



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

June 22, 2020

Alan Huth  
Interim General Manager  
South Norwalk Electric and Water  
1 State Street  
Norwalk, CT 06854  
[ahuth@snew.org](mailto:ahuth@snew.org)  
[smurphy@snew.org](mailto:smurphy@snew.org)

**RE: Non-Compliance with Development and Management (D&M) Plan Conditions**

**DOCKET NO. 431** – South Norwalk Electric and Water Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of an electrical substation and its connection to an existing 115 kV transmission line, located at 180 Dr. Martin Luther King, Jr. Drive, Norwalk, Connecticut.

Dear Mr. Huth:

The Connecticut Siting Council (Council) is in receipt of your letter dated June 18, 2020, submitted on behalf of South Norwalk Electric and Water, requesting an extension of time to submit the required written notifications and reports pursuant to Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies.

The Council hereby grants an additional 6-month extension of time until December 20, 2020 to submit the required written notifications and reports for the above-referenced project.

This extension is granted with the understanding that the Council will be notified should South Norwalk Electric and Water need additional time to submit the required documents.

Thank you for your attention to this matter.

Sincerely,

*s/Melanie A. Bachman*

Melanie A. Bachman  
Executive Director

MAB/laf



South Norwalk Electric and Water  
A Municipal Utility System  
Serving the Needs of the Community

ALAN E. HUTH, Interim General Manager

ALAN E. HUTH, Director of Water Operations  
SCOTT MURPHY, Director of Electric Operations  
ERIC D. STROM, Director of Customer Care & Finance

Ms. Melanie Bachman  
Executive Director  
Connecticut Siting Council  
State of Connecticut  
10 Franklin Square  
New Britain, CT 06051

June 18, 2020

Re: Non-Compliance Letter / Docket 431

Dear Ms. Bachman

On October 18, 2019; you sent us a letter concerning the above reference docket. In that letter you brought to our attention that there were certain documents that were not on file with the Siting Council. In addition, there was reference to completing the site beautification requirements and specifically the screening of the fence line along the west side of our substation. Originally, the fence design called for a 2" mesh chain link fence fabric with slats woven through to reduce the visibility into the substation yard.

On December 19, 2019; we replied that we were in contact with our project consultant and management firm, Robinson & Cole to determine if, when, and where the referenced documents were submitted or to now obtain copies and submit them per Docket requirements. As for the site beautification, after substation construction was underway, Homeland Security notified our co-owner of the substation (Eversource), that security requirements had been changed. The new regulations from the Federal Energy Regulatory Council (FERC) spelled out in the Critical Infrastructure Procedures (CIP) required that the chain link fence mesh be reduced to 1" so that the substation protection would be increased by changing the fence fabric from light duty to high security. We indicated in our response letter, that we needed to consult with Eversource to determine what impact this fence fabric change has on the original application for the construction, maintenance, and operation of our electrical substation at 180 Dr. Martin Luther King Jr. Drive in Norwalk, CT. We then asked for a 6 month extension so that we could research the issue and consult with Eversource. In your reply, dated December 23, 2019; you granted us such an extension until June 20, 2020.

To date, we have not been able to resolve these issues. Due to the interruption of normal business operations for the past several months we have not been able to come to a resolution on the status of the requested documentation. But we continue to work toward completing this task. As for the site beautification, after a significant amount of research, we have not been able to find 'screening slats' that will fit in the 1" mesh. The industry standard for such starts at 2" mesh. We have been looking for alternate means to perform this screening but that is still under investigation. In addition, we have made contact with Eversource for any information they might have in this matter. Our Engineering Department has made contact with their Engineering Department but this work is still ongoing.

Our expectation is that we will reach a resolution on all matters, submitting the 'missing' documentation and finding an acceptable solution to complete the site work. However, it is apparent that we cannot complete this task within the current time frame. Therefore, we respectfully request an additional extension of 6 months to enable us to bring this non-compliance issue to a satisfactory resolution and close this docket.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Huth" followed by a stylized flourish.

Alan Huth  
Interim General Manager  
South Norwalk Electric & Water