



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

June 13, 2022

TO: Service List, dated April 21, 2022

FROM: Melanie Bachman, Executive Director *MPB*

RE: **DOCKET NO. 508**— The United Illuminating Company (UI) application for a Certificate of Environmental Compatibility and Public Need for the Milvon to West River Railroad Transmission Line 115-kV Rebuild Project that consists of the relocation and rebuild of its existing 115-kilovolt (kV) electric transmission lines from the railroad catenary structures to new steel monopole structures and related modifications to facilitate interconnection of the rebuilt 115-kV electric transmission lines at UI's existing Milvon, Woodmont, Allings Crossing, Elmwest and West River substations along approximately 9.5 miles of the Connecticut Department of Transportation's Metro-North Railroad corridor traversing the municipalities of Milford, Orange, West Haven and New Haven, Connecticut.

Comments have been received from the State of Connecticut Department of Transportation on June 13, 2022. A copy of the comments is attached for your review.

MB/MP/laf

c: Council Members

STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION

Subject: Proposed 115kV Transmission Line Rebuild Between Milvon and West River by United Illuminating (UI)
Connecticut Siting Council – Docket 508

date: June 10, 2022

Memorandum from Garrett T. Eucalitto
Deputy Commissioner
Bureau of Public Transportation

The Connecticut Siting Council requested input from the Connecticut Department of Transportation on the feasibility of rebuilding the existing 115kV electric transmission lines between the Milvon and West River UI Substations. The proposal would rebuild the existing line that runs approximately 9.5 miles along the State Owned Metro-North Railroad corridor, commonly referred to as the New Haven Line, which traverses Milford, Orange, West Haven and New Haven, Connecticut.

Upon review of Application Section 2.1 *Proposed 115-kV Transmission Line Rebuild Facilities*, the Department concurs with the proposal to remove the existing 115-kV lines from the bonnets on top of both the north and south railroad catenary columns as well as the removal of the abandoned bonnets from the catenary structures.

With regard to other modifications to the transmission line that UI is proposing such as the installation of new monopoles as outlined in Tables 2-2 and 2-3, the Department offers the following comments:

As a general comment, the Department is currently engaged in several efforts to improve customer experience through shorter trip times, enhancing station amenities, and improved service along the entire New Haven Line. Part of this effort requires increasing train speeds and will require us to add catenary structures, track sidings, additional bridge spans and wayside equipment to support this high-speed rail initiative. Section 5.8.3 of the Docket outlines coordination between CT DOT and UI and we find it accurately represents the above.

PROPOSED 115-kV STRUCTURES

The Application indicates a total of 158 new 115-kV monopole structures are being proposed along the railroad corridor (145 on the north side, 13 on the south side). The State takes no objection to this proposal and while the Application mentions the offsets of these new monopole will average 25 feet from the existing catenary portals, the State would recommend UI look to move the transmission lines to the maximum extent possible to the railroad right-of-way (ROW) line. Jumping to Application Section 9 *Alternatives*, the Department concurs with the selection of Alternative #1 as the preferred solution to focus on a double-circuit monopole installation on the north side of the railroad and agrees that Alternatives 3 and 4 should not be undertaken.

Application Section 9.2 *Alternatives Reviewed but Eliminated* considered an “all underground configuration” but ultimately eliminated it and the Department concurs with that determination. The Department has previously testified that no longitudinal underground utility occupations are permitted within the ROW. Only transverse underground crossings are allowed. The railroad dates back to the mid-1800’s and CBYD is not applicable and requires the hand digging down to at least 4 feet at every excavation point adding time, cost and impact to railroad operations. There are numerous facilities within the ROW (both railroad and private) which would interfere with, or potentially be damaged by an underground transmission line installation. Furthermore, as mentioned above, our service growth demands that we preserve as much of the ROW for our expansion needs.

The recommended aerial rebuild Alternative #1 solution addresses many of the comments that follow:

Under Section 2.2 *Land Requirements*, outlines the proposal to favor the north side of the railroad, having the most available free space and distance from existing catenary. There is no objection from the Department and as noted above, we encourage designing the transmission alignments to the maximum extent possible to the railroad ROW line or on private property altogether such that the Department maintains property for expansion and placement of wayside equipment. The Application mentions, property is less available on the south side of the railroad and the Department agrees. The Application contains references to several private easements that UI would need to obtain under the proposal and as mentioned previously, we encourage that to afford the Department, the maximum flexibility with our service improvement designs.

Under Section 2.2.1 *Route Characteristics* there is mention of the transmission line route running through the Milford section of railroad which currently has only 3 tracks. Be advised that the Department's Office of Rail is planning the reinstallation of this track as a component of the high-speed initiative. When that project happens, the north side of the railroad, within those limits, will be used for relocation of a station, wayside equipment, and catenary portal extensions to make way for the reinstallation of that track.

Under Section 2.3.2 *Proposed Overhead Line Design, Appearance and Height*, the Department comments that the planned high-speed upgrades to the railroad will require the addition of new catenary portals. Current tangent line spacing between portals is approximately 300 feet, the future configuration will require a portal every 150 feet to support higher speeds. UI should anticipate that coming change for any of the rebuild alternative that remains in-line with the current catenary columns.

Under Section 3.6.5 *Blasting*, the State and Railroad typically do not allow blasting of any kind be performed within the railroad ROW. All means of mechanical rock removal shall be explored and utilized first before considering the blasting method. Should blasting become the only method to remove ledge or obstructions, UI is to immediately contact the Department and MNR for additional guidance and securing approvals before any blasting is permitted.

Under Section 3.8 *Operation and Maintenance Procedures* UI shall design the rebuild of the 115kV system such that there is sufficient separation from the State's Overhead Catenary System (OCS) and any wayside infrastructure to afford MNR the ability to access those systems freely and without the need to request outages of UI's transmission lines, to the maximum extent possible.

FACILITIES TO BE MODIFIED

There is no objection to the removal of UI's lines from the existing catenary structure, in fact, the Department would prefer that, as it aids in our maintenance of the traction power system and wayside equipment, by not having to request UI transmission line outages.

Under no circumstance are the railroad's traction power feeders to be left without protection from the static wire during the UI rebuild.

Any general comments related to all sections of the Application dealing with wetlands, flood plains, sedimentation controls, groundwater resources, biologic resources etc. are deferred to DEEP for their review and comment. Another general comment related to the placement of off-set transmission structures is that no structure shall be placed with an existing drainage swale carrying stormwater run-off from the MNR railbed. Many items such as this have been reviewed as outlined under Section 6.9.1 *CT DOT and MNR* as part of on-going reviews and coordination meetings.

Lastly, the New Haven Line corridor is one of the busiest railroads in the nation and the Department supports and encourages our utility partners when undertaking such a proposal as this. We envision this will lessen future impacts on railroad operations as we both go about the business of maintaining and improving the service to our respective customers.