaluation period. For this evaluation period, the only substation to conclude On/Off testing is Stoughton.

[§] National Grid did not start tracking voltage complaints until 2016.

Source: Guidehouse analysis

4.2.1.2 Key Findings and Recommendations

Findings from the evaluation of Performance Metrics indicate that VVO allowed Eversource and National Grid to realize energy savings and voltage reductions during the Spring 2022 – Winter 2022/23 M&V period.⁵¹ More specifically:

- During the Spring 2022 – Winter 2022/23 M&V period, Eversource's Agawam, Piper, Podick, and Silver substations realized 879 MWh (0.41%) energy savings and 1.52 V (1.24%) voltage reduction associated with VVO. The CVR Factor, which provides an estimate of energy savings possible with voltage reductions, was 0.60.⁵⁰ During the same M&V period, National Grid's East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem substations realized 1,867 MWh (0.84%) energy savings and 0.08 kV (0.62%) voltage reduction associated with VVO. National Grid's CVR factor was 0.36.⁵⁰
- Eversource energy savings of 879 MWh yielded a 299 short ton reduction of CO₂ emissions. National Grid energy savings of 1,867 MWh yielded a 645 short ton reduction in CO₂ emissions.
- Eversource and National Grid VVO feeders experienced a minimal benefit associated with peak demand, power factor, and distribution losses. Eversource VVO feeders experienced a statistically significant increase (0.70%) in peak demand, a statistically significant decrease (0.06%) in power factor, and a minimal decrease in distribution losses when VVO was engaged. National Grid VVO feeders experienced a statistically significant increase in peak demand (2.41%), a small increase (0.96%) in power factor, and a 1.95% increase in distribution losses when VVO was engaged.
- For Eversource, a total of 53 voltage complaints were received from customers connected to the Agawam, Piper, Podick, and Silver VVO feeders during the Spring 2022 – Winter

⁵⁰ Both Eversource and National Grid aggregated CVRf calculations only include estimates from feeders that experienced a minimum change in voltage of $\pm 0.25\%$. Certain feeders with changes in voltage greater than $\pm 0.25\%$ were also excluded from aggregated CVRf calculations due to highly unstable voltage and energy responses to VVO On / Off testing. Feeders excluded from this calculation are all of Eversource's Podick 18G feeders and Silver feeders 30A2, 30A4, and 30A6, All of National Grid's West Salem 29W feeders, and East Bridgewater feeders 797W1, 797W23, 797W23, and 797W42 are also removed from aggregated CVRf results due to unreliable voltage and energy responses to VVO On / Off testing.

⁵¹ It can be difficult to compare the results from Performance Metrics analysis between Eversource and National Grid. For example, there are differences in the granularity of telemetry (e.g., 15-minute versus 1 hour), data quality at different times of the year (e.g., sustained pauses in VVO On / Off testing, repeated data). As such, data cleaning can cause certain portions of the M&V period to be represented more for one EDC than the other. Additionally, there are numerous differences in DG penetration, customer types, and geographic areas served by Eversource and National Grid feeders that limit the ability to directly compare Eversource and National Grid VVO outcomes.

2022/23 M&V period. This is a 13% decrease relative to the average voltage complaints per year received between 2015 – 2017. For National Grid, a total of 136 voltage complaints were received from customers connected to the East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem VVO feeders during the period. This is a 16% decrease relative to the average voltage complaints per year received between 2016 – 2017. For both EDCs, there is not sufficient evidence to support changes in voltage complaints being attributed to VVO.

In 2023 and beyond, Guidehouse recommends that Eversource and National Grid:

- Ensure VVO On/Off testing is running according to plan, with limited pauses to the VVO On/Off testing schedule. Across the VVO feeders, one-quarter to one-half of data points were removed due to extended pauses in VVO On/Off testing. For some feeders, this resulted in the vast majority of provided data to be unusable for components of this evaluation (e.g., for estimation of distribution loss and power factor reductions). Sustained On/Off testing will increase the amount of usable data in the evaluation and improve the ability for Guidehouse to provide a comprehensive evaluation of VVO performance metrics.
- Confirm adjustments to VVO On/Off testing schedule for any VVO feeders prior to implementation. VVO On/Off testing is designed similarly to a Randomized Controlled Trial (RCT), and adjustments to the testing schedule could, potentially, hinder the effectiveness of the testing design and cause biases to affect the results. Ensuring there is proper balance in the number of VVO on and off hours throughout the evaluation period will allow for Guidehouse to provide a comprehensive and accurate evaluation of VVO performance metrics.
- Continue to investigate how to improve outcomes across VVO feeders. Many feeders across the EDCs underwent no material change in voltage. Correspondingly, energy reduction estimates were small-to-insignificant. These observations may indicate flaws in the VVO control scheme for these feeders. In order to improve VVO performance, Guidehouse recommends that the EDCs continue to investigate root causes to shortcomings in the VVO control scheme and work with distribution engineers and the VVO vendor to respond accordingly. If needed, Guidehouse can conduct in-depth case studies at these substations to further understand shortcomings in the VVO control scheme.

4.2.2 Eversource

This section discusses Eversource’s VVO Performance Metrics results following the Spring 2022 – Winter 2022/23 VVO M&V period.

4.2.2.1 Performance Metrics Analysis Timeline

Figure 20 highlights the key Performance Metrics analysis periods for Eversource. The Performance Metrics analysis provided for this report will be focused on results from VVO On/Off testing conducted during Spring 2022 – Winter 2022/23. Results from VVO On/Off testing conducted during Spring 2021 – Winter 2021/22 were provided in the Massachusetts Grid Modernization Program Year 2021 Evaluation Report for Volt-VAR Optimization.⁵²

⁵² All Massachusetts Grid Modernization Program Year 2021 Evaluation Reports were filed on July 1, 2022 under DPU dockets 22-40, 22-41, and 22-42.

Figure 20. Eversource Performance Metrics Analysis Timeline



Legend

- Prior Evaluated VVO On / Off Testing Period
- Current VVO On / Off Testing Period
- Prior Periods Not Covered by VVO On / Off Testing

Source: Guidehouse analysis

4.2.2.2 Evaluation Methodology

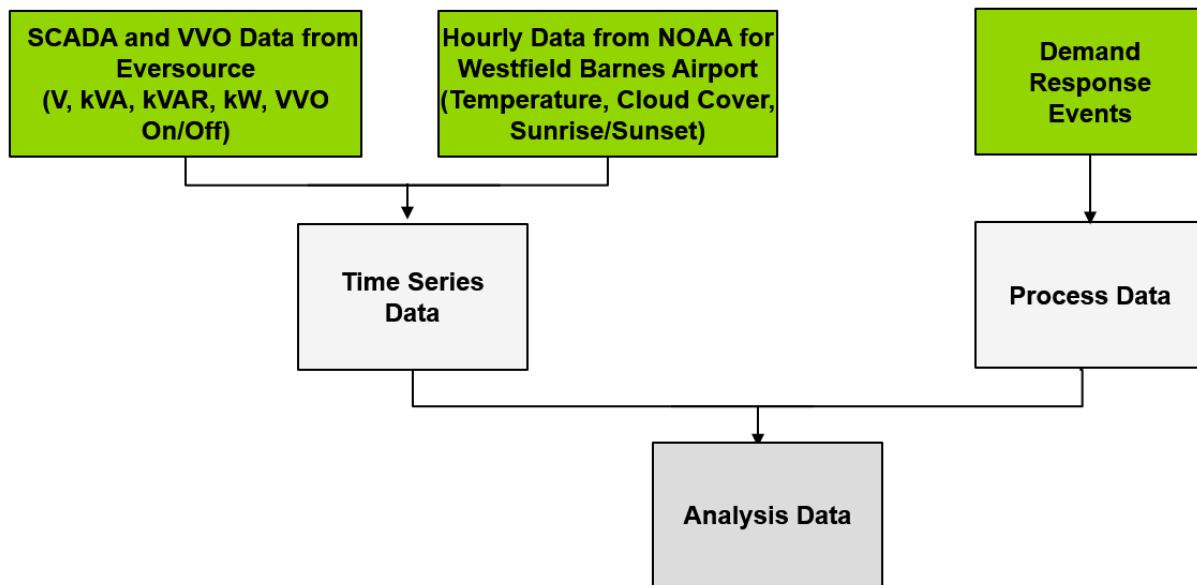
Guidehouse worked with Eversource to collect data necessary to complete the evaluation of VVO Performance Metrics. The sections that follow highlight the analysis data construction, analysis data cleaning, and the analysis approach.

Analysis Data Construction

To assess Performance Metrics, Guidehouse constructed an analysis dataset. This dataset was used in regression modeling to assess changes in multiple outcome variables, such as energy and peak demand. Figure 21 summarizes the data integration process used to construct the analysis dataset for the Eversource Performance Metrics analysis.⁵³

⁵³ Guidehouse receives different data types and structures from the EDCs for estimating impacts across the performance metrics. These differences were minimized as much as possible, but any differences that remain may affect the comparability of performance metrics results across the EDCs.

Figure 21. Eversource Analysis Data Construction Flowchart



Source: Guidehouse

Guidehouse constructed time series and process data to arrive at a final analysis dataset for Eversource's Performance Metrics analysis. To construct time series data, the evaluation team first integrated SCADA interval data from Eversource that contained 15-minute measurements of voltage, real power, apparent power, and reactive power. Time-stamped logs of VVO state changes between VVO On (engaged) and Off (disengaged) states were also contained within the SCADA data provided by Eversource. To complete the construction of time series data, hourly dry bulb temperature and hourly cloud cover data from NOAA for Westfield Barnes Municipal Airport were then joined to SCADA interval data.⁵⁴

To construct the process data, Guidehouse collected a log of demand response events during the evaluation period. The team joined resulting process data to time series data to construct a final analysis dataset.

Analysis Data Cleaning

After constructing the analysis dataset, the team conducted data cleaning steps to remove interval data that may bias the estimates of VVO impacts. Table 73 summarizes data observations made by the evaluation team and the resulting data cleaning steps that were executed.

⁵⁴ Westfield Barnes Municipal Airport was selected due to it having a quality controlled local climatological dataset and due to its being near the Eversource substations. Documentation on the NOAA dataset used in this analysis can be found here: <https://data.noaa.gov/dataset/dataset/quality-controlled-local-climatological-data-qclcd-publication>

Table 73. Data Cleaning Conducted for Eversource Analysis

Data Observation	Data Cleaning Step
Guidehouse identified a handful of periods of repeated, interpolated, and outlier values in the interval data received, as well as periods missing VVO-status data.	Guidehouse removed observations where anomalous data readings were flagged.
Guidehouse identified numerous periods where VVO events were longer than planned.	To reduce the risk of VVO estimates being biased by imbalance in the sample of VVO On/Off statuses (e.g., overrepresentation of VVO On during winter), Guidehouse removed all VVO events within the Spring – Fall seasons longer than 72 hours. Eversource switched to weekly VVO On/Off testing in mid-November; after the switch, Guidehouse removed all VVO events longer than ten days (240 hours).

Source: Guidehouse

Table 74 indicates the number of 15-minute intervals contained in the analysis dataset for the Agawam, Piper, Podick, and Silver substations. Much of the data removed during data cleaning was due to extended periods over which VVO was engaged or disengaged. Detailed data attrition information is included in Appendix B.10.

Table 74. Count of VVO On, VVO Off, and Removed Quarter-Hours for Eversource

Substation	Feeder	VVO On Quarter Hours	VVO Off Quarter Hours	Quarter Hours Removed by Data Cleaning	Spring 2022 – Winter 2022/23 Total
Agawam	16C11	9,965	10,215	14,860	35,040
	16C12	13,071	14,444	7,525	35,040
	16C14	13,126	13,313	8,601	35,040
	16C15	13,084	13,212	8,744	35,040
	16C16	13,138	13,316	8,586	35,040
	16C17	13,244	13,353	8,443	35,040
	16C18	13,383	13,391	8,266	35,040
	Piper	21N4	15,839	15,489	3,712
21N5		12,385	11,223	11,432	35,040
21N6		16,104	15,797	3,139	35,040
21N7		15,552	14,482	5,006	35,040
21N8		16,125	15,836	3,079	35,040
21N9		7,570	7,399	20,071	35,040
Podick	18G2	10,046	8,776	16,218	35,040
	18G3	12,395	10,957	11,688	35,040
	18G4	13,074	11,614	10,352	35,040
	18G5	12,679	11,252	11,109	35,040
	18G6	8,431	7,379	19,230	35,040
	18G7	12,410	10,600	12,030	35,040
	18G8	11,239	10,272	13,529	35,040
	Silver	30A1	6,594	7,646	20,800
30A2		11,662	12,545	10,833	35,040
30A3		5,002	5,900	24,138	35,040
30A4		11,275	12,877	10,888	35,040
30A5		8,651	9,562	16,827	35,040
30A6		10,280	11,568	13,192	35,040

Source: Guidehouse analysis

Analysis Approach

After the analysis data was constructed and cleaned, Guidehouse conducted regression modeling to assess the impacts of VVO on measured feeder-level energy and voltage. Equation 5-2 and Equation 5-3 in the Appendix summarizes the regression model used to estimate energy and voltage as a function of VVO.

To inform the regression model construction for estimation of energy and voltage, Guidehouse inspected the data to control for exogenous patterns. Table 75 summarizes observations made during this inspection and the implemented data analysis steps.

Table 75. Data Analysis Summary for Eversource

Data Observation	Data Analysis Step
Load and voltage data exhibit similar curvature from day-to-day, with load and voltage profiles for any two adjacent days being largely similar	A 24-hour lag of load (for energy models) and voltage (for voltage models) was included as a predictor of load (for energy models) and voltage (for voltage models)
Numerous feeders had a large nominal capacity of connected solar facilities.	Cloud cover and daylight hour data from NOAA were integrated and included in regression analysis to control for hourly generation observed under an array of solar conditions.
Large differences in energy and voltage were observed between most months in the analysis period	Monthly fixed effects were incorporated into regression modeling to capture energy and voltage differences observed across each week.
Numerous feeders were identified with non-residential customers making up a large portion of load, with drops in measured load during holidays and non-business hours.	Day type (i.e., weekday or weekend day) and hour of day fixed effects were incorporated into regression models to capture typical load shapes by day type and control for large drops in demand observed during non-business hours.
Numerous demand response events were called during the Spring 2022 – Winter 2022/23 M&V test period.	Intervals that occurred during demand response events were flagged and controlled for in the regression analysis to control for changes in energy and voltage associated with demand response events.

Source: Guidehouse

4.2.2.3 Performance Metrics Results

This section summarizes the Performance Metrics results for Eversource. Each of the subsections separately summarizes the evaluation results for each performance metric.

PM-1: Baseline

As detailed in the Stage 3 Plan submitted to the EDCs on March 1, 2023, Guidehouse provides a baseline using data collected when VVO was disabled during the evaluation period, which spans Spring 2022 – Winter 2022/23. Table 76 shows the energy baseline calculated using VVO Off data collected during Spring 2022 – Winter 2022/23 from the Agawam, Piper, Podick, and Silver substations.

Table 76. Eversource VVO Energy Baseline

Metric	Baseline Total Energy Use
Baseline Energy	524,992 MWh

Source: Guidehouse analysis

To estimate total baseline energy use, Guidehouse used regression models to first estimate energy savings that occurred for each feeder during Spring 2022 – Winter 2022/23. This resulted in an estimate of how energy use changed as a function of VVO. From there, Guidehouse fitted the model to a case in which VVO was off for the entirety of Spring 2022 – Winter 2022/23 for each VVO feeder, holding all other observable conditions constant (e.g., allowing weather to remain as it actually was when VVO was engaged). Guidehouse then

summed this calculated energy usage across all hours and feeders to calculate a baseline total energy use for the Spring 2022 – Winter 2022/23 evaluation period. Baseline energy use is provided by VVO feeder in Appendix B.11.

PM-2: Energy Savings

Table 77. Eversource VVO Net Energy Reduction during Actual VVO On Hours provides Eversource’s estimated energy savings for Spring 2022 – Winter 2022/23, as well as for each season. The ± figure indicates 90% confidence bounds associated with the energy savings estimates.

Table 77. Eversource VVO Net Energy Reduction during Actual VVO On Hours

Season	Net Energy Reduction	
	MWh [†]	% [‡]
Spring [^]	-282 ± 81 MWh	-0.58 ± 0.17%
Summer	1,257 ± 151 MWh	2.07 ± 0.25%
Fall	-391 ± 93 MWh	-0.74 ± 0.17%
Winter ^{^^}	582 ± 111 MWh	1.06 ± 0.26%
Spring 2022 – Winter 2022/23 Total	879 ± 184 MWh	0.41 ± 0.09%

† Total energy savings provided for each period is the sum of each feeder’s energy savings within that period. Due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row.

‡ Percentage energy savings provided for each period is the load-weighted average of percentage savings estimated for each feeder.

[^] Silver feeders 30A1, 30A3, and 30A5 are excluded from Spring estimate due to insufficient data.

^{^^}Podick feeder 18G8 is excluded from Winter estimate due to insufficient data.

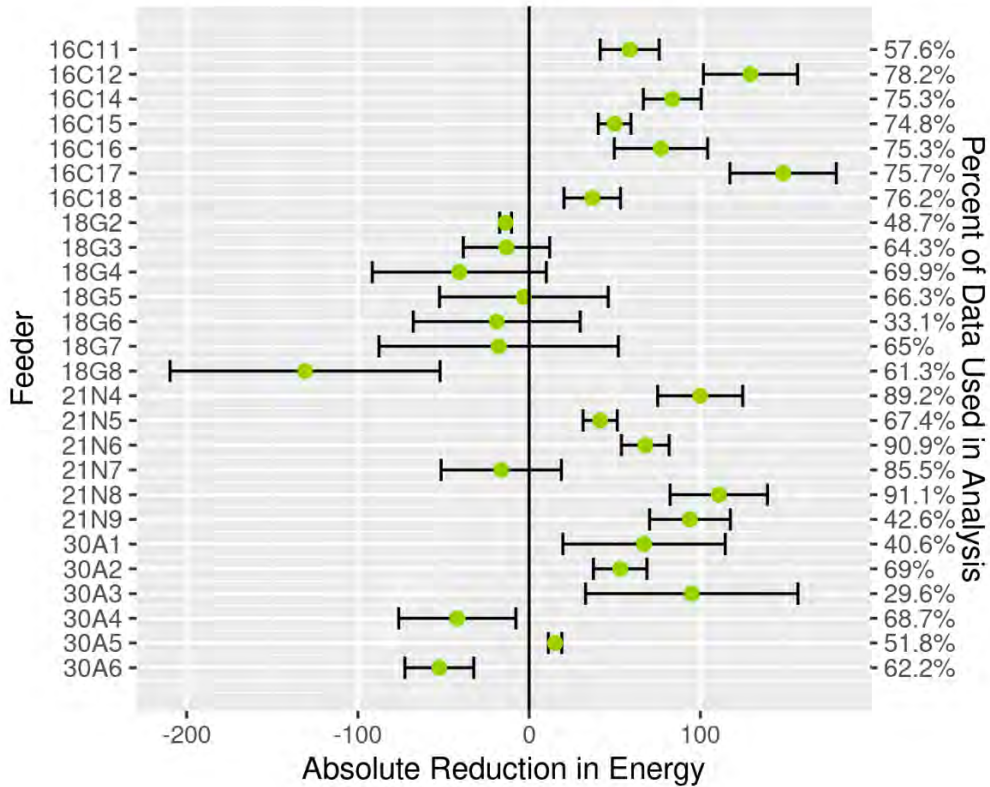
Source: Guidehouse analysis

Regression estimates indicate a statistically significant reduction in energy use associated with VVO, with 879 MWh (0.41%) in energy savings realized during the Spring 2022 – Winter 2022/23 M&V period.⁵⁵ Regression estimates indicate that there were statistically significant reductions in energy use for the Summer and Winter seasons, but statistically significant increases in energy use for the Spring and Fall seasons. The Summer season saw the largest reduction in energy, with an estimated value of 1,257 MWh, and the Fall season saw the largest increase in energy, with an estimated value of 391 MWh.

Figure 22 indicates the net energy reductions for each Eversource feeder in absolute terms (MWh), with green points indicating each feeder’s MWh savings. The associated 90% confidence intervals are provided by the whiskers overlaid on each feeder’s MWh savings estimate. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. Of the 26 feeders included in the Spring 2022 – Winter 2022/23 M&V period, 16 experienced statistically significant reductions in energy. Of these 16 feeders, feeders 16C17 and 16C12 realized the greatest energy savings.

⁵⁵ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged in the clean analysis data between March 1, 2022 and February 28, 2023.

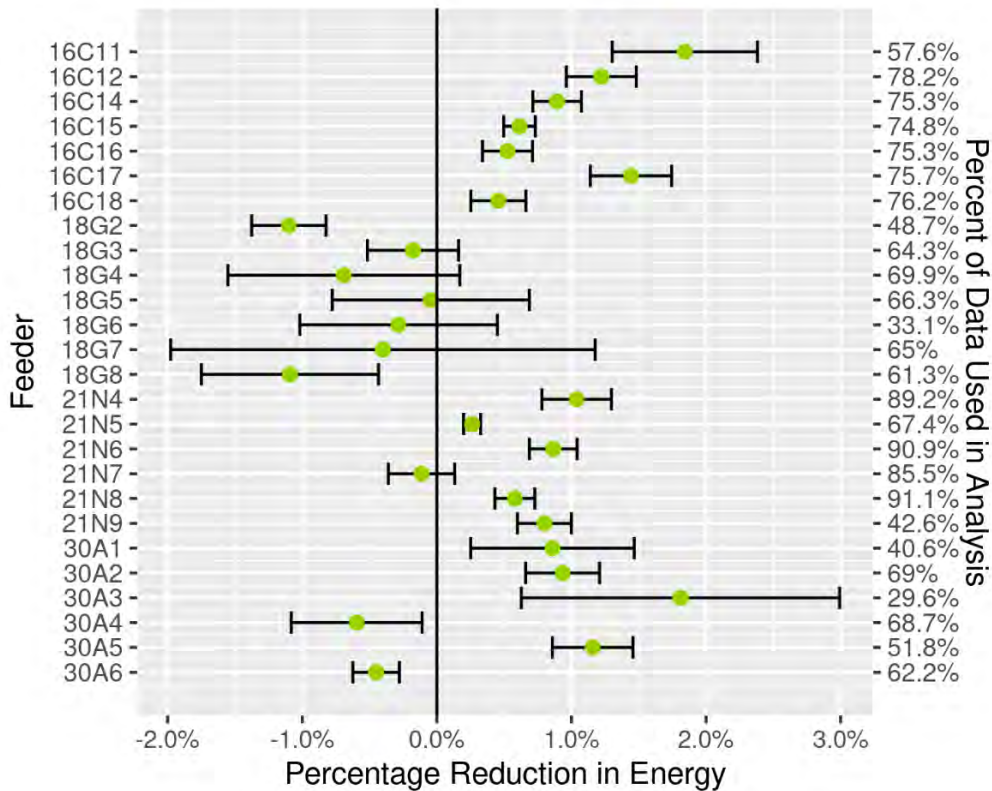
Figure 22. Net Energy Reduction (MWh) for Eversource VVO Feeders



Source: Guidehouse analysis

Figure 23 indicates the net energy reductions for each Eversource feeder in percentage terms, with green points indicating each feeder's percentage MWh savings. The whiskers overlaid on each feeder's percentage MWh savings estimate provide the associated 90% confidence levels. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 23. Net Energy Reduction (%) for Eversource VVO Feeders



Source: Guidehouse analysis

To further understand VVO impacts, Guidehouse estimated changes in voltage associated with VVO. Table 78 provides the evaluated voltage reductions for Eversource, with 90% confidence bounds associated with voltage reductions estimates indicated by the ± figure. Regression estimates indicate a statistically significant reduction in voltage associated with VVO, with a 1.52 V (1.24%) voltage reduction realized during the Spring 2022 – Winter 2022/23 M&V period.

Table 78. Eversource VVO Average Hourly Voltage Reduction*

Average Hourly Reduction (V)	Average Hourly Reduction (%)
1.52 ± 0.01 Volts	1.24 ± 0.01%

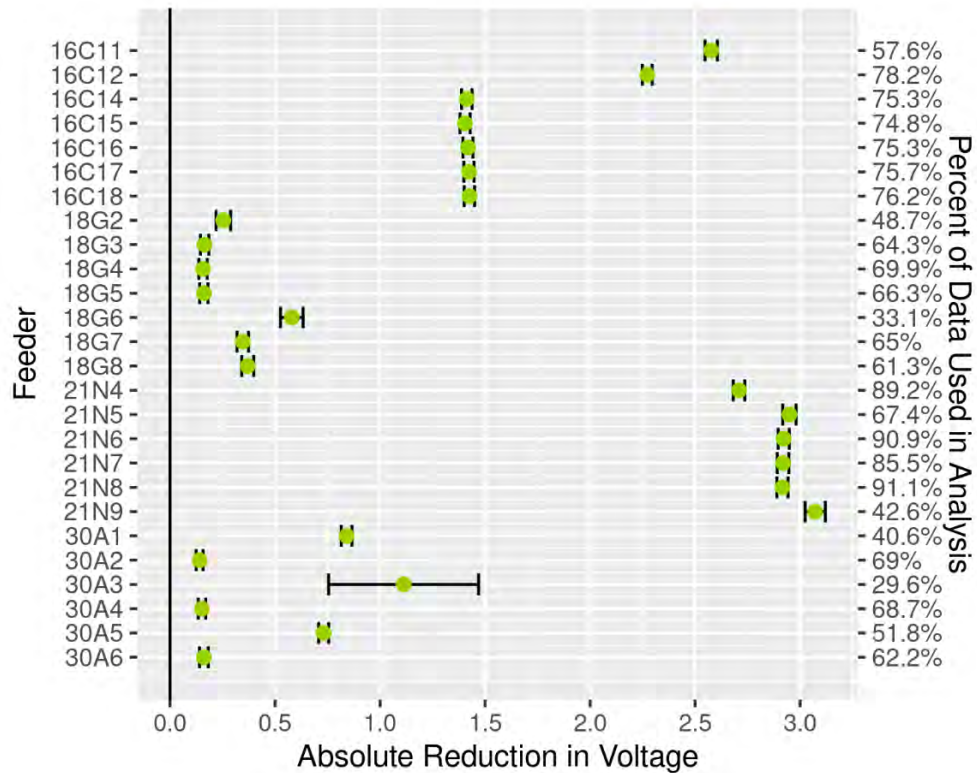
* Absolute and percentage voltage reductions provided for each period is the load-weighted average of absolute and percentage voltage reductions estimated for each feeder.

Source: Guidehouse analysis

Figure 24 indicates the average hourly voltage reductions for each Eversource feeder, with green points indicating each feeder's voltage reduction. The whiskers overlaid on each feeder's voltage reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

All 26 feeders experienced statistically significant reductions in voltage when VVO was engaged.

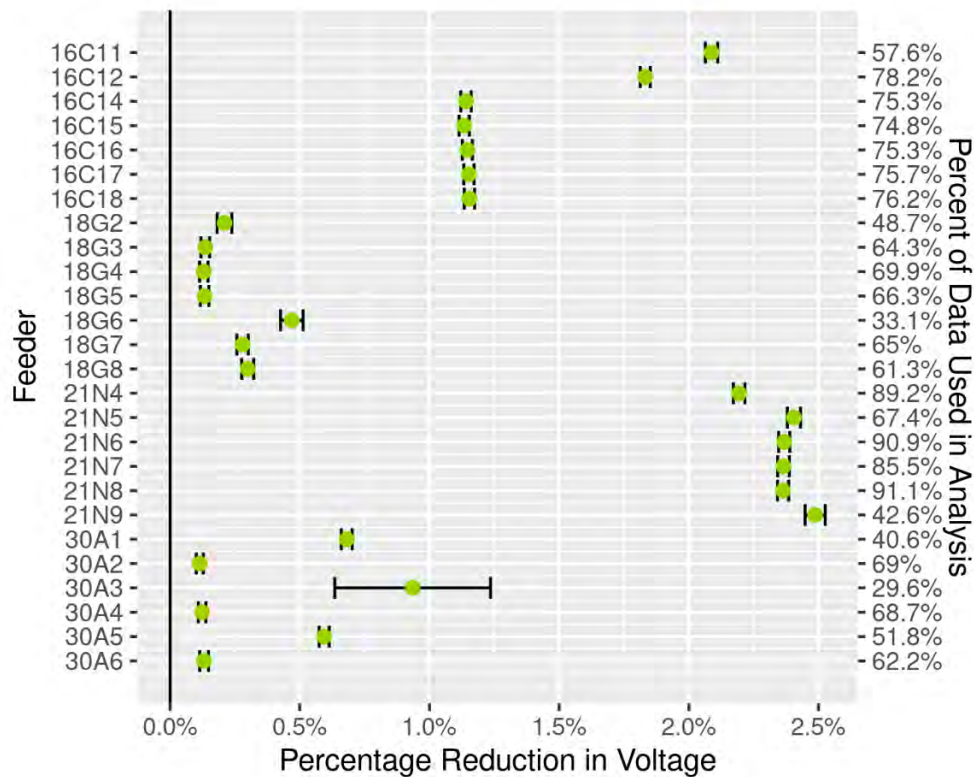
Figure 24. Average Hourly Voltage Reduction (V) for Eversource VVO Feeders



Source: Guidehouse analysis

Figure 25 indicates the net voltage reductions for each Eversource feeder in percentage terms, with green points indicating each feeder's percentage voltage reduction. The whiskers overlaid on each feeder's percentage voltage reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 25. Average Hourly Voltage Reduction (%) for Eversource VVO Feeders



Source: Guidehouse analysis

While all feeders underwent a statistically significant reduction in voltage, Podick 18G and even-numbered feeders at Silver 30A experienced a very minimal reduction in voltage, suggesting VVO was not operating as expected on these feeders. Energy reduction estimates are largely in-line with this finding, with most Podick feeders experiencing a statistically insignificant change in energy when VVO was engaged. In contrast, Piper 21N and Agawam 16C feeders experienced the largest reductions in voltage. Correspondingly, estimated energy savings for these feeders were statistically significant, with savings for most between 0.5% and 2.0%.

Following an estimation of percentage energy savings and percentage voltage reductions attributed to VVO, Guidehouse calculated the associated CVR factors for each feeder. The CVR factor, which is the ratio of percentage energy savings to percentage voltage reductions, can provide an estimate of the percentage energy savings possible with each percent voltage reduction. Equation 5-1 in the Appendix highlights how the CVR factor is calculated using an estimated percentage change in energy and in voltage. Table 79 provides the CVR factor for Eversource, and Figure 26 provides the CVR factors for the Spring 2022 – Winter 2022/23 M&V period for each feeder. Based on evaluation findings, the CVR factor for the Spring 2022 – Winter 2022/23 time period was 0.60.

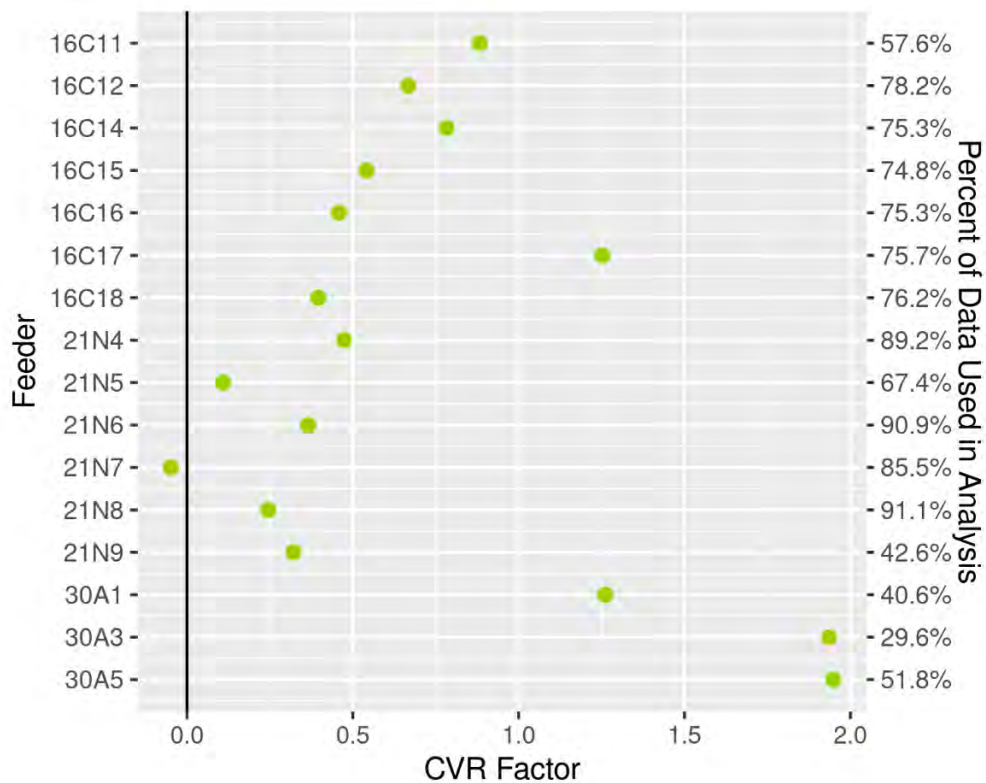
Table 79. Eversource VVO CVR Factor

CVR Factor†
0.60

† The CVR factor provided is the load-weighted average of CVR factors estimated for each feeder. All Podick feeders and Silver feeders 30A2, 30A4, and 30A6 experienced extremely small changes in voltage and have been excluded from overall CVRf calculations due to the outsize effect they have on overall estimates.

Source: Guidehouse analysis

Figure 26. Eversource VVO CVR Factors*



* All Podick feeders and Silver feeders 30A2, 30A4, and 30A6 experienced extremely small changes in voltage and have been excluded from overall CVRf calculations due to the outsize effect they have on overall estimates.

Source: Guidehouse analysis

PM-3: Peak Demand Impact

Guidehouse evaluated the impact of VVO during peak demand periods, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. Table 80 details the evaluated peak demand impact across all feeders in absolute and percentage terms.

Table 80. Eversource VVO Average Reduction in Peak Demand

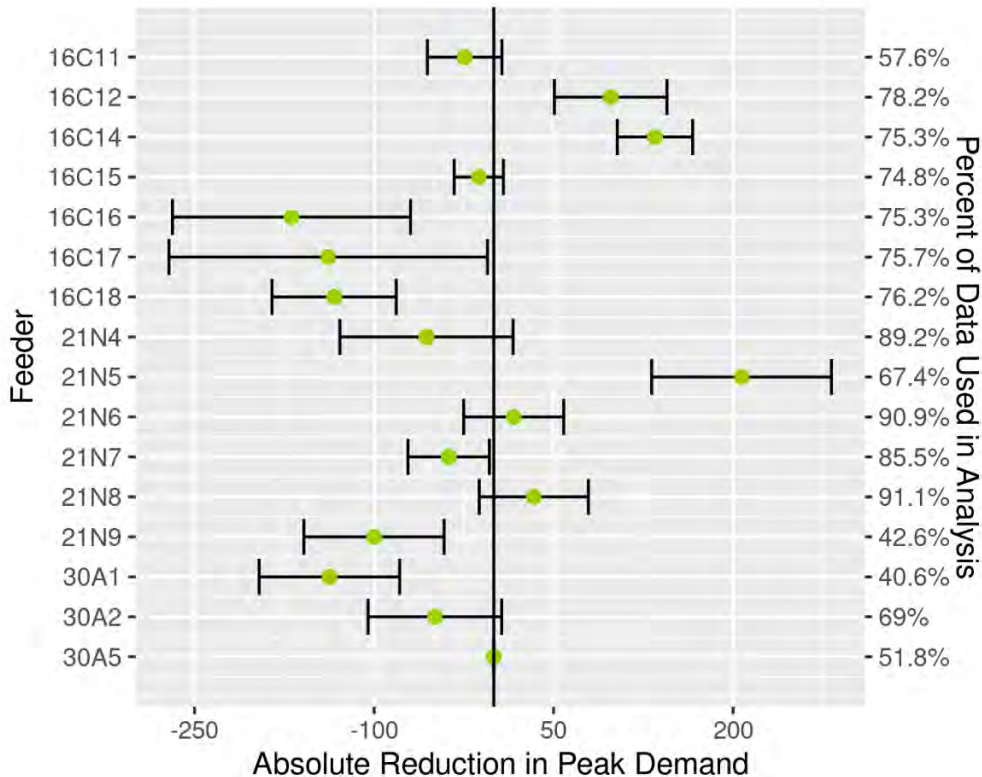
Peak Demand Reduction (kW) †	Peak Demand Reduction (%) †
-369 ± 245 kW	-0.70 ± 0.46%

† The percentage peak demand reduction presented in this table is the load-weighted average of percentage peak demand reductions estimated for each feeder. All Podick feeders and Silver feeders 30A3, 30A4, and 30A6 were removed from Peak Demand reduction calculations because they have unreliable standard error estimates.

Source: Guidehouse analysis

Figure 27 indicates the demand reductions measured in kW realized during the peak demand period, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. The whiskers overlaid on each feeder's absolute demand reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. Of the VVO feeders, only feeders 16C12, 16C14, and 21N5 experienced a statistically significant reduction in peak demand. All remaining feeders had an estimated statistically insignificant change in peak demand (7 feeders) or an estimated increase in peak demand (6 feeders).

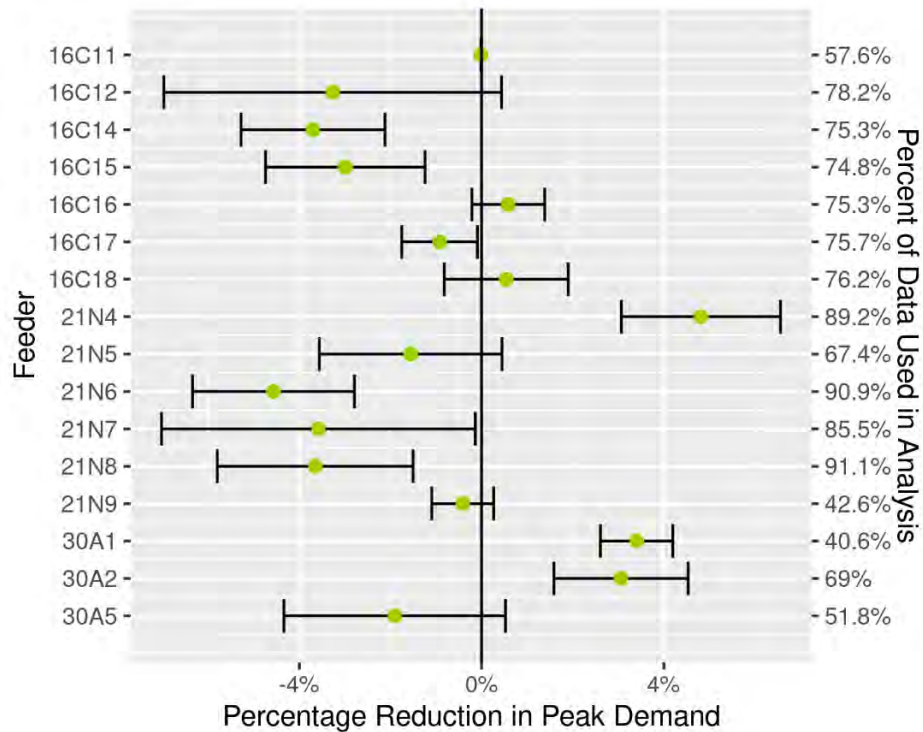
Figure 27. Eversource Reduction in Peak Demand (kW)



Source: Guidehouse analysis Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 28 indicates the percentage load reductions realized during the peak demand period, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. The whiskers overlaid on each feeder's percentage demand reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 28. Eversource Reduction in Peak Demand (%)



Source: Guidehouse analysis

Eversource and National Grid saw increases in peak demand between 1:00 p.m. and 5:00 p.m. on non-holiday summer weekdays. This was a finding in both the previous and current evaluations (i.e., PY 2021 and PY 2022). This may be attributable to a number of factors that were present during those hours:

- There is variation in customer types and their relative load contributions depending on the time of day. If feeder load was more heavily comprised of end-uses with constant power load during peak hours as currently defined, a reduction in voltage can be met by a corresponding increase in amperage, which could appear as an increase in MW load at the feeder head-end. For instance, if feeder load was more heavily comprised of commercial or industrial load during those hours, industrial equipment could have actually become more inefficient with a drop in voltage, which could appear as an increase in MW load at the feeder head-end.
- Distribution generation, which has considerable generation during early- to mid-afternoon hours during the summer, may have caused unintended interactions with the VVO scheme.

The period of 1:00 p.m. to 5:00 p.m. for non-holiday summer weekdays was based on ISO-NE's peak demand definition, which was identified in the Stage 3 Evaluation Plan and has been used since the PY 2021 evaluation report. This was intended to be consistent with energy efficiency evaluations. Guidehouse has reviewed other time frames (e.g., 6:00 p.m. to 10:00 p.m.) that better represent the average feeder peaks for those feeders with VVO enabled. However, to be consistent with the Stage 3 Evaluation Plan and prior evaluation reports, this evaluation included the results for the 1:00 p.m. to 5:00 p.m. timeframe. Guidehouse will further explore alternative definitions for peak periods to determine the proper definition moving forward.

PM-4: Distribution Losses

Guidehouse evaluated reduction in distribution losses as a function of VVO during the Spring 2022 – Winter 2022/23 M&V period. Per the Stage 3 Evaluation Plan submitted March 1, 2023, Guidehouse estimated changes in power factor where kW was greater than 75% of annual peak demand.⁵⁶ There were several feeders with very little data where kW was greater than 75% of annual peak demand for kVA. These feeders were ultimately removed from the power factor models, as they had fewer than 100 hours of data available for use in regression modeling. Given power factor is an input for the distribution losses equation, these feeders were ultimately removed from the distribution losses calculation. The methodology for calculating the percent reduction in distribution losses is shown in Appendix 5.3B.8.

Table 81 and Figure 29 indicates the estimated percentage change in distribution losses for each Eversource feeder with sufficient data quality.

Table 81. Eversource VVO Distribution Losses

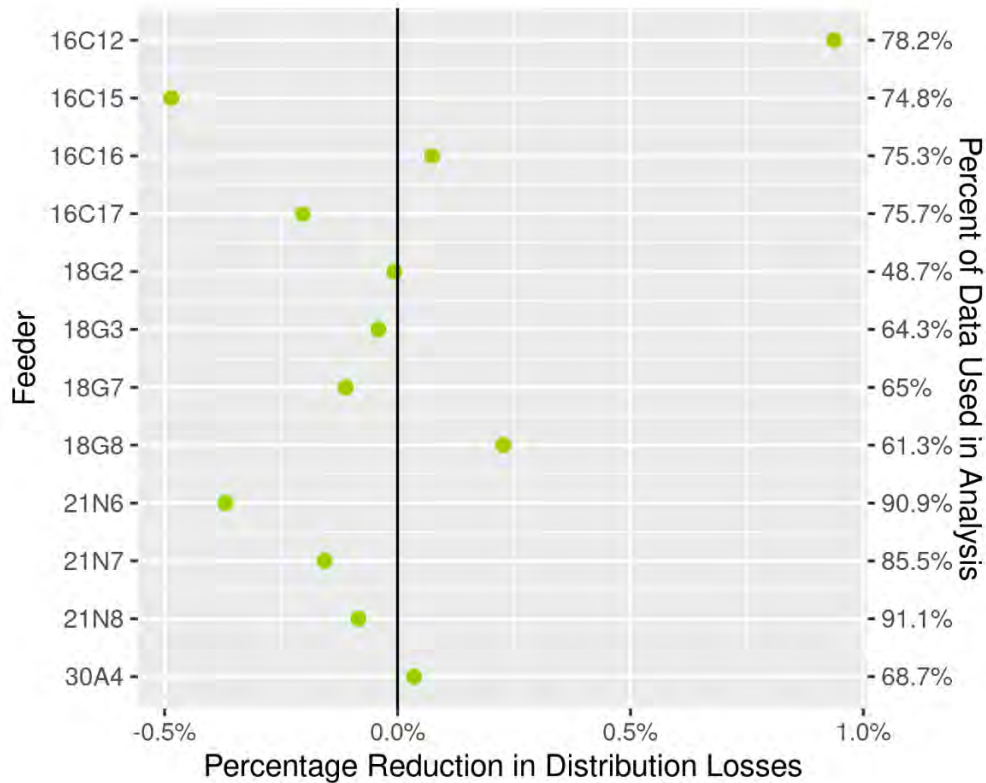
Reduction in Distribution Losses (%)†
0.01%

† The change in distribution losses presented in this table is the load-weighted average of change in distribution losses estimated for each feeder

Source: Guidehouse analysis

⁵⁶ This assumes sufficient data being available for use in the analysis for each VVO feeder. For some seasons, including winter, there will be a relatively small number of hours that meet the 75% threshold. Data limitations will limit Guidehouse's ability to conduct analysis for specific feeders or seasons in this case.

Figure 29. Eversource Reduction in Distribution Losses



Source: Guidehouse analysis

PM-5: Power Factor

Guidehouse evaluated the impact on power factor associated with VVO during the Spring 2022 – Winter 2022/23 M&V period. Changes in power factor were analyzed during periods where power was greater than 75% of feeder-specific annual demand. Table 82 details the evaluated change in power factor for each Eversource feeder where clean data existed in sufficient quantity.⁵⁷

Table 82. Eversource VVO Average Hourly Power Factor Change

Change in Power Factor†	Change in Power Factor (%)†
<0.001 ± <0.001	0.06 ± 0.02%

† Power factor changes presented in this table are the load-weighted averages of power factor changes estimated for each feeder

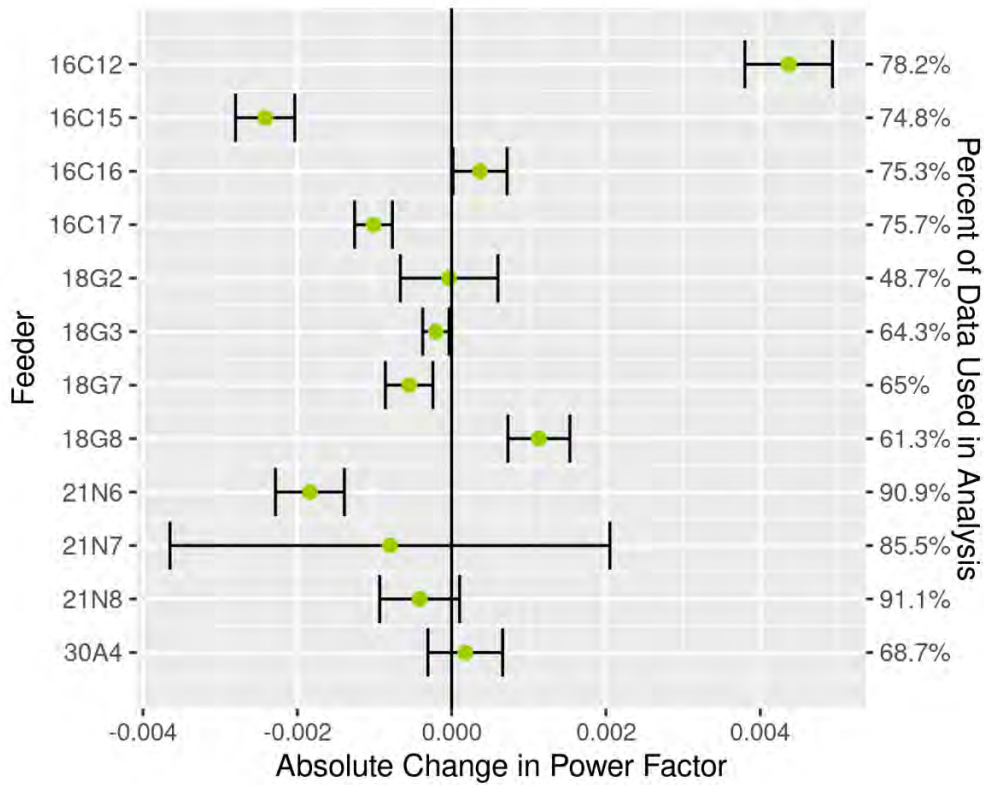
Source: Guidehouse analysis

Figure 30 indicates the change in power factor for each Eversource feeder in absolute terms, with green points indicating each feeder’s absolute power factor change. The whiskers overlaid

⁵⁷ There were some feeders with very little data where kW was greater than 75% of annual peak load for kVA. These feeders were ultimately removed from the power factor models, as they had fewer than 100 hours available for use in regression modeling.

on each feeder’s absolute power factor change estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

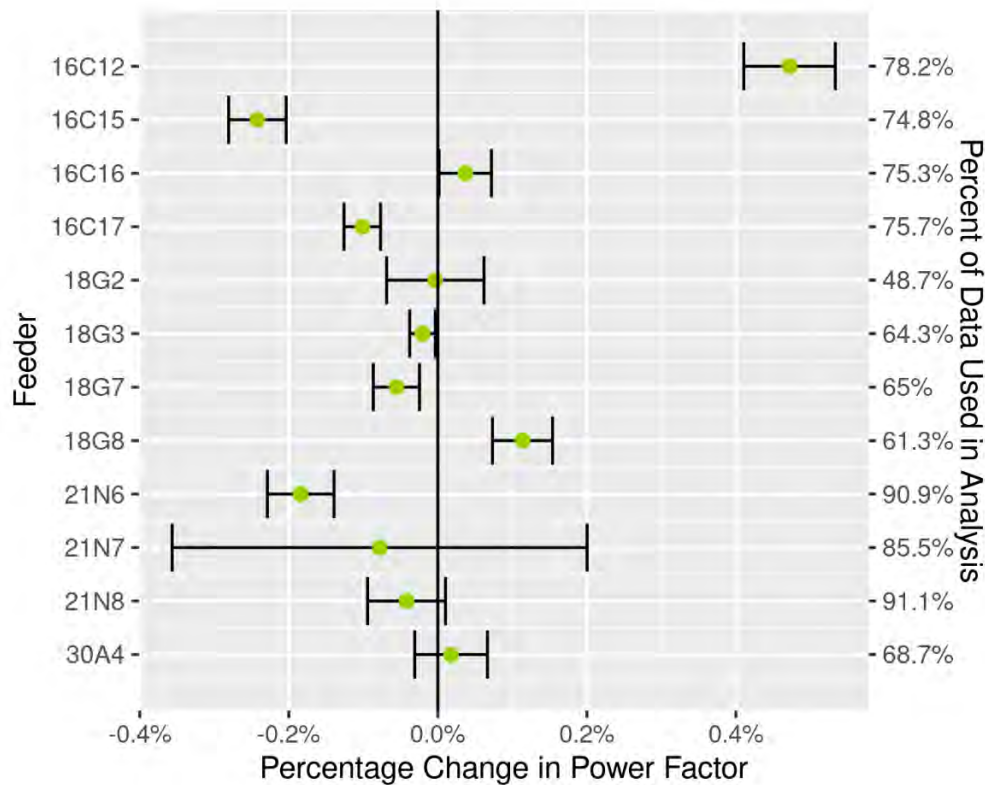
Figure 30. Eversource Absolute Change in Power Factor



Source: Guidehouse analysis

Figure 31 indicates the change in power factor for each Eversource feeder in percentage terms, with green points indicating each feeder’s percentage power factor change. The whiskers overlaid on each feeder’s percentage power factor change estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. Most feeders underwent a statistically significant change in power factor, although the changes in power factors were relatively small.

Figure 31. Eversource Percentage Change in Power Factor



Source: Guidehouse analysis

PM-6: GHG Reduction

After evaluating energy savings attributed to VVO, Guidehouse calculated the resulting emissions reductions. For 2022, emissions reductions were determined to be 0.34 metric tons of emissions per MWh. This was calculated drawing the 2019 value from DPU 18-110 – DPU 18-119, Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plan for 2019 – 2021, the 2025 value from DPU 21-120 – DPU 21-129, Massachusetts Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan for 2022-2024, and then interpolating the 2022 value from these two sources.⁵⁸

Table 83 provides emissions reductions associated with VVO, with 90% confidence bounds indicated by the ± figure.

⁵⁸ 2019 Emissions factors can be found on page 201 of Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plans for 2019 – 2021 <https://ma-eeac.org/wp-content/uploads/Exh.-1-Final-Plan-10-31-18-With-Appendices-no-bulk.pdf>. 2025 emissions factors can be found on page 326 of Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plans for 2022 – 2024 <https://ma-eeac.org/wp-content/uploads/Exhibit-1-Three-Year-Plan-2022-2024-11-1-21-w-App-1.pdf>

Table 83. Eversource VVO Emissions Reductions

Metric	CO ₂
Spring 2022 – Winter 2022/23 Emissions Reduction	299 ± 63 tons

Source: Guidehouse analysis

PM-7: Voltage Complaints

Guidehouse received voltage complaint logs from Eversource to facilitate Performance Metrics analysis. Guidehouse tabulated voltage complaints received by VVO feeder between 2015 and 2022. Discussion below highlights key observations for voltage complaints and compares the count of voltage complaints received during 2022 to the average number of voltage complaints from the 2015–2017 baseline period.

Table 84 summarizes voltage complaints for the Agawam substation. Relative to the average number of voltage complaints per year received prior to when VVO investments were deployed on these feeders (2015 – 2027), 2022 saw no change in voltage complaints relative to baseline at the Agawam substation.

Table 84. Count of Voltage Complaints for Agawam Substation

Number of Voltage Complaints	16C11	16C12	16C14	16C15	16C16	16C17	16C18	Total
Customers*	1,350	80	1,632	1,270	2,563	2,388	3,054	12,337
2015	0	0	2	2	4	2	0	10
2016	0	0	2	0	7	3	2	14
2017	1	0	2	3	7	3	5	21
Baseline†	1	0	2	3	6	3	3	15
2018	0	0	2	0	3	8	1	14
2019	4	0	1	0	5	5	4	19
2020	5	3	0	3	6	4	2	23
2021	1	0	1	2	7	2	2	15
2022	2	1	4	0	1	4	3	15

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix B.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2015 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 85 summarizes the count of voltage complaints for the Piper substation. Looking at 2015–2017 baseline period, there were 21 voltage complaints received, amounting to 7 voltage complaints per year. Relative to the baseline period, there were 1 fewer voltage complaints reported at the Piper substation in 2022.

Table 85. Count of Voltage Complaints for Piper Substation

Number of Voltage Complaints	21N4	21N5	21N6	21N7	21N8	21N9	Total
Customers*	2,299	829	787	2	557	2,404	6,878
2015	1	1	2	0	0	2	6
2016	2	1	0	0	0	3	6
2017	4	2	1	0	0	2	9
Baseline†	3	2	1	0	0	3	7
2018	1	0	0	0	0	3	4
2019	2	1	0	0	3	5	11
2020	6	3	1	0	0	1	11
2022	2	1	0	0	0	3	6

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix B.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2015 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 86 summarizes the count of voltage complaints for the Podick substation. Looking at 2015–2017 baseline period, there were 69 voltage complaints received, amounting to 23 voltage complaints per year. Based on voltage complaints data received, a total of 19 voltage complaints were reported along the Podick feeders during 2022, four fewer complaints than observed during the baseline period.

Table 86. Count of Voltage Complaints for Podick Substation

Number of Voltage Complaints	18G2	18G3	18G4	18G5	18G6	18G7	18G8	Total
Customers*	9	2,141	2,347	1,778	1,289	2,226	1,089	10,879
2015	0	3	1	2	1	3	3	13
2016	1	1	4	1	2	11	13	33
2017	0	0	5	4	3	6	5	23
Baseline†	1	1	4	3	2	7	7	23
2018	0	1	4	6	3	8	14	36
2019	0	6	5	8	1	4	3	27
2020	0	1	4	11	9	8	6	39
2021	0	3	6	7	3	7	5	31
2022	0	0	2	8	1	3	5	19

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix B.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2015 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 87 summarizes the count of voltage complaints for the Silver substation. Looking at 2015–2017 baseline period, there were 45 voltage complaints received, amounting to 16 voltage complaints per year. Based on voltage complaints data received, a total of 13 voltage complaints were reported along the Silver feeders in 2022, three fewer complaints than were observed during the baseline period.

Table 87. Count of Voltage Complaints for Silver Substation

Number of Voltage Complaints	30A1	30A2	30A3	30A4	30A5	30A6	Total
Customers*	2,519	2,286	239	801	1,659	1,007	8,511
2015	2	1	0	1	1	2	7
2016	4	5	1	1	2	5	18
2017	3	8	2	1	3	3	20
Baseline†	3	5	1	1	2	4	16
2018	4	2	0	2	0	2	10
2019	6	5	1	0	2	3	17
2020	5	1	2	4	1	4	17
2021	8	3	0	0	1	5	17
2022	7	1	2	1	1	1	13

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix B.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2015 and 2017, rounded up to the nearest whole number

‡ Only includes the first quarter of voltage complaints for 2023.

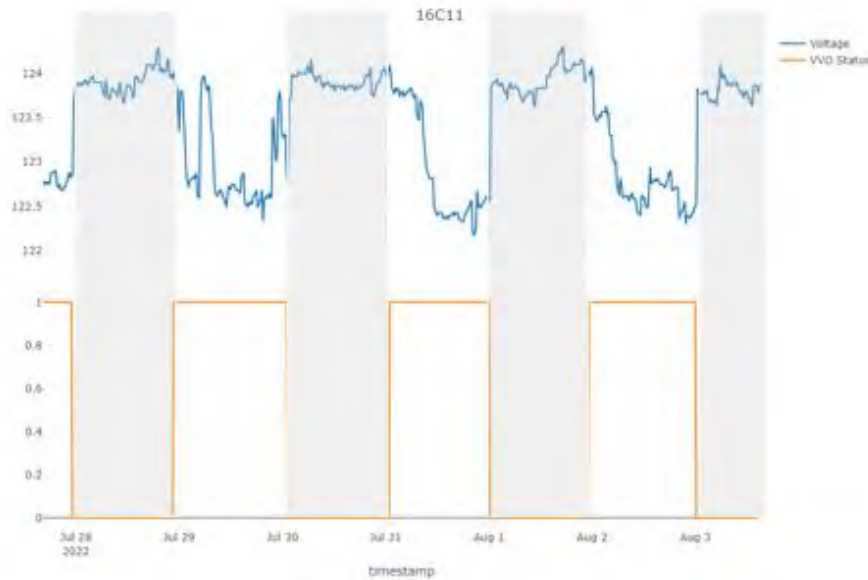
^ The count of voltage complaints in Spring 2022 – Winter 2022/23 contains some of the 2022 voltage complaints and all 2023 voltage complaints presented.

Source: Guidehouse analysis

4.2.2.4 Additional Investigation of Podick and Even-Numbered Silver Feeders

When feeders are undergoing VVO On/Off testing, Guidehouse usually expects to see head-end voltage levels cycling with VVO On/Off status, with voltage levels remaining somewhat higher when VVO is disengaged (e.g., around 124 Volts) and remaining somewhat lower when VVO is engaged (e.g., around 120 Volts). An example of the expected voltage response to VVO is shown in Figure 32 below highlights voltage (in blue) and VVO On/Off status (in orange, where VVO status equal to one corresponds with VVO being engaged) observed for the Agawam 16C substation from July 28, 2022 through August 3, 2022.

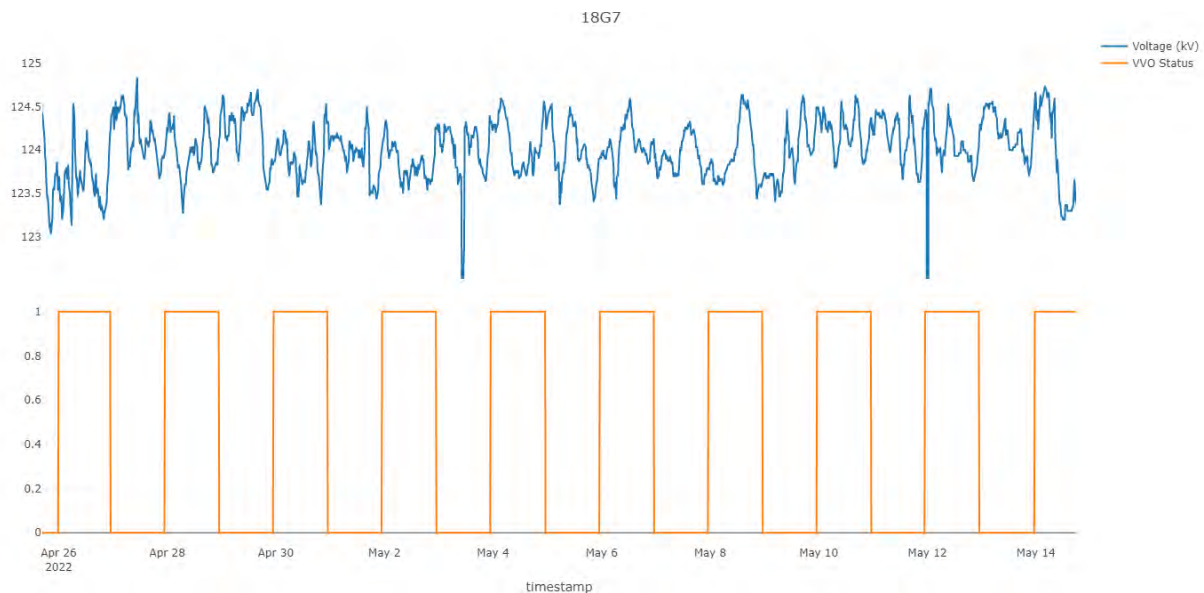
Figure 32. VVO On/Off Testing at Feeder 16C11



Source: Guidehouse analysis

During the process of data QA/QC, Guidehouse discovered that feeders at the Podick and Silver substations did not respond similarly to VVO signals. One such case is presented in Figure 33 for the feeder 18G7, where voltage (in blue) and VVO On/Off status (in orange, where VVO status equal to one corresponds with VVO being engaged) are plotted together for the period spanning April 26, 2022 through May 14, 2022.

Figure 33. VVO On/Off Testing at Feeder 18G7



Source: Guidehouse analysis

Figure 33 illustrates that voltage did not respond as expected during VVO On/Off testing throughout the period spanning April 26, 2022 through May 14, 2022. This was a pattern that was observed throughout much of the Spring 2022 – Winter 2022/23 evaluation period. These patterns were detected regression models and resulted in a minimal estimated impact associated with VVO across numerous feeders (e.g., all Podick 18G feeders and all even-numbered Silver 30A feeders), as VVO was marked as engaged but was not yielding clear voltage benefits. Guidehouse recommends that Eversource continue to investigate what may be driving these voltage patterns and what, if any, changes to the VVO control scheme needs to occur to ensure that VVO is correctly regulating voltage when VVO is engaged.

4.2.2.5 Key Findings and Recommendations

Guidehouse's VVO evaluation findings indicate that VVO allowed Eversource to realize some benefits during the Spring 2022 – Winter 2022/23 M&V period. More specifically:

- Eversource VVO feeders realized 0.41% energy savings and 1.24% voltage reductions when VVO was engaged. Podick feeders realized the least voltage benefits, with almost no change in voltage when VVO was engaged, which may indicate VVO malfunctions occurred. Additionally, Piper 21N4 realized the greatest energy savings, with 2.5% energy savings when VVO was engaged. Lastly, Podick 18G2, 18G8 as well as Silver 30A4 and 30A6 realized the least energy benefits, with a 0.75% increase in energy associated with VVO.
- Eversource VVO feeders experienced a statistically significant increase (0.70%) in peak demand when VVO was engaged. Additionally, Eversource VVO feeders experienced a statistically significant change (0.06%) in power factor when VVO was engaged, which resulted in a minimal decrease in distribution losses (0.01%).

In 2023 and beyond, Guidehouse recommends that Eversource:

- Ensure VVO On/Off testing is running according to plan, with limited pauses to the VVO On/Off testing schedule. Across the VVO feeders, one-quarter to one-half of data points were removed due to extended pauses in VVO On/Off testing. For some feeders, this resulted in the vast majority of provided data to be unusable for components of this evaluation (e.g., for estimation of distribution loss and power factor reductions). Sustained On/Off testing will increase the amount of usable data in the evaluation and improve the ability for Guidehouse to provide a comprehensive evaluation of VVO performance metrics.
- Confirm adjustments to VVO On/Off testing schedule for any VVO feeders prior to implementation. VVO On/Off testing is designed similarly to a Randomized Controlled Trial (RCT), and adjustments to the testing schedule could, potentially, hinder the effectiveness of the testing design and cause biases to evaluation results. Ensuring there is proper balance in the number of VVO on and off hours throughout the evaluation period will allow for Guidehouse to provide a comprehensive and accurate evaluation of VVO performance metrics.
- Continue to investigate how to improve outcomes across VVO feeders. Many feeders underwent no material change in voltage. Correspondingly, energy reduction estimates were small-to-insignificant. These observations may indicate flaws in the VVO control scheme for these feeders. In order to improve VVO performance, Guidehouse recommends that the EDCs continue their efforts to investigate root causes to shortcomings in the VVO control schemes and work with distribution engineers and the

VVO vendors to respond accordingly. If needed, Guidehouse can conduct in-depth case studies at these substations further understand shortcomings in the VVO control scheme.

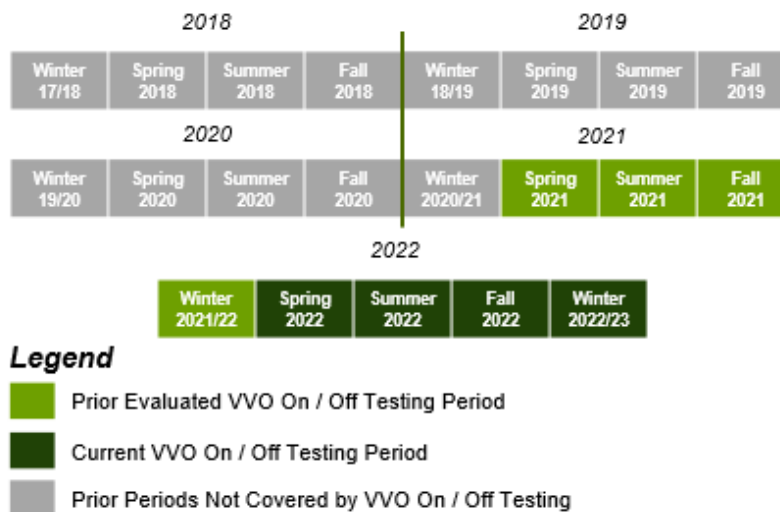
4.2.3 National Grid

This section discusses National Grid’s VVO Performance Metrics results following the Spring 2022 – Winter 2022/23 VVO M&V period.

4.2.3.1 Performance Metrics Analysis Timeline

Figure 34 highlights the key Performance Metrics analysis periods for National Grid. The Performance Metrics analysis provided for this report will be focused on results from VVO On/Off testing conducted during Spring 2022 – Winter 2022/23.

Figure 34. National Grid Performance Metrics Analysis Timeline



Source: Guidehouse analysis

4.2.3.2 Evaluation Methodology

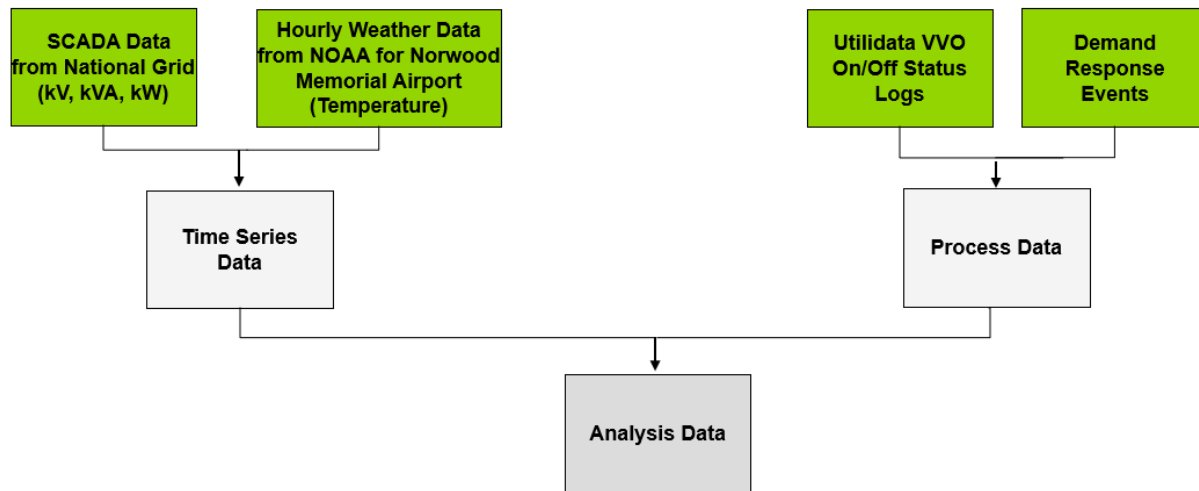
Guidehouse worked with National Grid to collect data necessary to complete the evaluation of VVO Performance Metrics. The sections that follow highlight the analysis data construction, analysis data cleaning, and the analysis approach.

Analysis Data Construction

To assess Performance Metrics, Guidehouse constructed an analysis dataset. This dataset was used in regression modeling to assess changes in multiple outcome variables, such as energy and peak demand. Figure 35 summarizes the data integration process used to construct the analysis dataset for the National Grid Performance Metrics analysis.⁵⁹

⁵⁹ Guidehouse receives different data types and structures from the EDCs for estimating impacts across the performance metrics. These differences were minimized as much as possible, but any differences that remain may affect the comparability of performance metrics results across the EDCs.

Figure 35. National Grid Analysis Data Construction Flowchart



Source: Guidehouse

Guidehouse constructed time series and process data to arrive at a final analysis dataset for National Grid Performance Metrics analysis. To construct time series data, the evaluation team first integrated SCADA interval data from National Grid that contained hourly measurements of voltage, real power, and apparent power. The team then integrated hourly dry bulb temperature and hourly cloud cover data from NOAA for Norwood Memorial Airport to arrive at a final time series dataset.⁶⁰

To construct the process data, Guidehouse integrated other VVO system information. Other system information included time-stamped logs of VVO state changes between VVO On (engaged) and Off (disengaged) states from Utilidata, and demand response events during the evaluation period. The time series and process data were then joined to construct a final analysis dataset.

Analysis Data Cleaning

After constructing the analysis dataset, the team conducted data cleaning steps to remove interval data that may bias the estimates of VVO impacts. Table 88 summarizes data observations made by the evaluation team and the resulting data cleaning steps that were executed.

⁶⁰ Norwood Memorial Airport was selected due to it having a quality controlled local climatological dataset and due to its being in close proximity to the National Grid substations evaluated this year. Documentation on the NOAA dataset used in this analysis can be found here: <https://data.noaa.gov/dataset/dataset/quality-controlled-local-climatological-data-qclcd-publication>

Table 88. Data Cleaning Conducted for National Grid Analysis

Data Observation	Data Cleaning Step
Guidehouse identified a handful of periods of repeated, interpolated, and outlier values in kV, kW, and kVA data, as well as periods missing VVO-status data.	Guidehouse removed hours where anomalous data readings were flagged.
Guidehouse identified numerous VVO events that were longer than planned.	To reduce the risk of VVO estimates being biased by imbalance in the sample of VVO On/Off statuses (e.g., overrepresentation of VVO On during winter), Guidehouse removed all VVO events that were three or more days in length (72 hours+).
Even-numbered Maplewood feeders experienced almost no VVO On/Off testing during the evaluation period.	Limited VVO On and Off data streams resulted in the removal of all even-numbered Maplewood feeders from the evaluation of performance metrics.
Due to extensive pauses to VVO On/Off testing, as well as several data outages, there was insufficient data to measure power factor and distribution loss impacts attributed to VVO.	Guidehouse was not able to provide estimates of changes in power factor or distribution losses for any of the substations that underwent VVO On/Off testing during the evaluation period. The power factor and distribution losses results are based on feeders that completed VVO On/Off testing prior to the current evaluation period (i.e., Stoughton).

Source: Guidehouse

Table 89 indicates the number of hours contained in the analysis dataset for the East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem substations. Much of the data removed during data cleaning was due to extended periods over which VVO was engaged or disengaged. Detailed data attrition information is included in Appendix B.10.

Table 89. Count of VVO On, VVO Off, and Removed Hours for National Grid*

Substation	Feeder	VVO On Hours	VVO Off Hours	Hours Removed by Data Cleaning	Spring 2022 – Winter 2022/23 Total
Easton[†]	92W43	255	235	662	1,152
	92W44	255	235	662	1,152
	92W54	255	235	662	1,152
	92W78	255	235	662	1,152
	92W79	255	235	662	1,152
East Bridgewater	797W1	1,278	1,310	6,172	8,760
	797W19	1,323	1,351	6,086	8,760
	797W20	1,323	1,351	6,086	8,760
	797W23	1,278	1,310	6,172	8,760
	797W24	1,323	1,351	6,086	8,760
	797W29	1,278	1,310	6,172	8,760
	797W42	1,278	1,310	6,172	8,760
East Methuen	74L1	2,362	1,692	4,706	8,760
	74L2	2,008	1,908	4,844	8,760
	74L3	2,362	1,692	4,706	8,760
	74L4	2,008	1,908	4,844	8,760
	74L5	2,362	1,692	4,706	8,760
	74L6	2,008	1,908	4,844	8,760
Maplewood	16W1	1,175	1,137	6,448	8,760
	16W2	152	355	8,253	8,760
	16W3	1,175	1,137	6,448	8,760
	16W4	152	355	8,253	8,760
	16W5	1,175	1,137	6,448	8,760
	16W6	152	355	8,253	8,760
	16W7	1,127	1,092	6,541	8,760
	16W8	152	355	8,253	8,760
West Salem[‡]	29W1	1,109	1,249	4,209	6,567
	29W2	1,258	1,378	3,931	6,567
	29W3	1,174	1,275	4,118	6,567
	29W4	1,223	1,339	4,005	6,567
	29W5	1,133	1,150	4,284	6,567
	29W6	752	833	4,982	6,567

* Stoughton completed VVO On/Off testing prior to the evaluation period and was not subject to regression analysis to estimate performance metrics.

[†] Easton began VVO On/Off testing in Winter 2022/23, limiting the total number of possible hours able to be used in the analysis.

‡ West Salem began VVO On/Off testing in Summer 2022, limiting the total number of possible hours able to be used in the analysis.

Source: Guidehouse

Analysis Approach

After the analysis data was constructed and cleaned, Guidehouse conducted regression modeling to assess the impacts of VVO on measured feeder-level energy and voltage. Equation 5-2 and Equation 5-3 in the Appendix summarizes the regression model used to estimate energy and voltage as a function of VVO.

To inform the regression model specification for estimation of energy and voltage as a function of VVO, Guidehouse conducted further inspection of the data to control for exogenous patterns. Table 90 summarizes observations made during this inspection and the resulting data analysis steps that were implemented.

Table 90. Data Analysis Summary for National Grid

Data Observation	Data Analysis Step
Load and voltage data exhibit similar curvature from day-to-day, with load and voltage profiles for any two adjacent days being largely similar	A 24-hour lag of load (for energy models) and voltage (for voltage models) was included as a predictor of load (for energy models) and voltage (for voltage models)
Numerous feeders had a large nominal capacity of connected solar facilities.	Cloud cover and daylight hour data from NOAA were integrated and included in regression analysis to control for hourly generation observed under an array of solar conditions.
Large differences in energy and voltage were observed between most months in the analysis period	Monthly fixed effects were incorporated into regression modeling to capture energy and voltage differences observed across each month.
Numerous feeders were identified with non-residential customers making up a large portion of load, with drops in measured load during holidays and non-business hours.	Day type (i.e., weekday or weekend day) and hour of day fixed effects were incorporated into regression models to capture typical load shapes by day type and control for large drops in demand observed during non-business hours.
Numerous demand response events were called during the Spring 2022 – Winter 2022/23 M&V test period.	Intervals that occurred during demand response events were flagged in the regression analysis to control for changes in energy and voltage associated with demand response events.

Source: Guidehouse

4.2.3.3 Performance Metrics Results

This section summarizes the Performance Metrics results for National Grid. Each of the subsections separately summarize the evaluation results for each performance metric.

PM-1: Baseline

As detailed in the Stage 3 Plan filed December 1, 2020, Guidehouse provides a baseline using data collected when VVO was disabled during the evaluation period, which spans Spring 2022 – Winter 2022/23. Table 91 provides the energy baseline calculated using VVO Off data collected during Spring 2022 – Winter 2022/23.

Table 91. National Grid VVO Energy Baseline

Metric	Baseline Total Energy Use
Baseline Energy	882,631 MWh

Source: Guidehouse analysis

To calculate total baseline energy use, Guidehouse used regression models to first estimate energy savings that occurred for each feeder during Spring 2022 – Winter 2022/23. This resulted in an estimate of how energy use changed as a function of VVO. From there, Guidehouse fitted the model to a case in which VVO was off for the entirety of Spring 2022 – Winter 2022/23 for each VVO feeder, holding all other observable conditions constant (e.g., allowing weather to remain as it actually was when VVO was engaged). Guidehouse then summed this calculated energy usage across all hours and feeders to calculate a baseline total energy use for the Spring 2022 – Winter 2022/23 evaluation period. Baseline energy use is provided by VVO feeder in Appendix 5.3B.11.

PM-2: Energy Savings

Table 92 provides the evaluated energy savings for National Grid for the spring season, summer season, fall season, winter season, and Spring 2022 – Winter 2022/23 overall. The ± figure indicate 90% confidence bounds associated with energy savings estimates.

Table 92. National Grid VVO Net Energy Reduction During Actual VVO On Hours

Season	Net Energy Reduction	
	MWh †	% ‡
Spring [^]	169 ± 127 MWh	0.37 ± 0.32%
Summer ^{^^}	317 ± 92 MWh	1.44 ± 0.44%
Fall ^{^^}	569 ± 76 MWh	3.33 ± 0.56%
Winter	533 ± 263 MWh	0.91 ± 0.30%
Spring 2022 – Winter 2022/23 Total [†]	1,867 ± 302 MWh	0.84 ± 0.15%

† Total energy savings provided for each period is the sum of each feeder’s energy savings within that period. Due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row.

‡ Percentage energy savings provided for each period is the load-weighted average of percentage savings estimated for each feeder.

[^]Easton and West Salem feeders are excluded from Spring estimate due to not having begun on/off testing.

^{^^}In addition to being excluded from Spring estimate, Easton feeders are also excluded from the Summer and Fall estimates due to not having begun on/off testing.

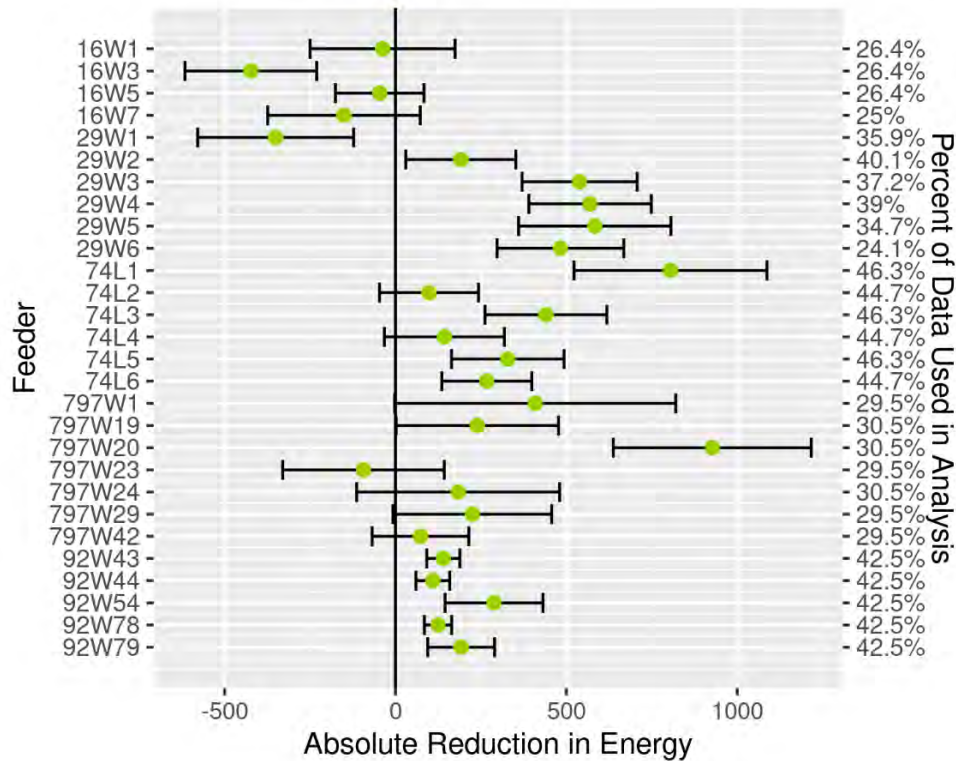
Source: Guidehouse analysis

Regression estimates indicate a statistically significant change in energy use associated with VVO, with 1,867 MWh (0.84%) energy savings realized during the Spring 2022 – Winter 2022/23 M&V period.⁶¹ Regression estimates indicate that there were statistically significant reductions in energy use during all meteorological seasons. The Fall season saw the largest reduction in energy, with a value of 569 MWh, and the Spring saw the smallest reduction in energy, with a value of 169 MWh.

⁶¹ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged in the clean analysis data between March 1, 2022 and February 28, 2023.

Figure 36 indicates the net energy reductions for each National Grid feeder in absolute terms (MWh), with green points indicating each feeder's MWh savings. The whiskers overlaid on each feeder's MWh savings estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. During the Spring 2022 – Winter 2022/23 M&V period, 15 feeders experienced statistically significant reductions in energy. Although included in the aggregate energy impact estimate, Stoughton's individual feeder results are not presented here, as average hourly impacts estimates are unchanged from last year's evaluation.

Figure 36. Net Energy Reduction (MWh) for National Grid VVO Feeders*

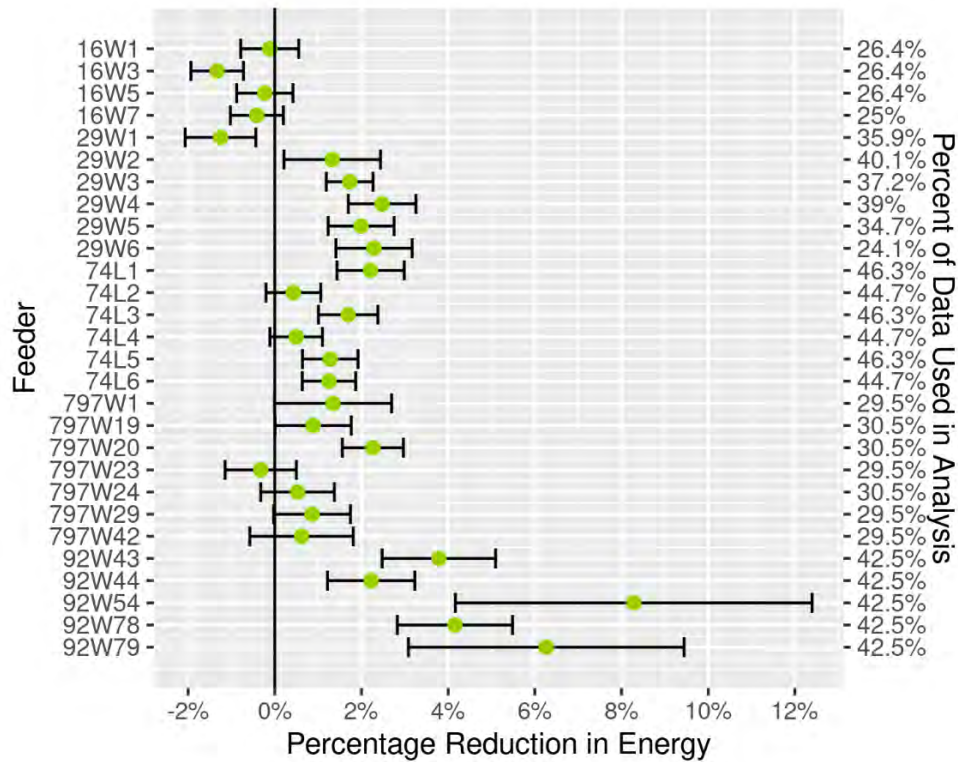


* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are removed from the analysis data, as only 5 weeks of On/Off testing took place during the evaluation period. Additionally, Easton feeders only contain estimates from Winter 2023 testing and West Salem feeders only contain estimates from the Summer 2022 – Winter 2023 seasons.

Source: Guidehouse analysis

Figure 37 indicates the net energy reductions for each National Grid feeder in percentage terms, with green points indicating each feeder's percentage MWh savings. The whiskers overlaid on each feeder's percentage MWh savings estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 37. Net Energy Reduction (%) for National Grid VVO Feeders*



* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are removed from the analysis data, as only 5 weeks of On/Off testing took place during the evaluation period. Additionally, Easton feeders only contain estimates from Winter 2023 testing and West Salem feeders only contain estimates from the Summer 2022 – Winter 2023 seasons.

Source: Guidehouse analysis

To further understand impacts, Guidehouse estimated changes in voltage associated with VVO, Table 93 provides the evaluated voltage reductions for National Grid, with 90% confidence bounds associated with voltage reductions estimates indicated by the ± figure. Regression estimates indicate a statistically significant reduction in voltage associated with VVO, with a 0.08 kV (0.62%) voltage reduction realized during the Spring 2022 – Winter 2022/23 M&V period.

Table 93. National Grid VVO Average Hourly Voltage Reduction*

Average Hourly Reduction (kV)	Average Hourly Reduction (%)
0.08 ± <0.001 kV	0.62 ± 0.01%

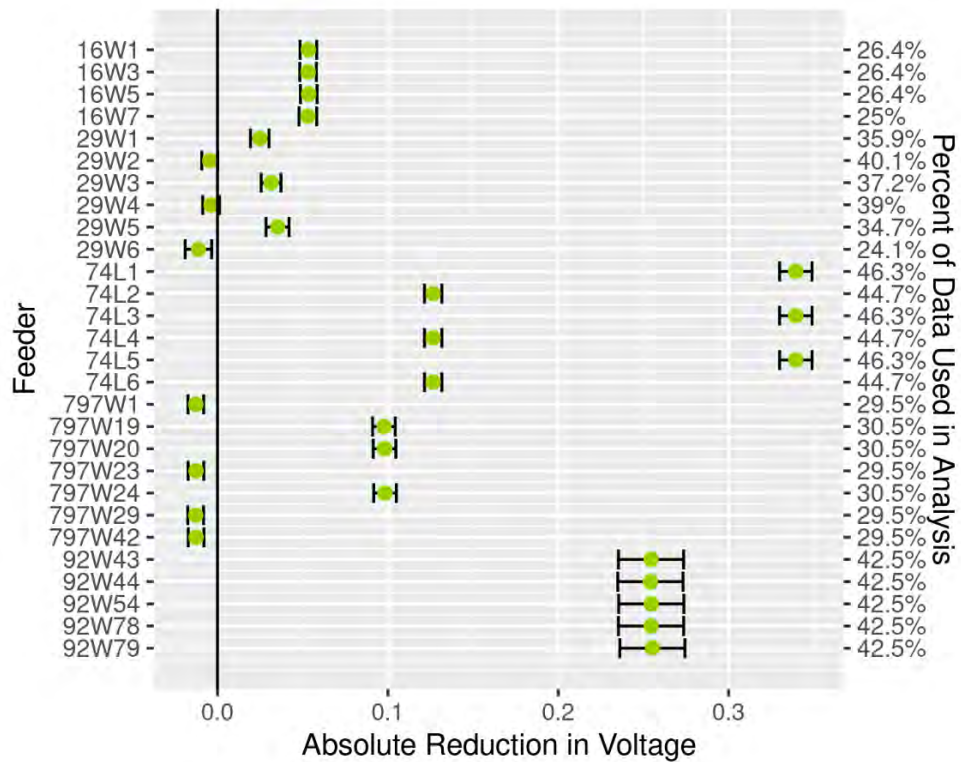
* Absolute and percentage voltage reductions provided for each period is the load-weighted average of absolute and percentage voltage reductions estimated for each feeder.

Source: Guidehouse analysis

Figure 38 indicates the average hourly voltage reductions for each National Grid feeder, with green points indicating each feeder's voltage reduction. The whiskers overlaid on each feeder's voltage reduction estimate provide the associated 90% confidence intervals, and the dashed

line denotes the weighted average voltage reduction. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. The majority of feeders experienced a significantly significant average hourly voltage reduction when VVO was engaged.

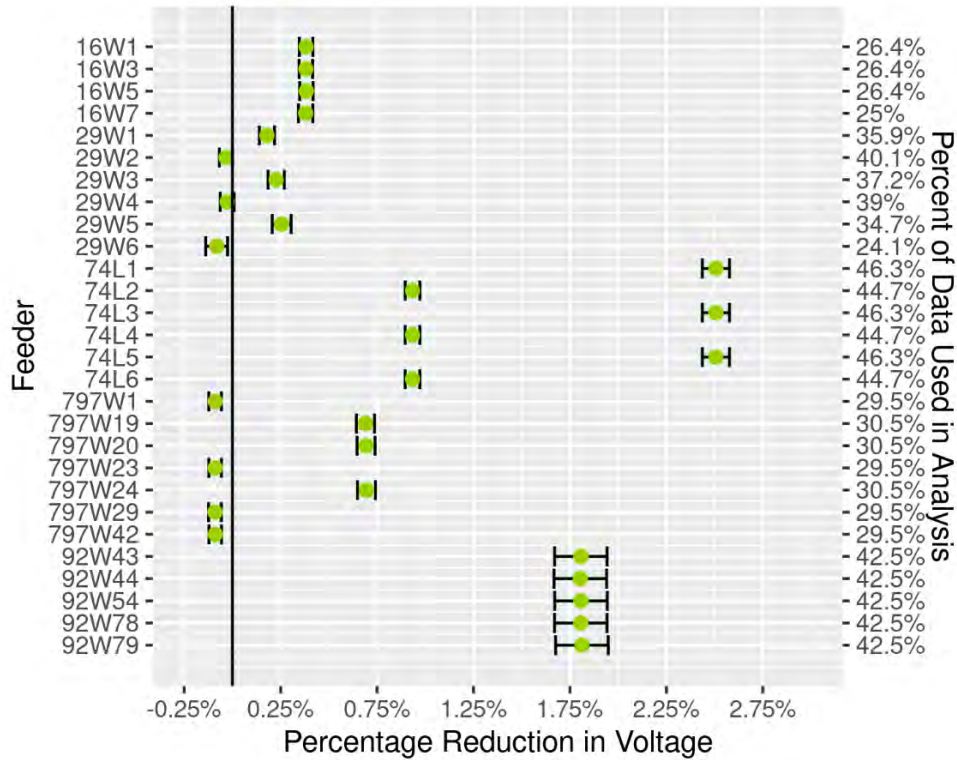
Figure 38. Average Hourly Voltage Reduction (kV) for National Grid VVO Feeders*



* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are removed from the analysis data, as only 5 weeks of On/Off testing took place during the evaluation period. Additionally, Easton feeders only contain estimates from Winter 2023 testing and West Salem feeders only contain estimates from the Summer 2022 – Winter 2023 seasons.
 Source: Guidehouse analysis

Figure 39 indicates the net voltage reductions for each National Grid feeder in percentage terms, with green points indicating each feeder's percentage voltage reduction. The whiskers overlaid on each feeder's percentage voltage reduction estimate provide the 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. Similar to absolute voltage impacts, the majority of feeders experienced a statistically significant increase in voltage when VVO was enabled.

Figure 39. Average Hourly Voltage Reduction (%) for National Grid VVO Feeders*



* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are removed from the analysis data, as only 5 weeks of On/Off testing took place during the evaluation period. Additionally, Easton feeders only contain estimates from Winter 2023 testing and West Salem feeders only contain estimates from the Summer 2022 – Winter 2023 seasons.
 Source: Guidehouse analysis

Following an estimation of percentage energy savings and percentage voltage reductions attributed to VVO, Guidehouse calculated the associated CVR factors for each feeder. The CVR factor, which is the ratio of percentage energy savings to percentage voltage reductions, can provide an estimate of the percentage energy savings possible with each percent voltage reduction. Equation 5-1 in the Appendix highlights how the CVR factor is calculated using an estimated percentage change in energy and in voltage. Table 94 provides the CVR factor for National Grid.

Table 94. National Grid VVO CVR Factor*

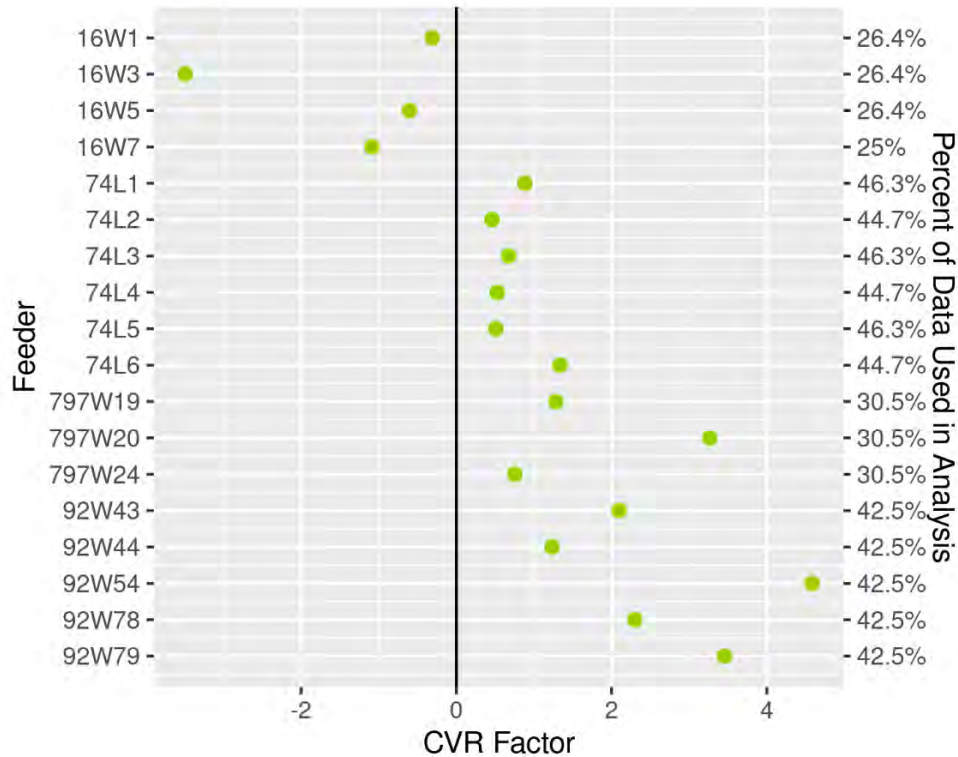
CVR Factor
0.36

* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are excluded from the entire analysis due to poor VVO signal data quality. The CVR factor presented in this table is the load-weighted average of CVR factors for all analysis feeders that experienced a minimum change in voltage of $\pm 0.25\%$. Certain feeders with changes in voltage greater than $\pm 0.25\%$ were also excluded from aggregated CVRf calculations due to highly unstable voltage and energy responses to VVO On / Off testing. Feeders excluded from this calculation are all West Salem 29W feeders and East Bridgewater feeders 797W1, 797W23, 797W23, and 797W42.

Source: Guidehouse analysis

From prior experience evaluating VVO, Guidehouse expects a CVR factor in the neighborhood of 0.80 from a year of VVO M&V testing. Based on evaluation findings, the CVR factor for the Spring 2022 – Winter 2022/23 time period was 0.36. Figure 40 provides the CVR factors for the Spring 2022 – Winter 2022/23 M&V period for each feeder. Although included in the aggregate CVRf estimate, Stoughton’s individual feeder results are not presented here, as CVRf estimates are unchanged from last year’s evaluation.

Figure 40. National Grid VVO CVR Factors*



* Maplewood feeders 16W2, 16W4, 16W6, and 16W8 are excluded from the entire analysis due to poor VVO signal data quality. The CVR factor presented in this table is the load-weighted average of CVR factors for all analysis feeders that experienced a minimum change in voltage of $\pm 0.25\%$. Certain feeders with changes in voltage greater than $\pm 0.25\%$ were also excluded from aggregated CVRf calculations due to highly unstable voltage and energy responses to VVO On / Off testing. Feeders excluded from this calculation are all West Salem 29W feeders and East Bridgewater feeders 797W1, 797W23, 797W23, and 797W42.

Source: Guidehouse analysis

PM-3: Peak Demand Impact

Guidehouse evaluated the impact of VVO during peak demand, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. Not all analysis feeders are included in peak demand impact tables and figures (see footnote below Table 95) Table 95 details the evaluated peak demand impact across all feeders in absolute and percentage terms. Although included in the aggregate peak demand impact, Stoughton’s individual feeder results are not presented here, as average hourly impacts estimates are unchanged from last year’s evaluation.

Table 95. National Grid Average Reduction in Peak Demand

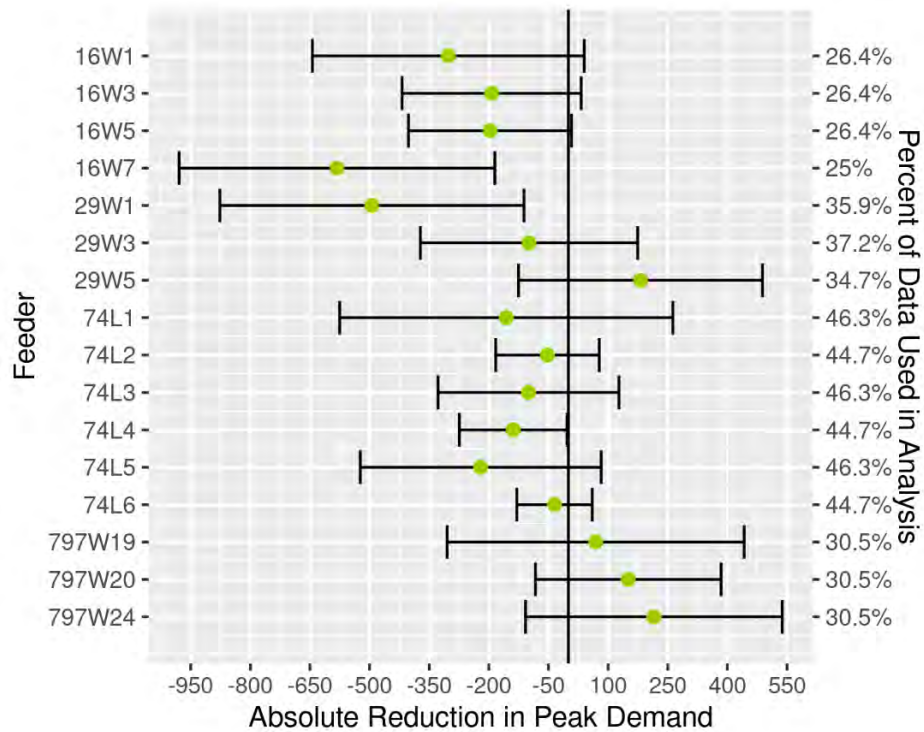
Peak Load Reduction (kW)†	Peak Load Reduction (%)†
-2,189 ± 1,173 kW	-2.41 ± 1.28%

† The percentage peak load reduction presented in this table is the load-weighted average of percentage peak load reductions estimated for each feeder. Feeders with statistically insignificant estimates, or those unreliable standard error estimates associated with VVO, are excluded from the estimate of peak demand reductions. These include Maplewood 16W2, 16W4, 16W6, and 16W8, West Salem 29W2, 29W4, 29W6, and East Bridgewater 797W1, 797W23, 797W29, and 797W42.

Source: Guidehouse analysis

Figure 41 indicates the load reductions measured in kW realized during the peak load period, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. The whiskers overlaid on each feeder’s absolute load reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant. None of the feeders included in the analysis experienced a statistically significant reduction in peak load.

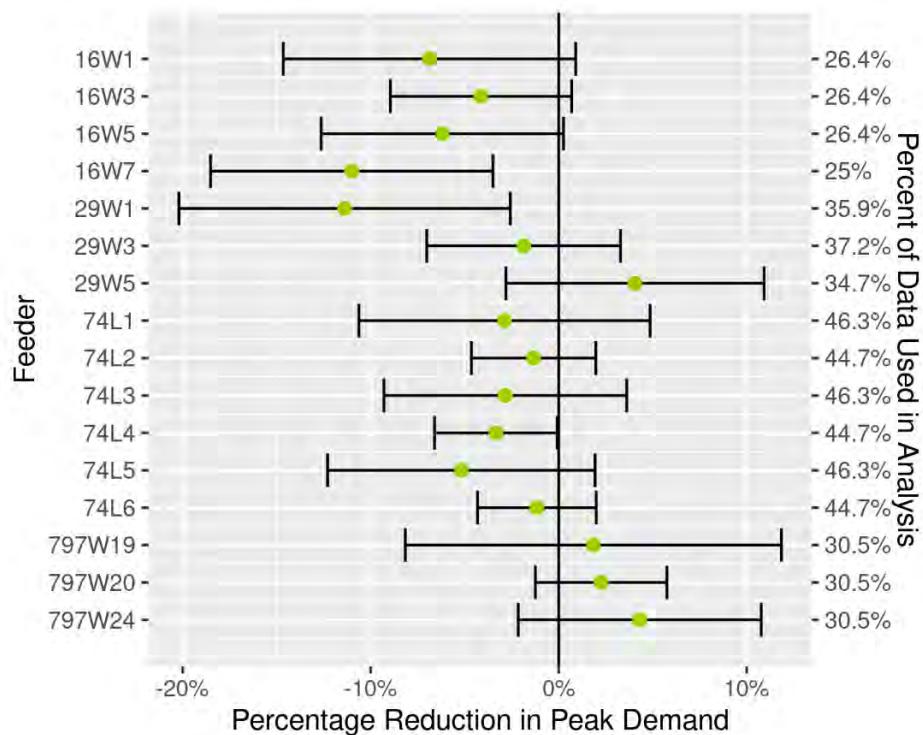
Figure 41. National Grid Reduction in Peak Load (kW)*



* Feeders with statistically insignificant estimates, or those unreliable standard error estimates associated with VVO, are excluded from the estimate of peak demand reductions. These include Maplewood 16W2, 16W4, 16W6, and 16W8, West Salem 29W2, 29W4, 29W6, and East Bridgewater 797W1, 797W23, 797W29, and 797W42.
 Source: Guidehouse analysis

Figure 42 indicates the percentage load reductions realized during the peak load period, defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays. The whiskers overlaid on each feeder's percent load reduction estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 42. National Grid Reduction in Peak Demand (%)*



* Feeders with statistically insignificant estimates, or those unreliable standard error estimates associated with VVO, are excluded from the estimate of peak demand reductions. These include Maplewood 16W2, 16W4, 16W6, and 16W8, West Salem 29W2, 29W4, 29W6, and East Bridgewater 797W1, 797W23, 797W29, and 797W42.
 Source: Guidehouse analysis

Eversource and National Grid saw increases in peak demand between 1:00 p.m. and 5:00 p.m. on non-holiday summer weekdays. This was a finding in both the previous and current evaluations (i.e., PY 2021 and PY 2022). This may be attributable to a number of factors that were present during those hours:

- There is variation in customer types and their relative load contributions depending on the time of day. If feeder load was more heavily comprised of end-uses with constant power load during peak hours as currently defined, a reduction in voltage can be met by a corresponding increase in amperage, which could appear as an increase in MW load at the feeder head-end. For instance, if feeder load was more heavily comprised of commercial or industrial load during those hours, industrial equipment could have actually become more inefficient with a drop in voltage, which could appear as an increase in MW load at the feeder head-end.

- Distribution generation, which has considerable generation during early- to mid-afternoon hours during the summer, may have caused unintended interactions with the VVO scheme.

The period of 1:00 p.m. to 5:00 p.m. for non-holiday summer weekdays was based on ISO-NE’s peak demand definition, which was identified in the Stage 3 Evaluation Plan and has been used since the PY 2021 evaluation report. This was intended to be consistent with energy efficiency evaluations. Guidehouse has reviewed other time frames (e.g., 6:00 p.m. to 10:00 p.m.) that better represent the average feeder peaks for those feeders with VVO enabled. However, to be consistent with the Stage 3 Evaluation Plan and prior evaluation reports, this evaluation included the results for the 1:00 p.m. to 5:00 p.m. timeframe. Guidehouse will further explore alternative definitions for peak periods to determine the proper definition moving forward.

PM-4: Distribution Losses

Guidehouse evaluated reduction in distribution losses as a function of VVO during the Spring 2022 – Winter 2022/23 M&V period. There were some feeders with very little data where kW was greater than 75% of annual peak load for kVA. Given that power factor is an input for the distribution losses equation, these feeders were ultimately removed from the distribution losses calculation, as they had fewer than 100 hours available for use in the regression modeling. The methodology for calculating the percent reduction in distribution losses is shown in Appendix 5.3B.9. Table 96 details the evaluated percentage reduction in distribution losses for each National Grid feeder with sufficient data quality.

Changes in distribution losses could not be estimated for feeders going through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period due to data outages and prolonged pauses to On/Off testing during periods of greater demand. Therefore, the results in Table 96 and Figure 43 only include VVO feeders that completed On/Off testing prior to the Spring 2022 – Winter 2022/23 M&V period (i.e., Stoughton) and informed by last year’s estimates.

Table 96. National Grid Reduction in Distribution Losses

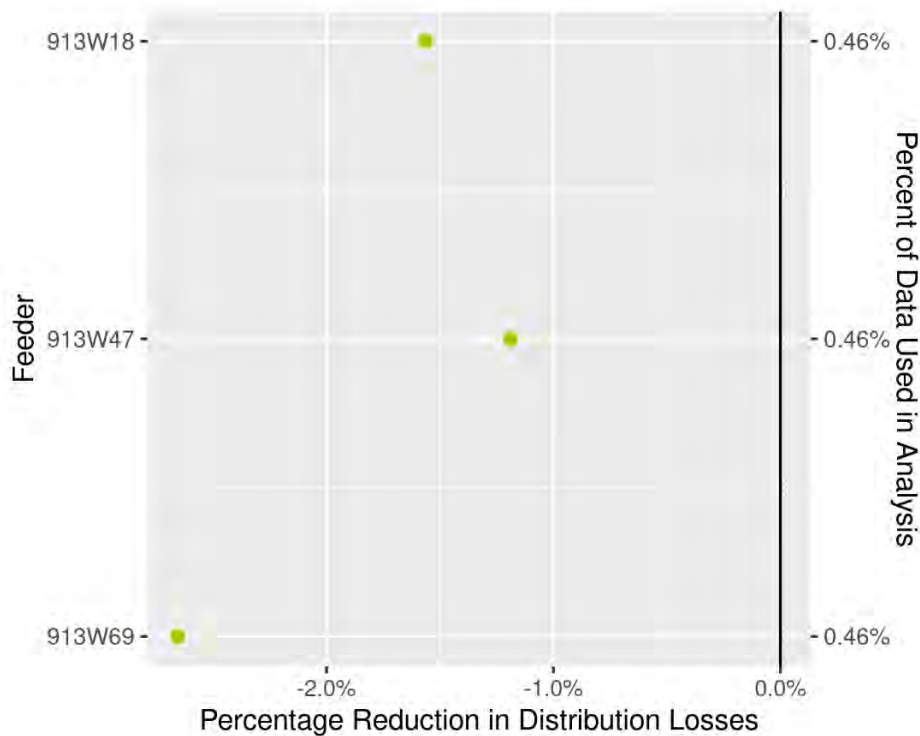
Reduction in Distribution Losses (%)*
-1.95%

* The change in distribution losses presented in this table is the load-weighted average of reduction in distribution losses estimated for each feeder.

Source: Guidehouse analysis

Figure 43 indicates the percentage reduction in distribution losses.

Figure 43. National Grid Reduction In Distribution Losses (%)*



* Changes in power factor and distribution losses could not be estimated for substations going through VVO On/Off testing during Spring 2022 through Winter 2022/23 due to data quality issues. Results presented for these metrics are based off of VVO substations that completed VVO On/Off testing prior to this evaluation period. For this evaluation period, the only substation to conclude On/Off testing is Stoughton.

Source: Guidehouse analysis

PM-5: Power Factor

Guidehouse evaluated the impact on power factor associated with VVO during the Spring 2022 – Winter 2022/23 M&V period. Changes in power factor were analyzed during periods where power was greater than 75% of feeder-specific annual demand. Table 97 details the evaluated change in power factor for each National Grid feeder with sufficient data quality.⁶²

Changes in power factor could not be estimated for feeders going through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period due to data outages and prolonged pauses to On/Off testing during periods of greater demand. Therefore, the results in Table 97 and Figure 44 only include VVO feeders that completed On/Off testing prior to the Spring 2022 – Winter 2022/23 M&V period (i.e., Stoughton) and informed by last year’s estimates.

⁶² There were some feeders with very little data where kW was greater than 75% of annual peak load for kVA. These feeders were ultimately removed from the power factor models, as they had fewer than 100 hours available for use in regression modeling.

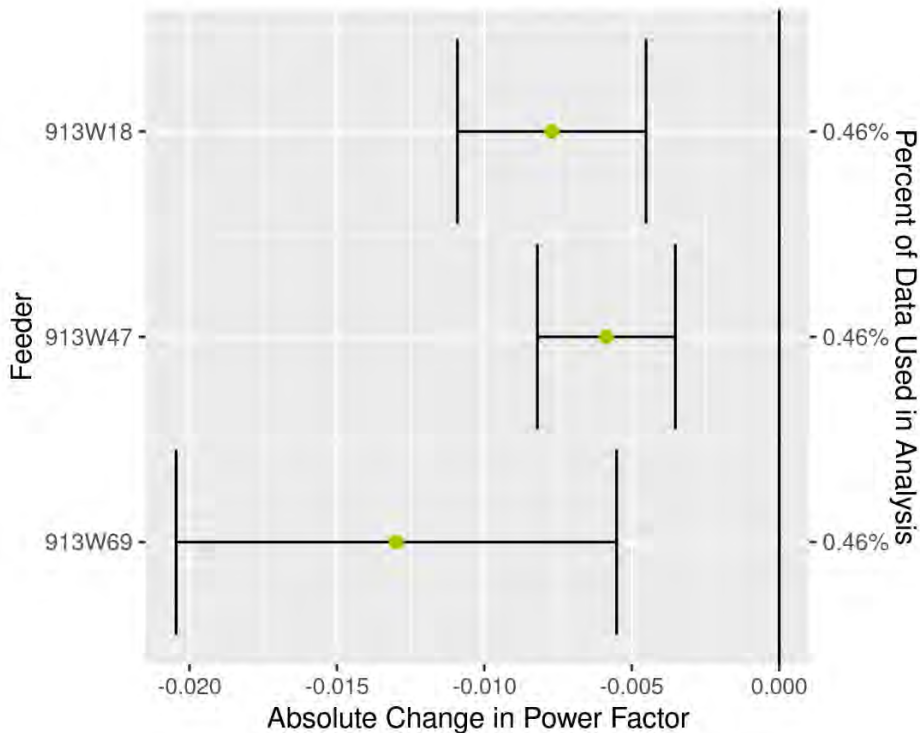
Table 97. National Grid VVO Average Hourly Power Factor Change*

Change in Power Factor	Change in Power Factor (%)
-0.01 ± 0.002	-0.96 ± 0.20%

* Power factor change presented in this table is the load-weighted average of power factor changes estimated for each feeder.
 Source: Guidehouse analysis

Figure 44 indicates the change in power factor for each National Grid feeder in absolute terms, with green points indicating each feeder’s absolute power factor change. The whiskers overlaid on each feeder’s absolute power factor change estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 44. National Grid Absolute Change in Power Factor*

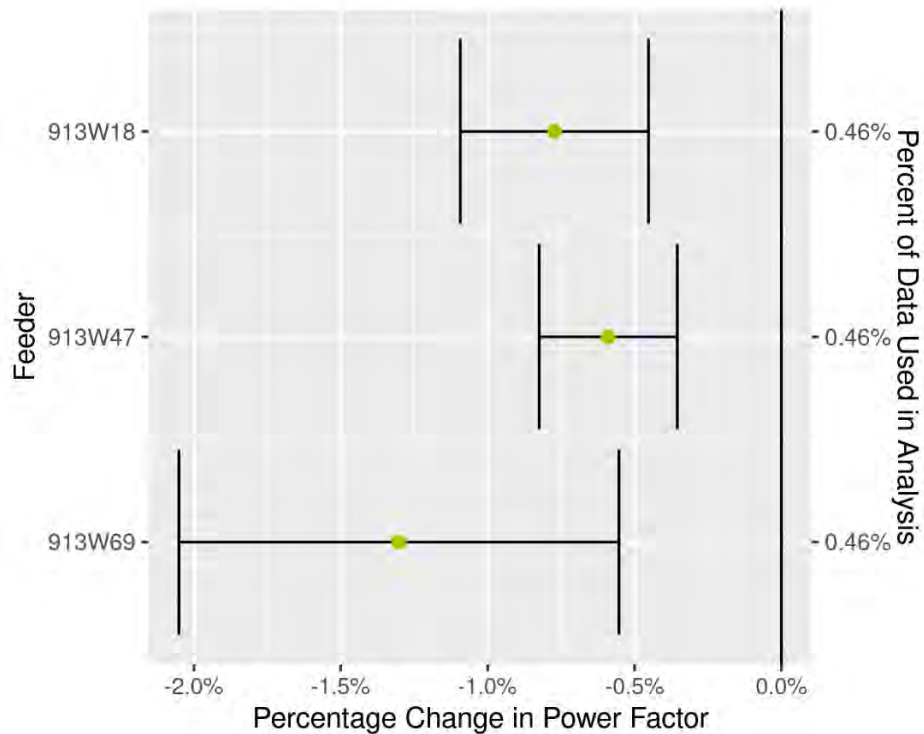


* Changes in power factor and distribution losses could not be estimated for substations going through VVO On/Off testing during Spring 2022 through Winter 2022/23 due to data quality issues. Results presented for these metrics are based off VVO substations that completed VVO On/Off testing prior to this evaluation period. For this evaluation period, the only substation to conclude On/Off testing is Stoughton.

Source: Guidehouse analysis

Figure 45 indicates the change in power factor for each National Grid feeder in percentage terms, with green points indicating each feeder’s percentage power factor change. The whiskers overlaid on each feeder’s percentage power factor change estimate provide the associated 90% confidence intervals. Where the confidence interval crosses the zero line, results may be interpreted as statistically insignificant.

Figure 45. National Grid Percentage Change in Power Factor*



* Changes in power factor and distribution losses could not be estimated for substations going through VVO On/Off testing during Spring 2022 through Winter 2022/23 due to data quality issues. Results presented for these metrics are based off of VVO substations that completed VVO On/Off testing prior to this evaluation period. For this evaluation period, the only substation to conclude On/Off testing is Stoughton.

Source: Guidehouse analysis

PM-6: GHG Emissions

After evaluating energy savings attributed to VVO, Guidehouse calculated the resulting emissions reductions. For 2022, emissions reductions were determined to be 0.34 metric tons of emissions per MWh. This was calculated drawing the 2019 value from DPU 18-110 – DPU 18-119, Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plan for 2019 – 2021, the 2025 value from DPU 21-120 – DPU 21-129, Massachusetts Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan for 2022-2024, and then interpolating the 2022 value from these two sources.⁶³

Table 98 provides emissions reductions associated with VVO, with 90% confidence bounds indicated by the ± figure.

⁶³ 2019 Emissions factors can be found on page 201 of Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plans for 2019 – 2021 <https://ma-eeac.org/wp-content/uploads/Exh.-1-Final-Plan-10-31-18-With-Appendices-no-bulk.pdf>. 2025 emissions factors can be found on page 326 of Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plans for 2022 – 2024 <https://ma-eeac.org/wp-content/uploads/Exhibit-1-Three-Year-Plan-2022-2024-11-1-21-w-App-1.pdf>

Table 98. National Grid VVO Emissions Reductions During Actual VVO On Hours

Metric	CO ₂
Spring 2022 – Winter 2022/23 Emissions Reduction	645 ± 103 tons

Source: Guidehouse analysis

PM-7: Voltage Complaints

Guidehouse received voltage complaint logs from National Grid to facilitate Performance Metrics analysis. Guidehouse tabulated voltage complaints received by VVO feeder between 2016 and Q1 2023, as well as the Spring 2022 – Winter 2022/23 M&V period.⁶⁴ Discussion below highlights key observations for voltage complaints, comparing the count of voltage complaints received during Spring 2022 – Winter 2022/23 to the average number of voltage complaints from the 2016–2017 baseline period.

Table 99 summarizes voltage complaints for the Easton substation. Looking at 2016–2017 baseline period,⁶⁵ there were about 15 voltage complaints per year. Based on voltage complaints data received, a total of 12 voltage complaints were reported along the Easton feeders during 2022, slightly below the baseline period average number of complaints per year.

Table 99. Count of Voltage Complaints for Easton

Number of Voltage Complaints	92W43	92W44	92W54	92W78	92W79	Total
Customers*	1,973	1,779	2,284	1,993	1,655	9,684
Baseline†	0	3	4	3	5	15
2022	1	2	4	2	3	12

* Count of customers served by each feeder and the baseline number of voltage complaints was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

Source: Guidehouse analysis

Table 100 summarizes voltage complaints for the East Bridgewater substation. Looking at 2016–2017 baseline period, there were about 25 voltage complaints per year. Based on voltage complaints data received, a total of 25 voltage complaints were reported along the East Bridgewater feeders during 2022, representing no change from the baseline period average number of complaints per year.

⁶⁴ Since 2016 is the earliest date at which voltage complaints data are available, Guidehouse limited its summary of voltage complaints to January 1, 2016 through February 28, 2023.

⁶⁵ Guidehouse presents a comparison of complaints between the 2016–2017 period and winter 2020/21 M&V period. For new VVO feeders that begin receiving VVO investments beginning in 2021, Guidehouse recommends that a 3-year moving average (i.e. 2019–2021) be used instead of an average for the time period spanning 2016 through 2017, as conditions in 2016 through 2017 may not accurately reflect baseline conditions immediately preceding deployment of VVO investments.

Table 100. Count of Voltage Complaints for East Bridgewater

Number of Voltage Complaints	797W1	797W19	797W20	797W23	797W24	797W29	797W42	Total
Customers*	2,821	2,563	1,717	2,650	2,583	2,338	1,239	15,911
Baseline†	7	1	5	1	5	3	4	25
2022	4	2	5	5	7	2	0	25

* Count of customers served by each feeder and the baseline number of voltage complaints was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

Source: Guidehouse analysis

Table 101 summarizes voltage complaints for the East Methuen substation. Voltage complaints vary considerably across years and VVO feeders, ranging from 14 complaints in 2019 to 35 complaints in 2016. Looking at 2016–2017 baseline period, there were 59 voltage complaints received, amounting to about 30 voltage complaints per year. Based on voltage complaints data received, a total of 15 voltage complaints were reported along the East Methuen feeders during 2022, 50% below the baseline period average number of complaints per year.

Table 101. Count of Voltage Complaints for East Methuen Substation

Number of Voltage Complaints	74L1	74L2	74L3	74L4	74L5	74L6	Total
Customers*	3,088	1,574	3,355	1,609	3,162	1,781	14,569
2016	2	5	10	7	9	2	35
2017	8	1	5	2	6	2	24
Baseline†	5	3	8	5	8	2	30
2018	3	0	2	3	5	3	16
2019	5	0	2	2	3	2	14
2020	1	1	7	3	2	2	16
2021	3	0	2	1	3	1	10
2022	2	3	7	1	1	1	15

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2016 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 102 summarizes voltage complaints for the Maplewood substation. Voltage complaints vary considerably across years and VVO feeders, ranging from 20 complaints in 2016 to 50 complaints in 2019. Looking at 2016–2017 baseline period, there were 51 voltage complaints received, amounting to about 26 voltage complaints per year. Based on voltage complaints data received, a total of 41 voltage complaints were reported along the Maplewood feeders during the 2022, above the baseline period average number of complaints per year.

Table 102. Count of Voltage Complaints for Maplewood Substation

Number of Voltage Complaints	16W1	16W2	16W3	16W4	16W5	16W6	16W7	16W8	Total
Customers*	3,683	4,674	3,352	1,131	1,710	5,627	3,891	3,427	27,495
2016	4	3	0	2	3	4	2	2	20
2017	6	3	2	0	5	6	4	5	31
Baseline†	5	3	1	1	4	5	3	4	26
2018	6	3	1	4	1	6	6	7	34
2019	7	10	5	3	1	8	6	10	50
2020	6	7	4	4	3	10	6	8	48
2021	2	7	0	1	1	4	3	3	21
2022	3	6	0	3	0	7	4	18	41

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2016 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 103 summarizes voltage complaints for the Stoughton substation. Voltage complaints vary considerably across years and VVO feeders, ranging from 3 complaints in 2021 to 32 complaints in 2019. Looking at 2016–2017 baseline period, there were 52 voltage complaints received, amounting to about 26 voltage complaints per year. Based on voltage complaints data received, a total of 22 voltage complaints were reported along the Stoughton feeders during the 2022, below the baseline period average number of complaints per year

Table 103. Count of Voltage Complaints for Stoughton Substation

Number of Voltage Complaints	913W17	913W18	913W43	913W47	913W67	913W69	Total
Customers*	1,350	1,504	2,132	1,796	755	3,603	11,140
2016	2	7	5	5	2	11	32
2017	1	8	5	1	1	4	20
Baseline†	2	8	5	3	2	8	26
2018	8	1	6	0	1	7	23
2019	4	3	4	2	0	1	14
2020	3	3	3	6	6	3	24
2021	1	2	0	0	0	0	3
2022	0	3	7	6	2	4	22

* Count of customers served by each feeder was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

† The baseline number of voltage complaints is calculated as the average number of voltage complaints between 2016 and 2017, rounded up to the nearest whole number

Source: Guidehouse analysis

Table 104 summarizes voltage complaints for the West Salem substation. Looking at 2016–2017 baseline period, there were 41 voltage complaints per year. Based on voltage complaints data received, a total of 23 voltage complaints were reported along the West Salem feeders during 2022, quite below the baseline period average number of complaints per year.

Table 104. Count of Voltage Complaints for West Salem Substation

Number of Voltage Complaints	29W1	29W2	29W3	29W4	29W5	29W6	Total
Customers*	3,788	1,653	4,286	2,700	2,915	1,426	16,768
Baseline†	16	4	8	1	9	3	41
2022	9	1	5	3	3	2	23

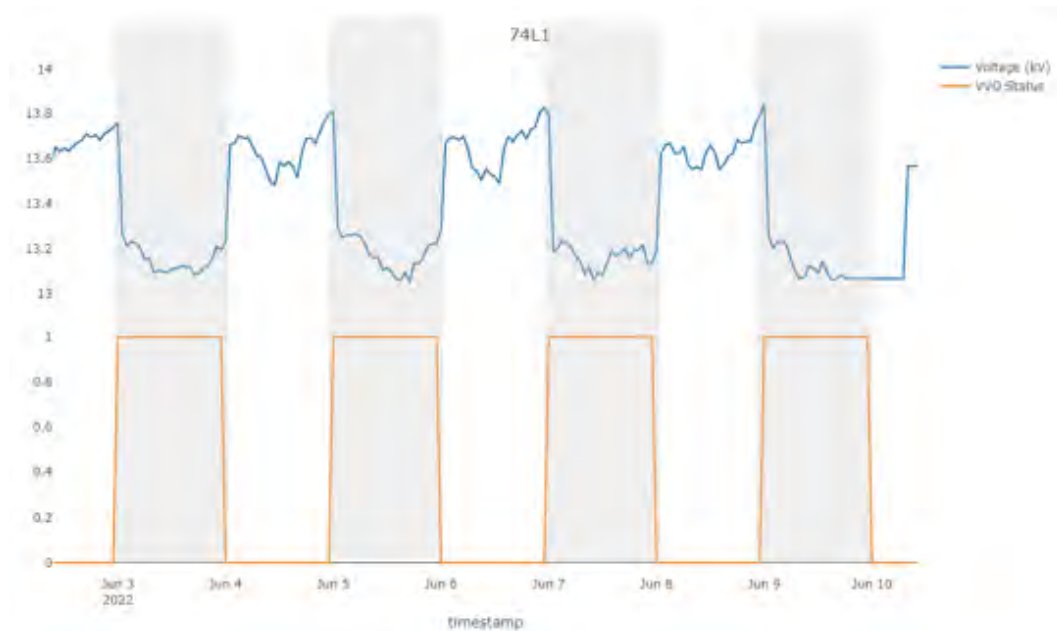
* Count of customers served by each feeder and the baseline number of voltage complaints was extracted from the 2022 D.P.U 23-30 Report, Appendix 22-25.

Source: Guidehouse analysis

4.2.3.4 Additional Investigation of West Salem Feeders

When feeders are undergoing VVO On/Off testing, Guidehouse usually expects to see head-end voltage levels cycling with VVO On/Off status, with voltage levels remaining somewhat higher when VVO is disengaged (e.g., 13.8 Volts) and remaining somewhat lower when VVO is engaged (e.g., 13.2 Volts). An example of the expected voltage response to VVO is shown in Figure 46 below highlights voltage (in blue) and VVO On/Off status (in orange, where VVO status equal to one indicates VVO is engaged) observed for the feeder 74L1 from June 3, 2022 through June 10, 2022.

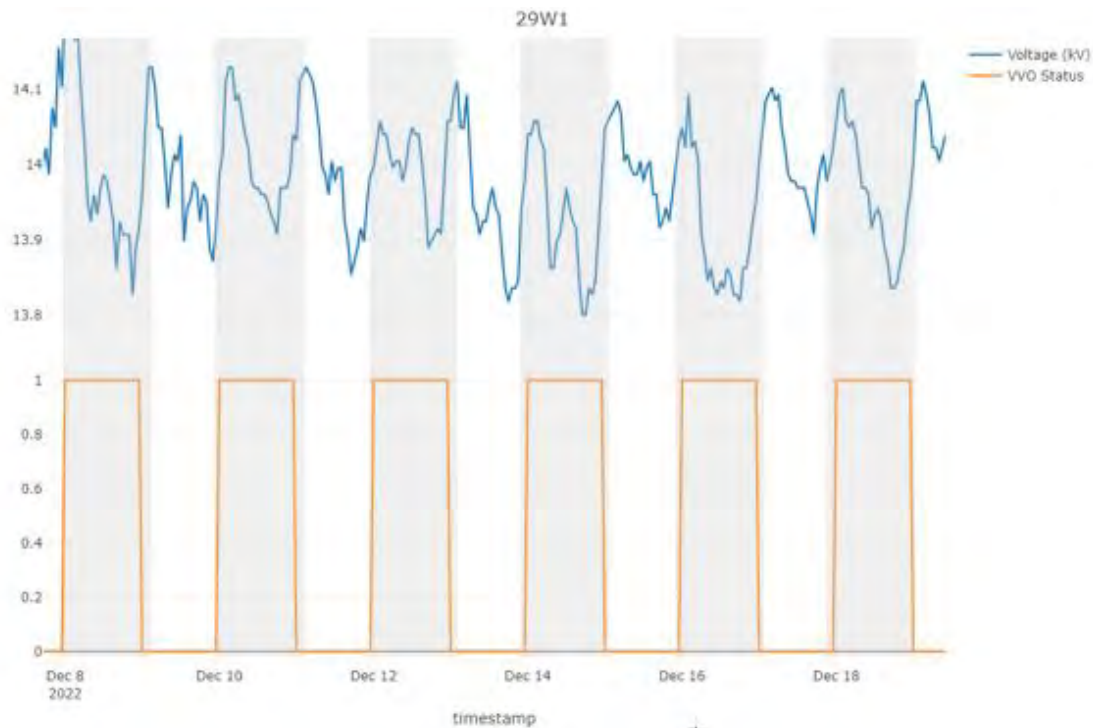
Figure 46. VVO On/Off Testing at Feeder 74L1



Source: Guidehouse analysis

However, Guidehouse has identified additional cases for feeders at the East Bridgewater, Maplewood, and West Salem substations where VVO signals did not correspond with reductions in voltage. One such case is presented in Figure 47 for the feeder 29W1, where voltage (in blue) and VVO On/Off status (in orange, where VVO status equal to one indicates VVO is engaged) are plotted together for the period spanning December 8, 2022, through December 18, 2022.

Figure 47. VVO On/Off Testing at Feeder 29W1



Source: Guidehouse analysis

Figure 47 illustrates that voltage did not fluctuate as expected during VVO On/Off testing throughout the period spanning December 8, 2022, through December 18, 2022. This reduced assessed impacts of VVO across numerous feeders (e.g., feeders at the East Bridgewater, Maplewood, and West Salem substations), as VVO was marked as engaged but was not yielding clear voltage benefits. Guidehouse recommends that National Grid investigate what may be driving these voltage patterns and what, if any, changes to VVO need to occur to ensure that VVO is correctly regulating voltage when VVO is engaged.

4.2.3.5 Key Findings and Recommendations

Guidehouse's VVO evaluation findings indicate that VVO allowed National Grid to realize energy savings and voltage reductions during the Spring 2022 – Winter 2022/23 M&V period. More specifically:

- National Grid VVO feeders realized 0.84% energy savings and 0.62% voltage reductions when VVO was engaged. East Methuen 74L1, 74L3, and 74L5 feeders realized greatest energy and voltage benefits, with 2.5% voltage reduction when VVO was engaged.
- National Grid VVO feeders experienced a statistically significant increase (2.41%) in peak demand when VVO was engaged. In addition, insufficient data during periods of higher demand limited the number of feeders for which Guidehouse could estimate changes in power factor and distribution losses associated with VVO.

In 2023 and beyond, Guidehouse recommends that National Grid:

- Ensure VVO On/Off testing is running according to plan, with limited pauses to the VVO On/Off testing schedule. Across the VVO feeders, one-quarter to one-half of data points were removed due to extended pauses in VVO On/Off testing. For some feeders, this resulted in the vast majority of provided data to be unusable for components of this evaluation (e.g., for estimation of distribution loss and power factor reductions). Sustained On/Off testing will increase the amount of usable data in the evaluation and improve the ability for Guidehouse to provide a comprehensive evaluation of VVO performance metrics.
- Confirm adjustments to VVO On/Off testing schedule for any VVO feeders prior to implementation. VVO On/Off testing is designed similarly to a Randomized Controlled Trial (RCT), and adjustments to the testing schedule could, potentially, hinder the effectiveness of the testing design and cause biases to evaluation results. Ensuring there is proper balance in the number of VVO on and off hours throughout the evaluation period will allow for Guidehouse to provide a comprehensive and accurate evaluation of VVO performance metrics.
- Continue to investigate how to improve outcomes across VVO feeders. Many feeders underwent no material change in voltage. Correspondingly, energy reduction estimates were small-to-insignificant. These observations may indicate flaws in the VVO control scheme for these feeders. In order to improve VVO performance, Guidehouse recommends that the EDCs continue their efforts to investigate root causes to shortcomings in the VVO control schemes and work with distribution engineers and the VVO vendors to respond accordingly. If needed, Guidehouse can conduct in-depth case studies at these substations further understand shortcomings in the VVO control scheme.

5. Key Findings and Recommendations

The subsections that follow present key findings for VVO Infrastructure Metrics, VVO Performance Metrics, and recommendations for the VVO investment area for each of the EDCs.

5.1 Key Findings for VVO Infrastructure Metrics

Guidehouse's review of Eversource's VVO progress on Term 1 revealed that Eversource was approximately on-track with planned spend and deployment outlined in their *2021 GMP Term Report*. However, some spend and deployment remain in order to complete activities from Term 1. Key findings related to Eversource's progress include:

Device Deployment

- Eversource made headway on deploying 2021 investments in 2022, with Capacitor Banks and Grid Monitoring Line Sensors comprising the bulk of deployed devices. Eversource exceeded plans (25 devices) for Capacitor Banks, as refinements made during the planning and design process placed more priority on Capacitor Banks, less on Regulators, for VVO operation. At the close of 2022, Eversource was awaiting delivery of 3 ordered VVO Regulators from its vendor. Line Sensor and Micro-capacitor deployment also fell short of plans.

Total Spend

- Eversource made substantial progress on PY 2021 work that was planned for 2022. Total spend through the end of 2022 was approximately on track with plans for all device types, with total spend on VVO (\$16.87M) being slightly below planned spend (\$17.23M) laid out for Term 1.

VVO Enablement

- Eversource completed deployment of VVO at four of its six Term 1 plan substations (Agawam, Piper, Podick, and Silver) by the end of 2021, and conducted On/Off testing at these substations throughout 2022. Eversource stopped VVO On/Off testing on these four substations in May 2023, transitioning towards leaving VVO in its enabled state moving forward. Meanwhile, the Gunn and Oswald substations will be VVO enabled in 2023, with On/Off testing to begin shortly thereafter.

PY 2022's VVO Infrastructure Metrics findings show that the EDCs are at varying stages in VVO deployment for Term 2. Details pertaining to device deployment progress, total spend, and VVO enablement progress are shown below:

Device Deployment:

- Eversource did not meet VVO deployment goals for PY 2022. Eversource progress on VVO investments targeted for 2022 through 2025 was comprised of progressing engineering/design work for all VVO device types, as well as planning for future VVO deployments, while awaiting DPU decisions on continued VVO investment for 2022 through 2025. Given limited deployment on Term 2 investments in 2022, Eversource has adjusted plans for the remainder of Term 2, with the majority of deployment and spend activity projected to occur in 2024 and 2025. At the technology-level, planned deployment has

declined for Regulators, Line Sensors, and Microcapacitors, and planned Capacitor Bank deployment has increased slightly. Capacitor Bank deployment has been revised upwards to reflect refinements made during the planning and design process.

- National Grid conducted less deployment than initially planned in PY 2022. A late-2022 DPU decision on preauthorizing 2022 through 2025 investment activity, resource constraints, and vendor lead times were all key contributors to this outcome. In response to lower-than-expected deployment in 2022, National Grid has accelerated its deployment timeline for 2023 through 2025. National Grid has also adjusted total deployment plans for numerous device types, increasing projected deployment for Capacitor Banks, Line Sensors, and LTC Controls, while reducing projected deployment for Regulators. National Grid cites that these revisions are primarily due to the VVO planning work that has been conducted since the 2022-2025 GMP was filed.
- Unitil deployment was below plans for 2022, with variation by technology. Unitil was on-track with deployment of VVO Capacitor Banks and Line Sensors in 2022, deploying 100% and 210% of planned units, respectively. However, deployment was under plans for Regulators and LTC Controls. Lower deployment than plans for these technologies may be attributed to Unitil's efforts to resolve LTC radio and control issues and cancellation of 4 deployments that were found to be unnecessary. Unitil has adjusted deployment plans for the remainder of Term 2 to conduct most deployment during 2023 and 2025. Additionally, Unitil has reduced its planned deployments of VVO Regulators and Capacitor Banks, as Unitil reassessed deployment plans and determined there were fewer Regulator and Capacitor Bank deployments needed than initially planned. Work in 2024 will be limited to material orders in preparation for construction work at the Beech Street substation.

Total Spend:

- Eversource spend on Term 2 investments amounted to \$0.04M, short of the \$8.70M that was initially planned for 2022. Given limited deployment and spend on Term 2 investments in 2022, as well as ongoing vendor delays in fulfilling material orders, Eversource has adjusted plans for the remainder of Term 2. In 2023, Eversource will be conducting additional design work, submitting material orders, and, when material orders are received, deploying VVO investments. Eversource has projected that most spend activity will occur in 2024 and 2025.
- National Grid spend on VVO was below plans for 2022. The majority of spend occurred on Capacitor Banks, while spend on Regulators and Line Sensors was well below plans. Lower-than-anticipated spend on Line Sensors can, in part, be attributed to National Grid's previous line sensor vendor discontinuing their selected model. For VVO Regulators, vendor delays in fulfilling material orders was a key contributor to lower spend than initially planned. In response to its 2022 experience with Line Sensors and Regulators, National Grid has begun to increase diversification of vendors that it sources materials from.
- Unitil spend on VVO was below initial plans. Unitil met 48% of its planned spend for Regulators. Spend and deployment of all other devices met or exceeded initial plans. Spend plans for the remainder of Term 2 have been revised downwards across all device types. Reduced spend on Regulators and Capacitor Banks can be attributed to a reduction in the units that Unitil plans to deploy, as well as lower than expected costs for deployment of Regulators. Reduced spend on LTC Controls and Line Sensors may be tied to process efficiencies implemented in 2022 that brought unit costs below plans. Most spend is

planned for 2023 and 2025, with work in 2024 limited to material orders in preparation for construction work at the Beech Street substation.

VVO Enablement:

- For its Term 2 substations, Eversource is currently in the VVO Investment phase, and is conducting engineering / design work for the selected substations. Eversource anticipates completing deployment during 2024 and 2025. Once VVO investments are deployed, Eversource plans to conduct VVO On/Off testing, with testing start dates ranging from July 2024 through July 2025. Once VVO On/Off testing has begun, Eversource anticipates conducting this testing for 9 – 12 months to collect one summer, one winter, and one shoulder season of testing data.
- National Grid conducted VVO On/Off testing at its East Methuen and Maplewood Term 1 substations throughout 2022. Among its Term 2 substations, National Grid conducted On/Off testing at the East Bridgewater substation throughout 2022, as VVO deployment was completed at the substation in 2021. Additionally, National Grid completed VVO deployment at the Easton and West Salem substations and began VVO On/Off for these substations in winter 2022/23 and spring 2022, respectively. National Grid projects that it will complete VVO deployment and enable VVO at its remaining Term 2 substations in 2023.
- Unitil completed VVO deployment for its Term 1 substation (Townsend) in 2021, enabling VVO on December 1, 2021, and On/Off testing is expected to begin in spring 2023. Among its Term 2 substations, Unitil completed deploying VVO investments at the Summer Street substation and enabled VVO in December 2022, with VVO On/Off testing projected to begin at the substation in December 2023. Lunenburg and West Townsend are currently receiving VVO investments and Unitil plans to enable VVO at the substations in January and November 2024, respectively. Unitil then plans to conduct On/Off testing at the substations beginning in December 2024. For its remaining substations, Unitil is currently conducting planning and engineering/design work for its Beech Street, Pleasant Street, and Princeton Road substations. These substations are expected to be enabled after the close of Term 2 in 2026 and 2027.

5.2 Key Findings for VVO Performance Metrics

Findings from the evaluation of Performance Metrics indicate that VVO allowed Eversource and National Grid to realize energy savings and voltage reductions during the Spring 2022 – Winter 2022/23 M&V period. It can be difficult to compare the results from Performance Metrics analysis between Eversource and National Grid. For example, there are differences in the granularity of telemetry (e.g., 15-minute versus 1 hour), data quality at different times of the year. As such, data cleaning can cause certain portions of the M&V period to be represented more for one EDC than the other. Additionally, there are numerous differences in DG penetration, customer types, and geographic areas served by Eversource and National Grid feeders that limit the ability to directly compare Eversource and National Grid VVO outcomes. Key Findings from the evaluation of Performance Metrics are as follows:

- During the Spring 2022 – Winter 2022/23 M&V period, Eversource's Agawam, Piper, Podick, and Silver substations realized 879 MWh (0.41%) energy savings and 1.52 V (1.24%) voltage reduction associated with VVO. The CVR Factor, which provides an estimate of energy savings possible with voltage reductions, was 0.60. During the same

M&V period, National Grid's East Methuen, East Bridgewater, Easton, Maplewood, Stoughton, and West Salem substations realized 1,867 MWh (0.84%) energy savings and 0.08 kV (0.62%) voltage reduction associated with VVO. National Grid's CVR factor was 0.36.

- Eversource energy savings of 879 MWh yielded a 299 short ton reduction of CO₂ emissions. National Grid energy savings of 1,867 MWh yielded a 645 short ton reduction in CO₂ emissions.
- Eversource and National Grid VVO feeders experienced a minimal benefit associated with peak load, power factor, and distribution losses. Eversource VVO feeders experienced a statistically significant increase (0.70%) in peak load, a statistically significant decrease (0.06%) in power factor, and a minimal decrease in distribution losses when VVO was engaged. National Grid VVO feeders experienced a statistically significant increase in peak load of 2.41%, a small decrease (0.43%) in power factor, and a minimal increase in distribution losses when VVO was engaged.
- For Eversource, a total of 53 voltage complaints were received from customers connected to the Agawam, Piper, Podick, and Silver VVO feeders during the Spring 2022 – Winter 2022/23 M&V period. This is a 13% decrease relative to the baseline number of voltage complaints measured between 2015 and 2017 (61 complaints). For National Grid, a total of 136 voltage complaints were received from customers connected to the East Methuen, East Bridgewater, Maplewood, West Salem, and Stoughton VVO feeders during the period. This is a 16% decrease relative to the average voltage complaints per year received between 2016 – 2017. For both EDCs, there is not sufficient evidence to support changes in voltage complaints being attributed to VVO.

5.3 Recommendations

In 2023 and beyond, Guidehouse recommends that Eversource and National Grid:

- Ensure VVO On/Off testing is running according to plan, with limited pauses to the VVO On/Off testing schedule. Across the VVO feeders, one-quarter to one-half of data points were removed due to extended pauses in VVO On/Off testing. For some feeders, this resulted in the vast majority of provided data to be unusable for components of this evaluation (e.g., for estimation of distribution loss and power factor reductions). Sustained On/Off testing will increase the amount of usable data in the evaluation and improve the ability for Guidehouse to provide a comprehensive evaluation of VVO performance metrics.
- Confirm adjustments to VVO On/Off testing schedule for any VVO feeders prior to implementation. VVO On/Off testing is designed similarly to a Randomized Controlled Trial (RCT), and adjustments to the testing schedule could, potentially, hinder the effectiveness of the testing design and cause biases to evaluation results. Ensuring there is proper balance in the number of VVO on and off hours throughout the evaluation period will allow for Guidehouse to provide a comprehensive and accurate evaluation of VVO performance metrics.
- Continue to investigate how to improve outcomes across VVO feeders. Many feeders across the EDCs underwent no material change in voltage. Correspondingly, energy reduction estimates were small-to-insignificant. These observations may indicate flaws in the VVO control scheme for these feeders. In order to improve VVO performance, Guidehouse recommends that the EDCs continue their efforts to investigate root causes to

shortcomings in the VVO control schemes and work with distribution engineers and the VVO vendors to respond accordingly. If needed, Guidehouse can conduct in-depth case studies at these substations further understand shortcomings in the VVO control scheme.

Appendix A. Additional Feeder Characteristics by EDC

A.1 Eversource Additional Feeder Characteristics

Table A-1. Additional Eversource Feeder Characteristics

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
Term 1 Feeders					
Agawam (13.8 kV)	16C11	7.11	55	0.39	0.23
	16C12	146.25	13	1.84	0.17
	16C14	7.17	105	0.76	0.02
	16C15	9.45	113	1.06	0.01
	16C16	4.56	115	0.52	0.22
	16C17	4.02	81	0.33	0.13
	16C18	3.37	145	0.49	0.08
	Piper (13.8 kV)	21N4	5.26	69	0.37
21N5		14.60	56	0.82	0.02
21N6		14.87	52	0.78	0.05
21N7		7,000	0	2.90	0.00
21N8		21.72	63	1.38	0.01
21N9		5.32	101	0.54	0.08
Podick (13.8 kV)	18G2	1,589	2	3.18	0.00
	18G3	5.98	57	0.34	0.08
	18G4	4.69	67	0.32	0.52
	18G5	5.79	44	0.26	0.22
	18G6	7.84	34	0.27	0.36
	18G7	4.63	35	0.16	1.13
	18G8	11.39	23	0.27	0.70
Silver (13.8 kV)	30A1	5.68	68	0.38	0.11
	30A2	5.60	187	1.05	0.03
	30A3	48.95	20	0.99	0.43
	30A4	13.73	74	1.01	0.03
	30A5	7.05	77	0.55	0.08
	30A6	8.04	51	0.41	0.28
Gunn (23 kV)	15A1	5.79	40	0.23	0.19
	15A2	8.49	97	0.83	0.22
	15A3	4.47	39	0.17	0.60
	15A5	5.31	110	0.58	0.11
Oswald (23 kV)	30B5	6.13	72	0.44	0.33
	30B7	8.33	23	0.19	0.88
Term 2 Feeders					
Amherst	17K1	2.47	85	0.21	2.62

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
(13.8 kV)	17K2	2.25	40	0.09	0.85
	17K3	2.22	110	0.25	0.21
	17K4	4.17	117	0.49	0.93
	17K5	4.45	57	0.25	0.15
	17K6	5.63	65	0.36	0.53
	17K7	1.45	76	0.11	0.26
	17K8	2.20	48	0.11	0.65
	Breckwood (13.8 kV)	20A11	N/A	0	1.59
20A12		2.73	88	0.24	0.09
20A13		2.31	149	0.34	0.23
20A14		3.08	88	0.27	0.37
20A21		2.86	96	0.27	0.23
20A22		2.59	127	0.33	0.18
20A23		2.39	100	0.24	0.20
20A31		2.70	105	0.28	0.07
20A32		2.27	119	0.27	0.35
20A33		3.38	130	0.44	0.18
20A34		3.12	85	0.26	0.35
Cross Road (13.2 kV)	2-522-522	3.54	26	0.09	1.13
	2-523-523	2.72	27	0.07	0.72
	2-524-524	1.61	16	0.03	0.99
	2-525-525	1,652	1	1.40	1.21
	2-528-528	N/A	0	0.06	0.50
Cumberland (13.8 kV)	22B1	6.10	26	0.16	0.29
	22B2	2.64	102	0.27	0.20
	22B3	3.21	38	0.12	0.89
	22B4	3.15	50	0.16	1.26
	22B5	2.00	17	0.03	3.70
	22B6	N/A	0	0.77	0.00
	22B7	3.08	24	0.07	0.38
	22B8	N/A	125	N/A	N/A
Doreen	19A1	1.32	68	0.09	0.64

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
(23 kV)	19A2	1.47	76	0.11	0.42
	19A3	18.18	11	0.21	1.34
	19A4	28.13	27	0.75	1.11
	19A5	4.50	43	0.20	0.38
	19A6	1,367	1	0.75	0.43
	19A7	1.36	133	0.18	0.18
	19A8	1.14	134	0.15	0.28
	Duxbury (4.16 kV)	3-24A-34J1	21.21	47	1.00
3-24A-34J2		51.73	56	2.92	0.00
3-24A-35J1		20.51	33	0.68	0.01
3-24A-35J2		N/A	0	0.00	N/A
Franconia (13.8 kV)	22H11	N/A	0	0.00	N/A
	22H12	4.18	63	0.26	0.32
	22H13	4.32	61	0.26	0.10
	22H14	2.63	113	0.30	0.10
	22H15	2.05	180	0.37	0.12
	22H16	2.00	181	0.36	0.15
	22H17	3.26	88	0.29	0.07
	22H18	4.24	333	1.41	0.01
Industrial Park (13.2 kV)	2-101-101	348.02	6	2.01	0.26
	2-102-102	6.52	51	0.33	1.02
	2-102-608	3.06	47	0.14	0.30
	2-103-103	340.14	2	0.73	0.85
	2-104-104	3.87	83	0.32	0.39
	2-105-105	3.13	119	0.37	0.22
	2-106-106	1,498	2	3.35	0.00
	2-106-160	1.13	82	0.09	0.64
	2-106-161	2.90	84	0.24	0.31
	2-107-107	12.51	17	0.22	2.05
	2-108-108	N/A	0	0.29	1.19
	2-151-151	312.09	5	1.51	0.90
2-152-152	N/A	0	3.69	0.00	
Mashpee (22.8 kV)	4-71-455	2.13	36	0.08	0.58
	4-71-71	1,538	42	64.40	0.00
	4-77B-456	3.48	44	0.15	0.14
	4-77B-77B	41.32	39	1.61	0.00
Montague	21C1	4.87	25	0.12	0.93

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
(13.8 kV)	21C2	6.93	45	0.31	1.27
	21C3	N/A	0	0.00	N/A
	21C4	3.97	111	0.44	0.17
	21C5	2.01	33	0.07	0.22
	21C6	1.82	102	0.19	8.68
	21C7	1.98	25	0.05	0.44
	21C8	3.04	44	0.13	3.02
	Orchard (13.8 kV)	27A10	2.00	125	0.25
27A11		4,600	1	2.90	0.00
27A12		767	4	2.96	1.66
27A13		3.80	163	0.62	0.79
27A14		N/A	0	1.85	0.00
27A15		200	0	0.02	0.00
27A16		N/A	0	1.66	0.00
27A17		N/A	0	1.69	0.00
27A4		2.92	105	0.31	0.21
27A5		8.16	42	0.34	0.43
Wareham (22.8 kV)	27A6	2.39	162	0.39	0.67
	27A7	3.63	98	0.36	0.16
	3-85-85	6.39	32	0.21	0.41
	3-85-928	5.74	29	0.17	1.34
	3-85-957	3.55	24	0.09	0.26
	3-86-966	5.88	42	0.24	0.59

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: Guidehouse analysis of 2022 GMP Term Report, Appendix 1 filed April 24, 2023. EDCs provided distributed generation data.

A.2 National Grid Additional Feeder Characteristics

Table A-2. Additional National Grid Feeder Characteristics

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
Term 1 Feeders					
East Methuen (13.2 kV)	74L1	6.04	80	0.48	0.31
	74L2	6.17	94	0.58	0.09
	74L3	3.39	171	0.58	0.17
	74L4	5.94	186	1.10	0.12
	74L5	3.47	58	0.20	0.12
	74L6	6.80	211	1.43	0.06

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
Stoughton (13.8 kV)	913W17	9.38	95	0.90	0.14
	913W18	6.75	127	0.86	0.07
	913W43	6.30	67	0.42	0.11
	913W47	8.08	112	0.90	0.04
	913W67	17.79	60	1.07	0.07
	913W69	3.73	114	0.43	0.12
Maplewood (13.8 kV)	16W1	3.28	212	0.70	0.11
	16W2	2.09	432	0.90	0.11
	16W3	3.78	248	0.94	0.05
	16W4	11.20	146	1.64	0.07
	16W5	7.20	254	1.83	0.08
	16W6	2.25	238	0.54	0.16
	16W7	3.26	272	0.89	0.15
	16W8	3.70	217	0.80	0.15
Term 2 Feeders					
East Bridgewater (13.8 kV)	797W1	5.19	79	0.41	0.10
	797W19	5.66	68	0.38	0.19
	797W20	8.21	55	0.45	0.05
	797W23	5.47	64	0.35	0.12
	797W24	5.62	48	0.27	0.10
	797W29	6.21	63	0.39	0.19
	797W42	11.38	58	0.66	0.14
East Dracut (13.8 kV)	75L1	3.20	183	0.58	0.10
	75L2	4.21	67	0.28	0.10
	75L3	5.21	46	0.24	0.18
	75L4	28.65	44	1.27	0.02
	75L5	2.73	190	0.52	0.11
	75L6	7.93	58	0.46	0.08
Easton	92W43	5.15	71	0.36	0.11

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
(13.8 kV)	92W44	7.55	68	0.51	0.10
	92W54	4.45	68	0.30	0.78
	92W78	6.24	52	0.33	0.07
	92W79	7.51	69	0.52	0.43
Melrose (13.8 kV)	25W1	7.82	85	0.66	0.19
	25W2	10.18	74	0.75	0.06
	25W3	15.41	84	1.30	0.07
	25W4	2.58	217	0.56	0.10
	25W5	3.24	193	0.63	0.11
West Salem (13.8 kV)	29W1	3.31	162	0.54	0.19
	29W2	6.80	105	0.71	0.06
	29W3	2.90	281	0.81	0.11
	29W4	4.16	152	0.63	0.19
	29W5	3.53	244	0.86	0.13
	29W6	8.88	83	0.74	0.10
Westboro (13.8 kV)	312W1	5.56	75	0.42	0.16
	312W2	71.03	21	1.46	0.24
	312W3	6.81	72	0.49	0.09
	312W4	4.79	48	0.23	0.40
	312W5	29.88	31	0.93	0.07

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: Guidehouse analysis of 2022 GMP Term Report, Appendix 1 filed April 24, 2023 EDCs provided distributed generation data.

A.3 Unutil Additional Feeder Characteristics

Table A-3. Additional Unutil Feeder Characteristics

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
Term 1 Feeders					
Townsend (13.8 kV)	15W15	8,844	6	55.20	0.00
	15W16	5.76	36	0.21	0.35
	15W17	15.41	50	0.77	0.36
Term 2 Feeders					
Summer Street (13.8 kV)	40W38	137.28	110	15.16	0.05
	40W39	24.93	46	1.14	0.21
	40W40	6.06	86	0.52	0.23
	40W42	4.98	153	0.76	0.20
Lunenburg	30W30	6.44	31	0.20	0.32

Substation	Feeder	Avg Customer Loading (kVA/customer)	Customer Density (customer/mi.)	Load Density (MVA/mi.)	DG Penetration (DG MW/MVA)
(13.8 kV)	30W31	6.01	37	0.22	0.94
West Townsend (13.8 kV)	39W18	6.63	38	0.25	0.00
	39W19	5.72	22	0.12	0.00

Note: Values presented in this table were published on April 24, 2023 and are reflective of data collected through the end of 2022.

Source: Guidehouse analysis of 2022 GMP Term Report, Appendix 1 filed April 24, 2023 EDCs provided distributed generation data.

Appendix B. Detailed Information for Performance Metrics Analysis

B.1 Conservation Voltage Reduction Factor

One informative metric associated with VVO is the conservation voltage reduction (CVR) factor, which reveals the percentage of energy savings that can be expected for each percentage of voltage reduction. Equation 5-1 highlights how the CVR factor is calculated using an estimated percentage change in energy and percentage change in voltage.

Equation 5-1. CVR Factor Calculation

$$CVRf = \frac{\% \Delta \text{ Energy}}{\% \Delta \text{ Voltage}}$$

B.2 Regression Methodology for Estimating VVO-Related Energy and Voltage Changes

For feeders going through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period, Guidehouse conducted regression modeling to assess the impacts of VVO on measured feeder-level real power and voltage. To estimate the impact of VVO on feeder-level real power and voltage observed during the Spring 2022 – Winter 2022/23 M&V period, Guidehouse estimated a regression model of real power and a regression model of voltage for each individual feeder. Equation 5-2 and Equation 5-3⁶⁶ summarizes the regression model specification used to estimate real power and voltage as a function of VVO.

Equation 5-2. Regression Model of Energy and Voltage

$$\begin{aligned} \{kW_{it}, V_{it}\} = & \beta_1 \text{lagged} \{kW_{it}, V_{it}\} + \beta_2 \text{Spring}_{it} + \beta_3 \text{Summer}_{it} + \beta_4 \text{Fall}_{it} + \beta_5 \text{Winter}_{it} \\ & + \beta_6 \text{VVO}_{it} * \text{Spring}_{it} + \beta_7 \text{VVO}_{it} * \text{Summer}_{it} + \beta_8 \text{VVO}_{it} * \text{Fall}_{it} + \beta_9 \text{VVO}_{it} \\ & * \text{Winter}_{it} + \beta_{10} \text{Daylight}_{it} + \sum_{wknd=1}^2 \beta_{11wknd} * \tau_{wknd} + \sum_{m=1}^{12} \beta_{12m} * \tau_m \\ & + \sum_{wknd,h=1}^{48} \beta_{13wknd,h} * \tau_{wknd,h} + \sum_{h=1}^{24} \beta_{14h} * \tau_h * \text{Cloud}_{it} * \text{Daylight}_{it} \\ & + \sum_{h=1}^{24} \beta_{15h} * \tau_h * \text{HDH}_{it} + \sum_{h=1}^{24} \beta_{16h} * \tau_h * \text{CDH}_{it} + \beta_{17} \text{DR Flag}_t + \varepsilon_{it} \end{aligned}$$

⁶⁶ Given that the Easton substation did not start VVO On/Off testing until Winter 2022/23, Guidehouse ran a separate model to estimate energy and voltage changes for this substation that does not include seasonal terms (e.g., Spring, Summer, Fall, and Winter).

Where:

- $i, t, h, wknd, \text{ and } m$ index feeder, time-interval, each of the 24 hours of the day, weekend, and month of year respectively.
- kW_{it} is real power (kW) measured at feeder i at time t .
- V_{it} is voltage (V) measured at feeder i at time t .
- $lagged kW_{it}$ is real power (kW) measured at feeder i at time $t - 24$. The corresponding coefficient, β_1 , captures the degree to which any given hour t 's real power is correlated with real power 24 hours prior.
- $lagged V_{it}$ is voltage (V) measured at feeder i at time $t - 24$. The corresponding coefficient, β_2 , captures the degree to which hour t voltage is correlated with voltage 24 hours prior.
- $Spring_{it}$ is an indicator equal to 1 when feeder i at time t falls within March 1 through May 31, 2022. The corresponding coefficient β_2 captures the average real power and voltage observed during the Spring season.
- $Summer_{it}$ is an indicator equal to 1 when feeder i at time t falls within June 1 through August 31, 2022. The corresponding coefficient β_3 captures the average real power and voltage observed during the Summer season.
- $Fall_{it}$ is an indicator equal to 1 when feeder i at time t falls within September 1 through November 30, 2022. The corresponding coefficient β_4 captures the average real power and voltage observed during the Fall season.
- $Winter_{it}$ is an indicator equal to 1 when feeder i at time t falls within December 1, 2022 through February 28, 2023. The corresponding coefficient β_5 captures the average real power and voltage observed during The Winter season.
- VVO_{it} is an indicator equal to 1 when VVO is engaged for feeder i at time t . The coefficient β_6 captures the average hourly impact of VVO on real power or voltage during the Spring season; the coefficient β_7 captures the average hourly impact of VVO on real power or voltage during the Summer season; the coefficient β_8 captures the average hourly impact of VVO on real power or voltage during the Fall season; and the coefficient β_9 captures the average hourly impact of VVO on real power or voltage during the Winter season. A combination of $\beta_6, \beta_7, \beta_8,$ and β_9 captures the average hourly impact of VVO on real power or voltage during the entire analysis period.
- $Daylight_{it}$ is an indicator equal to 1 when feeder i at time t falls within a daylight hour. The coefficient β_{10} captures the average real power or voltage

observed during daylight hours when distributed solar facilities are producing electricity.

- τ_{wknd} are fixed effects for a weekday or weekend. The corresponding β_{11wknd} coefficients capture the average daily real power or voltage for a weekday or weekend.
- τ_m are fixed effects for each month m . The corresponding β_{12m} coefficients capture the average monthly real power or voltage for each month of the Spring 2022 – Winter 2022/23 analysis period.
- $\tau_{wknd,h}$ are hourly fixed effects for each weekday or weekend $wknd$ and each hour of day h combination. The corresponding $\beta_{13wknd,h}$ coefficients capture the average real power or voltage for each weekday or weekend and hour of day combination.
- τ_h are hourly fixed effects for each hour of day h . The corresponding β_{14h} coefficients capture the average hourly real power or voltage for each hour across the Spring 2022 – Winter 2022/23 analysis period.
- $Cloud_{it}$ is a categorical variable denoting hourly cloud cover conditions recorded by NOAA, intended to control for distributed solar generation connected to VVO feeders. Cloud cover multiplied by $Daylight_{it}$ and τ_h forces the regression model to provide an estimate of real power or voltage associated with distributed solar during each daylight hour. The coefficient β_{14h} captures this average real power or voltage observed during daylight hours when distributed solar facilities are producing electricity.
- CDH_{it} are cooling degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on cooling load for each hour of day h . The corresponding coefficients β_{15h} captures the impact of CDH on real power or voltage for each hour of day h .
- HDH_{it} are heating degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on heating load for each hour of day h . The corresponding coefficients β_{16h} captures the impact of HDH on real power or voltage for each hour of day h .
- $DR\ Flag_t$ is an indicator equal to 1 when a demand response event occurred at time t . The coefficient β_{17} captures the average hourly impact of VVO on real power or voltage during the demand response events.
- ϵ_{it} is an error term for feeder i at time t and captures unexplained variation in real power or voltage.

Equation 5-3. Regression Model of Energy and Voltage (Easton Substation)

$$\{kW_{it}, V_{it}\} = \beta_1 \text{lagged} \{kW_{it}, V_{it}\} + \beta_2 VVO_{it} + \beta_3 \text{Daylight}_{it} + \sum_{wknd=1}^2 \beta_{4wknd} * \tau_{wknd} + \sum_{m=1}^{12} \beta_{5m} * \tau_m$$

$$+ \sum_{wknd,h=1}^{48} \beta_{6wknd,h} * \tau_{wknd,h} + \sum_{h=1}^{24} \beta_{7h} * \tau_h * \text{Cloud}_{it} * \text{Daylight}_{it} + \sum_{h=1}^{24} \beta_{8h} * \tau_h * \text{HDH}_{it}$$

$$+ \sum_{h=1}^{24} \beta_{9h} * \tau_h * \text{CDH}_{it} + \beta_{10} \text{DR Flag}_t + \epsilon_{it}$$

Where:

- $i, t, h, wknd, \text{ and } m$ index feeder, time-interval, each of the 24 hours of the day, weekend, and month of year respectively.
- kW_{it} is real power (kW) measured at feeder i at time t .
- V_{it} is voltage (V) measured at feeder i at time t .
- $\text{lagged } kW_{it}$ is real power (kW) measured at feeder i at time $t - 24$.
- $\text{lagged } V_{it}$ is voltage (V) measured at feeder i at time $t - 24$.
- VVO_{it} is an indicator equal to 1 when VVO is engaged for feeder i at time t . β_2 captures the average hourly impact of VVO on real power or voltage while Easton was going through VV On/Off testing.
- Daylight_{it} is an indicator equal to 1 when feeder i at time t falls within a daylight hour. The coefficient β_3 captures the average real power or voltage observed during daylight hours when distributed solar facilities are producing electricity.
- τ_{wknd} are fixed effects for a weekday or weekend. The corresponding β_{4wknd} coefficients capture the average daily real power or voltage for a weekday or weekend.
- τ_m are fixed effects for each month m . The corresponding β_{5m} coefficients capture the average monthly real power or voltage for each month while Easton was going through VVO On/Off testing.
- $\tau_{wknd,h}$ are hourly fixed effects for each weekday or weekend $wknd$ and each hour of day h combination. The corresponding $\beta_{6wknd,h}$ coefficients

capture the average real power or voltage for each weekday or weekend and hour of day combination.

τ_h	are hourly fixed effects for each hour of day h . The corresponding β_{7h} coefficients capture the average hourly real power or voltage for each hour while Easton was going through VVO On/Off testing.
$Cloud_{it}$	is a categorical variable denoting hourly cloud cover conditions recorded by NOAA, intended to control for distributed solar generation connected to VVO feeders. Cloud cover multiplied by $Daylight_{it}$ and τ_h forces the regression model to provide an estimate of real power or voltage associated with distributed solar during each daylight hour. The coefficient β_{8h} captures this average real power or voltage observed during daylight hours when distributed solar facilities are producing electricity.
CDH_{it}	are cooling degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on cooling load for each hour of day h . The corresponding coefficients β_{9h} captures the impact of CDH on real power or voltage for each hour of day h .
HDH_{it}	are heating degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on heating load for each hour of day h . The corresponding coefficients β_{10h} captures the impact of HDH on real power or voltage for each hour of day h .
$DR\ Flag_t$	is an indicator equal to 1 when a demand response event occurred at time t . The coefficient β_{17} captures the average hourly impact of VVO on real power or voltage during the demand response events.
ϵ_{it}	is an error term for feeder i at time t and captures unexplained variation in real power or voltage.

B.3 Methodology for Estimating VVO Energy Savings for Feeders that Completed On/Off Testing

For the VVO substations that completed VVO On/Off testing prior to the Spring 2022 – Winter 2022/23 M&V period, Guidehouse did not estimate energy impacts using a regression methodology. Instead, Guidehouse estimated energy impacts using energy impact estimates from the most-recent period (i.e., Spring 2021 – Winter 2021/22) in which the substation conducted VVO On/Off testing. For the Spring 2022 – Winter 2022/23 evaluation period, there was only one National Grid substation that completed VVO On/Off testing, which included 6 feeders.

To estimate energy savings, Guidehouse conducted the following four steps:

1. Calculated average hourly energy demand per feeder and peak energy period (i.e., Summer Peak, Summer Off-Peak, Winter Peak, Winter Off-Peak) while VVO was turned off during the current M&V period (i.e., Spring 2022 – Winter 2022/23)

2. Calculated the total number of hours where VVO was turned on per feeder and peak energy period (i.e., Summer Peak, Summer Off-Peak, Winter Peak, Winter Off-Peak) during the current M&V period (i.e., Spring 2022 – Winter 2022/23)
3. Calculated estimated average hourly energy reductions for each feeder for each peak energy period. This was calculated by taking the product of (a) percent energy reductions estimates per peak energy period from Spring 2021 – Winter 2021/22 (the last period where the feeder conducted VVO On/Off testing), and (b) average hourly energy demand per feeder and peak energy period (i.e., Summer Peak, Summer Off-Peak, Winter Peak, Winter Off-Peak) while VVO was turned off during the current evaluation period (i.e., Spring 2022 – Winter 2022/23).
4. Calculated the weighted average hourly energy reductions per feeder. This weighted average was calculated based on the total number of hours where VVO was turned on per feeder and peak energy period (e.g., Summer Peak, Summer Off-Peak, Winter Peak, Winter Off-Peak) during the current evaluation period (i.e., Spring 2022 – Winter 2022/23).

Once weighted average hourly energy reductions were calculated for each of these feeders, Guidehouse multiplied these values by the total number of hours where VVO was turned on per feeder during the current M&V period (i.e., Spring 2022 – Winter 2022/23) to generate total energy reduction estimates per feeder during the Spring 2022 – Winter 2022/23 M&V period.

B.4 Regression Methodology for Estimating VVO-Related Peak Load Changes

Equation 5-4 summarizes the regression model specification used to estimate peak load as a function of VVO for the feeders that went through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period.

Equation 5-4. Regression Model of Peak Load

$$Peak_{it} = \beta_1 VVO_{it} + \sum_{d=1}^7 \beta_{2d} * \tau_d + \sum_{h=1}^{24} \beta_{3h} * \tau_h * Cloud_{it} + \beta_4 CDH_{it} + \beta_5 HDH_{it} + \beta_6 DR Flag_t + \epsilon_{it}$$

Where:

- i, t, h, d index feeder, time-interval, each of the 24 hours of the day, and day of week respectively.
- $Peak kW_{it}$ is peak load (kW) measured at feeder i at time t .
- VVO_{it} is an indicator equal to 1 when VVO is engaged for feeder i at time t . The coefficient β_1 captures the average hourly impact of VVO on peak load during the entire analysis period.
- τ_d are fixed effects for each day of the week d . The corresponding β_{2d} coefficients capture the average daily peak load for each day of the week.
- τ_h are hourly fixed effects for each hour h . The corresponding β_{4h} coefficients capture the average hourly peak load across the Spring 2022 – Winter 2022/23 analysis period.
- $Cloud_{it}$ is a categorical variable denoting hourly cloud cover conditions recorded by NOAA, intended to control for distributed solar generation connected to VVO feeders. Cloud cover multiplied by τ_h forces the regression model to provide an estimate of peak load associated with distributed solar during each peak load hour of the day. The coefficient β_{3h} captures this average peak load observed during daylight hours when distributed solar facilities are producing electricity.
- CDH_{it} are cooling degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on cooling load. The corresponding coefficient β_4 captures the impact of CDH on peak load.
- HDH_{it} are heating degree-hours (HDH), base 65°F, for feeder i at time t to capture the impacts of temperature on heating load. The corresponding coefficient β_5 captures the impact of HDH on peak load.
- $DR Flag_t$ is an indicator equal to 1 when a demand response event occurred at time t . The coefficient β_6 captures the average hourly impact of VVO on real power or voltage during the demand response events.
- ϵ_{it} is an error term for feeder i at time t and captures unexplained variation in peak load.

B.5 Methodology for Estimating VVO-Related Peak Load Changes for Feeders that Completed On/Off Testing

For the feeders that did not undergo VVO On/Off testing during the Spring 2022 – Winter 2022/23 evaluation period, Guidehouse calculated estimated peak load changes by taking the product of (a) average hourly energy per feeder during peak load period that occurred Spring 2022 – Winter 2022/23 while VVO was turned off and (b) the estimated percentage reduction in peak load percentage from the last period where the feeder underwent VVO On/Off testing. For the Spring 2022 – Winter 2022/23 evaluation period, there was only one National Grid substation that completed VVO On/Off testing, which included 6 feeders.

B.6 Regression Methodology for Power Factor

Equation 5-5 summarizes the regression model specification used to estimate power factor as a function of VVO for the feeders that went through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period.

Equation 5-5. Regression Model of Power Factor

$$PF_{it} = \beta_1 VVO_{it} + \sum_{d=1}^7 \beta_{2d} * \tau_d + \sum_{h=1}^{24} \beta_{3h} * \tau_h * Cloud_{it} + \beta_4 HDH_{it} + \beta_5 CDH_{it} + \beta_6 DR Flag_t + \epsilon_{it}$$

Where:

i, t, h, d	index feeder, time-interval, each of the 24 hours of the day, and day of week respectively.
PF_{it}	is power factor measured at feeder i at time t .
VVO_{it}	is an indicator equal to 1 when VVO is engaged for feeder i at time t . The coefficient β_1 captures the average hourly impact of VVO on power factor during the entire analysis period.
τ_d	are fixed effects for each day of the week d . The corresponding β_{2d} coefficients capture the average daily power factor for each day of the week.
τ_h	are hourly fixed effects for each hour h . The corresponding β_{3h} coefficients capture the average hourly power factor across the Spring 2022 – Winter 2022/23 analysis period.
$Cloud_{it}$	is a categorical variable denoting hourly cloud cover conditions recorded by NOAA, intended to control for distributed solar generation connected to VVO feeders. Cloud cover multiplied by $Daylight_{it}$ and τ_h forces the regression model to provide an estimate of power factor associated with distributed solar during each daylight hour. The

coefficient β_{3h} captures this average power factor observed during daylight hours when distributed solar facilities are producing electricity.

HDH_{it} are heating degree-hours (HDH), base 65°F, for feeder i at time t to capture the impacts of temperature on heating load. The corresponding coefficient β_4 captures the impact of HDH on power factor.

CDH_{it} are cooling degree-hours (CDH), base 65°F, for feeder i at time t to capture the impacts of temperature on cooling load. The corresponding coefficient β_5 captures the impact of CDH on power factor.

$DR\ Flag_t$ is an indicator equal to 1 when a demand response event occurred at time t . The coefficient β_6 captures the average hourly impact of VVO on power factor during the demand response events.

ϵ_{it} is an error term for feeder i at time t and captures unexplained variation in power factor.

B.7 Methodology for Estimating VVO-Related Power Factor Changes for Feeders that Completed On/Off Testing

For the feeders that did not go through VVO On/Off testing during the Spring 2022 – Winter 2022/23 evaluation period, Guidehouse leveraged the estimates for power factor change from the last period where the feeder went through VVO On/Off testing. Power factor change estimates provided last year were interpreted as the average hourly impact of VVO on power factor for each feeder. Given that power factor is not affected based on the number of hours when VVO is On, the results from when the feeder underwent VVO On/Off testing applied to when the feeder completes VVO On/Off testing as well. For the Spring 2022 – Winter 2022/23 evaluation period, there was only one National Grid substation that completed VVO On/Off testing, which included 6 feeders.

B.8 Distribution Losses Methodology

Guidehouse evaluated change in distribution losses as a function of VVO during the Spring 2022 – Winter 2022/23 M&V period. To estimate the impact of VVO on feeder-level distribution losses, Guidehouse used a distribution losses equation for each individual feeder.⁶⁷ Equation 5-6 summarizes the equation used to estimate the change in distribution losses as a function of VVO for the VVO feeders that went through VVO On/Off testing during the Spring 2022 – Winter 2022/23 M&V period.

Equation 5-6. Distribution Losses Equation

$$\% \text{ Loss Reduction} = 100 - 100 \left(\frac{PF_{VVO\ off}}{PF_{VVO\ on}} \right)^2$$

⁶⁷ <https://www.nepsi.com/resources/calculators/loss-reduction-with-power-factor-correction.htm>

Where:

$PF_{VVO\ off}$ Power factor when VVO is in the disengaged state.

$PF_{VVO\ on}$ Power factor when VVO is in the engaged state.

B.9 Methodology for Estimating VVO-Related Distribution Loss Changes for Feeders that Completed On/Off Testing

For the feeders that did not undergo VVO On/Off testing during the Spring 2022 – Winter 2022/23 evaluation period, Guidehouse leveraged the estimates for distribution losses change from the last period where the feeder went through VVO On/Off testing. Given that distribution losses estimates provided were in percentage terms, the metric is unitless and is not affected based on the number of hours when VVO is On. As such, the results from when the feeder went through VVO On/Off testing can be applied to when the feeder completes VVO On/Off testing as well. For the Spring 2022 – Winter 2022/23 evaluation period, there was only one National Grid substation that completed VVO On/Off testing, which included 6 feeders.

B.10 Overall Data Attrition from Data Cleaning

The tables in this section provide a detailed summary of data attrition from cleaning steps applied to analysis datasets. Detailed data attrition results are provided separately by EDC and substation.

B.10.1 Eversource

Table B-1. Count of Quarter-Hours Remaining by Data Cleaning Step for Agawam

Data Cleaning Step	16C11	16C12	16C14	16C15	16C16	16C17	16C18
Initial Dataset (Spring 2022 – Winter 2022/23)	35,040	35,040	35,040	35,040	35,040	35,040	35,040
1. Remove Long Events	4,629	4,629	6,756	6,756	6,756	6,755	6,755
2. Remove Interpolated	6,460	1,398	1,050	1,089	1,093	890	886
3. Remove Repeated	2,789	844	487	541	442	178	204
4. Remove Outliers	982	654	308	358	295	620	421
Final Dataset	20,180	27,515	26,439	26,296	26,454	26,597	26,774
Observations Removed	14,860	7,525	8,601	8,744	8,586	8,443	8,266

Source: Guidehouse analysis

Table B-2. Count of VVO On, VVO Off, and Removed Quarter-Hours for Agawam

Number of Quarter-Hours	16C11	16C12	16C14	16C15	16C16	16C17	16C18
VVO On Weekday	7,076	9,302	9,142	9,104	9,178	9,185	9,333
VVO On Weekend	2,889	3,769	3,984	3,980	3,960	4,059	4,050
VVO Off Weekday	7,473	10,722	9,845	9,766	9,875	9,844	9,974
VVO Off Weekend	2,741	3,721	3,467	3,445	3,440	3,508	3,416
Removed	14,860	7,525	8,601	8,744	8,586	8,443	8,266
Spring 2022 – Winter 2022/23 Total	35,040	35,040	35,040	35,040	35,040	35,040	35,040

Source: Guidehouse analysis

Table B-3. Count of Quarter-Hours Remaining by Data Cleaning Step for Piper

Data Cleaning Step	21N4	21N5	21N6	21N7	21N8	21N9
Initial Dataset (Spring 2022 – Winter 2022/23)	35,040	35,040	35,040	35,040	35,040	35,040
1. Remove Long Events	1,912	1,912	1,912	1,912	1,912	1,912
2. Remove Interpolated	950	7,216	796	924	832	1,537
3. Remove Repeated	316	1,708	189	273	156	880
4. Remove Outlier	534	596	242	1,897	179	15,742
Final Dataset	31,328	23,608	31,901	30,034	31,961	14,969
Observations Removed	3,712	11,432	3,139	5,006	3,079	20,071

Source: Guidehouse analysis

Table B-4. Count of VVO On, VVO Off, and Removed Quarter-Hours for Piper

Number of Quarter-Hours	21N4	21N5	21N6	21N7	21N8	21N9
VVO On <i>Weekday</i>	11,016	8,607	11,183	10,978	11,211	5,220
VVO On <i>Weekend</i>	4,823	3,778	4,921	4,574	4,914	2,350
VVO Off <i>Weekday</i>	11,322	8,292	11,473	10,559	11,530	5,570
VVO Off <i>Weekend</i>	4,167	2,931	4,324	3,923	4,306	1,829
Removed	3,712	11,432	3,139	5,006	3,079	20,071
Spring 2022 – Winter 2022/23 Total	35,040	35,040	35,040	35,040	35,040	35,040

Source: Guidehouse analysis

Table B-5. Count of Quarter-Hours Remaining by Data Cleaning Step for Podick

Data Cleaning Step	18G2	18G2	18G4	18G5	18G6	18G7	18G8
Initial Dataset (Spring 2022 – Winter 2022/23)	35,040	35,040	35,040	35,040	35,040	35,040	35,040
1. Remove Long Events	0	0	0	0	0	0	0
2. Remove Interpolated	8,448	8,448	8,448	8,448	8,769	8,769	8,769
3. Remove Repeated	4,557	1,727	956	1,357	6,277	1,651	545
4. Remove Outliers	2,942	920	361	676	3,667	781	256
Final Dataset	18,822	23,352	24,688	23,931	15,810	23,010	21,511
Observations Removed	16,218	11,688	10,352	11,109	19,230	12,030	13,529

Source: Guidehouse analysis

Table B-6. Count of VVO On, VVO Off, and Removed Quarter-Hours for Podick

Number of Quarter-Hours	18G2	18G3	18G4	18G5	18G6	18G7	18G8
VVO On Weekday	6,903	8,561	8,951	8,702	5,809	8,659	7,787
VVO On Weekend	3,143	3,834	4,123	3,977	2,622	3,751	3,452
VVO Off Weekday	6,415	8,006	8,387	8,133	5,049	7,532	7,346
VVO Off Weekend	2,361	2,951	3,227	3,119	2,330	3,068	2,926
Removed	16,218	11,688	10,352	11,109	19,230	12,030	13,529
Spring 2022 – Winter 2022/23 Total	35,040	35,040	35,040	35,040	35,040	35,040	35,040

Source: Guidehouse analysis

Table B-7. Count of Quarter-Hours Remaining by Data Cleaning Step for Silver

Data Cleaning Step	30A1	30A2	30A3	30A4	30A5	30A6
Initial Dataset (Spring 2022 – Winter 2022/23)	35,040	35,040	35,040	35,040	35,040	35,040
1. Remove Missing VVO Status	0	0	0	0	0	0
2. Remove Long Events	14,147	3,564	14,147	3,564	14,147	3,564
3. Remove Interpolated	5,843	5,507	8,371	6,415	1,133	7,576
4. Remove Repeated	567	1,151	1,501	274	663	1,253
5. Remove Outliers	243	611	119	635	884	799
Final Dataset	14,240	24,207	10,902	24,152	18,213	21,848
Observations Removed	20,800	10,833	24,138	10,888	16,827	13,192

Source: Guidehouse analysis

Table B-8. Count of VVO On, VVO Off, and Removed Quarter-Hours for Silver

Number of Quarter-Hours	30A1	30A2	30A3	30A4	30A5	30A6
VVO On Weekday	4,660	8,150	3,396	8,025	6,051	7,144
VVO On Weekend	1,934	3,512	1,606	3,250	2,600	3,136
VVO Off Weekday	5,608	9,264	4,516	9,467	7,129	8,447
VVO Off Weekend	2,038	3,281	1,384	3,410	2,433	3,121
Removed	20,800	10,833	24,138	10,888	16,827	13,192
Spring 2022 – Winter 2022/23 Total	35,040	35,040	35,040	35,040	35,040	35,040

Source: Guidehouse analysis

B.10.2 National Grid

Table B-9. Count of Hours Remaining by Data Cleaning Step for Easton

Data Cleaning Step	92W43	92W44	92W54	92W78	92W79
Initial Dataset (Spring 2022 – Winter 2022/23)	1,152	1,152	1,152	1,152	1,152
1. Remove Missing VVO Status	0	0	0	0	0
2. Remove Long Events	661	661	661	661	661
3. Remove Interpolated	1	1	1	1	1
4. Remove Repeated	0	0	0	0	0
5. Remove Outliers	0	0	0	0	0
Final Dataset	490	490	490	490	490
Observations Removed	662	662	662	662	662

Source: Guidehouse analysis

Table B-10. Count of VVO On, VVO Off, and Removed Hours for Easton

Number of Hours	92W43	92W44	92W54	92W78	92W79
VVO On Weekday	159	159	159	159	159
VVO On Weekend	96	96	96	96	96
VVO Off Weekday	235	235	235	235	235
VVO Off Weekend	0	0	0	0	0
Removed	662	662	662	662	662
Spring 2022 – Winter 2022/23 Total	1,152	1,152	1,152	1,152	1,152

Source: Guidehouse analysis

Table B-11. Count of Hours Remaining by Data Cleaning Step for East Bridgewater

Data Cleaning Step	797W1	797W19	797W20	797W23	797W24	797W29	797W42
Initial Dataset (Spring 2022 – Winter 2022/23)	8,760	8,760	8,760	8,760	8,760	8,760	8,760
1. Remove Missing VVO Status	2,670	2,670	2,670	2,670	2,670	2,670	2,670
2. Remove Long Events	3,502	3,363	3,363	3,502	3,363	3,502	3,502
3. Remove Interpolated	0	53	53	0	53	0	0
4. Remove Repeated	0	0	0	0	0	0	0
5. Remove Outliers	0	0	0	0	0	0	0
Final Dataset	2,588	2,674	2,674	2,588	2,674	2,588	2,588
Observations Removed	6,172	6,086	6,086	6,172	6,086	6,172	6,172

Source: Guidehouse analysis

Table B-12. Count of VVO On, VVO Off, and Removed Hours for East Bridgewater

Number of Hours	797W1	797W19	797W20	797W23	797W24	797W29	797W42
VVO On Weekday	968	1,012	1,012	968	1,012	968	968
VVO On Weekend	310	311	311	310	311	310	310
VVO Off Weekday	969	1,045	1,045	969	1,045	969	967
VVO Off Weekend	341	306	306	341	306	341	343
Removed	6,172	6,086	6,086	6,172	6,086	6,172	6,172
Spring 2022 – Winter 2022/23 Total	8,760	8,760	8,760	8,760	8,760	8,760	8,760

Source: Guidehouse analysis

Table B-13. Count of Hours Remaining by Data Cleaning Step for East Methuen

Data Cleaning Step	74L1	74L2	74L3	74L4	74L5	74L6
Initial Dataset (Spring 2022 – Winter 22/23)	8,760	8,760	8,760	8,760	8,760	8,760
1. Remove Missing VVO Status	2,670	2,670	2,670	2,670	2,670	2,670
2. Remove Long Events	2,005	2,155	2,005	2,155	2,005	2,155
3. Remove Interpolated	28	16	28	16	28	16
4. Remove Repeated	3	3	3	3	3	3
5. Remove Outliers	0	0	0	0	0	0
Final Dataset	4,054	3,916	4,054	3,916	4,054	3,916
Observations Removed	4,706	4,844	4,706	4,844	4,706	4,844

Source: Guidehouse analysis

Table B-14. Count of VVO On, VVO Off, and Removed Hours for East Methuen

Number of Hours	74L1	74L2	74L3	74L4	74L5	74L6
VVO On Weekday	1,789	1,529	1,789	1,529	1,789	1,529
VVO On Weekend	573	479	573	479	573	479
VVO Off Weekday	1,268	1,441	1,268	1,441	1,268	1,441
VVO Off Weekend	424	467	424	467	424	467
Removed	4,706	4,844	4,706	4,844	4,706	4,844
Spring 2022 – Winter 2022/23 Total	8,760	8,760	8,760	8,760	8,760	8,760

Source: Guidehouse analysis

Table B-15. Count of Hours Remaining by Data Cleaning Step for Maplewood

Data Cleaning Step	16W1	16W2	16W3	16W4	16W5	16W6	16W7	16W8
Initial Dataset (Spring 2022 – Winter 2022/23)	8,760	8,760	8,760	8,760	8,760	8,760	8,760	8,760
1. Remove Missing VVO Status	2,670	2,670	2,670	2,670	2,670	2,670	2,670	2,670
2. Remove Long and Short Events	3,778	5,583	3,778	5,583	3,778	5,583	3,778	5,583
3. Remove Interpolated	0	0	0	0	0	0	91	0
4. Remove Repeated	0	0	0	0	0	0	2	0
5. Remove Outliers	0	0	0	0	0	0	0	0
Final Dataset	2,312	507	2,312	507	2,312	507	2,219	507
Observations Removed	6,448	8,253	6,448	8,253	6,448	8,253	6,541	8,253

Source: Guidehouse analysis

Table B-16. Count of VVO On, VVO Off, and Removed Hours for Maplewood

Number of Hours	16W1	16W2	16W3	16W4	16W5	16W6	16W7	16W8
VVO On Weekday	947	128	947	128	947	128	923	128
VVO On Weekend	228	24	228	24	228	24	204	24
VVO Off Weekday	885	331	885	331	885	331	864	331
VVO Off Weekend	252	24	252	24	252	24	228	24
Removed	6,448	8,253	6,448	8,253	6,448	8,253	6,541	8,253
Spring 2022 – Winter 2022/23 Total	8,760	8,760	8,760	8,760	8,760	8,760	8,760	8,760

Source: Guidehouse analysis

Table B-17. Count of Hours Remaining by Data Cleaning Step for West Salem

Data Cleaning Step	29W1	29W2	29W3	29W4	29W5	29W6
Initial Dataset (Spring 2022 – Winter 2022/23)	6,576	6,576	6,576	6,576	6,576	6,576
1. Remove Missing VVO Status	2,831	2,838	2,833	2,833	2,829	2,797
2. Remove Long Events	1,387	1,102	1,294	1,181	1,464	2,194
3. Remove Interpolated	0	0	1	1	1	1
4. Remove Repeated	0	0	1	0	0	0
5. Remove Outliers	0	0	0	0	0	0
Final Dataset	2,358	2,636	2,449	2,562	2,283	1,585
Observations Removed	4,218	3,940	4,127	4,014	4,293	4,991

Source: Guidehouse analysis

Table B-18. Count of VVO On, VVO Off, and Removed Hours for West Salem

Number of Hours	29W1	29W2	29W3	29W4	29W5	29W6
VVO On Weekday	879	982	898	970	856	604
VVO On Weekend	230	276	276	253	277	148
VVO Off Weekday	1,056	1,139	1,059	1,123	980	755
VVO Off Weekend	193	239	216	216	170	78
Removed	4,218	3,940	4,127	4,014	4,293	4,991
Spring 2022 – Winter 2022/23 Total	6,576	6,576	6,576	6,576	6,576	6,576

Source: Guidehouse analysis

B.11 Detailed Performance Metrics Results

This section details feeder-specific performance metrics estimates for the Spring 2022 – Winter 2022/23 period by VVO feeder. Results are provided separately by EDC.

B.11.1 Eversource

Table B-19. Eversource Performance Metrics Results by Feeder

Feeder	Energy Baseline (MWh)	Net Energy Reduction (MWh)* †	Voltage Reduction (V)	CVRf	Peak Load Reduction (kW)	Distribution Loss Reduction (%)	Power Factor Change	GHG Reductions (CO2) †
16C11	7,502	16 ± 5	2.58 ± 0.03	0.9	-24 ± 31	--	-	5 ± 2
16C12	24,627	34 ± 7	2.27 ± 0.02	0.7	98 ± 47	0.94	0.004 ± 0.001	12 ± 2
16C14	22,558	23 ± 5	1.41 ± 0.02	0.8	135 ± 31	-	-	8 ± 2
16C15	19,560	14 ± 3	1.4 ± 0.02	0.5	-13 ± 21	-0.49	-0.002 ± <0.001	5 ± 1
16C16	35,182	21 ± 7	1.42 ± 0.02	0.5	-169 ± 99	0.07	<0.001 ± <0.001	7 ± 3
16C17	24,679	41 ± 8	1.42 ± 0.02	1.3	-138 ± 133	-0.2	-0.001 ± <0.001	14 ± 3
16C18	19,286	10 ± 5	1.43 ± 0.02	0.4	-133 ± 52	-	-	3 ± 2
18G2	2,990	-4 ± 1	0.25 ± 0.03	-5.2	-12 ± 7	-0.01	<0.001 ± 0.001	-1 ± 0
18G3	17,621	-4 ± 7	0.16 ± 0.02	-1.3	27 ± 121	-0.04	<0.001 ± <0.001	-1 ± 2
18G4	13,742	-11 ± 14	0.16 ± 0.02	-5.3	137 ± 170	-	-	-4 ± 5
18G5	15,869	-1 ± 13	0.16 ± 0.02	-0.3	-4 ± 176	-	-	0 ± 5
18G6	16,257	-5 ± 14	0.58 ± 0.05	-0.6	-8 ± 121	-	-	-2 ± 5
18G7	10,485	-5 ± 20	0.35 ± 0.03	-1.4	-425 ± 283	-0.11	-0.001 ± <0.001	-2 ± 7
18G8	29,110	-37 ± 22	0.37 ± 0.03	-3.7	-172 ± 168	0.23	0.001 ± <0.001	-12 ± 8
21N4	19,606	23 ± 6	2.71 ± 0.03	0.5	-56 ± 72	-	-	8 ± 2
21N5	32,160	10 ± 2	2.95 ± 0.03	0.1	207 ± 74	-	-	3 ± 1
21N6	16,074	16 ± 3	2.92 ± 0.03	0.4	17 ± 42	-0.37	-0.002 ± <0.001	5 ± 1
21N7	29,070	-4 ± 8	2.92 ± 0.03	0	-38 ± 34	-0.16	-0.001 ± 0.003	-1 ± 3
21N8	38,995	26 ± 7	2.92 ± 0.03	0.2	33 ± 46	-0.08	<0.001 ± 0.001	9 ± 2
21N9	24,009	22 ± 5	3.07 ± 0.05	0.3	-100 ± 58	-	-	7 ± 2

Feeder	Energy Baseline (MWh)	Net Energy Reduction (MWh)* †	Voltage Reduction (V)	CVRf	Peak Load Reduction (kW)	Distribution Loss Reduction (%)	Power Factor Change	GHG Reductions (CO2) †
30A1	26,590	26 ± 19	0.84 ± 0.03	1.3	-137 ± 59	-	-	9 ± 6
30A2	12,956	14 ± 4	0.14 ± 0.02	8.2	-49 ± 56	-	-	5 ± 1
30A3	19,086	37 ± 24	1.11 ± 0.36	1.9	-92 ± 464	-	-	13 ± 8
30A4	16,111	-11 ± 9	0.15 ± 0.02	-4.8	-232 ± 91	0.04	<0.001 ± <0.001	-4 ± 3
30A5	4,544	6 ± 2	0.73 ± 0.02	1.9	0 ± 0	-	-	2 ± 1
30A6	26,324	-14 ± 5	0.16 ± 0.02	-3.4	-286 ± 580	-	-	-5 ± 2
Overall*	524,992	879 ± 184	1.52 ± 0.01	-0.18	-1,435 ± 903	0.01%	<0.001 ± <0.001	299 ± 63

* Overall energy savings is the sum of each feeder's energy savings, and due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row. Overall voltage reductions and CVR factors provided are load-weighted averages of these estimates provided for each feeder. Aggregate CVRf value presented here is the load-weighted average of every feeder-specific CVRf estimate for which there was enough data to estimate CVRf. This differs from the inclusion criteria applied to aggregate CVRf values presented in *Table* Table 79 and Table 94. Similarly, aggregate peak load reduction is the load-weighted average of every feeder-specific peak load reduction estimate for which there was enough data to estimate peak load reduction. This differs from the inclusion criteria applied to aggregate peak load reduction values presented in *Table* Table 80 and Table 95.

† Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged between March 1, 2022 and February 28, 2023.

Source: Guidehouse analysis

B.11.2 National Grid

Table B-20. National Grid Performance Metrics Results by Feeder*

Feeder	Energy Baseline (MWh)	Net Energy Reduction (MWh)†‡	Voltage Reduction (kV)	CVRf	Peak Load Reduction (kW)	Distribution Loss Reduction (%)	Power Factor Change	GHG Reductions (CO2)‡
16W1	30,699	-4 ± 24	0.05 ± <0.001	-0.3	-302 ± 334	-	-	-1 ± 8
16W3	31,288	-48 ± 22	0.05 ± <0.001	-3.5	-193 ± 220	-	-	-16 ± 7
16W5	19,329	-5 ± 15	0.05 ± <0.001	-0.6	-197 ± 200	-	-	-2 ± 5
16W7	35,103	-17 ± 25	0.05 ± 0.01	-1.1	-582 ± 388	-	-	-6 ± 9
29W1	37,577	-53 ± 35	0.02 ± 0.01	-7	-494 ± 378	-	-	-18 ± 12
29W2	19,272	29 ± 24	<0.001 ± <0.001	-40	-236 ± 218	-	-	10 ± 8
29W3	41,240	82 ± 26	0.03 ± 0.01	7.6	-99 ± 271	-	-	28 ± 9
29W4	30,585	87 ± 27	<0.001 ± <0.001	-90	-240 ± 250	-	-	29 ± 9
29W5	38,941	89 ± 34	0.04 ± 0.01	7.8	182 ± 305	-	-	30 ± 12
29W6	28,225	73 ± 28	-0.01 ± 0.01	-28.1	50 ± 194	-	-	25 ± 10
74L1	35,699	92 ± 32	0.34 ± 0.01	0.9	-156 ± 415	-	-	31 ± 11
74L2	22,748	11 ± 17	0.13 ± 0.01	0.5	-53 ± 129	-	-	4 ± 6
74L3	25,622	50 ± 20	0.34 ± 0.01	0.7	-100 ± 225	-	-	17 ± 7
74L4	28,739	16 ± 20	0.13 ± 0.01	0.5	-139 ± 135	-	-	6 ± 7
74L5	25,151	38 ± 19	0.34 ± 0.01	0.5	-220 ± 300	-	-	13 ± 6
74L6	21,148	31 ± 15	0.13 ± 0.01	1.3	-35 ± 94	-	-	10 ± 5
797W1	29,904	47 ± 47	-0.01 ± <0.001	-15	-	-	-	16 ± 16
797W19	26,886	27 ± 27	0.1 ± 0.01	1.3	69 ± 368	-	-	9 ± 9
797W20	40,544	106 ± 33	0.1 ± 0.01	3.3	151 ± 230	-	-	36 ± 11
797W23	28,363	-11 ± 27	-0.01 ± <0.001	3.6	-	-	-	-4 ± 9
797W24	34,820	21 ± 34	0.1 ± 0.01	0.8	215 ± 318	-	-	7 ± 12
797W29	25,735	26 ± 27	-0.01 ± <0.001	-9.5	-	-	-	9 ± 9
797W42	11,706	8 ± 16	-0.01 ± <0.001	-6.9	-	-	-	3 ± 6
913W17	12,900	9 ± 12	-	-	9 ± 103	-	-	3 ± 4
913W18	12,851	16 ± 9	-	-	-18 ± 73	-1.6	-0.008 ± 0.003	5 ± 3

Feeder	Energy Baseline (MWh)	Net Energy Reduction (MWh)†‡	Voltage Reduction (kV)	CVRf	Peak Load Reduction (kW)	Distribution Loss Reduction (%)	Power Factor Change	GHG Reductions (CO2)‡
913W43	13,940	15 ± 16	-	-	-55 ± 134	-	-	5 ± 5
913W47	15,213	14 ± 11	-	-	-51 ± 89	-1.2	-0.006 ± 0.002	5 ± 4
913W67	5,523	4 ± 6	-	-	-18 ± 50	-	-	1 ± 2
913W69	23,391	14 ± 20	-	-	-102 ± 164	-2.7	-0.013 ± 0.007	5 ± 7
92W43	26,146	122 ± 42	0.25 ± 0.02	2.1	-	-	-	41 ± 14
92W44	36,938	95 ± 43	0.25 ± 0.02	1.2	-	-	-	32 ± 15
92W54	24,153	250 ± 124	0.25 ± 0.02	4.6	-	-	-	85 ± 42
Overall†	882,631	1,867 ± 302	0.08 ± <0.001	-6.64	-2,615 ± 1,234	-1.95	-0.01 ± 0.002	645 ± 103

* A value of "-" for any one season has been provided for feeders without sufficient data in that specific season.

† Overall energy savings is the sum of each feeder's energy savings, and due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row. Overall voltage reductions and CVR factors provided are load-weighted averages of these estimates provided for each feeder. Aggregate CVRf value presented here is the load-weighted average of every feeder-specific CVRf value for which there was enough data to estimate CVRf. This differs from the inclusion criteria applied to aggregate CVRf values presented in Table and Table 94. Similarly, aggregate peak load reduction is the load-weighted average of every feeder-specific peak load reduction estimate for which there was enough data to estimate peak load reduction. This differs from the inclusion criteria applied to aggregate peak load reduction values presented in Table and Table 95.

‡ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged between March 1, 2022 and February 28, 2023.

Source: Guidehouse analysis

B.12 Feeder MW Percent of Peak MVA

This section details feeder-specific comparisons of feeder demand in the clean analysis data and feeder annual peak MVA. Each table details each feeder’s average demand during the entire analysis period, average demand during the summer peak period,⁶⁸ and annual peak MVA.⁶⁹ The average feeder demand during the entire analysis period and during the summer peak period are then compared to annual peak MVA by taking the ratio of these values to annual peak MVA. Results are provided separately by EDC.

B.12.1 Eversource

Table B-21. Eversource Feeder MW Percent of Peak MVA by Feeder

Feeder	Average MW (Spring 2022 – Winter 2022/23†)	Average MW (Summer Peak‡)	Annual Peak MVA¶	Average MW Percent of Peak MVA (Spring 2022 – Winter 2022/23)	Average MW Percent of Peak MVA (Summer Peak)
16C11	0.84	1.33	5.8	14%	23%
16C12	2.80	3.15	4.4	64%	72%
16C14	2.56	3.90	6.3	41%	62%
16C15	2.22	3.05	4.1	54%	74%
16C16	4.00	4.70	7.4	54%	64%
16C17	2.79	3.90	7.0	40%	56%
16C18	2.19	2.97	6.3	35%	47%
18G2	0.34	0.33	0.5	68%	66%
18G3	2.01	1.77	4.0	50%	44%
18G4	1.58	-0.15	4.7	34%	-3%
18G5	1.81	0.75	5.8	31%	13%
18G6	1.85	1.53	5.0	37%	31%
18G7	1.19	-1.26	4.5	26%	-28%
18G8	3.33	2.07	7.5	44%	28%
21N4	2.23	3.61	6.8	33%	53%
21N5	3.67	4.18	8.4	44%	50%
21N6	1.83	3.07	4.3	43%	71%
21N7	3.32	4.11	4.8	69%	86%
21N8	4.44	5.67	6.8	65%	83%
21N9	2.73	3.41	6.4	43%	53%
30A1	3.03	3.75	6.8	45%	55%
30A2	1.47	1.52	8.8	17%	17%
30A3	2.16	3.35	7.8	28%	43%

⁶⁸ Summer peak is defined in this evaluation as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays.

⁶⁹ Annual peak MVA was drawn from 2022 GMP Term Report, Appendix 1 filed April 24, 2023.

Feeder	Average MW (Spring 2022 – Winter 2022/23†)	Average MW (Summer Peak‡)	Annual Peak MVA¶	Average MW Percent of Peak MVA (Spring 2022 – Winter 2022/23)	Average MW Percent of Peak MVA (Summer Peak)
30A4	1.84	4.17	4.6	40%	91%
30A5	0.52	0.48	4.4	12%	11%
30A6	3.01	2.72	5.5	55%	49%

† Calculations are based off of clean analysis data.

‡ Summer peak is defined in this evaluation as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays.

¶ Annual peak MVA was drawn from 2022 GMP Term Report, Appendix 1 filed April 24, 2023.

Source: Guidehouse analysis

B.12.2 National Grid

Table B-22. National Grid Feeder MW Percent of Peak MVA by Feeder

Feeder	Average MW (Spring 2022 – Winter 2022/23*)	Average MW (Summer Peak†)	Annual Peak MVA‡	Average MW Percent of Peak MVA (Spring 2022 – Winter 2022/23)	Average MW Percent of Peak MVA (Summer Peak)
16W1	3.58	4.66	9.6	37%	49%
16W2	3.76	-	8.6	44%	-
16W3	3.65	4.83	7.6	48%	64%
16W4	2.57	-	9.2	28%	-
16W5	2.27	3.37	5.7	40%	59%
16W6	4.82	-	14.3	34%	-
16W7	4.13	-	10.9	38%	-
16W8	3.55	-	9.6	37%	-
29W1	4.30	4.70	10.7	40%	44%
29W2	2.19	2.89	6.0	37%	48%
29W3	4.68	5.36	10.3	45%	52%
29W4	3.43	3.60	8.2	42%	44%
29W5	4.43	4.36	10.5	42%	42%
29W6	3.18	4.09	6.8	47%	60%
74L1	4.11	5.59	12.1	34%	46%
74L2	2.60	3.95	6.7	39%	59%
74L3	2.94	3.63	8.2	36%	44%
74L4	3.29	4.20	6.6	50%	64%
74L5	2.91	4.49	10.7	27%	42%
74L6	2.42	3.00	5.0	48%	60%
797W1	3.45	3.72	10.4	33%	36%
797W19	3.10	3.91	8.3	37%	47%
797W20	4.63	6.80	9.7	48%	70%
797W23	3.30	4.20	9.7	34%	43%

Feeder	Average MW (Spring 2022 – Winter 2022/23*)	Average MW (Summer Peak†)	Annual Peak MVA‡	Average MW Percent of Peak MVA (Spring 2022 – Winter 2022/23)	Average MW Percent of Peak MVA (Summer Peak)
797W24	3.98	5.11	9.7	41%	53%
797W29	2.98	3.70	8.3	36%	45%
797W42	1.35	1.78	8.3	16%	21%
913W17	2.06	2.60	5.5	37%	47%
913W18	2.07	2.69	4.6	45%	58%
913W43	2.28	3.38	7.1	32%	48%
913W47	2.48	3.41	5.8	43%	59%
913W67	0.90	1.22	3.0	30%	41%
913W69	3.82	5.64	9.9	39%	57%
92W43	3.03	-	7.1	39%	-
92W44	4.23	-	9.0	43%	-
92W54	2.78	-	7.3	47%	-
92W78	2.39	-	7.9	38%	-
92W79	2.48	-	6.4	30%	-

† Calculations are based off of clean analysis data.

‡ Summer peak is defined by ISO-NE as 1:00 p.m. to 5:00 p.m. ET from June 1 to August 31 on non-holiday weekdays.

¶ Annual peak MVA was drawn from 2022 GMP Term Report, Appendix 1 filed April 24, 2023.

Source: Guidehouse analysis

B.13 VVO Energy Savings and Voltage Reductions by Season

At the request of Eversource, in this section Guidehouse provides energy savings and voltage reductions attributed to VVO for each season from Spring 2022 through Winter 2022/23. Each table provides the energy savings and voltage reductions, and the associated 90 percent confidence bounds. A value of “-“ for any one season has been provided for feeders without sufficient data in that specific season. Estimates are provided by feeder for Eversource and National Grid separately.

B.13.1 Eversource

Table B-23. Eversource Energy Savings by Feeder and Season

Feeder*	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	MWh#	%¶	MWh#	%¶	MWh#	%¶	MWh#	%¶
16C11	6.9 ± 8.9	1.5 ± 1.9	23.9 ± 8.4	2.2 ± 0.8	-15.2 ± 8.0	-1.8 ± 0.9	54.6 ± 9.9	7.8 ± 1.4
16C12	-34.3 ± 11.7	-1.8 ± 0.6	46.8 ± 14.9	1.6 ± 0.5	85.8 ± 14.1	2.9 ± 0.5	29.4 ± 14.2	1.0 ± 0.5
16C14	16.5 ± 5.4	1.7 ± 0.6	65.1 ± 9.2	2.2 ± 0.3	-12.9 ± 9.7	-0.5 ± 0.4	15.8 ± 8.9	0.6 ± 0.3
16C15	7.6 ± 3.1	0.9 ± 0.4	25.9 ± 5.2	1.0 ± 0.2	9.2 ± 5.5	0.4 ± 0.2	7.8 ± 5.0	0.3 ± 0.2
16C16	-7.6 ± 8.6	-0.7 ± 0.8	42.8 ± 14.7	1.0 ± 0.3	-2.5 ± 15.8	-0.1 ± 0.3	44.5 ± 14.4	0.9 ± 0.3
16C17	-27.4 ± 9.8	-3.1 ± 1.1	58.1 ± 16.7	1.7 ± 0.5	-3.4 ± 17.7	-0.1 ± 0.6	123.8 ± 16.7	3.8 ± 0.5
16C18	4.9 ± 5.3	0.7 ± 0.7	36.2 ± 8.9	1.3 ± 0.3	-4.8 ± 9.4	-0.2 ± 0.4	1.6 ± 8.7	0.1 ± 0.3
18G2	-3.7 ± 1.6	-0.9 ± 0.4	6.1 ± 1.8	2.9 ± 0.8	-7.2 ± 1.8	-2.5 ± 0.6	-7.4 ± 1.8	-2.3 ± 0.6
18G3	-18.9 ± 12.5	-0.9 ± 0.6	73.3 ± 13.2	5.2 ± 0.9	-22.4 ± 12.3	-1.3 ± 0.7	-23.4 ± 13.1	-1.0 ± 0.6
18G4	-27.2 ± 25.8	-1.9 ± 1.8	100.8 ± 24.7	11.2 ± 2.7	-58.5 ± 24.9	-4.3 ± 1.8	-37.7 ± 26.8	-1.7 ± 1.2
18G5	-38.3 ± 24.9	-2.2 ± 1.4	100.3 ± 23.7	7.1 ± 1.7	-64.5 ± 24.4	-4.4 ± 1.7	18.3 ± 26.1	0.8 ± 1.2
18G6	-42.6 ± 23.7	-2.3 ± 1.3	11.9 ± 22.5	0.6 ± 1.2	0.4 ± 29.2	0.0 ± 1.8	27.9 ± 28.6	2.0 ± 2.1
18G7	-14.2 ± 35.4	-1.5 ± 3.6	60.6 ± 37.4	5.8 ± 3.6	-49.0 ± 34.5	-5.0 ± 3.5	-7.5 ± 34	-0.5 ± 2.2
18G8	-99.6 ± 38.7	-2.6 ± 1.0	110.9 ± 38.1	3.2 ± 1.1	-73.2 ± 37.7	-2.6 ± 1.4	-	-
21N4	-4.4 ± 12.1	-0.2 ± 0.6	69.8 ± 12.3	2.3 ± 0.4	4.6 ± 12.9	0.2 ± 0.6	31.7 ± 12.2	1.3 ± 0.5
21N5	1.0 ± 4.7	0.0 ± 0.1	81.3 ± 6.2	2.2 ± 0.2	-4.6 ± 5.1	-0.1 ± 0.1	-4.8 ± 4.4	-0.1 ± 0.1
21N6	12.8 ± 6.8	0.7 ± 0.4	43.6 ± 7.0	1.9 ± 0.3	-7.4 ± 7.3	-0.4 ± 0.4	19.2 ± 6.8	1.0 ± 0.3
21N7	8.9 ± 17.1	0.3 ± 0.5	24.8 ± 16.9	0.7 ± 0.5	-91.8 ± 17.9	-2.6 ± 0.5	45.1 ± 18.4	1.2 ± 0.5
21N8	38.9 ± 13.9	0.8 ± 0.3	62.8 ± 14.1	1.3 ± 0.3	9.6 ± 14.9	0.2 ± 0.3	0.2 ± 13.9	0.0 ± 0.3
21N9	6.2 ± 13.5	0.2 ± 0.5	76.8 ± 10.2	2.5 ± 0.3	-20.1 ± 11.7	-0.7 ± 0.4	13.1 ± 12.3	0.4 ± 0.4

Feeder*	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	MWh†‡	%¶	MWh†‡	%¶	MWh†‡	%¶	MWh†‡	%¶
30A1	-	-	10.7 ± 26.8	0.3 ± 0.8	47.3 ± 25.0	1.9 ± 1.0	-103.9 ± 66.7	-5.4 ± 3.5
30A2	9.9 ± 8.1	1.1 ± 0.9	63.0 ± 9.7	4.3 ± 0.7	-3.7 ± 7.6	-0.2 ± 0.4	2.3 ± 6.2	0.1 ± 0.4
30A3	-	-	22.6 ± 122	1.4 ± 7.5	-64.3 ± 28.5	-3.9 ± 1.7	191.0 ± 30.2	9.5 ± 1.5
30A4	-51.2 ± 16.2	-3.1 ± 1.0	16.6 ± 16.6	0.6 ± 0.6	-20.4 ± 14.9	-1.6 ± 1.2	131.9 ± 38.9	11.5 ± 3.4
30A5	-	-	-0.7 ± 2.4	-0.2 ± 0.6	7.3 ± 2.4	1.5 ± 0.5	7.8 ± 1.9	2.0 ± 0.5
30A6	-26.4 ± 9.5	-0.9 ± 0.3	22.7 ± 15.3	0.8 ± 0.5	-29.4 ± 9.6	-1.0 ± 0.3	1.1 ± 8.1	0.0 ± 0.3
Overall†	-282 ± 81	-0.6 ± 0.2	1,257 ± 151	2.1 ± 0.3	-391 ± 93	-0.7 ± 0.2	582 ± 11	1.1 ± 0.3

† Total energy savings provided for each period is the sum of each feeder's energy savings within that period. Due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row.

‡ Calculation uses actual number of VVO On hours spanning the analysis period. Actual VVO On Hours are the number of hours VVO was engaged in the raw analysis data between March 1, 2022 and February 28, 2023.

¶ Percentage energy savings provided for each period is the load-weighted average of percentage savings estimated for each feeder. Estimates with a "-" represent a feeder/season for which there was not enough useable data to estimate impacts.

Source: Guidehouse analysis

Table B-24. Eversource Voltage Reductions by Feeder and Season*

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022	
	V	%	V	%	V	%	V	%
16C11	0.00 ± 0.08	0.00 ± 0.07	2.64 ± 0.05	2.14 ± 0.04	2.87 ± 0.05	2.32 ± 0.04	3.44 ± 0.07	2.80 ± 0.05
16C12	-0.03 ± 0.05	-0.02 ± 0.04	2.55 ± 0.05	2.06 ± 0.04	2.78 ± 0.04	2.24 ± 0.03	2.99 ± 0.05	2.42 ± 0.04
16C14	1.84 ± 0.07	1.49 ± 0.06	1.80 ± 0.05	1.45 ± 0.04	0.93 ± 0.04	0.75 ± 0.04	1.41 ± 0.05	1.14 ± 0.04
16C15	1.82 ± 0.07	1.47 ± 0.06	1.81 ± 0.05	1.46 ± 0.04	0.92 ± 0.04	0.74 ± 0.03	1.39 ± 0.04	1.12 ± 0.04
16C16	1.86 ± 0.07	1.50 ± 0.06	1.81 ± 0.05	1.47 ± 0.04	0.92 ± 0.04	0.74 ± 0.03	1.40 ± 0.04	1.13 ± 0.04
16C17	1.85 ± 0.07	1.50 ± 0.06	1.82 ± 0.05	1.47 ± 0.04	0.90 ± 0.04	0.73 ± 0.03	1.45 ± 0.05	1.17 ± 0.04
16C18	1.83 ± 0.07	1.48 ± 0.06	1.83 ± 0.05	1.48 ± 0.04	0.93 ± 0.04	0.76 ± 0.03	1.41 ± 0.04	1.15 ± 0.04
18G2	-0.01 ± 0.05	0.00 ± 0.04	1.48 ± 0.09	1.23 ± 0.07	0.12 ± 0.07	0.10 ± 0.06	-0.01 ± 0.07	-0.01 ± 0.06
18G3	0.01 ± 0.03	0.01 ± 0.03	1.05 ± 0.05	0.87 ± 0.04	0.03 ± 0.04	0.02 ± 0.03	-0.03 ± 0.04	-0.02 ± 0.03
18G4	0.01 ± 0.03	0.01 ± 0.03	0.89 ± 0.05	0.74 ± 0.04	0.02 ± 0.04	0.01 ± 0.03	-0.02 ± 0.04	-0.02 ± 0.03
18G5	0.00 ± 0.03	0.00 ± 0.03	0.88 ± 0.05	0.73 ± 0.04	0.03 ± 0.04	0.03 ± 0.03	-0.01 ± 0.04	-0.01 ± 0.03
18G6	0.09 ± 0.08	0.07 ± 0.07	1.58 ± 0.09	1.28 ± 0.07	0.10 ± 0.13	0.08 ± 0.10	0.03 ± 0.19	0.02 ± 0.15
18G7	0.06 ± 0.04	0.05 ± 0.04	1.26 ± 0.05	1.01 ± 0.04	0.01 ± 0.05	0.01 ± 0.04	0.09 ± 0.08	0.07 ± 0.06
18G8	0.07 ± 0.05	0.06 ± 0.04	1.06 ± 0.05	0.86 ± 0.04	0.01 ± 0.05	0.01 ± 0.04	-	-
21N4	2.51 ± 0.05	2.03 ± 0.04	2.48 ± 0.06	2.01 ± 0.05	2.65 ± 0.05	2.14 ± 0.04	3.18 ± 0.06	2.58 ± 0.05
21N5	2.73 ± 0.06	2.22 ± 0.05	3.31 ± 0.08	2.71 ± 0.07	2.75 ± 0.06	2.24 ± 0.05	3.15 ± 0.06	2.57 ± 0.05
21N6	2.69 ± 0.05	2.18 ± 0.04	2.75 ± 0.05	2.23 ± 0.04	3.01 ± 0.05	2.44 ± 0.04	3.22 ± 0.05	2.61 ± 0.04
21N7	2.67 ± 0.05	2.16 ± 0.04	2.73 ± 0.06	2.22 ± 0.04	3.01 ± 0.05	2.43 ± 0.04	3.30 ± 0.06	2.68 ± 0.05
21N8	2.71 ± 0.05	2.20 ± 0.04	2.73 ± 0.05	2.21 ± 0.04	3.00 ± 0.05	2.43 ± 0.04	3.21 ± 0.05	2.60 ± 0.04
21N9	3.00 ± 0.11	2.43 ± 0.09	3.01 ± 0.09	2.44 ± 0.07	3.13 ± 0.09	2.53 ± 0.07	3.14 ± 0.10	2.55 ± 0.08
30A1	-	-	0.58 ± 0.04	0.47 ± 0.03	0.99 ± 0.03	0.80 ± 0.03	1.54 ± 0.15	1.25 ± 0.12
30A2	0.07 ± 0.03	0.06 ± 0.02	0.37 ± 0.04	0.30 ± 0.03	0.12 ± 0.03	0.10 ± 0.03	0.08 ± 0.03	0.07 ± 0.03
30A3	-	-	2.81 ± 1.96	3.39 ± 2.37	1.08 ± 0.41	0.89 ± 0.34	0.80 ± 0.71	0.65 ± 0.58
30A4	0.08 ± 0.03	0.06 ± 0.02	0.27 ± 0.03	0.22 ± 0.03	0.12 ± 0.03	0.10 ± 0.03	0.15 ± 0.1	0.12 ± 0.08
30A5	-	-	0.57 ± 0.04	0.46 ± 0.03	1.05 ± 0.04	0.85 ± 0.03	0.43 ± 0.05	0.35 ± 0.04
30A6	0.08 ± 0.03	0.07 ± 0.03	0.53 ± 0.06	0.43 ± 0.05	0.18 ± 0.04	0.15 ± 0.03	0.07 ± 0.04	0.06 ± 0.03
Overall*	1.43 ± 0.01	1.16 ± 0.01	1.85 ± 0.05	1.40 ± 0.02	1.13 ± 0.01	1.53 ± 0.07	1.57 ± 0.02	1.28 ± 0.03

* Overall kV and percent voltage savings provided for each period is the load-weighted average of kV and percent savings estimated for each feeder. Estimates with a "-" represent a feeder/season for which there was not enough useable data to estimate impacts.
 Source: Guidehouse analysis

B.13.2 National Grid

Table B-25. National Grid Energy Savings by Feeder and Season

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	MWh* <i>f</i>	%	MWh* <i>f</i>	%	MWh* <i>f</i>	%	MWh* <i>f</i>	%
16W1	-18.2 ± 18.7	-1.0 ± 1.0	35.8 ± 13.7	3.8 ± 1.4	-31.7 ± 13.1	-7.7 ± 3.2	1.6 ± 11.9	0.2 ± 1.2
16W3	-35.9 ± 17.0	-1.9 ± 0.9	23.8 ± 12.5	2.6 ± 1.4	-34.7 ± 11.9	-7.8 ± 2.7	-16.7 ± 10.8	-1.6 ± 1.1
16W5	-20.3 ± 11.4	-1.8 ± 1.0	21.9 ± 8.4	3.6 ± 1.4	-11.6 ± 8.0	-3.9 ± 2.7	1.1 ± 7.3	0.2 ± 1.1
16W7	-33.2 ± 20.1	-1.6 ± 1.0	29.0 ± 13.9	2.5 ± 1.2	-22.4 ± 13.3	-4.2 ± 2.5	-0.1 ± 12.3	0.0 ± 1.1
29W1	West Salem did not undergo testing in Spring 2022		-94.7 ± 22.7	-5.4 ± 1.3	34.6 ± 21.0	4.4 ± 2.7	9.1 ± 57.4	0.2 ± 1.1
29W2			-35.3 ± 21.3	-2.7 ± 1.6	27.5 ± 15.9	6.5 ± 3.8	98.0 ± 43.1	3.8 ± 1.7
29W3			33.0 ± 19.9	1.4 ± 0.8	46.4 ± 14.9	5.3 ± 1.7	53.3 ± 41.4	1.0 ± 0.8
29W4			6.1 ± 22.5	0.3 ± 1.2	55.6 ± 17.4	8.5 ± 2.6	115.5 ± 47.4	2.6 ± 1.1
29W5			53.9 ± 26.4	2.1 ± 1.0	33.3 ± 18.9	3.8 ± 2.1	38.2 ± 49.9	1.0 ± 1.3
29W6			17.7 ± 15.0	1.4 ± 1.2	16.1 ± 11.8	2.6 ± 1.9	70.9 ± 34.3	3.6 ± 1.7
74L1	40.9 ± 43.4	1.3 ± 1.3	40.2 ± 27.0	1.9 ± 1.3	96.9 ± 24.6	9.7 ± 2.5	64.7 ± 91.8	1.1 ± 1.6
74L2	-37.2 ± 28.5	-1.5 ± 1.1	34.9 ± 19.2	1.7 ± 0.9	17.7 ± 13.4	3.4 ± 2.6	-7.3 ± 67.5	-0.2 ± 1.5
74L3	23.7 ± 27.4	1.0 ± 1.2	33.7 ± 17	2.4 ± 1.2	51.4 ± 15.5	8.3 ± 2.5	10.1 ± 57.9	0.2 ± 1.3
74L4	-25.4 ± 34.6	-0.8 ± 1.0	1.2 ± 23.3	0.0 ± 0.9	59.8 ± 16.3	8.2 ± 2.2	-15.4 ± 81.8	-0.3 ± 1.6
74L5	-5.4 ± 25.3	-0.2 ± 1.1	36.3 ± 15.7	2.3 ± 1.0	46.3 ± 14.3	7.5 ± 2.3	9.7 ± 53.5	0.2 ± 1.3
74L6	5.7 ± 25.9	0.2 ± 1.1	28.6 ± 17.4	1.5 ± 0.9	33.8 ± 12.2	6.4 ± 2.3	-6.2 ± 61.4	-0.1 ± 1.4
797W1	-12.3 ± 49.1	-0.5 ± 2.0	17.8 ± 25.8	4.2 ± 6.1	28.5 ± 23.1	5.2 ± 4.2	88.5 ± 104.7	1.6 ± 1.9
797W19	53.6 ± 34.2	2.5 ± 1.6	-12.8 ± 18.5	-1.2 ± 1.7	30.5 ± 15.2	5.4 ± 2.7	-18.9 ± 24.9	-1.1 ± 1.4
797W20	166.0 ± 41.7	4.8 ± 1.2	19.7 ± 22.6	1.2 ± 1.3	21.2 ± 18.5	2.4 ± 2.1	1.2 ± 30.4	0.1 ± 1.3
797W23	15.4 ± 28.1	0.6 ± 1.1	8.0 ± 14.7	1.8 ± 3.4	9.4 ± 13.2	1.9 ± 2.6	-166.5 ± 60.1	-3.8 ± 1.4
797W24	28.8 ± 42.8	1.0 ± 1.5	-2.5 ± 23.1	-0.2 ± 1.6	40.9 ± 19.0	5.8 ± 2.7	-38.2 ± 31.2	-1.8 ± 1.5
797W29	16.6 ± 27.7	0.8 ± 1.3	14.0 ± 14.5	3.6 ± 3.7	17.2 ± 13.0	3.6 ± 2.7	-46.2 ± 59.1	-1.1 ± 1.4
797W42	6.4 ± 16.9	0.7 ± 1.8	6.5 ± 8.9	3.5 ± 4.7	2.4 ± 7.9	1.2 ± 4.0	-9.9 ± 36.1	-0.5 ± 1.8
92W43	Easton did not undergo testing in Spring – Fall 2022						48.6 ± 16.8	3.8 ± 1.3
92W44							38.0 ± 17.2	2.2 ± 1.0
92W54							100.1 ± 49.6	8.3 ± 4.1

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	MWh*†	%	MWh*†	%	MWh*†	%	MWh*†	%
92W78							43.2 ± 13.8	4.2 ± 1.3
92W79							66.7 ± 33.8	6.3 ± 3.2
Overall*	169 ± 127	0.4 ± 0.3	317 ± 92	1.4 ± 0.4	569 ± 76	3.3 ± 0.6	533 ± 263	0.9 ± 0.3

* Total energy savings provided for each period is the sum of each feeder's energy savings within that period. Due to model noise, a manual sum of savings across periods may not equal the amount provided in the Total row.

† Calculation uses actual number of VVO On hours spanning the analysis period for each feeder. Actual VVO On Hours are the number of hours VVO was engaged in the raw analysis data during each feeder's testing period within the Spring 2022 – Winter 2023 evaluation period.

Source: Guidehouse analysis

Table B-26. National Grid Voltage Reductions by Feeder and Season

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	kV	%	kV	%	kV	%	kV	%
16W1	0.03 ± 0.01	0.24 ± 0.04	0.03 ± 0.01	0.21 ± 0.09	0.02 ± 0.02	0.18 ± 0.13	0.13 ± 0.01	0.90 ± 0.07
16W3	0.03 ± 0.01	0.24 ± 0.04	0.03 ± 0.01	0.20 ± 0.09	0.02 ± 0.02	0.17 ± 0.13	0.13 ± 0.01	0.89 ± 0.07
16W5	0.03 ± 0.01	0.24 ± 0.04	0.03 ± 0.01	0.20 ± 0.09	0.02 ± 0.02	0.17 ± 0.13	0.13 ± 0.01	0.90 ± 0.07
16W7	0.03 ± 0.01	0.25 ± 0.05	0.03 ± 0.01	0.21 ± 0.09	0.02 ± 0.02	0.17 ± 0.13	0.12 ± 0.01	0.88 ± 0.07
29W1	West Salem did not undergo testing in Spring 2022		0.03 ± 0.01	0.20 ± 0.06	0.04 ± 0.02	0.29 ± 0.11	0.02 ± 0.01	0.12 ± 0.05
29W2			0.00 ± 0.01	0.02 ± 0.05	-0.02 ± 0.01	-0.12 ± 0.09	-0.01 ± 0.01	-0.05 ± 0.05
29W3			0.02 ± 0.01	0.16 ± 0.07	0.09 ± 0.02	0.64 ± 0.12	0.02 ± 0.01	0.15 ± 0.06
29W4			0.01 ± 0.01	0.04 ± 0.06	-0.02 ± 0.01	-0.13 ± 0.10	-0.01 ± 0.01	-0.05 ± 0.05
29W5			0.03 ± 0.01	0.20 ± 0.06	0.07 ± 0.02	0.53 ± 0.12	0.03 ± 0.01	0.19 ± 0.09
29W6			0.01 ± 0.01	0.04 ± 0.08	-0.02 ± 0.01	-0.12 ± 0.11	-0.03 ± 0.01	-0.24 ± 0.11
74L1		0.34 ± 0.01	2.54 ± 0.08	0.40 ± 0.02	2.93 ± 0.12	0.30 ± 0.02	2.19 ± 0.18	0.31 ± 0.02
74L2	0.13 ± 0.01	0.97 ± 0.05	0.12 ± 0.01	0.92 ± 0.05	0.13 ± 0.01	0.93 ± 0.10	0.12 ± 0.01	0.88 ± 0.07
74L3	0.34 ± 0.01	2.54 ± 0.08	0.40 ± 0.02	2.93 ± 0.12	0.30 ± 0.02	2.19 ± 0.18	0.31 ± 0.02	2.30 ± 0.12
74L4	0.13 ± 0.01	0.97 ± 0.05	0.12 ± 0.01	0.92 ± 0.05	0.13 ± 0.01	0.93 ± 0.10	0.12 ± 0.01	0.88 ± 0.07
74L5	0.34 ± 0.01	2.54 ± 0.08	0.40 ± 0.02	2.93 ± 0.12	0.30 ± 0.02	2.19 ± 0.18	0.31 ± 0.02	2.30 ± 0.12
74L6	0.13 ± 0.01	0.97 ± 0.05	0.12 ± 0.01	0.92 ± 0.05	0.13 ± 0.01	0.93 ± 0.10	0.12 ± 0.01	0.88 ± 0.07
797W1	-0.03 ± 0.01	-0.20 ± 0.04	-0.08 ± 0.02	-0.53 ± 0.17	-0.03 ± 0.01	-0.23 ± 0.10	0.05 ± 0.01	0.37 ± 0.06
797W19	0.15 ± 0.01	1.05 ± 0.07	0.05 ± 0.01	0.35 ± 0.09	0.11 ± 0.02	0.81 ± 0.12	0.07 ± 0.01	0.47 ± 0.08
797W20	0.15 ± 0.01	1.05 ± 0.07	0.05 ± 0.01	0.35 ± 0.09	0.12 ± 0.02	0.81 ± 0.12	0.07 ± 0.01	0.47 ± 0.08
797W23	-0.03 ± 0.01	-0.20 ± 0.04	-0.08 ± 0.02	-0.54 ± 0.17	-0.03 ± 0.01	-0.23 ± 0.10	0.05 ± 0.01	0.37 ± 0.06
797W24	0.15 ± 0.01	1.05 ± 0.07	0.05 ± 0.01	0.35 ± 0.09	0.11 ± 0.02	0.81 ± 0.12	0.07 ± 0.01	0.47 ± 0.08
797W29	-0.03 ± 0.01	-0.21 ± 0.04	-0.08 ± 0.02	-0.54 ± 0.17	-0.03 ± 0.01	-0.23 ± 0.10	0.05 ± 0.01	0.37 ± 0.06
797W42	-0.03 ± 0.01	-0.21 ± 0.04	-0.07 ± 0.02	-0.53 ± 0.17	-0.03 ± 0.01	-0.23 ± 0.10	0.05 ± 0.01	0.37 ± 0.06
92W43	Easton did not undergo testing in Spring – Fall 2022						0.25 ± 0.02	1.81 ± 0.14
92W44	Easton did not undergo testing in Spring – Fall 2022						0.25 ± 0.02	1.80 ± 0.14
92W54	Easton did not undergo testing in Spring – Fall 2022						0.25 ± 0.02	1.81 ± 0.14
92W78	Easton did not undergo testing in Spring – Fall 2022						0.25 ± 0.02	1.81 ± 0.14

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	kV	%	kV	%	kV	%	kV	%
92W79							0.26 ± 0.02	1.81 ± 0.14
Overall*	0.12 ± 0.00	0.84 ± 0.02	0.56 ± 0.02	0.22 ± 0.01	0.08 ± 0.00	0.58 ± 0.03	0.12 ± 0.00	0.86 ± 0.02

* kV and percent voltage savings provided for each period is the load-weighted average of kV and percent savings estimated for each feeder.
 Source: Guidehouse analysis

B.14 Seasonal Data Attrition from Data Cleaning

This section details data attrition from data cleaning for each season from Spring 2022 through Winter 2022/23. Tables provide the number of observations received, then the observations remaining after data cleaning by season and by feeder. Tables are provided separately by EDC.

B.14.1 Eversource

Table B-27. Eversource Data Attrition by Feeder and Season

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	Obs* Received	Obs Remaining	Obs Received	Obs Remaining	Obs Received	Obs Remaining	Obs Received	Obs Remaining
16C11	8,828	2,544	8,832	5,907	8,736	6,890	8,640	4,835
16C12	8,828	5,014	8,832	6,803	8,736	7,843	8,640	7,851
16C14	8,828	3,131	8,832	7,029	8,736	8,215	8,640	8,060
16C15	8,828	3,020	8,832	7,064	8,736	8,162	8,640	8,046
16C16	8,828	3,144	8,832	7,118	8,736	8,142	8,640	8,046
16C17	8,829	3,167	8,832	7,195	8,736	8,378	8,640	7,853
16C18	8,829	3,150	8,832	7,143	8,736	8,324	8,640	8,153
18G2	8,828	6,847	8,832	3,141	8,736	4,328	8,640	4,502
18G3	8,828	8,102	8,832	3,557	8,736	5,862	8,640	5,827
18G4	8,828	8,246	8,832	4,290	8,736	6,102	8,640	6,046
18G5	8,828	8,069	8,832	4,189	8,736	5,863	8,640	5,806
18G6	8,828	6,222	8,832	5,679	8,736	2,573	8,640	1,332
18G7	8,828	8,018	8,832	5,655	8,736	5,908	8,640	3,425
18G8	8,828	8,341	8,832	6,689	8,736	6,106	8,640	0
21N4	8,828	8,142	8,832	7,201	8,736	7,959	8,640	8,022
21N5	8,828	6,528	8,832	3,513	8,736	6,296	8,640	7,267
21N6	8,828	8,338	8,832	7,239	8,736	8,015	8,640	8,305
21N7	8,828	7,945	8,832	7,225	8,736	7,918	8,640	6,942
21N8	8,828	8,361	8,832	7,325	8,736	8,022	8,640	8,249
21N9	8,829	2,823	8,832	4,535	8,736	4,116	8,640	3,491
30A1	0	0	8,832	5,714	8,736	8,097	8,640	425
30A2	8,828	7,338	8,832	4,491	8,736	6,012	8,640	6,362
30A3	0	0	8,832	726	8,736	7,475	8,640	2,697
30A4	8,828	8,498	8,832	7,156	8,736	7,416	8,640	1,078
30A5	0	0	8,832	5,913	8,736	7,606	8,640	4,690
30A6	8,828	7,707	8,832	2,744	8,736	5,723	8,640	5,670

* Refers to observations
 Source: Guidehouse analysis

B.14.2 National Grid

Table B-28. National Grid Data Attrition by Feeder and Season

Feeder	Spring 2022		Summer 2022		Fall 2022		Winter 2022/23	
	Hours Received	Hours Remaining	Hours Received	Hours Remaining	Hours Received	Hours Remaining	Hours Received	Hours Remaining
16W1	2,208	1,167	2,208	406	2,185	199	2,160	540
16W2	2,208	60	1,777	0	1,337	0	2,160	447
16W3	2,208	1,167	2,208	406	2,185	199	2,160	540
16W4	2,208	60	1,777	0	1,337	0	2,160	447
16W5	2,208	1,167	2,208	406	2,185	199	2,160	540
16W6	2,208	60	1,777	0	1,337	0	2,160	447
16W7	2,208	1,074	2,208	406	2,185	199	2,160	540
16W8	2,208	60	1,777	0	1,337	0	2,160	447
29W1	0	0	2,208	835	2,185	374	2,160	1,149
29W2	0	0	2,208	1,085	2,184	415	2,160	1,136
29W3	0	0	2,208	952	2,186	359	2,160	1,138
29W4	0	0	2,208	998	2,184	415	2,160	1,149
29W5	0	0	2,208	1,178	2,184	413	2,160	692
29W6	0	0	2,208	714	2,185	414	2,160	457
74L1	2,208	1,578	2,208	811	2,185	382	2,160	1,283
74L2	2,208	1,568	2,208	1,310	2,185	381	2,160	657
74L3	2,208	1,578	2,208	811	2,185	382	2,160	1,283
74L4	2,208	1,568	2,208	1,310	2,185	381	2,160	657
74L5	2,208	1,578	2,208	811	2,185	382	2,160	1,283
74L6	2,208	1,568	2,208	1,310	2,185	381	2,160	657
797W1	2,208	1,429	2,208	168	2,185	360	2,160	631
797W19	2,208	939	2,208	641	2,185	381	2,160	713
797W20	2,208	939	2,208	641	2,185	381	2,160	713
797W23	2,208	1,429	2,208	168	2,185	360	2,160	631
797W24	2,208	939	2,208	641	2,185	381	2,160	713
797W29	2,208	1,429	2,208	168	2,185	360	2,160	631
797W42	2,208	1,429	2,208	168	2,185	360	2,160	631
92W43	0	0	0	0	0	0	1,152	490
92W44	0	0	0	0	0	0	1,152	490
92W54	0	0	0	0	0	0	1,152	490
92W78	0	0	0	0	0	0	1,152	490
92W79	0	0	0	0	0	0	1,152	490

Source: Guidehouse analysis

**Distributed Generation
Policies
Section 19-1.2**

**Transformer Reverse
Power Capability**

19.012

Page 1 of 2

GENERAL

Any proposed DG that has the potential to cause reverse power flow through an Eversource substation transformer will require a System Impact Study (SIS). The SIS will specifically address the ability of the transformer to accommodate reverse power flow. The following items will be evaluated:

Note: This policy is applicable to all four operating companies: CT, WMA, EMA, and NH; unless noted otherwise.

SYSTEM VOLTAGE CONTROL

A precursor to transformer excitation problems is the loss of the ability to control voltage due to various factors such as system configuration, generator location, system impedances, transformer impedance, customer load, reactive power flows, and generation output. The system impact study shall determine if system voltage control can be maintained at various boundary conditions.

In addition, the nature of the generation source shall be evaluated for impact on system voltage and transformer Load Tap Changer (LTC) operation. For example, large photovoltaic sources whose outputs can vary significantly and rapidly will impact the ability to control distribution customer voltage, and can cause excessive LTC operations. Sudden large changes in DG output that are faster than the LTC's capability to maintain voltage within the allowable range can also result in overexcitation.

LTC DESIGN

1. Reactive Type use a preventive autotransformer to limit circulating current when on bridging tap positions. This type of LTC can handle reverse power with no restrictions.
2. Resistive Type use one or two resistors to limit circulating current when bridging tap positions.
 - a. Single resistor types cannot handle reverse power because of the manner in which load and circulating currents and voltages (recovery voltage) sum at the main arcing contacts – in one direction of operation. Single resistor type LTC's are unsuitable for DG / reverse power application. At a minimum, replacement of the LTC is required. Typically, however, the entire transformer must be replaced, as retrofit of another LTC type is a large involved job that requires input from both the transformer manufacturer and LTC manufacturer, and major modification to the transformer.
 - b. Two resistor type LTCs can handle reverse power with no restrictions.

LTC CONTROLLER TYPE

The controller will be evaluated for the ability to recognize reverse flow and to respond with appropriate control strategies.

Voltage and current inputs must be available to the LTC controller.

LTC controllers are to be designed to sense the reverse power/positive feedback condition, and react appropriately.

Any LTC controller configuration that is not appropriate for reverse power must be replaced with a suitable controller with both voltage and current inputs.

LTC CONTROL SETTINGS

The choice of proper control strategy will depend on whether the aggregate of DG's connected to an individual transformer can "push" the transformer secondary voltage around under light load conditions that result in reverse power flow back to the transmission system (i.e., supply of VAR's by DG's).

**Distributed Generation
Policies
Section 19-1.2**

**Transformer Reverse
Power Capability**

19.012

Page 2 of 2

Controllers shall have a variety of settings that can be used to “tune” LTC operation to the conditions encountered at a particular location. Such settings can be used to make location specific adjustments to LTC controller operation. The establishment of these settings will be dependent on case-by-case analysis of DG type and penetration.

CAPACITY LIMIT

Unless constrained by other more limiting DG policies, intermittent reverse power flow will be permitted up to 95 percent of the transformer’s top nameplate ampere rating with maximum cooling operational. The reverse power flow limit is based strictly on the transformer nameplate, with no consideration given to any forward power load on the transformer.

A possible consequence of allowing reverse power flow at a high percentage of the transformer nameplate rating is that the thermal aging rate of the transformer insulation will be increased, which may impact the lifespan of the transformer. Transformer insulation thermal aging is dependent on a combination of insulation temperature and time, as described in *IEEE Std. C57.91*, “IEEE Guide for Loading Mineral-Oil-Immersed Transformers and Step-Voltage Regulators.” Reverse power flow that will significantly add to the transformer insulation loss of life on a routine basis, based on the transformer specification and the insulation aging description in the latest version of *IEEE Std. C57.91*, must be evaluated. This evaluation will consider the calculated transformer insulation loss of life based on site specific ambient temperature and maximum aggregate DG power generation coincident with minimum distribution customer load on the distribution bus. Calculated loss of life that exceeds one percent per year will require further investigation of methods to mitigate the increased loss of life.

DG sources must supply a balanced three-phase output such that there would never be a situation where a substation transformer could experience forward power flow on one or more phases while experiencing reverse power flow on the other phase(s).

Please see the **Eversource DER Briefing Sheet – Transformer Reverse Power Capability** for additional background information.

DER-PG 2022
(Revision 00)



Distributed Energy Resources Planning Guide

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Updating Standards documents

Users of this standard should be aware that these documents may be superseded at any time by the issuance of new editions or may be amended from time to time through the issuance of amendments. The official standard, at any point, consist of the current edition of the document together with any amendment.

In order to determine whether a given document is the current edition and whether it has been amended, visit the standard Bookshelf Site or contact System Planning.

Contents

INTRODUCTION AND SCOPE	- 1 -
APPLICABILITY	- 2 -
1.0 GENERAL REQUIREMENTS	- 3 -
1.1 Documents and Standards.....	- 3 -
1.2 Interconnection Requests and Required Technical Information	- 4 -
2.0 STUDY KICK-OFF AND SCOPING	- 5 -
3.0 DER OPERABILITY AND N-1 CRITERIA	- 6 -
4.0 EXPRESS FEEDER AND STATION FEEDER BREAKERS	- 8 -
4.1 Express Feeders	- 8 -
4.2 Right-of-Way Issues	- 8 -
4.3 New or Existing Breaker Positions	- 9 -
5.0 VOLTAGE REGULATION BY DER	- 9 -
6.0 REQUIRED ELEMENTS OF THE SYSTEM IMPACT STUDY.....	- 10 -
6.1 Steady-State Thermal and Voltage Criteria	- 10 -
6.2 DER Impact on Voltage Regulating Equipment.....	- 11 -
6.3 Rapid Voltage Change and Voltage Flicker	- 11 -
6.4 Transient Overvoltage (TOV) and Transient Analysis	- 13 -
6.5 Transformer Reverse Power Capability	- 14 -
6.6 3V0 Assessment (Transmission Ground Fault Detection).....	- 15 -
6.7 Effective Grounding	- 20 -
6.8 Adverse Impact of Unintentional Islanding	- 21 -
6.9 Compliance with ISO-NE Source Requirement Document for Inverters	- 22 -
6.10 Short Circuit Evaluations.....	- 22 -
6.11 Short Circuit Ratio Evaluations.....	- 23 -
6.12 Communication and SCADA Requirement.....	- 23 -

INTRODUCTION AND SCOPE

This Distributed Energy Resource Planning Guide (DERPG) has been developed to describe the planning criteria and analyses used to study the impact of Distributed Energy Resources (“DER”) seeking to interconnect to the Eversource Energy (“Company”) Electric Power Systems (“EPS”). A consistent and uniform approach to DER Planning will ensure the reliability of the EPS is maintained and the quality of service to all customers meets expectations. The Planning Guide is aligned with applicable safety codes, regulatory requirements, and industry standards and provides uniform criteria and design standards across the Eversource Service Territory for all aspects of the DER Planning process.

The planning criteria and analyses described herein are used to ensure that DER do not degrade the safety, performance, or reliability of the EPS. This document is a guide, and the Company reserves the right to change its policies, procedures and standards when deemed necessary to maintain the reliability of the EPS and the safety of the Company’s customers, workforce, and general public.

Eversource has established administrative processes for interconnecting all types and sizes of DER installations. As the level of customer and developer interest advances beyond the initial inquiry phase, a formal review process takes place in which the potential impact of a given site on the Eversource EPS is reviewed. This review may include the execution of a formal System Impact Study Agreement (SISA) and may result in general and specific requirements for certain design aspects of the DER. These requirements typically include electrical protection and control design and configuration, interface transformer configuration, required modifications to local Eversource facilities (including conductor upgrades and substation modifications), metering and supervisory control and data acquisition (“SCADA”) requirements, and in some cases operating constraints for the proposed DER.

Additional Documents Under Development [this text will be removed when we publish]:

Job Aid - FERC or other “Fast Track” Screens – how to apply; how to determine when a full study can be waived

Job Aid – How to Conduct an SIS (steps to implement each of the study elements in Section 6 of this DERPG)

SIS Template – all three states should use a similar report format & content

Job Aid – Synergi – how to model voltage regulating devices (LTC, VREG, Caps, DVAR) and advanced inverter functions (e.g., Volt/VAR)

APPLICABILITY

This guide applies to DER seeking to interconnect to the Eversource system in CT, MA or NH at distribution voltage, i.e., facilities rated at less than 69 kV. Distribution System Impact Studies (D-SIS or SIS) will be performed per these guidelines regardless of whether the Interconnection Request falls under State or FERC jurisdiction. Facilities rated at 69 kV and greater are generally considered transmission. Transmission System Impact Studies are performed in accordance with ISO-NE planning procedures and are out of scope for this document. At the discretion of the Company or in accordance with local tariffs, certain DER (typically those serving residential and small commercial customers) will be screened for system impact without the need for a full System Impact Study. To the extent this document conflicts with local regulations or tariffs, the regulation or tariff will be controlling.

1.0 GENERAL REQUIREMENTS

1.1 Documents and Standards

DER Planning engineers shall be cognizant of the following:

For Massachusetts:

- Eversource distributed generation interconnection tariffs, Standards for Interconnection of Distributed Generation, M.D.P.U. No. 55 for both Eversource Western MA and Eversource Eastern MA (“Interconnection Tariff”).
- MA Technical Standards Review Group & MA Common Technical Standards Manual

For New Hampshire:

- Guidelines for Generator Interconnections
- Interconnection Standards for Inverters up to 100 KVA
- New Hampshire Code of Administrative Rules, Chapter Puc 900
- OP-0045 NH-LCC Minimum Telemetry and Communication Requirements of Merchant Generators

For Connecticut:

- The Connecticut Light and Power and The United Illuminating Guidelines for Generator Interconnection, Fast Track and Study Process.
- Docket No. 03-01-15RE04 (Guidelines for the Interconnection of Residential Single-Phase Certified Inverter-Based Generating Facilities of 20 kW (ac) or Less)

For all States:

- Eversource Distribution System Planning Guide (DSPG)
- Eversource Distribution System Engineering Manual (DSEM)
- The latest approved version of the Eversource DER Information and Technical Requirement document, which is posted on the internet for use by DER customer and developers
- The latest approved version of the IEEE 1547 (Standard for Interconnecting Distributed Resources with Electric Power Systems) and IEEE 1547.1 (Standard Conformance Test Procedures for Equipment Interconnecting Distributed Energy Resources with Electric Power Systems and Associated Interfaces) adopted by Eversource.

- Latest approved version of UL (Underwriters Laboratories) 1741 (Inverters, Converters, Controllers, and Interconnection System Equipment for use with Distributed Energy Resources).
- Effective June 1, 2018, all inverter-based projects are subject to ISO-NE ride-through requirements. To comply with these requirements, inverters shall be certified per the requirements of UL 1741 SA as a grid support utility interactive inverter and shall have the voltage and frequency trip settings and ride-through capability described in the ISO-NE Inverter Source Requirement Document. Additional background is provided in the presentation to the ISO-NE Planning Advisory Committee on February 14, 2018. [see also DSEM 19-1.5]. Compliance with UL 1741 SB is a pending requirement that is expected to be implemented in 2022.
- ISO-NE Document and Procedures, including:
 - Operating Procedure No. 12 – Voltage and Reactive Control
 - Operating Procedure No. 14 – Technical Requirements for Generators, Demand Resources, Asset Related Demands and Alternative Technology Regulation Resources
 - Operating Procedure No. 17 – Load Power Factor Correction
 - Operating Procedure No. 18 – Metering and Telemetry Criteria
 - ISO-NE Planning Procedure 5-1 – Procedure for Review of Governance Participant’s Proposed Plans (Section I.3.9 Applications: Requirements, Procedures, and Forms); and
 - ISO-NE Planning Procedure 5-3 – Guidelines for Conducting and Evaluating Proposed Plan Application Analyses.

1.2 Interconnection Requests and Required Technical Information

Without adequate technical information regarding the proposed DER, the impact study process can be delayed and inefficient. DER Planning engineers should perform a thorough review of the provided documentation before initiating the study and request appropriate updates to customer documentation that is required for study completion. Required information includes:

- DER Equipment information (type, size, make, model, requested export limitations or other equipment deratings or operational restrictions, etc.)
 - For solar Installations of any size, both inverter AC rating and the panel DC rating
- Proposed location and desired interconnection point
- PE Stamped One-Line must adequately identify the following element:
 - GSU rating, winding configuration, Z%, X/R ratio
 - Grounding method, including the above for all grounding transformer(s), if applicable, or Neutral grounding impedance Z_n in Ohms if applicable.
 - Proposed Inverter Settings, Equipment Make & Model, UL 1741 SA or later indication

- Unintentional Island Detection Information
- Documents that show compliance with Transient Over-voltage requirement
- Inverter certification document & specification sheet
- Models of the DER facility shall be provided in PSCAD with any applicable Self-Protective Overvoltage function (SPOV) or other applicable function enabled to show compliance with IEEE 1547-2018 clause 7.4.2. Specific requirements will be included at a later date in an appendix to this document and are currently considered on a case-by-case basis. Models can be requested from the project sponsor at the time of application submittal, or as an SISA deliverable prior to commencing the impact study. North American default settings (e.g., 60 Hz) must be included in the model. All projects >500 kVA shall provide a model.
- DER facilities that may require a Transmission System Impact Study (T-SIS) shall provide a suitable PSS/E model of the project.

2.0 STUDY KICK-OFF AND SCOPING

Prior to initiating the study, DER Planning should arrange a scoping meeting with the appropriate disciplines, e.g., System Planning (T & D), Distribution Engineering, Protection & Controls, Substation Engineering, and System Operations. The scoping agenda should include:

- Proposed DER equipment and Point-of-Interconnection (POI)
- Known circuit and substation limitations
- Availability and accuracy of Eversource system model (Synergi, CYME, Aspen)
- Load allocation, feeder loading, verify regulator and cap bank location and control mode
 - System Planning should provide the gross peak and minimum day 24h profiles to be considered in the interconnection
- Existing DER on the circuit and station (including alternate configurations)
- Planned capital projects fully funded and scheduled for completion in the next year that may impact the study. The inclusion of planned capital projects should be documented in the System Impact Study Agreement (SISA). Any planned capital projects that are a pre-requisite for full DER operability must be documented in the Interconnection Agreement (IA) with appropriate timelines, terms, and conditions.
- Primary and Alternative system configurations to be studied
- Protection concerns such as DTT and fuse / device coordination
 - Determine what model will be used to evaluate fault currents and effective grounding (Synergi, CYME, Aspen).

- Determine staff performing reviews.
- Cap Bank and Line regulator settings
- LTC controls and the potential for reverse power
- Existence of 3V0 protection at the station transformer(s)
- The impact on the transmission system and possible need for a T-SIS.
 - ISO-NE Planning Procedures dictate when a T-SIS is required. Eversource Transmission System Planning shall be consulted for all DER applications ≥ 5.0 MW and for projects < 5.0 MW in an area with aggregate DER penetration levels considered significant.

3.0 DER OPERABILITY AND N-1 CRITERIA

DER will not be permitted to operate in system configurations that were not included in either the original SIS or via subsequent evaluation.

Distribution feeders that have been intentionally designed to provide transfer capability between bulk substations during emergency conditions shall be considered LCC lines, since they contribute to the Load Carrying Capability of that station.

DER and System Planning shall determine if the proposed DER point-of-interconnection (POI) is on an LCC line. **If the POI is located on an LCC line, the SIS must include N-1 scenarios in which the line is supplying customers that would otherwise have been isolated following the N-1 triggering event. If the POI is on a side tap off of the main LCC line, N-1 shall also apply.**

Specific guidance is below:

1. DER locations normally sourced via a single transformer bank bulk substation

All feeders supplied from a one-bank substation shall be considered LCC lines. Following loss of the transformer, the line would be in-service and acting as an alternative source of supply for a prolonged period. **Therefore, the SIS must include loss of the normal supply transformer.**

2. DER locations normally sourced via multi-transformer bank bulk stations that rely on feeder transfer during N-1

If a multibank substation exceeds nameplate capacity and relies on nearby substations following loss of a transformer, the lines that are used to reduce the substation load below nameplate are considered LCC lines. **Therefore, if the proposed POI is on the LCC line, the SIS must include loss of the largest transformer in that station.**

If the proposed POI is on a line that is not used to reduce the substation load during N-1, it is still possible for the line to be considered an LCC line due to a tie to an electrically adjacent substation. For example, a line in Station A (two banks) might be used to offload Station B (single bank) following an event at Station B. **In this case, the SIS must include loss of the transformer that was the basis for the LCC line designation (e.g., the transformer at Station B).**

3. DER locations normally sourced via multi-transformer bank bulk stations that do not rely on feeder transfer during N-1 (i.e., self-sufficient)

A multi-bank substation is self-sufficient during N-1 when it has adequate firm capacity (LTE) to carry the load following the loss of the largest supply transformer. Lines served by these stations are not LCC lines (unless they are designated as LCC based on the configuration at an electrically adjacent station). **If the proposed POI is not on an LCC line, the SIS need not include loss of a normal supply transformer (see note below about reverse power).**

4. 3V0 Screening and Transformer Reverse Power Screening

Regardless of whether the DER POI is on an LCC line, a non-LCC line, at either a Bulk or a Non-Bulk station, the System Impact Study will review loss of the largest normal supply transformer during light load to determine if 3V0 or reverse power risk is present and requires mitigation (see Section XXX for treatment of minimum load).

5. DER locations normally sourced via non-LCC-Lines or via non-bulk stations

For these DER applications, only the normal system configuration is included in the SIS (other than noted in #4 above).

6. Other Considerations

Faults on the primary feeder serving the POI and other temporary, unplanned events do not need to be considered in the SIS. These events are expected to be restored quickly and DER operability is not a primary concern during emergency system restoration. The DER may be tripped offline during these situations as needed.

Device coordination, proper fault sensing and related Protection & Control functionality (e.g. 3V0, Direct Transfer Trip, short-circuit studies) must be fully operable for all permitted configurations (normal and off-normal, i.e. N-1). As permitted by IEEE 1547-2018 (footnote 9), alternative settings may be utilized for temporary, alternative configurations.

When N-1 scenarios result in required mitigation (e.g., station upgrades, line reconductoring, 3V0, DTT, etc.) the DER customer shall be responsible for the upgrade costs. The DER customer

shall not be offered the option to go off-line during any of the studied N-1 scenarios as an alternative to funding identified upgrades.

The cases to be included in the System Impact Study (N-0 and N-1) shall be discussed during the scoping meeting or otherwise and shall be documented in the SIS Agreement (SISA) and included in the SIS report.

4.0 EXPRESS FEEDER AND STATION FEEDER BREAKERS

4.1 Express Feeders

[see also DSEM 19-1.4.3]

Express feeders will be built to all normal construction and power quality standards, including proper voltage at the POI. Operation of the DER on the express feeder should not limit Eversource's ability to serve future customers from that feeder.

Future use of Express feeders to serve Eversource customers will be specifically addressed in each Interconnection Agreement.

Eversource shall use only customary practices to acquire the permits and easements that may be necessary to site an express feeder.

4.2 Right-of-Way Issues

[see also DSEM 19-1.4.4]

System upgrades to accommodate DER, including express feeders, shall not limit or hinder the future use of Eversource ROW. The DER developer should not be given a preliminary indication that space in an existing ROW will be available until management approval has been obtained.

Eversource ROW cannot be used for private distribution infrastructure owned by 3rd parties.

Tapping of a ROW line to bring service to a new DER customer requires review and approval by Distribution Engineering and System Operations. ROW taps can decrease area reliability, slow restoration, and result in poor availability for the DER customer.

Any lateral crossings of a ROW must be designed in accordance with Eversource standards. Ownership, maintenance, and any legal issues associated with the crossing will be included in the Interconnection Agreement or a separate agreement.

All requests to co-locate facilities parallel to, within or adjacent to Eversource transmission and distribution line corridors shall follow Eversource Administrative Procedure M2-SI-2008 (Co-Location Requests with Transmission).

4.3 New or Existing Breaker Positions

[see also DSEM 19-1.4.2]

Senior management shall be consulted regarding the offering of substation real estate and/or spare breaker capacity for purposes of DER interconnection. The decision to offer a substation breaker position to a new DER shall consider future expansion plans, space limitations, etc. Substation Engineering and System Planning must approve any conceptual interconnection designs that may limit future system expansion and/or reconfigurations. The Solution Design Committee (SDC) is one possible venue for this review. The DER developer should not be given a preliminary indication that a breaker position will be available until approval has been obtained.

5.0 VOLTAGE REGULATION BY DER

[see also DSEM 19-1.2 and DSEM 19-1.4.5]

The DER facility shall not actively regulate the voltage of the EPS unless specifically agreed by the Company. Initial load flow simulations for inverter-based DER should be performed with the DER at fixed unity power factor (PF = 1.0). To mitigate over-voltages and/or rapid voltage changes, the DER may be modeled with a fixed, off-unity PF (i.e., absorbing VAR) that is at any point ≥ 0.9 as a least-cost mitigation. In areas of high penetration, or for utility-scale DER, modeling the DER with a voltage schedule may be considered after consulting with System Planning and may be required per ISO-NE OP-14 (Section II.H – Voltage Control). Typically, the voltage schedule shall be consistent with the LTC settings and/or line regulator settings. The normal system voltage at a nearby device should also be reviewed. When DER projects are to be given a voltage schedule, ensure the settings and control mode of circuit capacitor banks are modified as needed. It is also advisable to require circuit capacitor banks and/or line regulators to be upgraded with SCADA visibility and control.

Eversource is required to adhere to ISO-NE Operating Procedure OP-17 – Load Power Factor Correction. DER with operating schedules that conflict with the goals of OP-17 shall be reviewed and may require mitigation. Any DER that is expected to contribute to OP-17 violations will be required to provide appropriate VAR support to enable compliance with OP-17. Consideration shall be given to Dynamic Reactive Devices (DRD) and/or Battery Energy Storage Systems (see DSPG Section 2.11 - Battery Energy Storage Systems Design Criteria).

6.0 REQUIRED ELEMENTS OF THE SYSTEM IMPACT STUDY

6.1 Steady-State Thermal and Voltage Criteria

For all modeled cases, the addition of the DER shall not result in any equipment exceeding its normal rating. For conductor and cable, the more stringent limitations of the Eversource DSPG (Section 2.10 Feeder Upgrade) shall apply.

For all modeled cases, the addition of the DER shall not cause the voltage at any point along the EPS to deviate from +5% / -5% of nominal or to violate the voltage criteria documented in the Eversource DSPG (Section 2.4, Voltage). When evaluating Energy Storage Systems in the charging mode, primary voltage at the POI must remain above 0.983 p.u. or else mitigation is required.

Prior to performing any project study cases, one or more “pre-project” cases must be conducted to screen for existing thermal and voltage concerns. System issues identified in these pre-project cases must be mitigated in the model prior to evaluating the system impact of the DER.

The results will be presented in tables showing the voltage and loading results. Any voltage or thermal issues will be identified, and possible mitigation options will be provided such as adjustments to the voltage regulation settings, upgrade of feeder conductors, and adding reactive power control capability to the DER with due consideration of the IEEE 1547 Standard. The study report should identify the voltage regulation devices on the circuit, how they are programmed in the field, and how they were captured in the models.

If off-unity PF operation is indicated as a method to mitigate over-voltage concerns, the load flows will be re-evaluated. Increased VAR demands at the substation transformer, caused by the DG operating off-unity, will be determined and documented.

Mitigation Options – Thermal Capacity Overload

Reconductoring and other equipment upgrades to increase the normal rating are required. DER operating restrictions can be considered only with Eversource owned and operated control technology.

Mitigation Options – Voltage Issues

The Synergi model should be reviewed to ensure existing feeder voltage regulation equipment is properly modeled and configured. Control mode and/or modified settings should be considered. The model results (pre-project) should be benchmarked against actual voltage data when possible. Pre-project time-series analysis may be useful to review device operation.

DER operation in off-unity (fixed or voltage schedule) should be considered.

Voltage Regulators & Capacitor banks.

Dynamic reactive devices should be considered only if the DER does not have adequate VAR capability to mitigate the issue.

Reconductoring should be considered.

DER operating restrictions can be considered only with Eversource owned and operated control technology.

6.2 DER Impact on Voltage Regulating Equipment

[see also DSEM 19-1.4]

The SIS will evaluate and document the impact on Eversource voltage regulating equipment (LTCs, Caps, Line Regulators) due to DER ramping between 5% and 100% of nameplate power output. Any concerns with the operation of voltage regulation equipment shall be discussed with Distribution Engineering to evaluate if mitigation is required.

Mitigation

The Synergi model should be reviewed to ensure existing feeder voltage regulation equipment is properly modeled and configured. Control mode and/or modified settings should be considered. The model results (pre-project) should be benchmarked against actual voltage data when possible. Pre-project time-series analysis may be useful to review device operation.

DER operation in off-unity (fixed or voltage schedule) should be considered.

Dynamic reactive devices should be considered only if the DER does not have adequate VAR capability to mitigate the issue.

6.3 Rapid Voltage Change and Voltage Flicker

[see also DSEM 19-1.2]

Rapid Voltage Change (RVC)

Simulate an instantaneous trip of the generator from full 100% to 0% output, and vice versa. Any dynamic reactive capabilities of the inverters shall be disabled, and other voltage regulating

devices on the circuit should be locked. The rapid voltage change criteria is 3% on distribution voltages per IEEE 1547-2018 clause 7.2.2. Results >2% (either in the initial simulation or after some partial mitigation) should undergo the additional flicker analyses, see below. Only the applicant DER is included in the RVC test cases.

RVC Mitigation

Dynamic reactive devices should be considered.

Reconductoring should be considered.

Ramp rate limitation (including for PV for site off-to-on violations).

Flicker Assessment

Simulate an instantaneous decrease in the generator from full 100% to 5% output, and vice versa. If the project will be operating with a voltage schedule, any dynamic reactive capabilities of the inverters shall be enabled in the model. Other voltage regulating devices on the circuit should be locked. Flicker criteria is 2% for PV. Results >2% must either be mitigated to <2% or should undergo additional flicker analyses, including the Pst and Plt review. IEEE 1547-2018 limits for EPst and PPlt should be considered. IEEE 1453 and IEC/TR 61000-3-7 references may be considered if mitigation is required by the flicker criteria.

As part of the flicker evaluation, simultaneous output changes of other DER sites on the circuit may be considered for the analysis if they are the same type since a common event (such as variable cloud cover) could affect more than one DER site. The default approach is to include solar projects within ¼ mile of the solar project under study.

Ramp Rate control can be considered as a mitigation for flicker. Any mitigation that reduces the operational flexibility of the DER must be agreeable to the owner and documented in the Interconnection Service Agreement (ISA).

Flicker Mitigation

DER operation in Volt/VAR should be considered. Ensure Synergi is properly modeling the dynamic capability of the DER.

Reconductoring may be considered.

Dynamic reactive devices should be considered only if the DER does not have adequate VAR capability to mitigate the issue.

DER Ramp Rate limitation may be considered.

6.4 Transient Overvoltage (TOV) and Transient Analysis

[see also DSEM 19-1.2.4]

Transient overvoltage is of concern due to potential load rejection overvoltage (LROV) by inverter-based DER. There is concern that during step changes in load (such as tripping of an upstream device), the proposed inverters may cause transient over voltages in excess of 1.2pu, which can potentially cause damage to the customer's equipment, utility equipment, and/or nearby customer equipment. Due to this concern, Eversource requires that the customer demonstrate that the inverters limit their cumulative overvoltage according to the transient overvoltage curve in IEEE Std. 1547-2018 clause 7.4.2. If the inverters do not demonstrate compliance to the curve given in the standard, additional utility upgrades and/or transient analysis may be required to mitigate the overvoltage concern. The customer may demonstrate compliance by:

- Providing a copy of the most recent HECO qualified equipment list highlighting the inverter make/model and firmware that meets the above requirements.
- Providing documentation that the inverter(s) have passed the Hawaiian Electric Companies (HECO) test procedure for transient overvoltage qualifications, as evaluated by a Nationally Recognized Testing Laboratory (NRTL).
- Providing a letter from the inverter manufacturer indicating that the proposed inverter is capable of and set to trip for no higher than 1.4pu voltage in 1ms or less clearing time. *Note: "clearing time" is defined in IEEE 1547. Any implications of solely "trip time" may not sufficiently clear the TOV (e.g., a circuit breaker typically trips in 1-2 cycles, but an inverter may cease to energize by opening IGBTs in milliseconds).*
- Other means proposed by the customer/inverter manufacturer may be acceptable on a case-by-case basis.
- All documentation shall include the applicable firmware version(s). The correct firmware version shall be demonstrated by the customer during witness testing/final review. Generally, all DER installations 500kW and larger shall provide this documentation. The Company reserves the right to ask for this documentation for smaller DER projects undergoing study and/or additional review. DER projects <100kW are exempt from this data requirement.
- In future revisions, UL 1741 test procedures are anticipated to cover this requirement. In the interim, customers large enough to require an impact study or additional review are required to demonstrate compliance to avoid potential damage to customer and utility equipment. Regardless of utility documentation requirements, it is the responsibility of

the DER customer to meet all applicable standards, including but not limited to the latest version of IEEE 1547.

A Transient Analysis (using PSCAD or equivalent software) shall be performed as part of the SIS under the following conditions:

- Risk of Islanding (ROI) – unless otherwise mitigated, a dynamic study is required to further assess the ROI when a project fails the applicable screens during an impact study.
- TOV – A dynamic study is required for TOV when a DG is identified in the impact study as increasing the aggregate generation on a feeder / substation bus to $\geq 115\%$ of gross minimum load. The study should also screen for potential worst-case TOV issues at mid-line devices.
- Other – A dynamic TOV study may be required for other cases where there are other system concerns, which cannot be properly evaluated inside of Synergi and require time-based analysis.

If the analysis determines that a transient over-voltage condition is caused by the DER, mitigation shall be required. The analysis shall also screen for pre-existing transient over-voltage issues.

TOV Mitigation

Self-Protection Over-Voltage enabling in the inverter

Review grounding solution and options

Surge Arrestors at POI or Station

6.5 Transformer Reverse Power Capability

[see also DSEM 19-1.2]

Any proposed DER facility that has the potential to cause reverse power flow through an Eversource substation transformer will require an Impact Study. The Impact Study will specifically address the ability of the transformer to accommodate reverse power flow. The following items will be evaluated:

LTC Design, Controller Type and Controller Settings: The Impact Study will evaluate the capability of the LTC and controller to accommodate reverse power conditions and to respond with appropriate control strategies.

Voltage and current inputs must be available to the LTC controller.

Any LTC controller configuration that is not appropriate for reverse power must be replaced with a suitable controller with both voltage and current inputs. The requirement to add a backup controller will also be evaluated.

For LTC evaluation all substation circuits must be modelled to ensure an LTC response to the reverse power flow from the interconnecting DG does not cause a low voltage condition

Capacity Limit: As an initial screen, unless constrained by other more limiting requirements, aggregate DER (in kVA) will be permitted up to 95% of the transformer's top nameplate ampere rating (in kVA) with maximum cooling operational. This limit is based strictly on the transformer nameplate, with no consideration given to any forward power load on the transformer. This assessment must include N-1 scenarios, i.e., loss of the largest transformer at a multi-bank station, or other N-1 configurations in which the DER is sourced from an alternate station or those in which existing or queued DER from an electrically adjacent station is transferred to the applicant DER source station (see Section 3.0 for a discussion of required N-1 scenarios).

If the initial screen is failed, an assessment will be made of the absolute minimum load that may be considered as protection against transformer backfeed in excess of the nameplate. The default minimum load for this review will be 67% of the historical minimum loading on the transformer in the configuration being analyzed. Engineering judgement will be used to consider if a more conservative assumption is required, e.g., most heavily loaded feeder is in a switched configuration.

Mitigation

Additional transformation capacity is required.

6.6 3V0 Assessment (Transmission Ground Fault Detection)

This section details a methodology that facilitates the identification of the following:

- Potential for Ground fault Overvoltage (GFOV),
- Condition when such a potential may be present

When it is determined that GFOV protection is required, the tripping time shall be compared with the Temporary Over Voltage characteristics of the transformer high side arresters to identify the need to replace the arresters with higher rated units and evaluate impact on the transformer BIL rating. In addition, the line arresters on the high/transmission side of the substation transformer may need to be evaluated.

This guideline provides requirements and methodology for identifying where 3V0 or other transmission-side ground fault protection may be required for bulk distribution substations. It is

also applicable to the evaluation of high-side protection at non-bulk distribution substations. It considers the fact that Distributed Energy Resources (DERs) can energize a substation transformer prior to reverse power flow occurring and requires the protection when standard DER-to-minimum load ratios are exceeded under various operational system conditions. The DER-to-minimum load ratio screens are to be completed for all potential scenarios (i.e., normal and N-1 alternative configurations). The methodology included in this document will identify the need for 3V0 protection based on existing, proposed and forecasted DER penetration over both short- and long-term planning horizons.

Distribution substations are typically designed for one-way flow: to provide power to distribution customers from the transmission or sub-transmission system. The addition of Distributed Energy Resources (DER) can require additional fault protection for ground faults on the high/transmission side of distribution substation transformers. This protection is typically known as 3V0, or 59N, and detects the neutral shift that occurs when the ungrounded high side of the transformer is energized from the low side for a ground fault. Without this protection, the DER at certain penetration levels can continue to energize the substation transformer during high-side ground faults, causing potential damage to equipment and/or present a safety hazard. This policy discusses the screens for where 3V0 or other high/transmission-side ground fault protection may be required for distribution substations. It considers the fact that DERs can energize a substation transformer prior to reverse power flow occurring and requires the protection when DER to minimum load ratios are $\geq 67\%$, considering a single n-1 contingency scenario (feeder or transformer contingency). This will ensure high side ground faults have adequate protection in place when DERs may be capable of energizing the ground fault when the remote (source) substations have tripped.

Concerns for DERs 'back feeding' into a transmission ground fault arise before the aggregate penetration of DER can cause reverse power at a given substation transformer. The concern arises when the aggregate DER can continue to *energize* the substation transformer. Although this is possible with nearly any DER level¹, the loads can help 'swamp out' the generation in some cases, meaning 3V0 may not be required if the DER penetrations are sufficiently low enough. The existing Sandia screens for risk of islanding are the basis of the 67% threshold for determining where 3V0 is required. Where there is insufficient generation to carry the minimum load on a given substation transformer, it is expected that the DERs on all feeders will trip on the 88% trip setting², because the DERs are unable to hold the islanded voltage any higher. The load screens are based on the following derivation:³

¹ Transformer magnetization impedance requires very little current to overcome.

² Note that the MA Technical Standards Review Group (MA TSRG) is increasing the trip time from 2s to 3s for DERs to proactively comply with PRC 024 and ISO-NE requests for ride through for DERs

³ Source: "Toward a new set of "Sandia screens" for risk of islanding," Michael Ropp, Northern Plains Power Technologies, August 30, 2019 presentation to EPRI Islanding Supplemental Supporters. A short on this logic is publicly available in the Sandia "Suggested Guidelines for Assessment of DG Unintentional Islanding Risk" <https://energy.sandia.gov/wp-content/gallery/uploads/SAND2012-1365-v2.pdf> on page 7.

$$Z_{load} = \frac{V_{nom}^2}{P_{load}}, \text{ and therefore:}$$

$$V_{nom}^2 = Z_{load} * P_{load}, \text{ and}$$

$$V_{isl}^2 = Z_{load} * P_{DER}$$

$$\frac{V_{isl}}{V_{nom}} = \sqrt{\frac{P_{DER}}{P_{load}}} \leq 0.88$$

$$\frac{P_{DER}}{P_{load}} \leq (0.88)^2 = 0.77$$

Where:

- Z_{load} is the impedance of the loads on the given feeder(s) connected to the substation transformer
- V_{nom} is the nominal voltage of the circuit
- P_{load} is the power of the minimum load in kW
- V_{isl} is the voltage in the resulting island

Therefore, where the ratio of DER rating to load rating is >0.77 , the voltage in the potential island may remain above 0.88 per unit of the nominal voltage. A 10% safety margin is used, resulting in the 67% criteria. This margin can account for inaccuracies in DER voltage measurement, PI data measurements, and other inaccuracies.

Given that the distribution system is commonly operated in several configurations, the screening must consider N-1 contingencies for the substation transformer and/or transformer offloading for maintenance. Therefore, the screens consider two N-1 scenarios:

1. N-1 feeder level: the feeder with the largest contribution to net load on the transformer is taken out of service or transferred to another substation
2. N-1 transformer level: if the feeders on a given substation may be carried by less than all of the substation transformers at the station, one transformer should be taken out of service and the screens repeated for this scenario. In this case, an N-1 feeder criterion is not also taken.

During initial reviews of the DER proposal (or in the beginning of the impact study), the aggregate DER-to-minimum gross load ratio shall be calculated using the installed DER nameplate capacity. For penetration dominated by PV systems, the daytime minimum gross load may be used. For all other DERs (rotating machines, energy storage) that are expected to operate 24/7 or outside daylight hours, the review shall consider the 24-hour minimum gross load. For the cases given below where the aggregate DER nameplate is greater than 67% of the gross *minimum* load it is *possible* for this condition to occur, and Protection & Substations Engineering should be

consulted for either a list of substations with full 3V0 installed to trip all applicable feeders offline, or to determine whether that particular substation configuration requires 3V0. The *aggregate DER* refers to the total nameplate rating of the DER existing, proposed, and forecasted, as applicable for the type of study.

$$\text{Where: } \frac{\text{Aggregate DER}}{\text{Minimum Gross Load}} \geq 0.67 \rightarrow 3V0 \text{ is required}$$

Case 1:

One substation transformer, one feeder:

$$\text{Where: } \frac{\text{Aggregate Feeder A DER}}{\text{Feeder A Minimum Gross Load}} \geq 0.67 \rightarrow 3V0 \text{ is required}$$

Case 2:

One substation transformer, three feeders:

$$\text{Where: } \frac{\text{Feeder A DER} + \text{Feeder C DER}}{\text{Min Gross Load}_A + \text{Min Gross Load}_C} \geq 0.67 \rightarrow 3V0 \text{ is required}$$

Where Feeder B is the heaviest *net* loaded feeder⁴, considering both the aggregate DER on the feeder and the minimum gross load on the feeder. This feeder is removed from the equation to simulate the heaviest net loaded feeder being out of service.

Case 3:

Two substation transformers, **solid/straight bus on the low side of the transformers**, multiple feeders (where one transformer may be used to supply all feeders):

Consider the load on both transformers. Consider the following scenarios:

- N-1 transformer configuration: One substation transformer out of service, and all feeders are sourced by the single transformer. Do NOT consider the heaviest net loaded feeder out. If this screen fails, 3V0 is required on *both* transformers (as the DERs may be carried by either transformer).
- N-1 feeder configuration: For both substation transformers in service, consider the heaviest net loaded feeder out of service. If this screen fails, 3V0 is required on both transformers.

Case 4:

⁴ "Net" refers to the PI readings in most cases, which inherently include the existing DER that was online at a given time. However, when the hourly data is available, the "heaviest net loaded feeder" should be determined using feeder gross load minus feeder aggregate DER nameplate.

Two substation transformers, **Normally Open low side bus/breaker and/or separate buses**, multiple feeders (where one transformer may be used to supply all feeders):

- N-1 transformer configuration: One substation transformer out of service, and all feeders are sourced by the single transformer. Do NOT consider the heaviest loaded feeder out. If this screen fails, 3V0 is required on *both* transformers (as the DERs may be carried by either transformer).
- N-1 feeder configuration: For the transformer the DER is connecting to only, consider the heaviest net loaded feeder out of service. If this screen fails, 3V0 is required on that transformer.

In any of the cases above, if the feeder load is **not** able to be carried by a single transformer or is never planned to be switched to be carried by a single transformer, there is no need to perform that scenario. Document this in the screening for project records.

All configurations not considered above should be discussed with the System Planning, System Operations, Protection and Substations Departments to determine how the substation is operated and what conditions would cause concern for energized transmission-side ground faults.

In all cases, care should be taken to ensure that Eversource can operate its substations in all typical configurations while being covered by the 3V0 installation and/or existing ground fault protection at the substation. All the above screens MUST be performed for both the normal AND the N-1 alternate configuration(s) for a DER facility being studied (e.g., if the DER may be tied to Substation A or Substation B, the screens must be performed for BOTH Substation A and Substation B).

When performing station-level screens proactively (e.g., as part of a system-wide evaluation rather than for a specific DER application) it is also required to consider what circuits from other stations (i.e., Substation B) may be offloaded onto the station under review (i.e., Substation A). In this case, the load and DER of those circuits (from Substation B) must be part evaluation of Substation A.

Applicable Transformer Configurations:

This verification is always needed for delta high-side transformers, as well as any transformer configuration containing or acting as an ungrounded wye or delta that would effectively break zero sequence continuity/the ground fault current path between transmission and distribution (e.g., Yg-D-Yg, D-Yg, Y-Y, or Y-Yg). Y-ground-Y-ground transformers⁵, provided there is no delta or phantom tertiary in the transformer, should pass through transmission-side voltages and currents the DER will be able to see, and are not applicable for this document. The transformer configuration and protection requirements should be determined in consultation with the

⁵ Also assumes high magnetizing impedance for 3-legged core-type transformers.

Protection department or by reviewing the list of substation evaluations for 3V0 provided by the Protection department.

Mitigation

Consult with Protection & Control Engineering on possible mitigation options.

6.7 Effective Grounding

[see also DSEM 19-1.1]

Where Effective Grounding Is Required:

Effective grounding shall be required for all DER interconnections where any of the following is true:

- The fault current at the point of common coupling (PCC) is caused to increase by at least 10 percent of the existing value.
- Areas where fault current may already be deemed excessive.
- DER interconnections equal to or larger than 1MW.
- Anywhere there may exist a potential islanding concern regarding generation to load ratio.

Effective Grounding Methods:

To achieve effective grounding, the DER owner shall design and install an interconnection system where the ratio of the DER's reactance parameters meets the following criteria:

$$2 < X_0 / X_1 < 3$$

X_0 = zero sequence reactance and X_1 = positive sequence reactance at the PCC

The DER shall use one of the following methods:

- A generator step-up transformer (GSU) with a reactively grounded neutral on the high (utility) wye-connected side and a delta configuration on the low (generator) side.
 - o Reactor sizing calculations confirming conformance to Eversource design requirements shall be submitted by the customer prior to scheduling of the witness test. The DER owner shall also supply specifications and ratings for all equipment as it pertains to all reactor sizing calculations.

- o Note: This method is preferred with respect to ferro-resonance and harmonics concerns for most generators.
- A GSU with a grounded-wye / grounded-wye configuration and a grounding transformer on either side of the GSU (for DER that do not source ground fault current).
- A delta high (utility) side GSU configuration and a grounding transformer on the high (utility) side.

Where Effective Grounding is Not Required:

Where DER connections are not required to be effectively grounded, delta windings shall be used on the high (utility) side of the GSU. For this type of interconnection or installations with existing delta connected transformers on the utility side which are serving as a GSU, a customer provided 59N (3V0) scheme fed by PTs on the high (utility) side of the GSU shall also be required to sense over voltages on the un-faulted phases during single phase-to-ground faults upstream of the GSU. The 59N requirement is in addition to normal protection requirements specified for DER installations at Eversource.

Mitigation

The developer shall submit revised design plans that satisfy the effective grounding criteria.

6.8 Adverse Impact of Unintentional Islanding

[see also DSEM 19-3.1]

Unintentional Islanding by the DER of all or part of the EPS (meaning a part of the EPS is kept energized by the generating facility after the area has been de-energized) is prohibited as it may result in unsafe conditions on the EPS.

The initial screening below must be completed for all projects >200 kVA (Max AC rating)

Circuit segments to review are those created by automatic sectionalizing devices (breakers, reclosers, VCS switches).

Step 1 - Aggregate DER (any type) in segment <= 67% of Minimum Gross Load?

YES – ROI mitigation not required. End of evaluation. (Note: this assumes all DERs >500kVA have a POI recloser for visibility as a minimum level of mitigation).

NO – continue...

Step 2 - Synchronous machines in the line segment under review?

YES – **Mitigation and/or Further Evaluation Required (see below)**

NO – continue...

Step 3 - Inverter uses UIDM Group 1 or 2A?

YES - **ROI mitigation not required. End of evaluation.**

NO - **Mitigation and/or Further Evaluation Required (see below)**

Mitigation

Risk mitigation and evaluation options to consider include:

Full mitigation:

- perform detailed ROI study to confirm Run-on-Time < 2 seconds (PSCAD, see Section 6.4)
- Fiber or other DTT to either the DER under study or synchronous DER

Partial mitigation:

- Eversource-owned SCADA device at the POI
- SCADA-based tripping logic at POI device
- System Operating Procedures to check for islanded DER
- Block-of-close of upstream automatic sectionalizing device(s) to mitigate potential for out-of-phase reclosing into an island

6.9 Compliance with ISO-NE Source Requirement Document for Inverters

The SIS will review the DER project information relative to compliance with the SRD and future requirements, e.g., Ride-Through 2.0 and UL 1741 SB requirements. The study report will document the voltage and frequency settings required for compliance. The required settings and control modes must be documented on the final customer one-line diagram.

6.10 Short Circuit Evaluations

[see also DSEM 19-2.1]

Pre- and Post-project faults currents will be determined and documented. Equipment short circuit ratings included in the system model will be compared to the available fault calculated in ASPEN One Liner or Synergi, including potential contribution from the proposed DER in aggregation with other generation on the distribution circuits. A review of the existing protection scheme and coordination will be included.

The maximum allowable fault duty on the station bus is 10 kA without the use of reactors. The DER interconnection cannot cause the substation bus fault duty to exceed 10 kA or result in exceeding the interrupting rating of distribution line equipment. Failure of this criteria requires review by Protection and Control Engineering.

DER interconnections, in aggregate with other generation on the distribution circuit, should not contribute more than 10 percent to the maximum fault current of the distribution circuit at the point on the high voltage (primary) level nearest the proposed Point of Common Coupling (PCC). Failure of this criteria requires review by Protection and Control Engineering.

6.11 Short Circuit Ratio Evaluations

A short circuit ratio ("SCR") test will be performed at the Project's terminal bus (e.g., 480V or 600V) to determine the electrical strength of the external Eversource system at that location. The system is to be tested under N-2 and N-3 conditions. The N-3 condition is an operational consideration and not a design condition at this time. The minimum SCR requirement provided by the DER inverter manufacturer must be compared to the calculate SCR under all conditions.

The short-circuit MVA will be computed for different line-out conditions to determine the lowest measured SCR at the interconnecting point. The ASPEN case used should represents the minimum fault condition where all local generators in the vicinity of the project (including the Project itself) were taken out-of-service during the computation. The N-0 base case should also be performed for the pre-project condition without any loss of transmission elements.

DER Planning must coordinate with ISO-NE (for FERC jurisdictional projects) and/or Transmission System Planning to ensure that this evaluation is captured in either the Distribution SIS or the Transmission SIS.

6.12 Communication and SCADA Requirement

The SIS shall note any relevant requirements base on the latest approved version of the Eversource DER Information and Technical Requirement document. The SIS shall document

whether Eversource will require SCADA or other real-time communication to either i) an Eversource-owned device at the POI or ii) a customer-owned device beyond the POI. In general, any DER with a maximum AC capacity greater than 500 kVA shall require a SCADA feed back to the applicable System Operations Control Center (and potentially a backup control center). SCADA will provide for remote monitoring and tripping of the DER. Exceptions may be made by local management with the concurrence of System Operations.

Job Title: Clerical Utility Worker

General Description of Job:

Performs a wide variety of clerical tasks requiring a wide knowledge of Company, Division and/or Department procedures and practices as they relate to the assigned duties.

Regular Duties:

Performs stockhandling (when needed) and clerical duties.

Miscellaneous maintenance duties.

Types a wide variety of forms, records and reports which may include confidential material. May record and transcribe dictation on a limited basis.

Performs data entry on mainframes and personal computers. Works with data bases and spreadsheets. Records and verifies a variety of data.

Maintains and updates filing systems.

Completes complex assignments which may be of a special, confidential, or infrequent nature.

Provides guidance and training.

Exercises judgment to apply standard practice to a given situation.

Handles non-routine inquiries and determines whether standard replies can be adjusted to the situation.

The majority of duties associated with this position are clerical. Clerical skills and the ability to work with and learn multiple business computer systems including Maximo, Click Mobile, WorkForce, TRAMS, DARS, ARCOS and several other systems related to the support of the Operations group is required. Under limited supervision, individual will primarily perform a wide variety of clerical job functions and occasionally other duties that **may** include some stock handling and miscellaneous meter inventory tasks. Individual **may** be asked to perform some minimal maintenance tasks such as salting and snow removal and will perform other duties as assigned.

Note: This description does not describe all of the responsibilities inherent in this job. It provides as much detail as necessary to distinguish this job from all other jobs. In addition, the requirements list are not all inclusive. Management has the right to make determinations based upon individual circumstances.

POSITION REQUIREMENTS:

A High School diploma or the equivalent is required. In addition, the ability to perform basic math functions, communicate effectively, follow instruction, and work without direct supervision is required. A valid motor vehicle operator's license and a proven, safe driving record are required. A CDL-B license or the ability to obtain one is also required. The ultimate wage rate for this position is \$35.37.

NOTE: The closing date is at 12:01 a.m. on date shown; interested candidates must apply by previous day.

License(s)/Certificate(s): Motor Vehicle Operator's License required.

A proven, safe, driving record is required.

Commercial Operator's License may be required.

Clerical Job Description

Job Title: Senior Departmental Clerk

General Description of Job:

Performs a wide variety of clerical tasks requiring a wide knowledge of Company, Division and/or Department procedures and practices as they relate to the assigned duties.

Regular Duties:

1. Performs clerical tasks such as copying data and compiling records and reports; tabulating and posting data in books; preparing, issuing and distributing receipts, bills, invoices, statements and checks; computing wages, taxes, premiums, commissions and payments; preparing inventory records; opening and sorting incoming mail, answering correspondence with standard replies; preparing outgoing mail, proofreading records and forms; receiving and processing customer and internal complaints, inquiries, and orders; and other similar activities.
2. Types a wide variety of forms, records and reports which may include confidential material. May record and transcribe dictation on a limited basis.
3. Performs data entry on mainframes and personal computers. Works with data bases and spreadsheets. Records and verifies a variety of data.
4. Maintains and updates filing systems.
5. Completes complex assignments which may be of a special, confidential or infrequent nature.
6. Provides guidance and training.
7. Exercises judgment to apply standard practice to a given situation.
8. Handles non-routine inquiries and determines whether or not standard replies can be adjusted to the situation.

Background:

Required: High school diploma or equivalent. Four (4) years directly related clerical experience.

Helpful: Associate's degree in Secretarial Sciences; courses in word processing, communications, math, personal computers.

Required Skills:

The ability to: use clear and concise written and verbal communication techniques; type accurately; work on a word processor; perform basic math functions; operate a terminal console; alphabetize; follow moderate to complex instructions; apply independent judgment in an exceptional situation; operate various office machinery; and train and instruct. Good organizational skills. Knowledge of Company policies and procedures.

License(s)/Certificate(s): None required.

Source of Direction:

Will vary according to assignment.

Note: This description does not describe all of the responsibilities inherent in this job. It provides as much detail as necessary to distinguish this job from all other jobs. In addition, the requirements list are not all inclusive. Management has the right to make determinations based upon individual circumstances.

90-2

3/15/1990



Property Damage Billing & Collection Process Document

Issued: July 2024
Revised: NA

TABLE OF CONTENTS

HIGH LEVEL ELECTRIC PROCESS FLOW.....	5
INSTRUCTIONS	6
1. PROGRESS THE WORK ORDER	7
1.1 Respond to the incident.	7
1.2 Create the work order in Maximo	8
1.3 Build a design estimate in Maximo	9
1.4 Schedule the follow-up work to be completed.	9
1.5 Construct the Facilities	9
1.6 Triage the material variance when the system creates a prerequisite 245.....	9
1.7 Resolve the Material Variance.	10
2. COLLECT THE PAPERWORK NEEDED TO SUPPORT THE CLAIM.....	11
2.1 Order the police report within 2 weeks after creating the work order, when appropriate. 11	11
2.2 Investigate the dig up when appropriate.....	11
2.3 Process the police or damage report.....	11
2.4 Attach invoices to the work order within 90 to 120 days after going in service.....	14
3. GENERATE A BILL TO SUMMARIZE THE COSTS OF THE CLAIM.....	16
3.1 Create bill in the Work Management Billing System (WMBS) within 2 weeks.	16
3.2 Approve the bill package is appropriate, complete and accurate within 2 weeks.....	19
3.3 Send bill from Maximo to Oracle to record the receivable.....	20
3.4 Delete or Cancel Maximo bill or line items or WMBS bill.	22
4. COLLECT THE RECEIVABLE FROM THE RESPONSIBLE PARTY.....	25
4.1 Negotiate a settlement with the responsible party.....	25
4.2 Refer claim as outlined in Attachment 3-Collection Tactic Decision Process.....	27
4.3 Process payments made against claims.	28
4.4 Write-off uncollectible portion of claim.	28
<i>SUMMARY OF CHANGES</i>	28
ATTACHMENT 1 - CLAIM CANCELLATION MATRIX.....	29
ATTACHMENT 2 - LEXIS NEXIS RESPONSE ACTIONS.....	30
ATTACHMENT 3 - COLLECTION TACTIC DECISION PROCESS.....	31
ATTACHMENT 4 – STATE REQUIREMENTS TO NOTICE MUNICIPALS REGARDING CLAIM	
32	
APPENDIX	33
1. ALTERNATE TO PRE245-VARIANCE PORTLET	34
2. USING HYPERION DETAIL OF CHARGES TO COMPARE WITH WMBS BILL. ...	35

INTRODUCTION

Objective

This document outlines the process for establishing and recovering a claim against a responsible party for causing damage to Eversource property.

Applicability

This process is applicable to all situations where our electrical system is damaged. The facilities can be below, on, or above ground.

References

This process is kept in the Property Damage Project/Process Documentation/Active Version/ Sharepoint site.

Discussion

This document was written to outline the overall process to be followed when pursuing a property damage claim starting with responding to an incident and finishing with recovering the company's costs to repair the damaged facilities back to normal configuration.

At the time of the incident, the company will always take the needed steps to make the situation safe and restore power. In some cases, additional "follow-up" work may need to be planned, scheduled and constructed to bring the system back to normal configuration.

Example

A vehicle hits and cracks a pole in the middle of the night. Power has not been loss. The pole is braced at the time of the incident. The replacement of the pole and transfer of facilities will be planned subsequently.

When the bill is submitted to Oracle as a receivable, it will also be reimbursed to the operational cost control center. The reimbursement is not contingent on the collection of the claim.

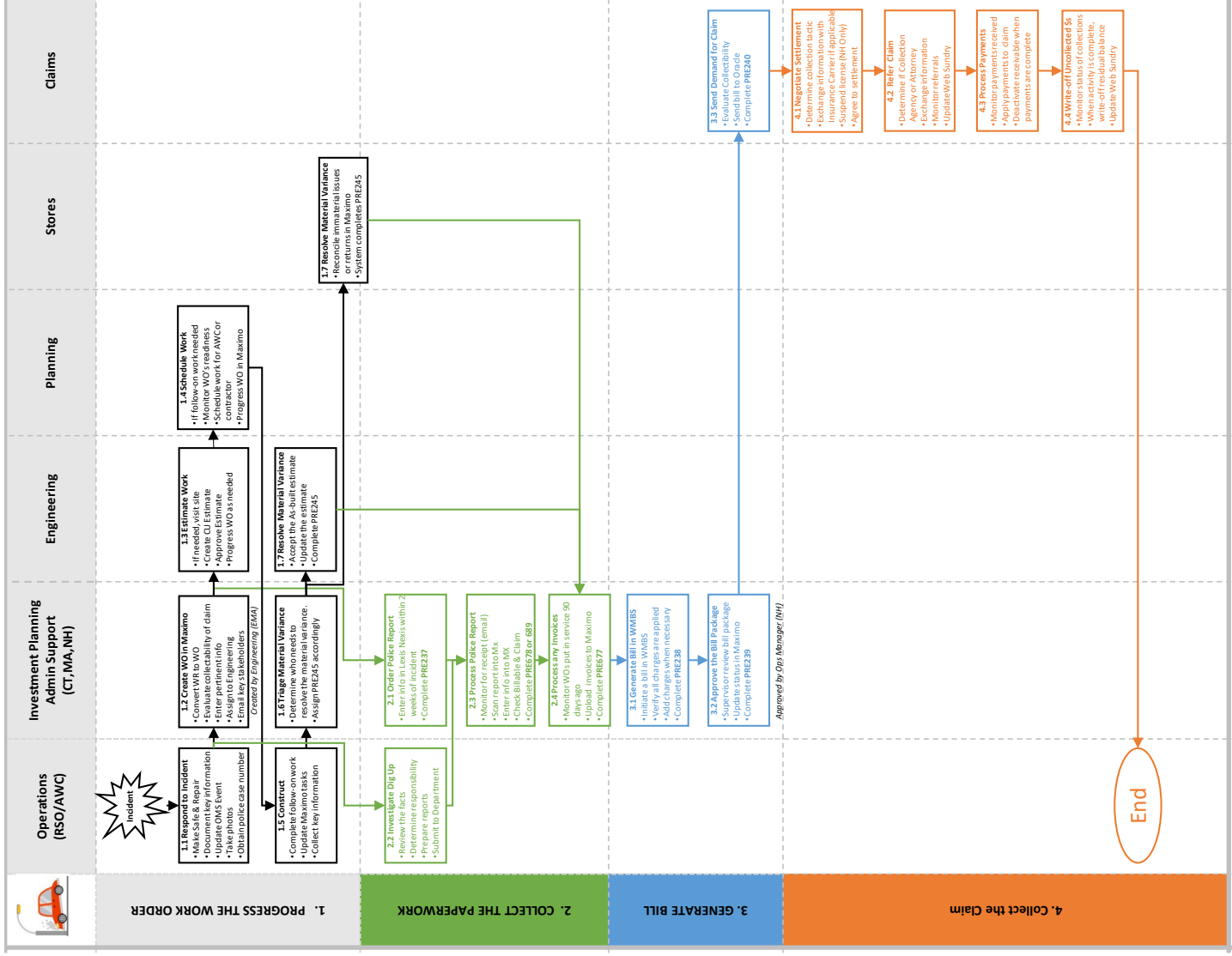
The two criterion to create a bill in the Work Management Billing System are (1) the work orders must be in the status of COMP or PCLOSE; and (2) the work type must be EM, CM, or CP.

The criteria to include a work order in the dashboard data simply requires at least one of the property damage specific prerequisites. Designers are currently instructed to use the property damage sub-work types, but on occasion and historically, Designers used other sub-work types.

The property damage prerequisites are used to manage the process from incident to billing the responsible party. It relies on the proper disposition of the prerequisites in the work management system at the appropriate time to process efficiently.

Standard Prerequisites Number	Description	Type	Activation Status	Completion Status	Completed When	Completed By	Part of Report Criteria
PRE223	Work by Telephone Co.	JOINTUSE	DSINPRG	WTBS	Pole installed.	Operations	No
PRE237	PDB Police Report Contact & Damage Claim	DAMINV	DSINPRG	COMP	Police report ordered in Lexis Nexis portal.	Admin	Yes
PRE238	PDB Summary Report Package Complete	DAMINV	FCOMP	COMP	Bill generated and documentation attached.	Admin	Yes
PRE239	PDB Reviewed for Release to MX	DAMINV	FCOMP	COMP	Documentation and bill approved accurate and complete.	Admin	Yes
PRE240	PDB Claims Review/Send to Oracle	DAMINV	FCOMP	COMP	Bill sent to Oracle as a receivable.	Claims	Yes
PRE245	Variance Reconciliation	COMPCLOSE	FCOMP	FCOMP	Material variance is resolved.	Operations	No
PRE677	Need Invoiced	BILLING	FCOMP	COMP	All invoices attached and highlighted	Admin	Yes
PRE678	Police Report Received	BILLING	DSINPRG	COMP	Police report provided by Lexis Nexis and attached.	Admin	No
PRE689	Dig Up Docs Attached	BILLING	DSINPRG	COMP	Dig up documentation provided and attached.	Admin	Yes

High Level Electric Process Flow



Instructions

The following instructions are aligned to the high-level process flow and are meant to provide detailed activities performed during the process steps. The level of detail assumes that a user is familiar with the navigation and functionality of the various applications, including Maximo Work Order and Invoices, Work Management Billing System (WMBS), Lexis Nexis Portal and Web Sundry.

1. PROGRESS THE WORK ORDER

1.1 Respond to the incident.

Operations

Reference

Supervisor's Briefing Sheet SBS-14-008 revision 3 outlines first responder's responsibilities related to property damage incidents.

- 1.1.1 EVALUATE the situation and MAKE it safe.
- 1.1.2 When the incident is an underground dig up, DISPATCH the investigator to the scene.
- 1.1.3 DOCUMENT any information about the person/company responsible (i.e. City Garbage Truck took down service, City Plow knocked pad off of slab, ABC Construction dug up primary, Tree Company took down secondary)
- 1.1.4 TAKE photos of the scene to help clarify and support responsibility.

Example

Vehicle license plate, Company name/logo on vehicle or equipment, point of contact in relation to mark outs, etc.

- 1.1.5 FILL OUT a Trouble Ticket (electronically or paper) noting the following information:
 - Street and Town
 - Structure # (i.e. pole)
 - Description of Work Completed
 - Note if "Follow-Up Work" is Needed
 - Materials Used
 - Contractors Used or Copy of Timesheets (Check-off Box for Traffic Control)
 - List all Eversource Employees On-Scene
 - Police case number
 - License Plate or VIN#

NOTE

The more information obtained and provided either from the scene of the accident or from the follow-up work, the quicker the property damage bills can be processed and the quicker the company can recover their costs, which results in a operational budget reimbursement.

- 1.1.6 When the incident is underground, RECORD the Dig Safe Ticket number on the trouble ticket.
- 1.1.7 While police are on scene, OBTAIN the summary report, police traffic duty slip, and police case number on the trouble ticket.

Administrative (CT, WMA, NH) and Designer (EMA)

1.2 Create the work order in Maximo

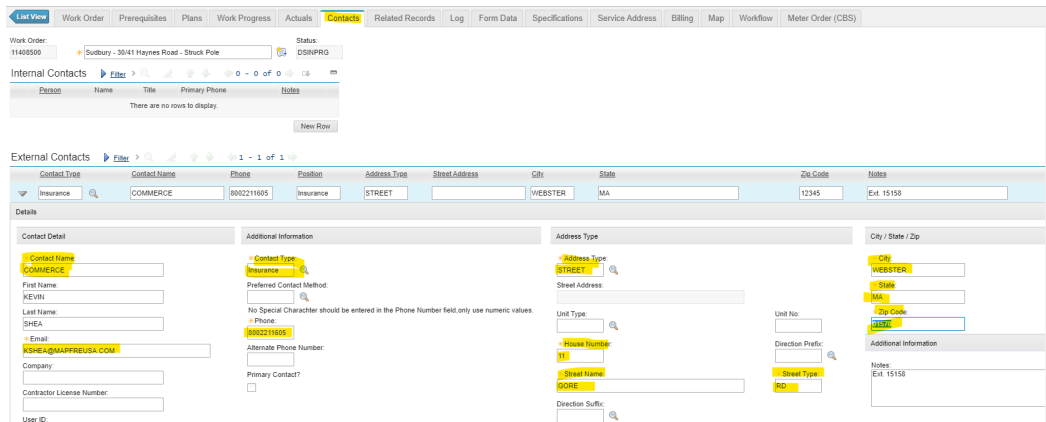
- 1.2.1 NAVIGATE to the Maximo portlet for work requests
- 1.2.2 CONVERT work request to a work order.
- 1.2.3 EVALUATE criterion of Cancellation Matrix (Attachment 1) in the Work Order Creation section and PERFORM actions outlined if appropriate.
- 1.2.4 CHECK “Responsible Party Unknown?” on the Billing Tab in Maximo and then SAVE, if appropriate.

EMA Administrative will perform the next two steps when ordering the police report

- 1.2.5 CHECK “Fatality?” on the Billing Tab in Maximo, if appropriate.
 - a. EMAIL pdclaims@eversource.com the work order to notify of fatality.

Claims

- b. REVIEW police report attached to the work order.
- c. CONTACT the insurance company for claim information.
- d. CREATE a contact type of “Insurance” with the highlighted information shown below.



- e. If no insurance is listed on the police report, DETERMINE if appropriate and who to bill.
- f. CREATE a contact to reflect who should be billed, if appropriate.
- g. ADVISE Admin of determination.

Admin

- h. PROCEED with billing or cancellation as appropriate.
- 1.2.6 INFORM Claims the responsible party is a municipal, state or federal agency, if appropriate.

NOTE

Attachment 4 - State Requirements to Notice Municipals Regarding Claim describes the requirements:

- Connecticut requires notice within 6 months and action within 2 years of incident.
- Massachusetts requires notice within 2 years and suit filed within 3 years of incident.
- New Hampshire requires notice within 60 days and suit filed within 3 years of incident.

Claims

- 1.2.7 PLACE the Agency on written notice of the claim within the state's required timeframe using the department's form letter.
- 1.2.8 UPDATE Maximo damage notes when Notice of Claim is sent and acknowledged.
- 1.2.9 ATTACH Notice of Claim and Agency Acknowledgement to Maximo work order tab.

Administrative (CT, WMA, NH) and Designer (EMA)

- 1.2.10 If the work order is labor only, ADVANCE the work order to COMP in Maximo.

Designer

- 1.3 Build a design estimate in Maximo
 - 1.3.1 DETERMINE if the information provided is adequate to build estimate.
 - 1.3.2 If not, VISIT the site and RECORD the necessary information.
 - 1.3.3 CREATE estimate in Maximo.
 - 1.3.4 APPROVE estimate in Maximo.
 - 1.3.5 PROGRESS estimate in Maximo

Planner

- 1.4 Schedule the follow-up work to be completed.
 - 1.4.1 MONITOR the work order's readiness to be scheduled.
 - 1.4.2 SCHEDULE the work for the Area Work Center (AWC) personnel or Outside Contractors.
 - 1.4.3 PROGRESS work order in Maximo, as appropriate.

Operations

- 1.5 Construct the Facilities
 - 1.5.1 GATHER and RECORD with material to perform the repair.
 - 1.5.2 COMPLETE the permanent repair in the field.
 - 1.5.3 UPDATE the Maximo task statuses.
 - 1.5.4 DOCUMENT key information including if work was built as designed.

Admin

- 1.6 Triage the material variance when the system creates a prerequisite 245.
 - 1.6.1 DETERMINE who needs to resolve the material variance.

NOTE

Quantity Planned is the Material the Designers Planned for the job. **Net Issues** is what the Storeroom issued to job. **Quantity As-built** is the material that was used for the job. **Quantity Variance** is the difference between the Net Issues and Quantity As-built.

- a. When all planned quantities are 0 (zero), REASSIGN the PRE245 to Field Engineering to update the asbuilt estimate to align with what was issued to the field.
- b. When all as-built quantities are 0 (zero), REASSIGN the PRE245 to Field Engineering to perform as-built acceptance.
- c. When planned quantities and net issues match, but as-built quantities do not, REASSIGN to Field Engineering to perform as-built acceptance.
- d. When planned quantity and as-built quantity match, but net issues do not, REASSIGN the PRE245 to the Storeroom to charge out material.
- e. When more than 1 condition exists, SEND to Field Engineering first.

1.6.2 REASSIGN the PRE245 to the appropriate party in Maximo in CT, WMA & NH.

1.6.3 EMAIL the appropriate party in EMA.

Operations

1.7 Resolve the Material Variance.

NOTE

The steps below are not sequential.

Admin or Designer

1.7.1 PERFORM as-built acceptance.

Designer

1.7.2 REWRITE the asbuilt estimate to align with material used in the field.

STORES

1.7.3 ADJUST the net issues or returns to align with the estimate and material used in the field

Admin, Designer, or System

1.7.4 COMPLETE the PRE245 in Maximo.

2. COLLECT THE PAPERWORK NEEDED TO SUPPORT THE CLAIM

NOTE

These steps do not occur sequentially after progressing the work order but will happen in parallel at the appropriate point.

Admin

2.1 Order the police report within 2 weeks after creating the work order, when appropriate.

- 2.1.1 SUBMIT request for police report in the Lexis Nexis portal, by entering the following information:
 - a. Agency Name
 - b. Date of Loss (DOL)
 - c. Claim # - begin with the Maximo work order followed by a hyphen then any characters can be added subsequently to help identify the claim (FWO, AWC, etc).
 - d. Police Case Number under report, if provided
 - e. Eversource as Last Name of Party 1
 - f. Address in Street of Loss
 - g. City and State
 - h. Vehicle Identification Number (VIN), if provided
 - i. Vehicle License Plate (Tag), if provided.
 - j. General Description under Additional Info
- 2.1.2 COMPLETE PRE237 in Maximo

Designated Investigator

2.2 Investigate the dig up when appropriate.

- 2.2.1 COORDINATE with the Utility Locator investigation, when applicable.
- 2.2.2 REVIEW all the relevant facts for accuracy.
- 2.2.3 DETERMINE the responsible party of the incident.
- 2.2.4 SUBMIT required documentation to the regulatory agency.
- 2.2.5 RETAIN the reports and supporting documentation per retention guidelines.

Admin

2.3 Process the police or damage report.

- 2.3.1 FOLLOW the Actions outlined in the Lexis Nexis Response Actions attachment to guide next steps.
- 2.3.2 EVALUATE criterion of Cancellation Matrix (Attachment 1) in the *Police Report or Dig Up Documentation Resolution* section and PERFORM actions outlined if appropriate.

- 2.3.3 If claim is still viable, CHECK both the “Billable?” Box and “Claim?” box in the Billing Tab in Maximo.
- 2.3.4 CHECK “Responsible Party Unknown?” on the Billing Tab in Maximo, if appropriate.
- 2.3.5 EXPORT the police report from the Lexis Nexis portal and ATTACH it to the work order in Maximo.
- 2.3.6 VALIDATE the Incident Date is accurate in the Damage Claims section of the Billing Tab. It will drive the Billing Deadline and Statute of Limitations.
- 2.3.7 FILL-OUT any other pertinent information available in the Damage Claims section of the Billing Tab.
- 2.3.8 SAVE your updates to the Billing Tab in Maximo.
- 2.3.9 VALIDATE or CHECK “Fatality?” on the Billing Tab in Maximo, if appropriate.
 - a. EMAIL pdclaims@eversource.com the work order to notify of fatality.

Claims

- b. REVIEW the attached police report to the work order.
- c. CONTACT the insurance company for the claim information.
- d. CREATE a contact type of “Insurance” with the highlighted information shown below.

- e. If no insurance is listed on the police report, DETERMINE if appropriate and who to bill.
- f. CREATE a contact to reflect who should be billed, if appropriate.
- g. ADVISE Admin of determination.

Admin

- h. PROCEED with billing or cancellation as appropriate.

Damage Claims

Claim? Billed? Responsible Party Unknown?

Claim Number: Claim Bill Received? Billing Adjustment Needed?

Billing Deadline: 7/4/25 Responsible Party: ELEMENT FLEET CORP. Fatality?

Statute of Limitations: 10/4/25 1:52 PM Registration Number: CT - K92968

Incident Date: 10/4/23 1:52 PM Drivers License Number: CT - 026251888

Police Case Number: 2300016223

Damage Claim Notes:

NOTE: Add insurance company name in Damage Claims Note and in Contact Tab:

2.3.10 NAVIGATE to the Contacts Tab in Maximo and ADD contacts.

- a. CLICK on New Row button all the way to the right in the External Contacts section.
- b. ENTER required fields for a Contact Type of Vehicle Owner in the Details section that pops up.
- c. SAVE the contact you added.
- d. REPEAT steps a - c for a Contact Type of Operator, even if the same as Vehicle Owner.
- e. REPEAT steps a – c for a Contact Type of Insurance using the Insurance Company Name and Policy Number as the contact name.

* Contact Name:

Amica Mutual Insurance Company- Policy # 9

NOTE

All External Contacts must be entered before you Calculate & Save the bill in WMBS even if the information is the same.

- 2.3.11 COMPLETE or CANCEL PRE678 (police report) or PRE689 (damage report) as guided in Lexis Nexis Response Actions or Cancellation Matrix.

Admin

2.4 Attach invoices to the work order within 90 to 120 days after going in service.

- 2.4.1 MONITOR for work orders that have been in service for 90 days.
- 2.4.2 REVIEW that work order is written and all charges have hit the work order (labor, outside services, materials, overheads and loaders).
- NAVIGATE to the Actuals Tab
 - VALIDATE time has been charged on the Labor sub-tab.
 - VALIDATE no materials are checked as Out of Balance on the Material Variance sub-tab and there is no active PRE245.
 - VALIDATE outside services have been charged on the Services sub-tab.

NOTE

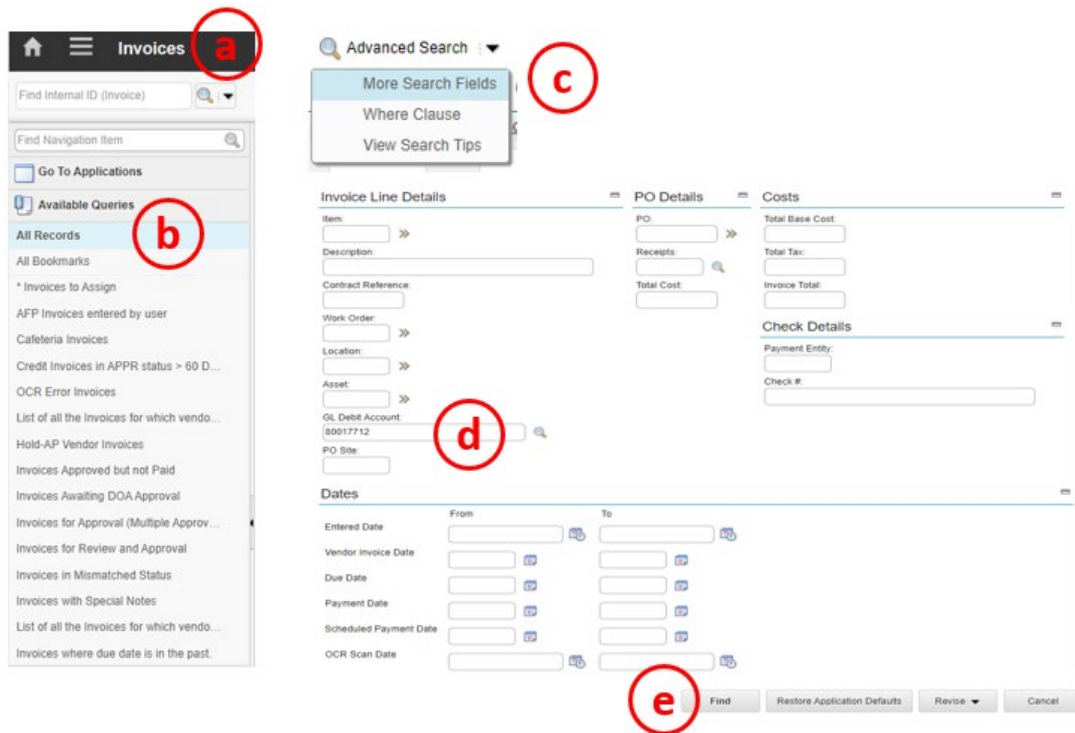
You must wait until Day 2 of the monthly close of the latest charge to ensure all overheads and loaders have been applied.

- 2.4.3 DETERMINE if contractor charges hit Outside Service.
- GOTO CU Estimating (T&D) – Electric by clicking on the chevron next to Estimate Request on the Actuals Tab



- NAVIGATE to the Summary Tab.
 - OBSERVE if contractor was added to the work order.
- 2.4.4 When work order contains contractor costs, LOCATE the contractor invoices in Maximo.
- NAVIGATE to the Invoice Module in Maximo.
 - CLICK All Records.
 - CLICK Advance Search and then CLICK More Search Fields.
 - ENTER Maximo FWO in GL Debit Account.

e. CLICK Find.



NOTE
Entity, CCC, and Cost Element are not required for the search. All invoices associated with the work order will populate.

- 2.4.5 EXPORT and HIGHLIGHT all applicable contractor charges to the work order.
- 2.4.6 ATTACH all marked up documents to the work order in Maximo.
- 2.4.7 COMPLETE PRE677.

3. GENERATE A BILL TO SUMMARIZE THE COSTS OF THE CLAIM

NOTE
Both Steps 1 and 2 must be complete before generating the bill in WMBS.

Admin

3.1 Create bill in the Work Management Billing System (WMBS) within 2 weeks.

- all prerequisites are done, meaning a status of blank, COMP, CAN, & CLOSE;
- work order was placed in service more than 90 days ago;
- work order status is COMP or PCLOSE; and
- work order does not meet any cancellation criterion.

NOTE
Supervisor should review with the Claims Manager any large claim (> \$10,000) with clear responsibility and insurance past the Billing Deadline but at least 30 days before Statute of Limitations before cancelling claim. The Billing Deadline is 90 days before the Statute of Limitations)

3.1.1 INITIATE or UPDATE a bill to support a property damage claim.

- NAVIGATE to the Work Management Billing System (WMBS) <http://wms.nu.com/apps/wmbs/>.
- CLICK Update Existing Bill if you already started a bill; otherwise Generate New Bill will already be highlighted.
- SELECT Property Damage for the Bill Type, if not preselected.
- ENTER the Work Order and Field Work Order
- CLICK SEARCH.
- CLICK Initiate to generate a bill. The WMBS status will be INIT.

The screenshot shows the EVERSOURCE Work Management Billing System interface. At the top, there is a green header with the EVERSOURCE logo and the text "Work Management Billing System". Below the header is a search bar. The main form area contains a "Bill Type" dropdown menu set to "Property Damage", a "Work Order" input field with the value "4390634", and a "Field Work Order" input field with the placeholder text "Enter Field Work Order". There are two radio buttons: "Generate New Bill" (selected) and "Update Existing Bill". A blue "SEARCH" button is located at the bottom right of the form. Below the form is a table with the following columns: "Bill No", "Work Order", "Field Work Order", "Entity", "City", "Area Work Center", "Bill Status", and "Created By". The first row of the table has the following values: "f", "Initiate", "4390634", "80007173", "11", "MANCHESTER", "HARAWC", and "INIT".

- 3.1.2 VERIFY the Work Order Details and CONTACT match Maximo information.
 - a. OPEN the Maximo Work Order Tab in a second window.
 - b. COMPARE information in Work Order details with Work Order Tab in Maximo.
 - c. CONFIRM Description says 9A-Car vs Pole or 9A-Dig-up.
- 3.1.3 CALCULATE and SAVE the bill in WMBS after you made all adjustments to the Actuals from the Labor Charge tab. The WMBS status will change to INPRG.
- 3.1.4 CLICK on View Report to see the results of the bill calculation.

The screenshot shows the 'Billing Summary' page in WMBS. The page has a blue header with navigation tabs: BILLING SUMMARY, CONTACT, LABOR CHARGE, MATERIAL CHARGE, CONTRACTOR CHARGE, and ADDITIONAL CHARGE. Below the header are four main sections: Work Order Details, Account Details, Work Order Contact, and Company Billing Information. Each section contains specific data points. At the bottom right, there are two buttons: 'CALCULATE AND SAVE' and 'VIEW REPORT'. Red circles are drawn around the 'Work Order Details' and 'Work Order Contact' sections, and around the 'CALCULATE AND SAVE' and 'VIEW REPORT' buttons.

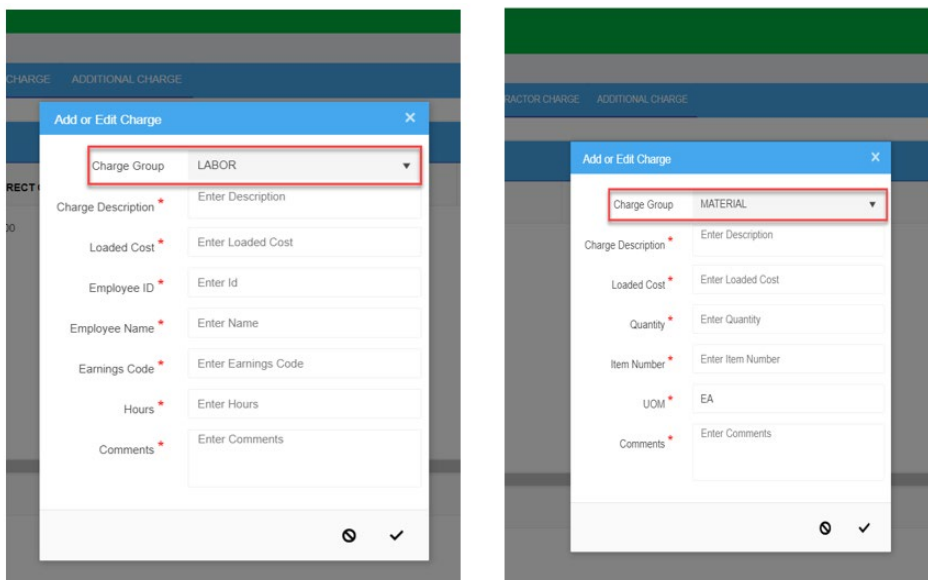
Work Order Details	Account Details	Work Order Contact	Company Billing Information
Work Order : 4390034 Bill No : 10 Status : INIT Work Order Type : Electric Distribution Work Type : EM Sub Work Type : PROPDUG-AD Bill Type : FCB Area Work Center : HADAWC Description : DBJ-0A-01-31-11 CAR VS PAD 2842 *FOLLOW UP NEEDED Notes :	Entity : 11 Field Work Order : 00007173 Charge CC : ZNP Line Of Business : 11100 Total Direct Cost : Total Loaded Cost :	Street Address : OAK FOREST City : MANCHESTER State : CT	Facility : 0 Company Name : EVERSOURCE CBYDID : Service Date : 5/8/2020 2:59:13 PM Pole ID : Police Case ID : 5452027 Incident Date : 5/8/2020 12:00:00 AM Pole Custodian : N/A

- 3.1.5 VALIDATE all direct charges have been applied to the work order.
 - a. CONFIRM appropriate Transformer charges are present.
 - b. REFER to Appendix to compare the Hyperion Detail of Charges query results with WMBS report, when needed. Hyperion Detail of Charges reflects charges posted to Power Plan.

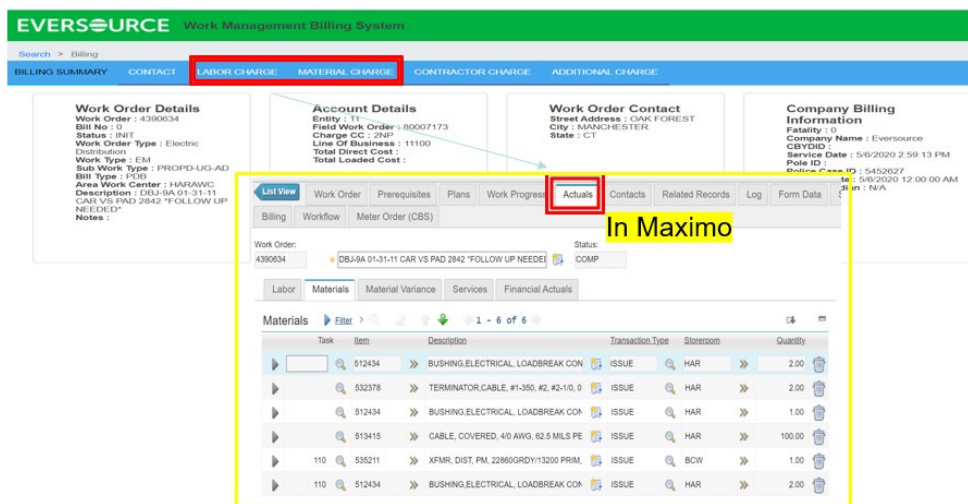
NOTE

The rows that are displayed in the Labor Charge and Material Charge tabs of WMBS are actuals. The system does not allow users to adjust those rows. You must add a manual row. You are allowed to edit a manual row that you added.

- 3.1.6 DELETE charges in WMBS, if not appropriate.
 - Design Contractor Invoices
- 3.1.7 ADD or ADJUST manual charges in WMBS, if needed.
 - a. NAVIGATE to the Bill Summary page in WMBS.
 - b. SELECT New Charge button on the appropriate charge tab.
 - c. ENTER the requested information.
 - d. SAVE your edits by clicking the check mark.
 - e. CLICK the pencil to edit the charge.



- f. CALCULATE and SAVE the changes.
- g. VALIDATE entered charges are correctly reflected.



- 3.1.8 ATTACH page 3 of the WMBS bill report to the work order in Maximo.
- 3.1.9 CONFIRM property damage claim is still viable and all supporting documents have been attached to work order in Maximo to create an electronic bill package.
 - Trouble Ticket (CT, WMA & NH) or Keep Cost Report (EMA)
 - Pictures
 - Police Report or Dig Up Documentation
 - WMBS Billing Report (page 3)

NOTE

When the standard Police Report or Dig up Documentation are not available, any documentation from a third party that identifies the responsible party, date of the incident, location, insurance, and description of the incident can be substituted.

NOTE

Although Timesheets will not be required as part of the package initially, Claims may request them if needed in the future. The Material Summary and Hyperion Detail of Charges have been removed from the package intentionally.

- 3.1.10 NH only, DELIVER or EMAIL bill package to Ops Manager for approval and signature.
- 3.1.11 RELEASE TO MAXIMO by clicking the button at bottom right of Billing Summary page in WMBS. The WMBS status will change to COMPL
- 3.1.12 COMPLETE PRE238

3.2 Approve the bill package is appropriate, complete and accurate within 2 weeks.

Admin Supervisor (CT & MA)

- 3.2.1 PULL UP the work order in both WMBS and Maximo .
 - a. NAVIGATE to Bill Summary page in the Work Management Billing System (WMBS) <http://wms.nu.com/apps/wmbs/>.
 - b. CLICK the View Report button on the bottom right side of the page.

Admin Supervisor (CT & MA), Ops Manager (NH)

- 3.2.2 VALIDATE claim is still viable.
- 3.2.3 EVALUATE criterion of Cancellation Matrix (Attachment 1) in the *Prio to Finalizing the Bill* section and PERFORM actions outlined if appropriate.
- 3.2.4 COMPLETE the following steps when claim is not viable.
 - a. EVALUATE criterion of Cancellation Matrix (Attachment 1) in the *Work Order Creation* section and PERFORM actions outlined as appropriate.
 - b. CANCEL the bill in Maximo and WMBS outlined in step 3.4.
 - c. CANCEL all remaining Property Damage specific prerequisites.
- 3.2.5 VERIFY the charges are accurate and complete.
- 3.2.6 COMPARE the WMBS billing report to Bill Line Details in the Billing Tab in Maximo.
- 3.2.7 VERIFY the supporting documentation referenced in step 3.1.9 is complete and attached to the work order .
- 3.2.8 RESOLVE any discrepancies found.

Admin Supervisor (CT & MA), Admin (NH)

3.2.9 COMPLETE the PRE239.

3.2.10 In CT & MA, EMAIL Claims the bill is ready.

NOTE

As of the writing of this process, the Maximo portlet for Claims is not functioning properly. The email is needed to ensure no claims are missed. The dashboard correctly tracks all claims updated in the Maximo.

Claims

3.3 Send bill from Maximo to Oracle to record the receivable.

3.3.1 VALIDATE the bill package is complete, accurate, and viable.

- a. EVALUATE criterion of Cancellation Matrix (Attachment 1) in the *Claims Review of Package* section and PERFORM actions outlined if appropriate.
- b. CONFIRM the actual bill in Maximo aligns with the supporting documentation of package.
- c. ENSURE the police or damage report clearly identify the responsible party being billed.
- d. Verify that all invoices are included and link to charges on the bill.
- e. REVIEW Trouble tickets information is aligned with supporting information.

3.3.2 WORK with bill preparer to resolve any minor quick (within 1 business day) fixes needed.

3.3.3 RETURN to bill preparer for larger fixes that will likely take more than a day.

- a. EMAIL bill preparer and COPY supervisor describing the discrepancy and action needed.
- b. ADD new PRE239 to work order in Maximo.

3.3.4 SELECT the correct contact by expanding the bill under Bills for Work Order section of the Maximo Billing Tab.

NOTE

There are currently two instances of Oracle. The instance used by CT, WMA, and NH is automated between Oracle and Maximo. The instance used by EMA is manual. The manual button in Maximo updates the status and tracks the date but does not send any information to ORACLE. The bill information is emailed to AcctSundryBilling AcctSundryBilling@eversource.com to create the receivable.

3.3.5 For CT, WMA, or NH, CLICK the Send to Oracle button in the expanded section.

3.3.6 For EMA, manually SEND the Bill to Oracle while in the expanded section.

- a. CHECK the “Do Not Send to Oracle?” box which will enable the Manual Bill button.
- b. CLICK the Manual Bill button.

- c. EMAIL the bill information AcctSundryBilling@eversource.com to create the receivable.
- d. LOG the action in the Weekly Accomplishments tracker and the NSTAR tracking spreadsheet (i.e. 2007-2024 Master Keep Cost Electric.xlsx).

3.3.7 COMPLETE PRE240.

3.3.8 For CT, WMA, or NH, VALIDATE the Oracle Customer Number populated 2 business days after sending.

3.3.9 For EMA, ENTER the Oracle Customer Number in NSTAR tracking spreadsheet once received from AcctSundryBilling@eversource.com.

The screenshot displays the Oracle Billing System interface for a specific work order. At the top, there is a navigation bar with tabs like 'List View', 'Work Order', 'Prerequisites', etc. Below this, the work order details are shown: 'Work Order: 5846071', 'Description: Car vs Pole', 'Status: PCLOSE', and 'Revenue Amount(dollars):'. The main section is titled 'Bills for Work Order' and shows a table with one bill entry: 'Bill Number: 5846071-1', 'Bill Type: DAMAGE', 'Description: Car vs Pole', 'Status: INIT', and 'Bill Amount: 12,946.38000'. Below the table, there is a detailed form for the selected bill. The form includes fields for 'Bill Number', 'Bill Type', 'Status', 'Notes', 'Pre Pay?', 'Do Not Send to Oracle?', 'Invoice No.', and 'Oracle Customer Number'. The 'Oracle Customer Number' field is circled in red. There are also fields for 'Contact Type', 'Email Address', 'Company Name', 'Formatted Address', 'City', 'State', and 'Zip Code'. The 'Contact Type' dropdown is also circled in red. On the right side of the form, there are financial fields like 'Total Refundable', 'Total Non-refundable', 'Tax Adder', 'Sales Tax', 'Bill Amount', and 'Amount Paid'. At the bottom right, there are buttons for 'Send to Oracle', 'Manual Bill', and 'Cancel Bill'. The 'Send to Oracle' button is circled in red. The bottom of the interface shows 'Bill Lines' and a filter icon.

3.4 Delete or Cancel Maximo bill or line items or WMBS bill.

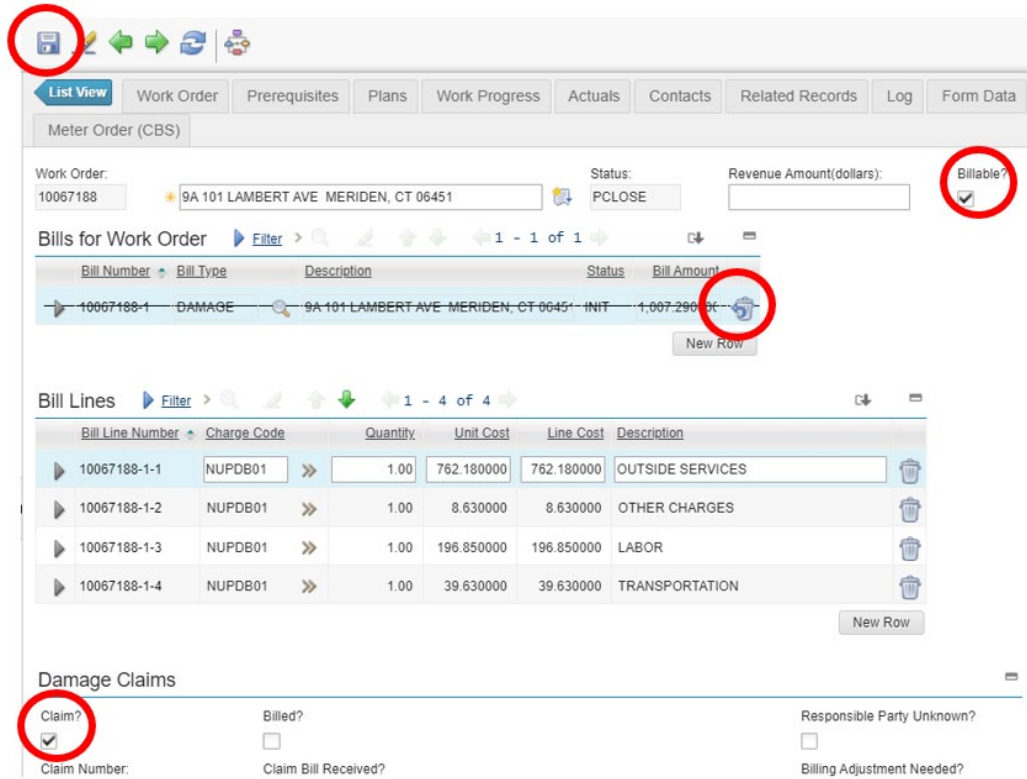
NOTE

The steps needed to delete or cancel a bill or bill lines are determined based on the status of the of the bill in WMBS and Maximo. The following table outlines the needed actions. Where there is Maximo and WMBS steps, Maximo actions must be completed first.

WMBS Status	Maximo Bill Status	What's happening?	Action in Maximo (Must be done first)	Action in WMBS
INIT	NA	WMBS pulled Bill Summary header information from Maximo	None	<ul style="list-style-type: none"> • Cancel Bill • Or to Update Bill - Reinitiate a new bill
INPRG	NA	WMBS pulled charge details from PowerPlan and created billing report	None	<ul style="list-style-type: none"> • CANCEL Bill • Or to Update Bill - CALCULATE and SAVE
COMPLT	INIT	WMBS released the summary bill details and Maximo created bill and bill lines	<ul style="list-style-type: none"> • Delete Bill or bill lines 	<ul style="list-style-type: none"> • Make bill UNBILLABLE • CANCEL Bill • Or to Update Bill – Reintiate and CALCULATE and SAVE
	SENT	Maximo sent bill lines to Oracle and updated status. Oracle returned the Oracle Customer Number tied to receivable	<ul style="list-style-type: none"> • Cancel Bill 	<ul style="list-style-type: none"> • Make bill UNBILLABLE • CANCEL Bill • Or to Update Bill – Reintiate a new bill • Inform Claims and Sundry Billing
	MANUAL	Maximo changed status to recognize bill manually sent to Oracle. Bill lines emailed to Sundry Billing, who returns Custom Number tied to receivable.		
	PAID	Oracle updated the status in Maximo to reflect the receivable was paid in full.	Bill cannot be deleted or cancelled	<ul style="list-style-type: none"> • Bill cannot be deleted or cancelled

3.4.1 Delete a Maximo bill or bill lines in INIT status.

- a. NAVIGATE to Billing Tab in Maximo.
- b. CLICK the trash barrel to the right of the bill in the Bills for Work Order section. All billing lines will be deleted once saved.
- c. If no longer billable, UNCHECK Billable and Claim? and ADD reason code from the Cancellation Matrix in the Damage Claim Notes.
- d. CLICK the disk in top left corner to save the changes.
- e. CANCEL all remaining property damage prerequisites.

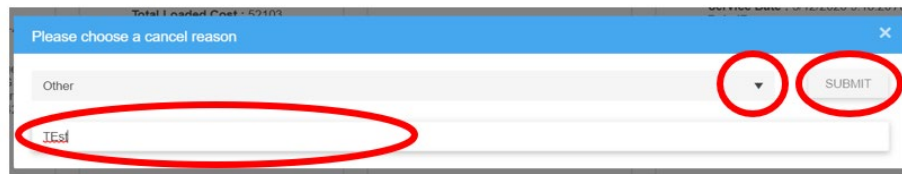
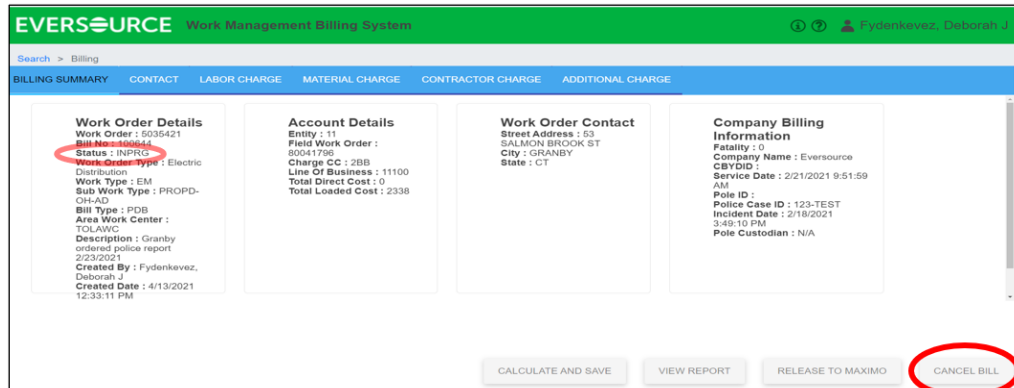


3.4.2 CANCEL a Maximo bill in SENT or Manual status.

- a. NAVIGATE to Billing Tab in Maximo.
- b. CLICK on the Cancel button after expanding the bill line.
- c. If no longer billable, UNCHECK Billable and Claim? and ADD reason code from the Cancellation Matrix in the Damage Claim Notes.
- d. CLICK the disk in top left corner to save the changes.
- e. CANCEL all remaining property damage prerequisites.
- f. INFORM AcctSundryBilling AcctSundryBilling@eversource.com the bill is being canceled and the receivable should be reversed.

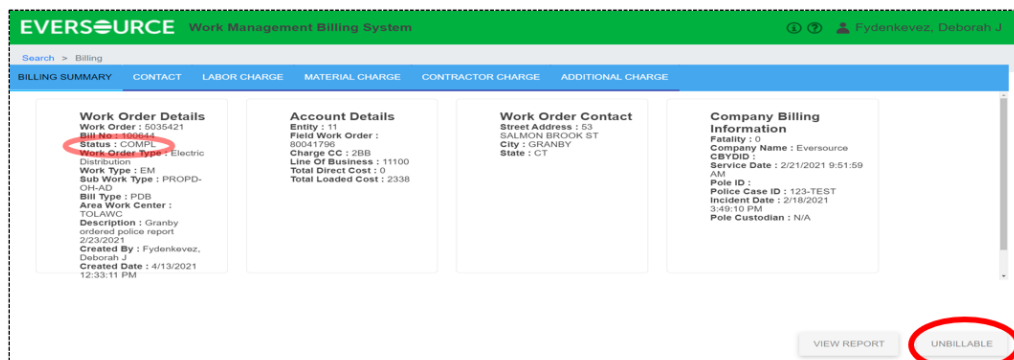
3.4.3 Cancel a WMBS bill in INIT or INPRG status.

- a. NAVIGATE to the Bill Summary in WMBS.
- b. CLICK the CANCEL BILL button in the bottom right hand corner.
- c. SELECT a cancel reason in the pop-up window.
- d. ENTER a descriptive reason if other is selected.
- e. SUBMIT cancel reason.
- f. If needed, REINITIATE a new bill and GOTO step 3.1.



3.4.4 Cancel a WMBS bill in COMPLT status.

- DELETE Maximo bill and GOTO step 3.4 based on the Maximo bill status.
- NAVIGATE to the Bill Summary in WMBS.
- CLICK the UNBILLABLE button in the bottom right hand corner.
- SELECT a cancel reason in the pop-up window.
- ENTER a descriptive reason if other is selected.
- SUBMIT cancel reason.



4. COLLECT THE RECEIVABLE FROM THE RESPONSIBLE PARTY

Claims

NOTE

The negotiation is an iterative process with the insurance company or responsible party. Each communication, agreement and action should be noted in Web Sundry, as well as adding a reminder for future actions.

4.1 Negotiate a settlement with the responsible party.

4.1.1 CONTACT insurance company and/or responsible party to make them aware of the claim and exchange information.

4.1.2 ENTER the receivable pertinent data and documentation in Web Sundry.

- a. FILL IN the Account section with the OAR Number, Entity, Name, Address, and Incident Date.
- b. DETERMINE the Credit Status based on the initial collection tactic by following the decision process (Attachment 3).
- c. FILL IN the Summary section with the Credit Status, Original Bill Date, Original Bill Amount in.
- d. FILL IN the Damage Information section with Location, Event Date and Work Request # (aka Maximo Work Order Number)
- e. FILL IN the Insurance Company section, Insurance Claim #, Adjuster Name, Phone Numbers, and Email Addresses in the Insurance Information Section.
- f. ATTACH the aggregated billing documentation (BD) into a single file using the following naming convention “Work Order Number-INT-BD”.
- g. GENERATE letter if appropriate,

Letter	Purpose
14 Day Final Notice	This letter is utilized after the negligent party fails to respond to our “First Letter Request for Insurance information.
Arrangement with Promissory	This is a contract document with the negligent party agreeing to make monthly payments to resolve the legal debt.
Broken Payment Arrangement	This letter is utilized to communicate to the negligent party that they have failed honor the “Arrangement with Promissory” contract and our now delinquent. Subsequently, it advises them we will resume collection action.
Collection Agency	This letter is utilized when all attempts by an Eversource claims analyst to recover from the negligent party have failed. We now advise them that this matter will be pursued by our collection agency.
Conditional Release of License Cover Letter	This letter is utilized as a contract with the negligent party agreeing to payment installments to collect the legal debt. In exchange the negligent party’s license will be restored by the DMV.

Customer Notification of Possible License Suspension	This letter is utilized to advise the negligent party that their failure to respond to this legal debt will now result in our request to the jurisdictional DMV for license suspension.
Dig Up Letter	This letter is utilized as first notice to the negligent excavator to respond to Eversource's request for insurance information relevant to the occurrence.
First Letter Request for Insurance Information	This letter is utilized to place a negligent party that damaged our above ground facilities on notice and request insurance information.
Halt Revocation	Notice to jurisdictional state DMV to cease the process of revoking the negligent party's driver's license.
Notice to City	Notice of claim sent to Municipality of intent to pursue a negligence claim.
Paid in Full (DMV Release)	This letter is used to communicate to the jurisdictional DMV that the negligent party has satisfied its legal debt and their driver's license can be restored.
Request Revocation Broken Arrangement	This letter is utilized to communicate to the jurisdictional DMV and request a license suspension of the negligent party.
Second Letter	This letter is the second request for insurance information from the negligent party which damaged our above ground facilities.
State of NH Conditional Release Cover Letter	This letter is utilized in New Hampshire only as a contract with the negligent party agreeing to payment installments to collect the legal debt. In exchange the negligent party's license will be restored by the New Hampshire DMV.
State of NH Notification to Suspend License	This letter is utilized in New Hampshire only to advise the negligent party that their failure to respond to this legal debt will now result in our request to the New Hampshire DMV for license suspension.

h. ADD a Reminder when appropriate.

- Municipal Notice Deadline
- License Suspension (NH Only)
- Payment Expected
- Follow-up after GL Team
- Placing claim into collections
- Write-offs

i. ADD note to reflect update.

The screenshot displays the EVERSOURCE Incident Detail interface. Key elements are highlighted with red circles:

- (a)** Account information: QAR Number: 4000479612, Account #: 18103026, Distribution: Distribution @Eversource Energy, Bill Type: Damage.
- (b)** Data Changes table: A table with columns for Status, Date, and Type, listing various event date changes from 11-09-23 to 11-09-23.
- (c)** Summary table: A table showing financial details such as Credit Balance, Original Bill Date, Original Bill Amount, Amount Due, Unsettled, and Paid.
- (d)** Damage Information: Location: Gowing Hudson NH, Event Date: 11-09-23, Work Request #: MX15273847.
- (e)** Insurance Information: Insurance Carrier: Progressive, Policy Number: 24-4000559, Adjuster Name: Marcella, Phone Number: 440-620-4861.
- (f)** Vehicle Operator Information: Operator Name, Operator Address, License, Date of Birth, Police Report Number, Phone Number, Email Address.
- (g)** Letters section: A dropdown menu for selecting letter types, currently set to "Final Notice".
- (h)** Reminders section: A table for adding reminders with columns for Status, Date, and Reminder text.
- (i)** Notes section: A text area for adding notes, with a "Notes" header and "Add Note" button.

- 4.1.3 CONFIRM the insurance company and/or responsible party accepts responsibility.
- 4.1.4 ADDRESS any questions or challenges regarding responsibility or demand amount.
- 4.1.5 FINALIZE settlement, demand amount and payment terms.
- 4.1.6 RECORD transactions and payment terms in Web Sundry.
- 4.1.7 INPUT a reminder in Web Sundry.
- 4.1.8 ADD note to reflect update.
- 4.1.9 DECIDE next step if a reasonable settlement is NOT reached or communications break down.

Claims

4.2 Refer claim as outlined in Attachment 3-Collection Tactic Decision Process.

- 4.2.1 In NH only, FOLLOW the following steps:
 - a. WRITE-OFF any claim less than \$500.
 - b. REFER to Collection Agency if value is between \$500 to \$1,000.
 - c. For claims greater than \$1,000, SUSPEND the driver's license when negotiations and productive communication breakdown
 - Suspension must be done within 2 years of incident.
 - NOTIFY responsible party of a possible license suspension letter 14 days in advance.
 - If no response, SUBMIT a request to NH DMV to have license revoked.
 - Suspension applies pressure to responsible party to negotiate with us.
 - If agreement is reached, PROVIDE a Condition Release agreement signed by responsible party and Eversource and INFORM NH DMV using a release letter.
- 4.2.2 In CT and MA, FOLLOW the following steps.
 - a. WRITE-OFF any claim less than \$500.
 - b. FORWARD claim to a collection agency when value is between \$500 and \$10,000.
 - 1) MONITOR status of collection referrals.
 - 2) REVIEW to see if there is still activity.
 - 3) WRITEOFF any collections where there has been no activity or communication for 6 months
- 4.2.3 For all states, RETAIN attorney (internal or external) for claims greater than \$10,000 with preference to internal versus external counsel.
 - a. MONITOR status of attorney referrals.
 - b. ANSWER interrogatories associated with the case.
 - c. CONFER with attorneys regarding any settlement offers.
 - d. FINALIZE settlement with responsible party and court.

- e. UPDATE and STATUS Web Sundry throughout the course of litigation.
- 4.2.4 UPDATE and NOTE Web Sundry claim status.
- 4.2.5 PROVIDE Collection Agency or Attorney all the supporting documentation for the claim.
- 4.2.6 DEACTIVATE Oracle monthly billing of receivable.

Claims

4.3 Process payments made against claims.

- 4.3.1 MONITOR payments made.
- 4.3.2 IDENTIFY account payment is associated.
- 4.3.3 UPDATE Web Sundry of payment.
- 4.3.4 When all payments are complete, CLOSE the receivable.
 - a. DEACTIVATE Oracle monthly billing of receivable.
 - b. ENTER completion status in Web Sundry as outlined in Attachment 3.
 - c. WRITEOFF any residual balance.

Claims

4.4 Write-off uncollectible portion of claim.

- 4.4.1 PROVIDE list of any writeoffs from claims by the ## of the month.
- 4.4.2 PROVIDE writeoff balance to AcctSundryBilling AcctSundryBilling@eversource.com.
- 4.4.3 UPDATE status in Web Sundry.
- 4.4.4 FOR EMA, UPDATE excel tracking spreadsheet.

----- End of Instruction -----

Summary of changes

July 2024 Published

Attachment 1 - Claim Cancellation Matrix

(Sheet 1 of 1)

Process Step	Reason	Reason Code	Dollar Amount	Action
Work Order Creation <i>Actions by Bill Preparer</i>	Hit and Run and therefore no responsible party.	*HNR*	Any	1. Cancel all claim prerequisites. 2. Enter "Not Billable" followed by reason code to work order description. 3. Uncheck "Billable" and "Claim?" on Billing Tab.
	The total charges are Below Threshold and there is no follow-up work required.	*BT*	CT & MA - \$200 NH - \$0	
	Internal description or police report identifies Low Hanging Wires . High vehicles contacting wires do not qualify.	*LOW1*	< \$50,000	
		LOW2	≥ \$50,000	4. Supervisor will validate with Manger as well as Operations and Claims that cancelling claim is only course of action left. 5. Note billing tab once supervisor approves 6. Complete steps for < \$50,000.
Police Report Resolution <i>Actions by Bill Preparer</i>	No Police Report or police report does not identify responsible party.	*NPR1*	< \$10,000 considering actual and pending charges	1. If too early to reasonably evaluate charges, place PRE678 INPRG. 2. Once work order status is "COMP", follow steps based on costs. 3. Cancel all remaining claim prerequisites. 4. Enter "Not Billable" followed by reason code in work order description. 5. Uncheck "Billable" and "Claim?" on Billing Tab.
		NPR2	≥ \$10,000	6. Send Freedom of Information Letter (FOIA) to the agency to obtain police report or any other documentation they may have. 7. If responsible party identified, follow steps based on costs. 8. If responsible party NOT identified, review with Supervisor and then Complete steps for <\$10,000.
		NPR3	≥ \$50,000	9. Supervisor will validate with Manger as well as Operations and Claims that cancelling claim is only course of action left. 10. Note billing tab once supervisor approves 11. Complete steps for < \$10,000.
	Low Hanging Wires	*LOW1*	< \$50,000	See instructions above in Work Order Creation.
		LOW2	≥ \$50,000	
Dig Up Documentation Resolution <i>Actions by Bill Preparer</i>	There is No Dig up Documentation or the documentation does not identify responsible party	*NDUP1*	< \$50,000 considering actual and pending charges	1. If too early to reasonably evaluate charges, place PRE689 INPRG. 2. Once work order status is "COMP", follow steps based on costs. 3. Cancel all remaining claim prerequisites. 4. Enter "Not Billable" followed by reason code in work order description. 5. Uncheck "Billable" and "Claim?" on Billing Tab.
		NDUP2	≥ \$50,000	6. Supervisor will validate with Manger as well as Operations and Claims that cancelling claim is only course of action left. 7. Note billing tab once supervisor approves. 8. Complete steps for < \$50,000.
Prior to Finalizing the Bill <i>Actions by Bill Preparer</i>	The bill has not been completed and date is beyond the Billing Deadline, or 90 days prior to the Statute of Limitation (SOL).	*SOL*	Any	1. Review with supervisor, once approved go on to next step. 2. Cancel all remaining claim prerequisites and bill (if created). 3. Enter "Not Billable" followed by reason code and then brief explanation to work order description.
Claims Review of Package <i>Actions by Claims Analyst</i>	The package is complete and appropriate but the Claim is determined unbillable .	*CLAIM1*	< \$10,000	1. Cancel all remaining claim prerequisites and bill. 2. Enter "Not Billable" followed by reason code and then brief explanation to work order description. 3. Uncheck "Billable" and "Claim?" on Billing Tab.
		CLAIM2	≥ \$10,000	4. Manger will validate with Operations and Claims that cancelling claim is only course of action left. 5. Note billing tab once approved. 6. Complete steps for < \$10,000

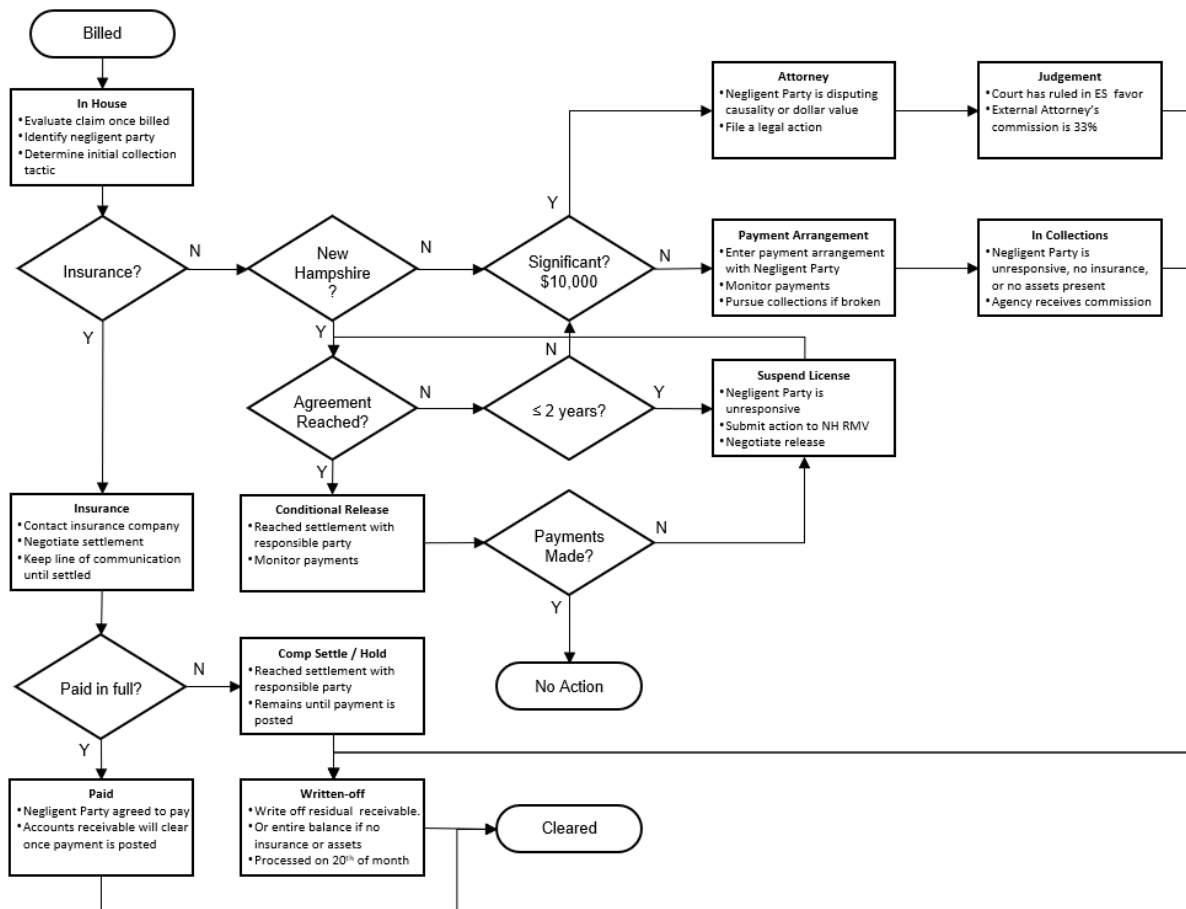
Attachment 2 - Lexis Nexis Response Actions

(Sheet 1 of 1)

CODE	Reason	Description	ACTIONS	
COMPLETED Lexis Nexis Code	PRAC	Police Report Attached	A report was found by police records and forwarded to you by LexisNexis.	Process police report in Maximo and complete prerequisite (678).
	NRFN	No Report Found	The report could not be found with the info provided. Suggestions are made as to what information would help.	Follow instructions in Property Damage Claim Cancellation Matrix.
	NRWN	No Report Written	Some police do not write a report for losses on private property of if the loss is under a certain value. We deliver the notification to you describing the outcome.	
	MISC	Miscellaneous-Not Found	When a report cannot be found for reasons out of the ordinary, you are sent a No Report Found notice with notes of explanation. This could be a situation where the officers responded, no log call was generated and no report was written , or it could be the agency just cannot find a report.	
	ARIN	Police Agency failed to respond	If a report request is distressed, two or more calls are made, and second requests are submitted if allowed. When we have been promised the report, but it still has not been received. The request is terminated, and we would forward any response once it is received.	
	RNRN	Report Released to Insured Only	A few agencies will not release a report to anyone other than a party involved. This is a notification to let you know we are unable to obtain this report.	Send Freedom of Information Act (FOIA) letter to obtain report.
	SIOI	Report Not Releasable	This code indicates the report was not releasable. If the release of the report is expected in the future, the notification describes the situation.	Validate first request was submitted and acted upon accordingly.
	DURI	Duplicate Request	If you have an active request in our system and you generate another request, you are sent a notice of the duplicate and the report is not re-ordered. No charge applies.	
PENDING Lexis Nexis Code	CRII	Conflicting Information on Request	Your report request had information in one section that conflicted with another section. Example: Order report from "CA HP" but the state of loss shows "NJ". No charge applies.	Resubmit request for police report with appropriate information.
	IISI	Insufficient Info to Order	This report cannot be ordered due to missing some critical information. A notice is generated telling you what info you need. No charge applies.	
	WPJR	Wrong Jurisdiction-More Info Required	Your request specified an agency, but they advised LexisNexis it was not theirs. There was insufficient info to determine the correct jurisdiction.	
	SRRI	Signed Release Required	Some police agencies require a party involved to sign a release allowing us to get a copy of the report. The notice contains instructions on how to get the release to us and also to re-order the report. No charge applies.	Bring to Supervisor.
	PDFR	Agency Failed to Respond- Reorder	If an agency states they did not receive the request, we reorder the report on your behalf. No further action is required by your adjuster. No charge applies.	No action required.
	RCAC	Agency Address Change	If your report was requested from an agency that has moved and comes back to us as 'No Forwarding Address', we obtain the correct address and reorder the report. No further action is required by your adjuster. No charge applies.	
	RCCC	Agency Requirements Change	If your report was requested from an agency that has changed their requirements since our last contact, we send you a notice and reorder the report. No further action is required by your adjuster. No charge applies.	
	RCER	Agency Error- Reorder	Sometimes an agency will make a mistake and requires corrective action. We coordinate the corrective action and reorder the report for you. No further action is required by your adjuster. No charge applies.	
	RNNF	Report Number Needed	If an agency requires a report number to do a search and it is missing from your request, we will contact the agency to obtain the report number on your behalf. If we are unable to obtain the report number, we will terminate the order with notes of explanation. No charge applies.	
	ROTH	Wrong Info Submitted from Client	This is the same as a NRFN, except the information submitted was not correct and the agency could not locate the report. We correct the information and resubmit the order and notification explaining the problem is delivered to the adjuster. No further action is required by your adjuster.	
	RRSC	LN Error	Once in a while we will make a mistake. We take corrective action, reorder your report and send you a notice advising you of the situation. No further action is required by your adjuster. No charge applies.	
WJRR	Wrong Jurisdiction-Reroute	Your request specified an agency, but they advised LexisNexis it was handled by another jurisdiction. We reroute the request to the correct jurisdiction. No further action is required by your adjuster.		

Attachment 3 - Collection Tactic Decision Process

(Sheet 1 of 1)



Attachment 4 – State Requirements to Notice Municipals Regarding Claim (Sheet 1 of 1)

STATE	LEGAL AUTHORITY	NOTICE DEADLINES	CLAIMS/ACTIONS ALLOWED	COMMENTS/EXCEPTIONS	DAMAGE CAPS
CONNECTICUT	<p>Liability of Political Subdivisions. C.G.S.A. § 52-557n. (codified qualified immunity established by common law).</p> <p>Connecticut in minority of states that still make distinction between governmental acts (qualified immunity from discretionary acts requiring judgment or discretion) and proprietary functions (no immunity for ministerial acts performed in a prescribed manner without judgment or discretion).</p> <p>Exceptions to qualified immunity: (1) failure to act leads to imminent harm; (2) statute provides for cause of action; and (3) intentional act.</p>	<p>Written notice must be filed with the clerk of such municipality within six (6) months after such cause of action has accrued.</p> <p>Statute of Limitation: An action against municipality must be commenced within two (2) years after the cause of action. C.G.S.A. § 7-101a(d).</p> <p>Claims for injuries resulting from defective highways, sidewalks, roads, or bridges must be brought within two (2) years and notice within ninety (90) days. C.G.S.A. §§ 13a-149, 13a-144. Section 13a-149 has savings clause that forgives inaccuracy in notice if no intent to mislead.</p>	<p>Municipalities generally are liable for damages to persons or property caused by: (1) Negligent acts by employees within the scope of their employment or official duties; (2) Negligence in operation of enterprise for "special corporate benefit or pecuniary profit" (e.g., water supply, sewer, municipal parking garage, or golf course); and (3) Creation or participation in the creation of a nuisance. C.G.S.A. § 52-557n(a)(1).</p> <p>However, this liability is significantly limited by several exceptions. Suits can be brought against state or municipality for defective or poorly maintained roads and bridges. C.G.S.A. § 13a-149.</p> <p>For additional liability statutes, see C.G.S.A. §§ 13a-144 to 13a-153e.</p>	<p>No liability for acts which require the exercise of judgment or discretion as an official function of authority granted by law. C.G.S.A. § 52-557n(a)(2).</p> <p>Other statutory exceptions covering particular activities or conditions are set forth in C.G.S.A. § 52-557n(b).</p> <p>No immunity when performing following governmental functions: (1) maintenance of a park system; (2) construction of storm water sewers (a governmental function because it is a duty imposed by the state on municipalities to maintain highways within its limits); (3) use of municipal property as a public park; and (4) traditional governmental functions such as the operation of jails, public libraries, and city garbage services.</p>	None

STATE	LEGAL AUTHORITY	NOTICE DEADLINES	CLAIMS/ACTIONS ALLOWED	COMMENTS/EXCEPTIONS	DAMAGE CAPS
MASSACHUSETTS	<p>Massachusetts Tort Claims Act. M.G.L.A. Ch. 258, § 2 to § 14 (1978).</p> <p>Public employers (county, city, town, etc.) are liable for injury to property or personal injury caused by negligence of public employee in course and scope, in the same manner and to the same extent as a private individual (tort and contract). M.G.L.A. Ch. 258 § 2.</p>	<p>Claim must be presented in writing to executive officer of the public employer within two (2) years after the date upon which the cause of action arose and denied. Failure to act in six (6) months is deemed denial.</p> <p>Exceptions: (1) Plaintiff led to believe that presentment not an issue; (2) Actual notice.</p> <p>M.G.L.A. Ch. 258 § 4.</p> <p>No civil action can be brought more than three (3) years after accrual.</p> <p>M.G.L.A. 258 § 4.</p>	<p>Public premises owner owes duty of reasonable care to all persons lawfully on premises. <i>Doherty v. Belmont</i>, 485 N.E.2d 183 (Mass. 1985).</p> <p>Public Duty Rule: The public duty doctrine is considered when an individual alleges that law enforcement personnel or other government employees are liable for injuries due to a breach of a legal duty. Unless the employee created or enhanced a risk or had a special relationship with the plaintiff, there is no recovery because the duty owed by the government to its citizens is to the public generally and not to citizens individually. <i>Judson v. Essex Agricultural and Technical Institute</i>, 635 N.E.2d 1172 (Mass. 1994).</p>	<p>Public employer not liable for any claim based upon an act or omission as follows: (1) in the execution of a statute; or (2) discretionary acts; or (3) arising out of an intentional tort, assault, libel, slander, or misrepresentation; or (4) negligent inspection of property. See other exceptions at M.G.L.A. 258 § 10.</p> <p>Discretionary function two-step test: (1) Is there discretion as to what course of conduct to follow? (2) Is it the type of discretion for which the Act provides immunity? <i>Fortenbacher v. Com.</i>, 888 N.E.2d 377 (Mass. 2008).</p>	<p>Liability of public employer may not exceed \$100,000 for each plaintiff.</p> <p>Public employer not liable to levy or execution or for interest prior to judgment or for punitive damages.</p> <p>Claims against the Massachusetts Bay Transportation Authority are not subject to the \$100,000 limit.</p> <p>M.G.L.A. Ch. 258, § 2.</p>

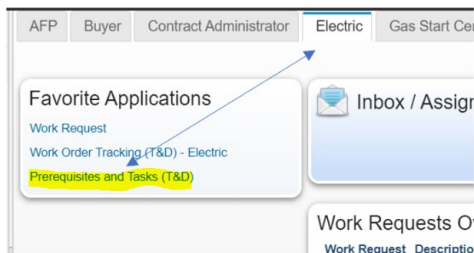
STATE	LEGAL AUTHORITY	NOTICE DEADLINES	CLAIMS/ACTIONS ALLOWED	COMMENTS/EXCEPTIONS	DAMAGE CAPS
NEW HAMPSHIRE	<p>Bodily Injury Actions Against Governmental Units. N.H. Rev. Stat. § 507-B:1 to 541-B:11.</p> <p>Municipal and county common law immunity abolished in <i>Merrill v. City of Manchester</i>, 332 A.2d 378 (N.H. 1974) (liability same as that of private corporation).</p>	<p>Notice of Claim must be filed within sixty (60) days of discovery of injury.</p> <p>Suit must be filed within three (3) years of injury or damage.</p> <p>N.H. Rev. Stat. § 507-B:7.</p>	<p>General Grant of Immunity.</p> <p>No "governmental unit" liable except as provided in Chapter 507-B. N.H. Rev. Stat. § 507-B:5.</p> <p>Although it doesn't address it, "discretionary function immunity (discretionary vs. ministerial)" has been regularly applied by courts:</p> <ul style="list-style-type: none"> Decision to lay out roads; Traffic control; and Setting road maintenance. <p><i>Maruya v. Velardi</i>, 135 A.3d 121 (N.H. 2016).</p> <p>Statute doesn't completely occupy the field of municipal immunity.</p>	<p>Exceptions to immunity: "Governmental Unit" liable for damages arising out of ownership, occupation, maintenance or operation of all motor vehicles, and all premises." N.H. Rev. Stat. § 507-B:2.</p> <p>*No liability for snow, ice, or other weather hazards on premises owned, occupied, maintained, or operated, unless gross negligence. N.H. Rev. Stat. § 507-B2-b.</p> <p>"Governmental unit" means any political subdivision. N.H. Rev. Stat. § 507-B:1(I).</p> <p>"Political subdivision" means any village district, school district, town, city, county or unincorporated place in the state. N.H. Rev. Stat. § 541-B:1(VI).</p>	<p>\$275,000 Per Person \$925,000 Per Occurrence N.H. Rev. Stat. § 507-B:4.</p>

APPENDIX

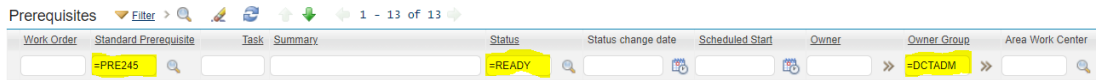
1. ALTERNATE TO PRE245-VARIANCE PORTLET

NOTE
 If Maximo portlets are not working properly and provides a list of active PRE245-Variance Reconciliation, SKIP to step 2.6.4.


1.1.1 NAVIGATE to Prerequisites and Tasks (T&D) module in Maximo.



1.1.2 FILTER to active PRE245 – Variance Reconciliation for your owner group.



Territory	Owner Group
Connecticut Electric	DCTADM
Eastern Mass Electric	DEMADM
Western Mass Electric	DWMADM
New Hampshire Electric	DNHADM

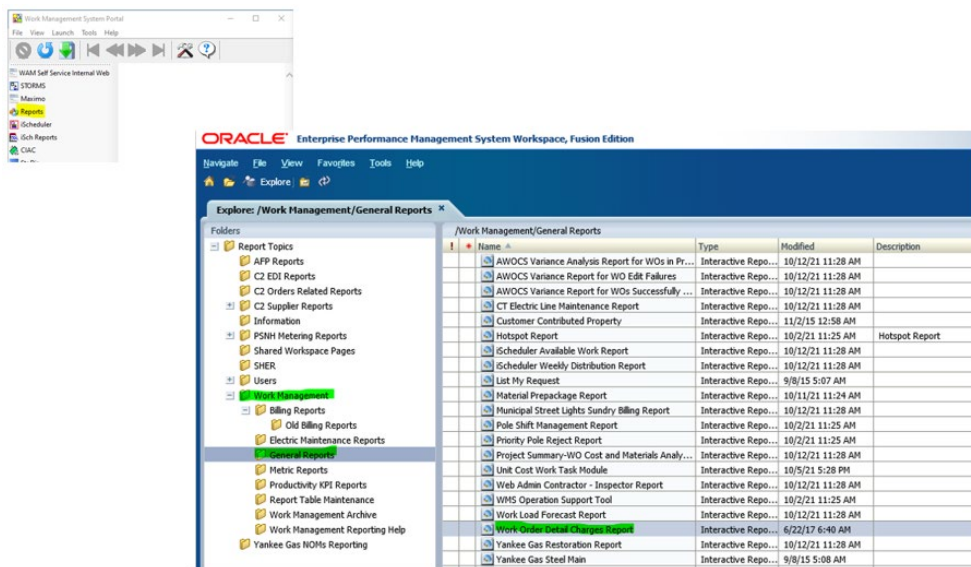
1.1.3 EXPORT the list of work orders to excel by clicking on the  symbol all the way over on the top righthand side just above the filters.

1.1.4 Using the exported file as a work list, NAVIGATE to the Material Variance sub-tab in the Actuals tab in Maximo for each work order and perform the following:

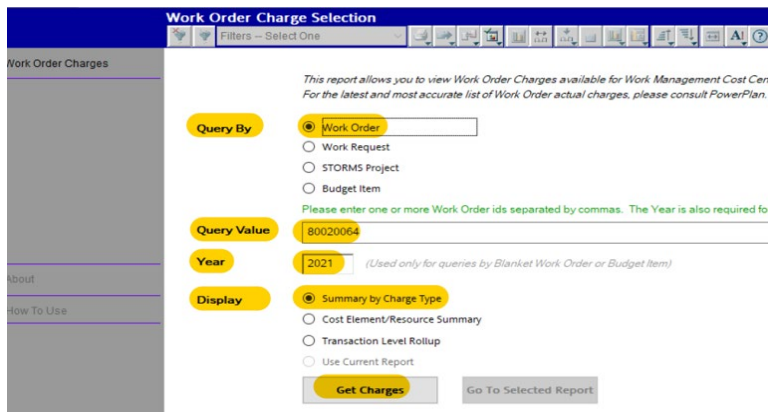
2. USING HYPERION DETAIL OF CHARGES TO COMPARE WITH WMBS BILL.

2.1.1 VALIDATE all charges in the Hyperion Detail of Charges have been applied to the work order.

- a. NAVIGATE to Reports in the Work Management Portal.
- b. EXPAND Work Management Folder then OPEN General reports and finally CLICK on Work Order Detail Charges Report.



- c. ENTER the criterion for the query and CLICK Get Charges button where Query Value is the FWO and Year is the date of the incident.



NOTE
 The AFUDC charge does not get included in any totals.

Work Order Charges					
Home					
Quick Picks 2.1 Summary by Charge Type and Sub Type					
Charge Type	Sub Type	Quantity	Hours	Mib Direct Amount	Amount
Loaders	AFUDC			3.36	3.36
	AS&E			0.00	17.66
	Other			0.00	39.20
NU Equipment	Construction		0	0.00	242.17
NU Labor	Construction		13.25	595.46	973.97
	Design		2.5	145.65	238.23
Other Costs				0.00	490.00

Hyperion Report

Loaders = Other Charges on Billing Report = AS&E + Other
 17.66 + 39.20 = 56.86

NU Equipment = Transportation Vehicles on Billing Report

NU Labor = Labor on Billing Report
 = Construction + Design + Other Costs
 973.97 + 238.23 + 490.00 = 1702.20

WMBS Report				
Charge Group	Charge Description	Hours		Amount
LABOR	BASE RATE	15.75 Hrs	5 Empl	\$1,702.20
	Sub Total			\$1,702.20
OTHER CHARGES	ADMINISTRATIVE SERVICES AND EXPENSES			\$56.86
	Sub Total			\$56.86
TRANSPORTATION	Vehicles			\$242.17
	Sub Total			\$242.17
Total				\$2,001.23

Year	Storm Type	CountOfDate
2002	E	5
2002	W	8
2003	E	3
2003	W	2
2004	E	1
2004	W	7
2005	E	5
2005	W	5
2006	E	5
2006	S	1
2006	W	6
2007	E	3
2007	S	2
2007	W	6
2008	E	3
2008	S	3
2008	W	16
2009	E	2
2009	W	2
2010	E	3
2010	S	11
2010	W	12
2011	E	5
2011	S	3
2011	W	5
2012	E	1
2012	S	10
2012	W	10
2013	E	5
2013	P	1
2013	S	12
2013	W	6
2014	E	1
2014	P	2
2014	S	14
2014	W	8
2015	E	1
2015	P	4
2015	S	6
2015	W	5
2016	E	2
2016	S	8
2016	W	12
2017	E	4
2017	P	3
2017	S	14

Key

E=Major - IEEE MED (Major Event Day)

P=Pre-Stage

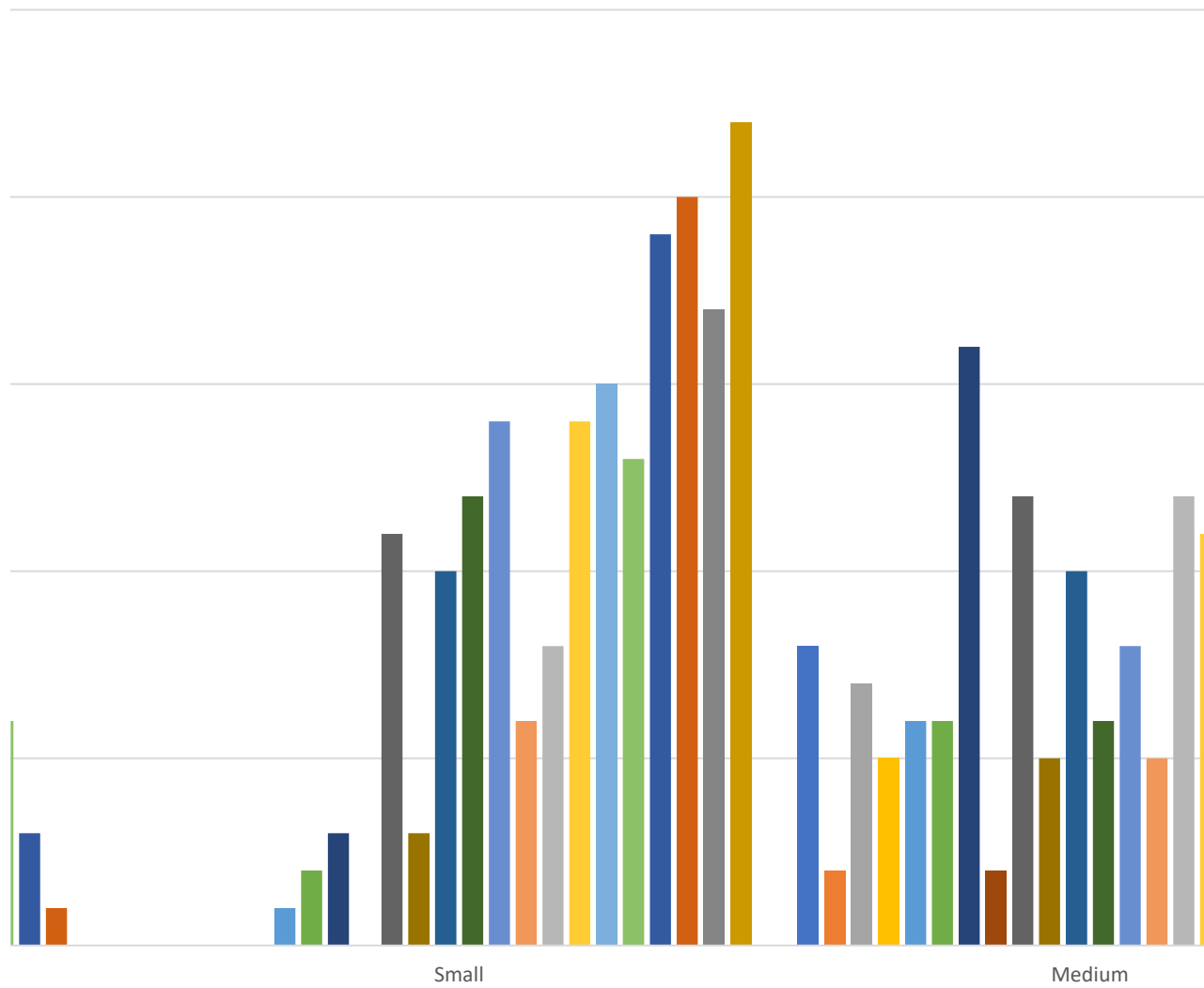
S=Small

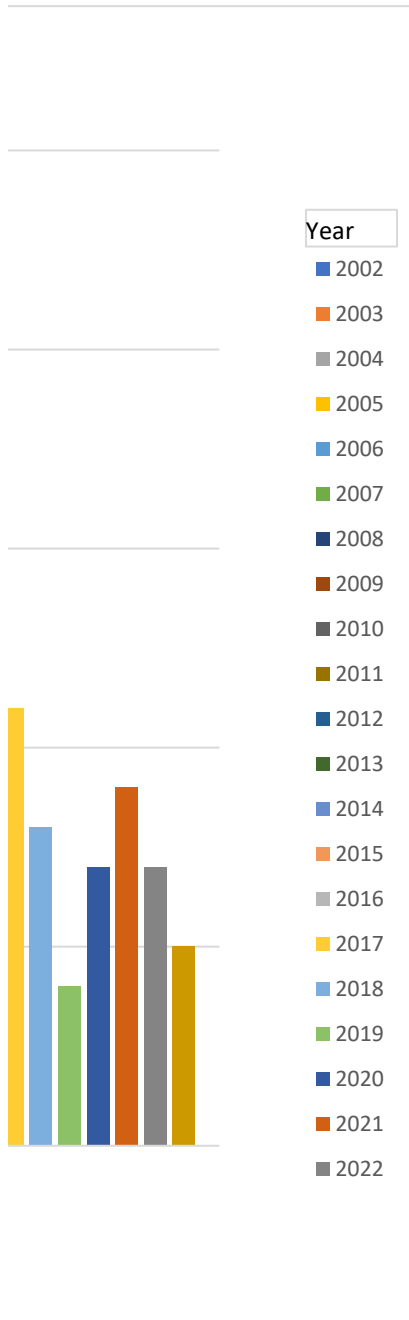
W=Medium (WO)

2017	W	11
2018	E	7
2018	P	6
2018	S	15
2018	W	8
2019	E	4
2019	P	6
2019	S	13
2019	W	4
2020	E	6
2020	P	3
2020	S	19
2020	W	7
2021	E	3
2021	P	1
2021	S	20
2021	W	9
2022	E	6
2022	S	17
2022	W	7
2023	E	3
2023	S	22
2023	W	5

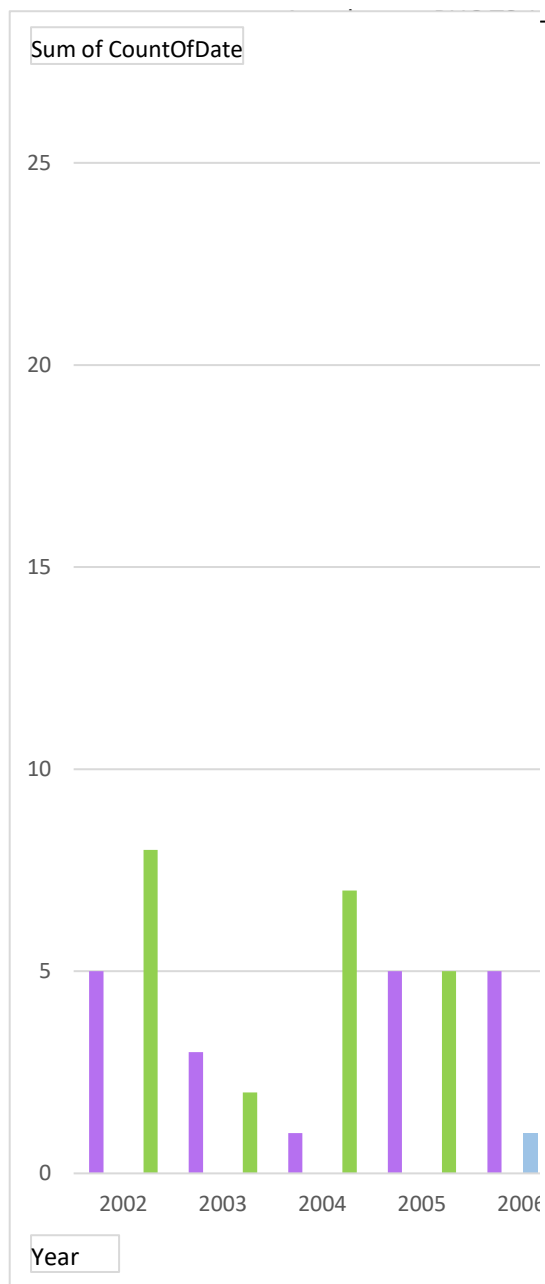
2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Grand Total
5	1	1	2	4	7	4	6	3	6	3	78
1	2	4		3	6	6	3	1			26
12	14	6	8	14	15	13	19	20	17	22	190
6	8	5	12	11	8	4	7	9	7	5	161
24	25	16	22	32	36	27	35	33	30	30	455

Storm Events By Storm Type





Sum of CountOfDate	Column Labels				
Row Labels	Major	Pre	Small	Medium	Grand Total
2002	5			8	13
2003	3			2	5
2004	1			7	8
2005	5			5	10
2006	5	1		6	12
2007	3	2		6	11
2008	3	3		16	22
2009	2			2	4
2010	3	11		12	26
2011	5	3		5	13
2012	1	10		10	21
2013	5	1	12	6	24
2014	1	2	14	8	25
2015	1	4	6	5	16
2016	2		8	12	22
2017	4	3	14	11	32
2018	7	6	15	8	36
2019	4	6	13	4	27
2020	6	3	19	7	35
2021	3	1	20	9	33
2022	6		17	7	30
2023	3		22	5	30
Grand Total	78	26	190	161	455



2002-2023 NH # Storm Events By Storm Type

