

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NEW CINGULAR WIRELESS PCS,  
LLC (AT&T) FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY AND PUBLIC  
NEED FOR THE CONSTRUCTION, MAINTENANCE,  
AND OPERATION OF A WIRELESS  
TELECOMMUNICATIONS FACILITY AT 499 MILE  
LANE, CITY OF MIDDLETOWN, CONNECTICUT

DOCKET NO. 506

January 26, 2022

NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T  
SUPPLEMENTAL SUBMISSION

SUPPLEMENTAL AT&T SUBMISSIONS

AT&T (the "Applicant") respectfully submits the following supplemental information to the Connecticut Siting Council in the above-referenced proceeding:

1. Multiple Carriers Interested

*T-Mobile and Dish have indicated initial interest in the site, but no specific commitments have been made at this time. Verizon has indicated that it has no specific interest for a site here at this time. As AT&T's engineering and radiofrequency expert witnesses testified at the November 30<sup>th</sup> and December 21<sup>st</sup> evidentiary hearings, collocation for any such future carrier would not be feasible for the existing light-duty municipal tower and any reinforcement plan.*

2. Alternatives Comparison

*Below is a chart comparing the alternatives the Council has inquired about regarding tower siting on the subject parcel and summarizing the technical, environmental, economic and public safety feasibility of each alternative using the siting criteria set forth in 16-50p and 16-50aa of the Connecticut General Statutes.*

	<b>AT&amp;T's Proposal: Modify the Existing Tower Site with a Second Tower</b>	<b>Reinforce Existing Light-Duty Municipal Tower</b>	<b>Construct a New Replacement Monopole Tower in an Adjacent Location</b>	<b>Construct a New Large Replacement Lattice Tower</b>
<b>Technical Feasibility</b>	Yes	No	No	No
<b>Environmental Feasibility</b>	Yes	Yes	Yes	Yes
<b>Public Safety Feasibility</b>	Yes	No	No	No
<b>Economic Feasibility</b>	Yes	No	No	No
<b>Exclusive of AT&amp;T Equipment Costs</b>	Approx \$150,000	Approx \$350,000 – \$450,000	Approx \$500,000	Approx \$1,000,000+
<b>Avoids the Unnecessary Proliferation of Towers</b>	Yes	No	Yes	Yes
<b>Comments Based on Testimony of AT&amp;T and City Witnesses</b>	<p>No significant adverse environmental effects as listed in the CGS §16-50p(a)(3)(B) state statutory criteria</p> <p>No Agricultural land impacts</p> <p>Not within 250' of a school or day care facility</p> <p>Not on water company land</p> <p>Meets manufacturer safety standards</p>	<p>Additional carriers could not collocate</p> <p>The scope of structural modifications that do not meet the building code and which would require custom welds render this a technically and economically infeasible option.</p> <p>The City has legitimate interests in public safety associated with this unique hub site for the whole City's emergency</p>	<p>The City wont consent to this option citing its legitimate public safety concerns related to technical viability for its microwave links and concerns over cut over issues to a second set of network facilities prior to demolition of the old site and given this site is it's unique hub for the whole City emergency network.</p> <p>The City wont consent to this option citing its capital investment in the existing tower structure and ownership of same for reserved capacity for additional whips the City planned for but not installed.</p>	<p>In addition to all the same issues with installation of one replacement monopole that the City wont consent to, other than microwave link stability, the costs to the City and AT&amp;T are further multiplied compared to the proposed monopole tower cost and something the City wont consent to.</p> <p>This alternative would also have added construction costs for a new compound, driveway and utility extensions if in a modified location on the property.</p> <p>Notably, these costs provide added economic</p>

	<p>Collocation is available for other wireless carriers</p> <p>This part of Middletown is not in a DEEP or local area of undisturbed scenic quality</p> <p>Use of a monopole minimizes incremental aesthetic effects with lower tower height, lesser mass and minimal footprint</p> <p>Public safety concerns require the City and AT&amp;T facilities to be constructed along the higher elevations where the existing tower is located for service to the community</p>	<p>network and concerns with AT&amp;T construction impacts given the magnitude of what would be required to essentially rebuild this light duty tower</p>	<p>The City also cites economic concerns over the extra expenditures related to purchasing duplicative equipment for the new facility and the cost of decommissioning and removing the existing tower which are concerns shared by AT&amp;T.</p> <p>This option would also limit the height of future collocation by other wireless carriers to avoid interference and the spacing requirements on 1 combined monopole (i.e.. other carriers would be at heights below 100’), whereas the proposed addition of a monopole by AT&amp;T and the City allows enough horizontal separation of the two structures to interleave carrier elevations on the proposed monopole with typical 10’ separations at the 150’ through 120’ elevations with the adjacent City elevations on the existing 180’ light duty tower remaining and not impacted.</p>	<p>context in addition to the unique technical concerns the City has for its public safety network and why the City did not build a collocatable tower in 2017/2018 with taxpayer funds or why AT&amp;T and other tower companies would have declined any request by the City to contribute capital to the City (on the order of \$500,000 to \$750,000) for the City’s construction and ownership of one collocatable 180’ lattice tower.</p> <p>This alternative would also have comparatively additional environmental effects including relative visibility, ground disturbance and other factors.</p>
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SUPPLEMENTAL INFORMATION REQUESTED BY THE SITING COUNCIL

AT&T (the “Applicant”) respectfully submits the following exhibits and redirect testimony in response to the Connecticut Siting Council’s request for additional information dated December 22, 2021:

- a) Provide a cost estimate of the small cell configuration described in “Late Filed Exhibit a” (AT&T’s November Supplemental Submission).

*Kelly Wade Bettuchi- The estimated cost of a hypothetical small cell alternative in this Docket would be over \$3 million, which far exceeds AT&T’s capital budget for this site and*

*renders a small cell configuration economically infeasible irrespective of the technical and public safety deficiencies small cells would present.*

*Mr. Lavin and AT&T's Radiofrequency Engineers have estimated that at least 42 and likely over 50 small cell nodes would be required to achieve mostly roadway coverage only. Based on a sample of AT&T's PURA utility pole attachment installations in the state, and depending on the amount of make ready work including pole replacements, the range of capital costs per small cell node is somewhere in the \$50,000 to \$70,000 range each. Other types of small cells including new poles on private properties would generally have increased costs. Notably, these costs do not include the capital costs to AT&T of building a "hub site" or "front haul fiber" required to the nodes and for a coverage type small cell build.*

*Martin Lavin- A small cell configuration would not adequately meet AT&T's coverage and public safety objectives in this Docket, given that placement of small cells is typically limited to locations along the rights-of-way. Replicating the full coverage of the proposed facility would require dozens more sites and leases for pole installations with various private landowners, thereby complicating and extending the buildout process significantly.*

*As an example, in-building coverage, like the coverage needed in the schools in the area within the search ring would require more than simply right of way utility pole attachments to achieve. Middletown High School has buried utilities and no available poles. In order to provide reliable coverage for the schools in the search ring area, it would be necessary to install new on-site poles at the School with commercial power and fiber for interconnection to the network too.*

*Additionally, small cells would not further the public safety objectives identified in this Docket because AT&T's small cells do not support FirstNet. The 700 MHz band is not deployed on small cells due to the limitations on physical antenna size. This inhibits FirstNet users from having priority access on Band 14.*

*The lack of 700 MHz signal on a small cell configuration also limits coverage due to the use of higher frequencies (such as PCS, AWS). This results in increased signal loss to foliage and impacts coverage objectives. Further, the unavailability of long-term emergency back-up power for a small cell configuration makes them unreliable in an emergency power outage situation and renders this option infeasible from a public safety standpoint.*

*It is my professional opinion that small cells are not technically implicated as an alternative in this Docket.*

- b) Provide the run time for the proposed diesel generator based on its fuel capacity and operating at full load conditions.

*Daniel Hamm- The proposed emergency back-up diesel generator could operate for approximately 48 hours based on full load conditions, which utilize approximately 1.90*

*gallons per hour. The fuel capacity for the proposed diesel generator is approximately 92 gallons. Attached as Exhibit 1 is the Equipment Specification Sheet for the proposed Generac Industrial Diesel Generator.*

- c) Determine if natural gas is available at the site.

*Daniel Hamm- Natural gas is available at the street, but not at the existing tower site. The City has deployed propane as its backup power fuel source. In order to utilize natural gas as a fuel source, a new gas line would need to be installed from the street up the hill to the proposed tower location. This would involve approximately 700 linear feet of new trenching in addition to potential driveway excavation and re-paving. The capital costs of a new natural gas line would be well in excess of planned costs for back up power generation at the site for AT&T and not warranted for economic reasons in light of viable alternatives including diesel or propane that do not present significant adverse environmental effects as a fuel source at the existing tower site.*

- d) Identify any alternative site(s) (other than the Lawrence School property at Kaplan Drive) that were evaluated by AT&T, and provide the reason(s) such site(s) were rejected.

*Brian Gaudet- Included as Exhibit 2 is an aerial map of all parcels within 2,500' of the center of the search area provided by AT&T with the search ring shown and color coding land uses in the area to show single family residential, municipal, utility and agricultural lands. As depicted, the majority of properties within this area are residential and there are substantial areas of wetlands to the east, north and northwest of the proposed site associated with Swamp Brook and lower elevations. The three parcels in the search ring are all owned by the City of Middletown which include the current parcel used as the City's emergency response and fire training center, Middletown High School and Keigwin Middle School, school properties also owned by the City.*

*Martin Lavin- Included as Exhibit 3 is a topographic map showing the original search ring and the refined search area based on topography. As depicted, there is limited technical availability of properties to the east or west of the proposed site because of the ridge line the existing tower is located on and which would block coverage to the area as required to address what is a significant coverage gap in Middletown for AT&T and other wireless carriers. As such a tower on one of the three City properties towards the top of the ridge line is required and why AT&T focused on the existing parcel and tower site which was made available to it by the City and has existing access and utilities.*

*Notably, the existing Eversource right of way to the south adjacent to residences further south along Aspen and Blacksmith Drives and Quail Run, consists of light-duty approximately 50' to 60' wood utility poles part of what is a 115kv line. Collocating on these poles is not feasible nor are they structurally engineered to accommodate the additional load of wireless equipment. Additionally, Eversource has not allowed carriers to install*

*altogether new towers in its rights of way and further limits replacement poles due to maintenance and repair complications for them and wireless carriers. See Siting Council Docket No. 388 (2011). There are also access limitations to the top of the hill where a new tower would have to be located.*

*Kelly Wade Bettuchi/Scott Pike- Typically AT&T will not explore new "raw land" locations on other properties when there is an existing tower site, as is the case here. This consistent with state law that seeks to avoid the unnecessary proliferation of towers in the state and our company's understanding of Siting Council application of the Connecticut General Statutes. Our site acquisition approach also incorporates the general state legislated preference to avoid tower siting within 250' of school buildings which would include the Lawrence School and other schools in the area.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day an electronic copy and one original and fifteen (15) hard copies of the foregoing was sent via overnight mail to the Connecticut Siting Council with an electronic copy sent to:

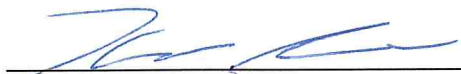
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January 26, 2022



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cc: Christopher J. Forte, Esq., City of Middletown Office of the Attorney General  
Joseph Barbagallo, Talias Trail  
Kelly Pugliares, Talias Trail  
Michael Siteman, Talias Trail  
AT&T, Smartlink Group

# Exhibit 1



# SDC20 | 2.5L | 20 kW - AC INDUSTRIAL DIESEL GENERATOR SET

EPA Certified Stationary Emergency

**GENERAC** | INDUSTRIAL  
POWER

Model G007098-0 (Steel)

## Standby Power Rating

20 kW AC, 60 Hz





Image used for illustration purposes only


## Codes and Standards


Generac products are designed to the following standards:

 UL2200, UL508, UL142, UL489

 NFPA 37, 70, 99, 110

 NEC700, 701, 702, 708

 ISO 3046, 7637, 8528, 9001

 NEMA ICS10, MG1, 250, ICS6, AB1

 ANSI  
American National Standards Institute ANSI C62.41

## Powering Ahead

For over 50 years, Generac has provided innovative design and superior manufacturing.

Generac ensures superior quality by designing and manufacturing most of its generator components, including alternators, enclosures and base tanks, control systems and communications software.

Generac gensets utilize a wide variety of options, configurations and arrangements, allowing us to meet the standby power needs of practically every application.

Generac searched globally to ensure the most reliable engines power our generators. We choose only engines that have already been proven in heavy-duty industrial applications under adverse conditions.

Generac is committed to ensuring our customers' service support continues after their generator purchase.

# SDC20 | 2.5L | 20 kW - AC

## INDUSTRIAL DIESEL GENERATOR SET

EPA Certified Stationary Emergency

**GENERAC**® | INDUSTRIAL  
POWER

Model G007098-0 (Steel)

### STANDARD FEATURES

#### ENGINE SYSTEM

- Oil Drain Extension
- Air Cleaner with Service Indicator
- Fan Guard
- Stainless Steel Flexible Exhaust Connection
- Exhaust Silencer with Drain
- Factory Filled Oil & Coolant

#### Fuel System

- Primary Fuel Filter

#### Cooling System

- 120V AC Coolant Heater
- Closed Coolant Recovery System
- UV/Ozone Resistant Hoses
- Factory-Installed Radiator
- 50/50 Ethylene Glycol Antifreeze
- Radiator Drain Extension

#### Electrical System

- Battery Charging Alternator
- AGM Spill Proof Battery
- Battery Cables
- Sealed/Rubber-Booted Engine Electrical Connections
- Solenoid Activated Starter Motor
- Output Circuit Breaker

#### ALTERNATOR SYSTEM

- Class H Insulation Material
- Vented Rotor
- 2/3 Pitch
- Skewed Stator
- Amortisseur Winding
- Brushless Excitation
- Sealed Bearings
- Rotor Dynamically Spin Balanced
- Full Load Capacity Alternator
- Protective Thermal Shutdown

#### GENERATOR SET

- Single Side Service
- Internal Genset Vibration Isolators
- Separation of Circuits- High/Low Voltage
- Silencer Heat Shield
- High Heat Wrapped Exhaust Piping
- Silencer Enclosed Within Generator
- 5 Year Extended Warranty
- Extended Factory Testing
- 12 Gallon System Spill Containment
- 2.5 Gallon Fuel Fill Spill Containment

#### ENCLOSURE

- Serviceable Items Accessible Through Lift-Off Door
- High Performance Sound-Absorbing Material
- Gasketed Door
- Stamped Air-Intake Louvers
- Single Door Latch Lockable with Key & Padlock
- Rhino Coat™ - Textured Polyester Powder Coat
- 150 MPH Wind Rating
- 36" Snow Rating

#### FUEL TANK

- UL 142 Compliant
- Double Wall Construction
- Factory Pressure Tested (5 psi)
- Rupture Basin Alarm
- Fuel Level Gauge and Sender
- Check Valve in Supply Line
- Rhino Coat™ - Textured Polyester Powder Coat
- Stainless Steel Hardware
- Integrated Fork Pockets

#### CONTROL SYSTEM

- Digital H Control Panel - Dual 4x20 Display
- Programmable Crank Limiter
- 7-Day Programmable Exerciser
- Special Applications Programmable PLC
- RS-232/485 Communications
- All-Phase Sensing Voltage Regulator
- Full System Status
- 2-Wire Start Compatible
- Power Output (kW)
- Power Factor
- kW Hours, Total & Last Run
- Real/Reactive/Apparent Power
- All Phase AC Voltage
- All Phase Currents
- Oil Pressure
- Coolant Temperature
- Coolant Level
- Engine Speed
- Battery Voltage

- Frequency
- Date/Time Fault History (Event Log)
- Isochronous Governor Control
- Waterproof/Sealed Connectors
- Audible Alarms and Shutdowns
- Not in Auto (Flashing Light)
- Auto/Off/Manual Switch
- E-Stop (Red Mushroom-Type)
- NFPA110 Level I and II (Programmable)
- Customizable Alarms, Warnings, and Events
- Modbus protocol
- Predictive Maintenance Algorithm
- Sealed Boards
- Password Parameter Adjustment Protection
- Single Point Ground Connections
- 15 Channel Data Logging
- 0.2 msec High Speed Data Logging
- Alarm Information Automatically Comes Up On the Display

#### Alarms

- Generator Run- Dry Contact
- Major Alarm- Dry Contact
- Minor Alarm- Dry Contact
- Low Fuel Alarm- Dry Contact
- Rupture Basin Alarm- Dry Contact
- Alarms & Warnings Time and Date Stamped
- Alarms & Warnings for Transient and Steady State Conditions
- Snap Shots of Key Operation Parameters During Alarms & Warnings
- Alarms and Warnings Spelled Out (No Alarm Codes)

### MODEL OPTIONS

#### CONTROL SYSTEM

- 21 Light Annunciator- Shipped Loose Kit and Field Installed
- External E-Stop-Shipped Loose Kit and Field Installed

#### ENCLOSURE

- Aluminum Enclosure
- Extreme Cold Weather Kit - Shipped Loose Kit and Field Installed

#### TANKS

- External Fuel Vent- Shipped Loose Kit and Field Installed

# SDC20 | 2.5L | 20 kW - AC INDUSTRIAL DIESEL GENERATOR SET

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POWER

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## APPLICATION AND ENGINEERING DATA

### ENGINE SPECIFICATIONS

#### General

Make	Mitsubishi
EPA Emissions Compliance	Interim Tier 4
Cylinder #	4
Type	In-Line
Displacement - L (Cu In)	2.5 (158)
Bore - mm (in)	88 (3.5)
Stroke - mm (in)	103 (4.1)
Compression Ratio	22:1
Intake Air Method	Naturally Aspirated

#### Engine Governing

Governor	Electronic Isochronous
Frequency Regulation (Steady State)	± 0.25%

#### Lubrication System

Oil Pump Type	Trochoid Gear Pump
Oil Filter Type	Filtering Paper, Full Flow
Crankcase Capacity - L (qts)	6.5 (6.9)

#### Cooling System

Cooling System Type	Forced Circulation
Water Pump Type	Centrifugal Pump
Fan Type	Pusher
Fan Speed (rpm)	2100
Fan Diameter - mm (in)	431.8 (17)
Coolant Heater Wattage	1000
Coolant Heater Voltage	120

#### Fuel System

Fuel Type	Ultra Low Sulfur Diesel #2
Fuel Specifications	ASTM
Fuel Filtering (microns)	6
Fuel Inject Pump Make	Bosch
Injector Type	Engine Driven Gear
Engine Type	Diesel
Fuel Supply Line - mm (in.)	6.6 (0.26)

#### Engine Electrical System

System Voltage	12 VDC
Battery Charger Alternator	12V-50A
Battery Size	650 CCA
Battery Group	35
Battery Voltage	12 VDC
Ground Polarity	Negative

### ALTERNATOR SPECIFICATIONS

Standard Model	Mecc Alte ECP 28-2L/4
Poles	4
Field Type	Revolving
Insulation Class - Rotor	H
Insulation Class - Stator	H
Total Harmonic Distortion	<5%
Telephone Interference Factor (TIF)	<45
Standard Excitation	Brushless

Bearings	Dual Sealed
Coupling	Belt, Pulley
Load Capacity - Standby	100%
Prototype Short Circuit Test	Yes
Voltage Regulator Type	Digital
Number of Sensed Phases	All
Regulation Accuracy (Steady State)	±0.5%

### RATING DEFINITIONS

Standby - Applicable for a varying emergency load for the duration of a utility power outage with no overload capability.

# SDC20 | 2.5L | 20 kW - AC

## INDUSTRIAL DIESEL GENERATOR SET

EPA Certified Stationary Emergency

Model G007098-0 (Steel)

### OPERATING DATA

#### POWER RATINGS

Single-Phase 120/240 VAC @1.0pf	20 kW	Amps: 83
Circuit Breaker Size	100A	

#### FUEL CONSUMPTION RATES\*

Diesel - gph (lph)	
Percent Load	Standby
25%	0.74 (2.80)
50%	0.99 (3.75)
75%	1.41 (5.30)
100%	1.90 (7.19)

\* Fuel supply installation must accommodate fuel consumption rates at 100% load.

#### COOLING

		Standby
Coolant Flow per Minute	gpm (lpm)	11.9 (45)
Coolant System Capacity	gal (L)	3.5 (13.2)
Heat Rejection to Coolant	BTU/hr	238,200
Inlet Air	cfm (m <sup>3</sup> /min)	2365 (67)
Max. Operating Ambient Temperature (Before Derate)	°F (°C)	77° (25°)
Maximum Radiator Backpressure	in H <sub>2</sub> O	0.50

#### COMBUSTION AIR REQUIREMENTS

	Standby
Flow at Rated Power cfm (m <sup>3</sup> /min)	88 (2.49)

#### ENGINE

		Standby
Rated Engine Speed	rpm	1800
Horsepower at Rated kW**	hp	33.5
Piston Speed	ft/min	1220.47
BMEP	psi	96.5

#### EXHAUST

		Standby
Exhaust Flow (Rated Output)	cfm (m <sup>3</sup> /min)	193 (328)
Max. Backpressure (Post Silencer)	inHg (kPa)	1.38 (4.67)
Exhaust Temp (Rated Output - Post Silencer)	°F (°C)	928 (497.7)

\*\* Refer to "Emissions Data Sheet" for maximum bHP for EPA and SCAQMD permitting purposes.

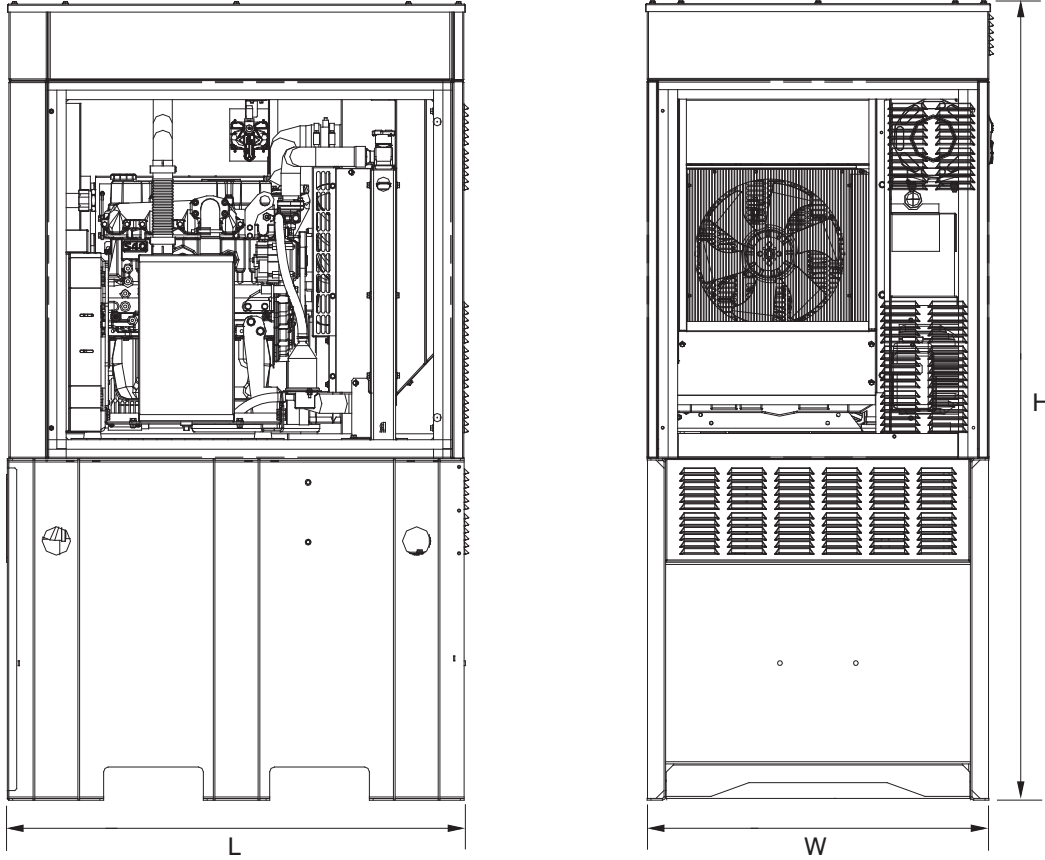
Deration – Operational characteristics consider maximum ambient conditions. Derate factors may apply under atypical site conditions. Please consult a Generac Power Systems Industrial Dealer for additional details. All performance ratings in accordance with ISO3046, BS5514, ISO8528 and DIN6271 standards.

**SDC20 | 2.5L | 20 kW - AC**  
**INDUSTRIAL DIESEL GENERATOR SET**

EPA Certified Stationary Emergency

Model G007098-0 (Steel)

**DIMENSIONS AND WEIGHTS\***



**Level 2 Sound Attenuation Enclosure**

Run Time Hours	48
Usable Capacity Gal (L)	92 (348.2)
L x W x H in (mm)	48 x 36 x 90 (1219.2 x 914.4 x 2286)
Weight lbs (kg)	2400 (1089)
Sound Level	71 dBA

\* All measurements are approximate and for estimation purposes only.

<b>YOUR FACTORY RECOGNIZED GENERAC INDUSTRIAL DEALER</b>

Specification characteristics may change without notice. Dimensions and weights are for preliminary purposes only. Please consult a Generac Power Systems Industrial Dealer for detailed installation drawings.

**SDC20 | 2.5L | 20 kW - AC**

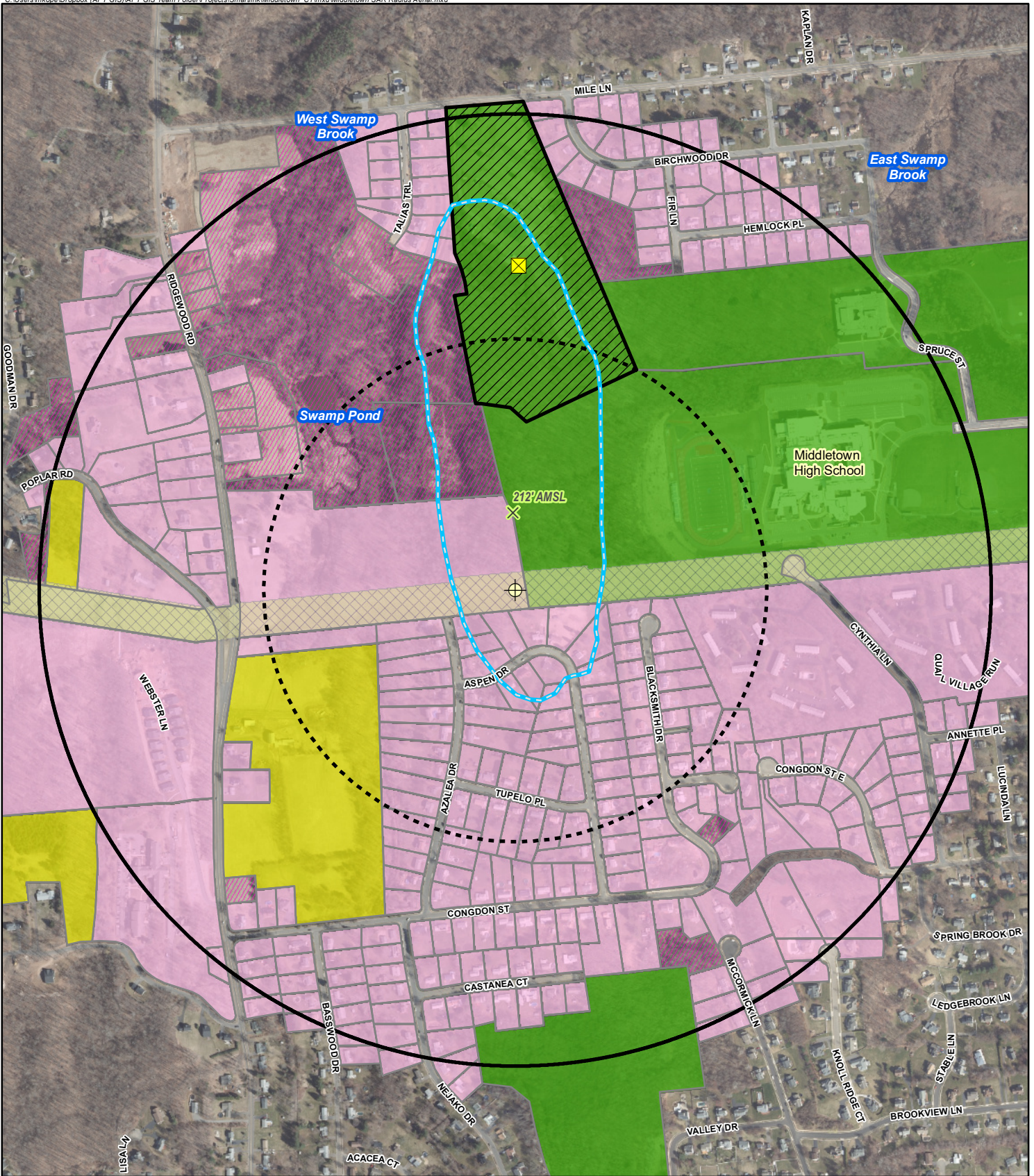
**INDUSTRIAL DIESEL GENERATOR SET**

EPA Certified Stationary Emergency

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**POWER**

**Model G007098-0 (Steel)**

# Exhibit 2



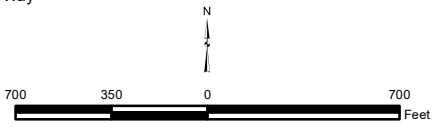
- Legend**
- Proposed Site
  - SAR Center Point
  - Search Area Ring (SAR)
  - 2,500' Radius
  - Subject Property (Proposed Site)
  - Approximate Ridge
  - Approximate Eversource Utility Right-of-Way

- Parcels within Search Area Radius and Associated Land Use**
- Residential
  - Vacant Residential
  - Residential (Potential Agricultural Use)
  - Municipal (City of Middletown)
  - Utility Right-of-Way

**Parcels within 2,500' of Search Area Center**

Proposed Wireless Telecommunications Facility  
 Middletown\_Mile Lane  
 499 Mile Lane  
 Middletown, Connecticut

**Map Notes:**  
 Base Map Source: 2019 Aerial Photograph (CTECO)  
 Map Scale: 1 inch = 700 feet  
 Map Date: January 2022










# Exhibit 3



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<p><b>Legend</b></p> <ul style="list-style-type: none"> <li> Proposed Site</li> <li> SAR Center Point</li> <li> Search Area Ring (SAR) 2,500' Radius</li> <li> Subject Property (Proposed Site)</li> <li> Approximate Ridge</li> </ul>	<p><b>2,500' Radius Topographic Map</b></p> <p>Proposed Wireless Telecommunications Facility Middletown_Mile Lane 499 Mile Lane Middletown, Connecticut</p>
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**Map Notes:**  
 Base Map Source: USGS 7.5 Minute Topographic  
 Quadrangle Map, Middletown, CT (1992)  
 Map Scale: 1 inch = 700 feet  
 Map Date: January 2022

