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P.O. Box 270
Hartford, CT 06103

Kathleen M. Shanley
Manager – Transmission Siting
Tel: (860) 728-4527

May 5, 2020

Melanie Bachman, Esq.
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Sub-Petition No. 1293-PU-01

Dear Attorney Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-PU-01 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Putnam Connecticut. The work includes replacing one existing transmission structure with a new weathering steel transmission structure.

Eversource notified the officials of the municipality of Putnam of Eversource's submission of the Sub-Petition and sent copies of the Sub-Petition to owners of directly abutting properties (see Proof of Notice).

Enclosed please an electronic copy of this filing. As a safety precaution related to the coronavirus pandemic, hardcopies will not be delivered at this time.

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Sub-Petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley". The signature is fluid and cursive, with a large loop at the end.

Enclosures

Attachments:
Exhibit A: Sub-Petition
Exhibit B: Photographs
Exhibit C: Maps
Exhibit D: Abutter Letter and Proof of Notice

ATTACHMENT A
SUB-PETITION

**THE CONNECTICUT LIGHT AND POWER COMPANY doing business as
EVERSOURCE ENERGY**

Sub-Petition
CONNECTICUT SITING COUNCIL – PETITION NO. 1293
TRANSMISSION FACILITY ASSET CONDITION
MAINTENANCE IMPROVEMENTS TO COMPLY
WITH THE UPDATED NATIONAL ELECTRIC
SAFETY CODE CLEARANCE REQUIREMENTS

Town: Putnam

Sub-Petition 1293-PU-01

Project: 347 Transmission Line Structure Replacement Project

Structure Locations: One Transmission Line Structure located in Putnam, Connecticut

I. Introduction:

In accordance with Condition 1 of the March 30, 2017 ruling by the Connecticut Siting Council (the "Council") (as set forth in the Council's March 31, 2017 letter) regarding Petition No. 1293, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. Description of Transmission Work Activities:

Eversource's 347 Transmission Line Structure Replacement Project is part of an ongoing maintenance program which evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to ensure the safe and reliable transmission of power to its customers. Due to asset condition, one structure requires replacement on the 347 Line between Aldrich Road and Fox Road in Putnam, Connecticut. The 347 Line, in its entirety, is a 345-kilovolt line that extends from Killingly Substation in Killingly, Connecticut to National Grid's Sherman Road Substation in Burrillville, Rhode Island. The structure to be replaced is a wood H-Frame structure and will require a slight increase in structure height to comply with current clearance requirements.

Eversource plans to conduct the transmission structure replacement work to remediate wood structure damage caused by structure age, weather, and woodpecker activity. The following work ("Work Activities") will be performed:

- Replace one existing wood H-frame structure, Structure 9295, with a new weathering steel H-frame structure. The replacement structure will be 9 feet taller than the existing structure and be installed within 15 feet of the existing structure location.

III. No Substantial Adverse Environmental Effect:

Eversource respectfully submits that the proposed modifications would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- a) All Work Activities would take place within Eversource's existing ROW utilizing an existing access road as well as a section of proposed temporary access road (collectively the "Work Areas").
- b) The Work Activities would result in approximately 3,179 square feet of temporary wetland impact from the use of temporary matting required for the access and work pad at Structure 9295.

Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, September 2016 ("BMPs") to avoid impacts to nearby wetland and watercourse resources.

- c) No direct impacts to vernal pools ("VP") would result from the proposed Work Activities. However, a total of two VP habitats, VP1 and VP2, have been identified near the Work Areas. A portion of the existing access road for Structure 9295 is located within the vernal pool envelope ("VPE") associated with VP2 and a portion of the existing access and the majority of the work pad would be located within the VPE associated with VP1. Vernal pool species protection measures will be implemented where Work Activities extend into the VPEs. The existing access road would not be widened or altered where it extends into the VPEs. Elevated construction matting will be used on the temporary access road to allow amphibian migration and non-elevated construction matting would be utilized on the temporary work pad to avert amphibian access and avoid entrapment. Vegetation removal in the VPEs will be minimized and limited to hand clearing only. With the implementation of these protective measures, no adverse impact to VPs would result from proposed Work Activities.
- a) Based on review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDDB"), the Work Activities associated with a portion of the access road and the entire work pad for Structure 9295 are proposed within a NDDDB buffered area and wetland jurisdictional area and therefore are subject to a NDDDB review request. Eversource submitted an NDDDB review request to CTDEEP in March 2018 regarding structure replacement work on the 347 Line and received a response from NDDDB on March 20, 2018 with recommendations for the protection of rare species potentially present. The recommended protection measures identified in the March 20, 2018 NDDDB letter have been accepted by Eversource and will be incorporated into the Company's BMPs, project plans and construction activities for the proposed Work Activities at Structure 9295. With these protective measures, no adverse impacts to state-listed rare species are anticipated.
- d) The Work Activities will not require any tree clearing. However, Eversource may need to undertake minor tree trimming and/or vegetation removal/mowing in upland areas within the managed ROW corridor to improve access to portions of the Work Areas.
- e) A Phase 1A assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") did not identify any National or State Register of Historic Places properties/districts located within 500 feet of the Work Areas. Based on a review of historic maps, aerial photographs and available soil profiles, the proposed work pad location was identified to possess a potential for moderate to high archaeological sensitivity. A pedestrian survey was

conducted at the subject location and based on the results, the proposed location was identified by Heritage as possessing no to low archaeological sensitivity. Therefore, no protective measures are required for the proposed activity and no further investigation is recommended or warranted.

- f) The replacement structure would be located within 15 feet of the existing structure.
- g) Work Activities associated with Structures 9295 are located partially within the mapped 100-year flood zone associated with Little Dam Tavern Brook. Eversource would utilize its BMPs to minimize any impacts to the flood zone by utilizing temporary construction matting and/or by not placing any fill that would increase the elevations of the existing or proposed road surfaces or work pad to ensure that the floodplain hydrology would not be adversely affected. With these protective measures and the use of the BMPs, no adverse impact to the 100-year flood zone would result from the proposed Work Activities.
- h) No change in noise levels would result from the installation of the new structure and the applicable line would continue to comply with the State of Connecticut noise regulations.
- i) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. Mitigation:

Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment controls ("E&S") will be employed and maintained, as needed, for the duration of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and the BMPs.
- Potential impacts to wetlands and watercourses will be mitigated with the use of temporary construction matting and adherence to the BMPs.
- Vernal pool protective measures will be incorporated into the Eversource's BMPs during construction.
- The NDDB recommended rare species protective measures have been incorporated into Eversource's BMPs for use during construction.
- Potential impacts to the 100-year flood zone would be avoided with adherence to the BMPs and the use of temporary construction matting.
- Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at the construction entrance onto the public road to prevent tracking of soil onto the local street.
- Upon completion of the Work Activities, all disturbed/exposed areas would be stabilized and revegetated as needed. After the establishment of permanent ground cover,

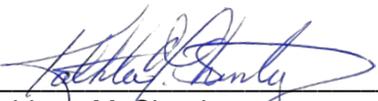
Eversource's contractor would remove the temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

V. Access:

No new permanent access roads would be constructed to facilitate access to the structure within the ROW. The existing access road may be hardened in upland areas to facilitate the safe passage of construction vehicles. Construction matting would be used for the temporary access road located in wetlands. The matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

Eversource would access the Work Area by entering the ROW from an existing access point on Fox Road in Putnam.

By:



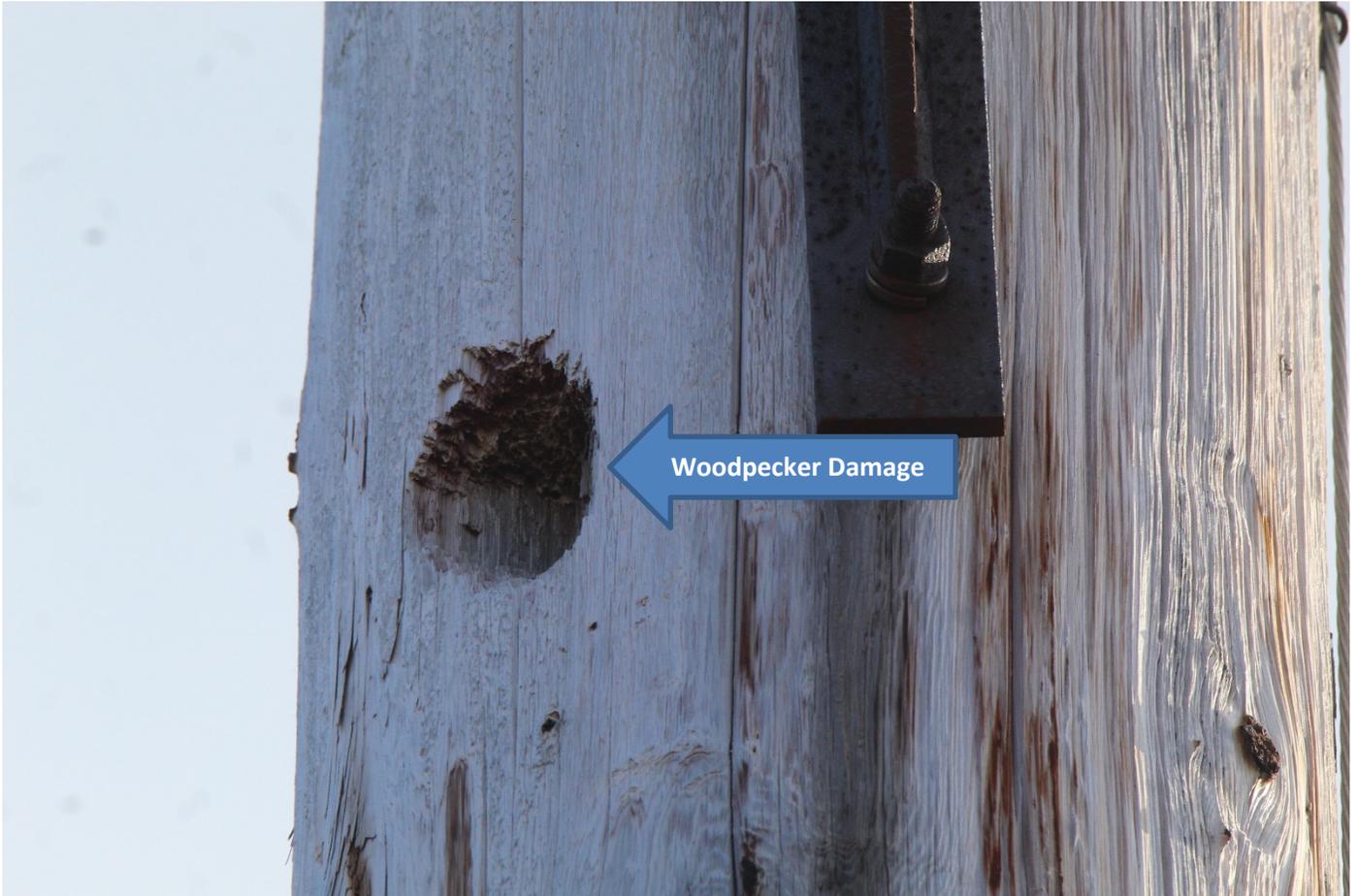
Kathleen M. Shanley
Manager - Transmission Siting

ATTACHMENT B
PHOTOGRAPHS

Structure #9295



Structure #9295



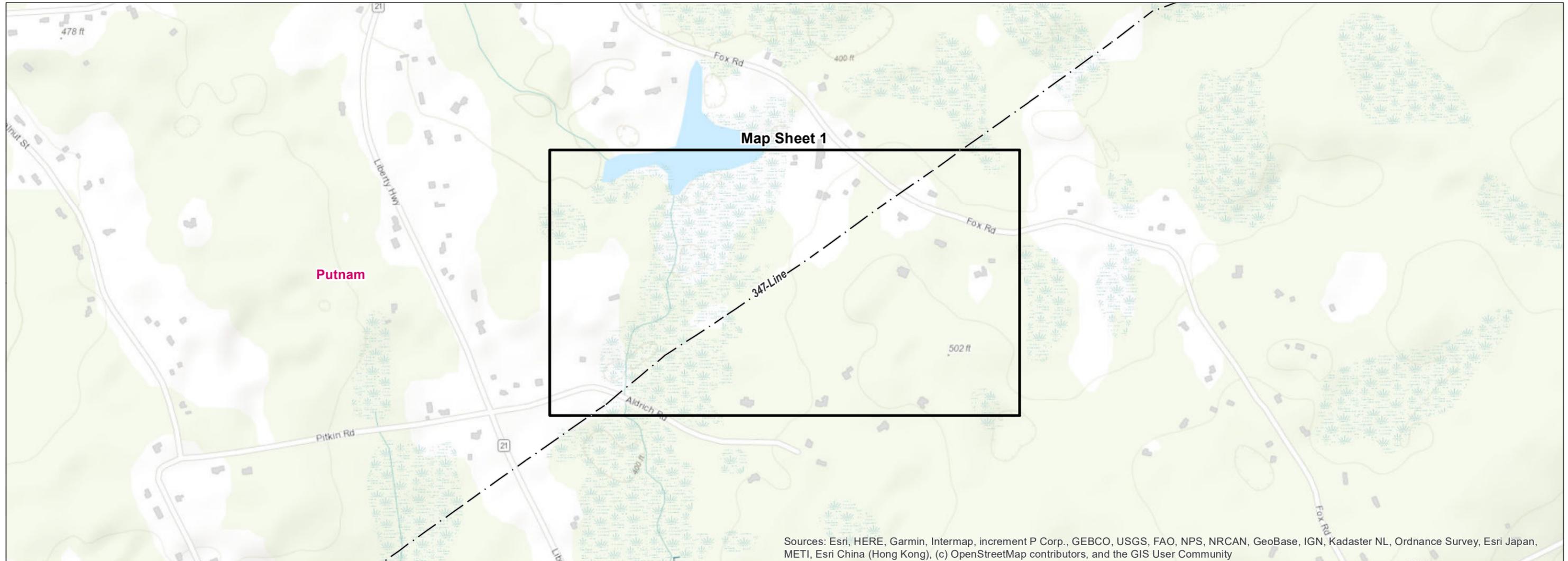
ATTACHMENT C

MAPS

347 Line - Structure Replacement Project

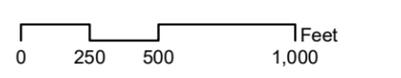
Putnam, CT
Sub-Petition Map Set

Date: April 6, 2022



Legend

□ Map Sheet - - - Overhead Eversource Line



INDEX OF FIGURES

Title Sheet / Index Map
Abutter Table & Map Sheet

PREPARED FOR:

EVERSOURCE
ENERGY

107 Selden Street
Berlin, CT 06037

PREPARED BY:

 **ALL-POINTS**
TECHNOLOGY CORPORATION

567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

Map Sheet 1 of 1
347 Line – Structure Replacement Project
Sub-Petition Abutters List

<u>Line List Number</u>	<u>Owner Name</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
246	ADAM M. PAQUIN	70 ALDRICH ROAD	PUTNAM	CT

ATTACHMENT D
ABUTTER LETTER AND
PROOF OF NOTICE

May 5, 2020

Dear Neighbor,

As part of our everyday effort to deliver reliable energy to our customers and communities, we're planning work in your area to replace electric transmission structures. Maintaining the infrastructure that supports the electric lines is one of the ways Eversource ensures the safe, secure transmission of electricity throughout the region.

You're receiving this letter and a copy of the Sub-Petition because the proposed work would be taking place within the right of way on or near your property in Putnam. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-PU-01 this week to the Connecticut Siting Council (CSC) for its review.

About This Electric System Improvement: What You Can Expect

First, we want you to know that this work will not interrupt electric service to your property.

As part of this project, we are proposing to replace a damaged structure due to structure age, weather, and/or woodpecker activity. The height of the existing structures will increase, as necessary, to comply with current clearance requirements. The new structure will provide continued reliability of the transmission system.

The safety of our employees, our customers, and the public is our top priority during the ongoing coronavirus public health crisis. Our commitment to safety, first and always, is continuous.

At the same time, Eversource must fulfill its foundational mission to deliver safe, reliable services to our customers. We continue to call on our employees and contractors to perform essential work, such as this proposed project, that maintains and improves the reliability of our networks, while also adapting our work practices to incorporate social distancing, heightened hygiene, and other best practices to protect their, and the public's, health.

Connecticut Siting Council Process and Timing

With this letter, Eversource is providing notice to you of its proposed work activity, as described in the enclosed Sub-Petition. If you have any comments or concerns about the project, please send them to the CSC at the following address within 30 days of the date of this letter: Melanie Bachman, Executive Director; Connecticut Siting Council; Ten Franklin Square; New Britain, CT 06051. You may also email them to the siting.council@ct.gov. If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-PU-01 in your correspondence.

Our Commitment to You

We are committed to being a good neighbor and doing our work with respect for you and your property. If you would like more information about this work please call 1-800-793-2202, or send an email to ProjectInfo@eversource.com. Thank you.

Sincerely,

Jared Kupiec

Jared Kupiec
Eversource Project Manager – Transmission Projects

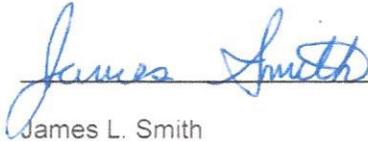
AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

In accordance with Condition 2 of the Connecticut Siting Council's ("Council") March 31, 2017 declaratory ruling on Petition No. 1293, I hereby certify that on May 5, 2020, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-PU-01 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 1 abutter. The notice of the proposed maintenance activities states that comments or concerns regarding the maintenance activities described in the Sub-Petition should be submitted to the Council within 30 days of the date of such notice.

Municipal Officials:

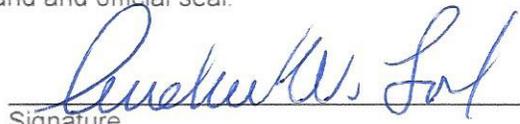
Town of Putnam
Barney Seney, Mayor
126 Church Street
Putnam, CT 06260



James L. Smith
Project Siting Specialist

On this the 5th day of May 2020, before me, the undersigned representative, personally appeared, James L. Smith, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.



Signature

Notary Public / My Commission expires _____
Officer of the Superior Court / Juris No. 413393