

March 5, 2020

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

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

Re: PETITION NO. 1310A – Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut

Dear Attorney Bachman:

In connection with the above-referenced Petition No. 1310A, enclosed please find an original plus fifteen (15) copies of Comments of The Connecticut Light and Power Company Doing Business As Eversource Energy Regarding the Draft Findings of Fact Dated February 21, 2020 of the Connecticut Siting Council.

Very truly yours,


Marianne Barbino Dubuque

MBD/mkw
Enclosures

cc: Service List dated January 15, 2020 attached (with enclosure)

{W3201642}

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-mail	Quinebaug Solar, LLC	<p>David W. Bogan, Esq. Locke Lord LLP 20 Church Street Hartford, CT 06103 Phone: (860) 541-7711 Fax: (866) 877-2145 david.bogan@lockelord.com</p> <p>Kathryn E. Boucher, Esq. Locke Lord LLP 20 Church Street, 20th Floor Hartford, CT 06103 Phone: (860) 541-7714 kathryn.boucher@lockelord.com</p> <p>Hagen Lee Quinebaug Solar, LLC c/o NextEra Energy Resources, LLC 700 Universe Boulevard, E5E/JB Juno Beach, FL 33408 Phone: (561) 694-4012 hagen.lee@nexteraenergy.com</p>
Party (Approved 9/19/17)	<input checked="" type="checkbox"/> E-mail	Troy and Meghan Sposato 192 Wauregan Road Canterbury, CT 06331 megsposato@yahoo.com tsposato9@yahoo.com	
Party (Approved 1/2/20)	<input checked="" type="checkbox"/> E-mail	The Connecticut Light and Power Company d/b/a Eversource Energy	<p>Marianne Barbino Dubuque, Esq. Carmody Torrance Sandak Hennessey LLP 50 Leavenworth Street P.O. Box 1110 Waterbury, CT 06702 Phone: (203) 578-4218 MDubuque@carmodylaw.com</p> <p>Kathleen M. Shanley Manager-Transmission Siting Eversource Energy P.O. Box 270 Hartford, CT 06141-0270 Phone: (860) 728-4527 Kathleen.shanley@eversource.com</p>

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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Quinebaug Solar, LLC petition for declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance, and operation of a 50-megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut	PETITION NO. 1310A March 5, 2020
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**COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY
DOING BUSINESS AS EVERSOURCE ENERGY REGARDING
THE DRAFT FINDINGS OF FACT DATED FEBRUARY 21, 2020 OF
THE CONNECTICUT SITING COUNCIL**

The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) respectfully files these comments regarding the Draft Findings of Fact issued by the Connecticut Siting Council (the “Council”) dated February 21, 2020 (“DFOF”) in response to the Council’s notice dated February 28, 2020.

I. Clarifications

A) The Council’s **DFOF #21** concerning its notice to the City of Norwich of the public hearing schedule and invitation to participate in same did not include the Council’s specific notice regarding Eversource’s proposed work in Norwich. Eversource proposes the following revisions to DFOF #21 (in bold):

21. *On January 9, 2020, the Council sent a letter to the City of Norwich to provide notification of **Eversource’s proposed modification of an approximately 0.75-***

mile segment of existing electric transmission lines between Bean Hill Substation and Wawecus Junction in Norwich. The Council provided notice of the public hearing schedule and [] invited the City to participate. (Council Letter to City of Norwich dated January 9, 2020)

- B) The Council's **DFOF #153** addresses the height of the existing double-circuit structures and the proposed single-circuit monopoles between Bean Hill Substation and Wawecus Junction in Norwich. In order to include the issue of visibility of the proposed new monopoles in the Record, Eversource proposes the following revisions to DFOF #153 (in bold):

*153. The existing double-circuit structures range between 74.5 to 92.5 feet tall. The proposed single-circuit monopoles would range between 84 and 93.5 feet tall. **In general, year-round and seasonal visibility of the proposed monopoles would be consistent with existing conditions. Even with the addition of the new structures and vegetation management activities necessary for construction, the ROW would retain sufficient tree cover and distances to receptors such that there would be no substantive increase of visibility to the surrounding area.** (Eversource 2, p. 16; Transcr. 3, p. 117)*

- C) The Council's **DFOF #207** states that no FAA notice is required for any of Eversource's proposed structures associated with the Canterbury Switching Station or the transmission modifications in Norwich. This finding reflects testimony that was based on a preliminary design of Eversource's proposed tap structures in Canterbury. Once the design is finalized, another review will be necessary to determine whether an FAA filing will be required. Thus, Eversource proposes the following revision to DFOF #207 (in bold).

*207. No notice to the FAA is required for any proposed Eversource structures associated with CSS in Canterbury **based on their preliminary design or the transmission modification work in Norwich.** (Tr. 3, pp. 123-124; Eversource 2)*

II. Proposed Additions

Eversource requests that the Council consider incorporating the following findings of fact, which were included in Eversource's Proposed Findings of Fact ("PFOF") filed with the {W3201549}

Council on February 24, 2020. Eversource has included a brief explanation of its rationale for its request below each proposed addition.

A) Add Eversource's PFOF #5, after DFOF #21:

Eversource also conducted outreach to the First Selectman of Canterbury and the Mayor of Norwich, informing both of its Motion for Party Status in this proceeding and its planned construction in each municipality. Eversource advised both officials of its previously conducted and planned outreach to property owners adjacent to the proposed construction and work sites. (Eversource 2, pp. 25-26)

Comment: This finding provides evidence of Eversource's outreach efforts in the municipalities affected by its proposed work for this Project.

B) Add Eversource's PFOF #23 after DFOF #144:

Access to the transmission line taps would be provided by the new access road to be constructed by the Petitioner, or through the existing Eversource transmission ROW. (Eversource 2, p. 9)

Comment: This finding provides information regarding Eversource's access to the transmission line tap sections in Canterbury, and clarifies DFOF #145, which addresses vegetation removal in Eversource's transmission ROW, but does not include information regarding the new access road to the work area.

C) Add Eversource's PFOF #36 after DFOF #176:

The existing access road off Philanne Drive would need to be widened slightly and improved with top grading to accommodate the safe passage of construction vehicles, emergency vehicles and equipment. Such improvements typically include trimming adjacent vegetation and widening roads, as needed, to provide a minimum travel surface that is approximately 12 to 16 feet wide (additional width may be needed at turning or passing locations). (Eversource 2, pp. 19-20; Transcr. 3, pp. 122-123)

Comment: This finding reflects the upgrades required to the existing access road for Eversource's proposed separation of the double-circuit transmission line in Norwich.

D) Add Eversource's PFOF #47 before DFOF #208:

Petitioner is responsible for civil construction work (including any pre- and post-construction protective measures, permits and monitoring requirements) prior to Eversource installing the proposed Switching Station, which is planned in the area adjacent to Petitioner's proposed new substation. Eversource conducted a site

reconnaissance and reviewed publicly available environmental information resources (i.e., CT DEEP GIS, UCONN's Center for Land Use Education and Research, and CT ECO) and reviewed Petitioner's environmental documentation relative to the Switching Station location. (Eversource 3, CSC-002)

Comment: This finding provides a clearer picture of the division of responsibilities and due diligence between Petitioner and Eversource.

Respectfully submitted,

**THE CONNECTICUT LIGHT AND POWER
COMPANY DOING BUSINESS AS
EVERSOURCE ENERGY**

By: 
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NOTICE OF SERVICE

I hereby affirm that a copy of these Comments of The Connecticut Light and Power Company doing business as Eversource Energy Regarding the Draft Findings of Fact Dated February 21, 2020 of the Connecticut Siting Council was sent to each Party on the Service List dated January 15, 2020.

Dated: March 5, 2020


Marianne Barbino Dubuque