

BRUCE L. MCDERMOTT 203.772.7787 DIRECT TELEPHONE 860.240.5723 DIRECT FACSIMILE BMCDERMOTT@MURTHALAW.COM

May 13, 2022

Melanie A. Bachman, Esq. Executive Director Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket No. 508 - The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Milvon to West River Railroad Transmission Line 115-kV Rebuild Project

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") is The United Illuminating Company's revised response to the Council's April 1, 2022 Interrogatory 16.

An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,

Bruce L. McDermott

Enclosures

cc: Service List

Murtha Cullina LLP 265 Church Street New Haven, CT 06510 T 203.772.7700 F 203.772.7723

Interrogatory CSC-16 Revised – May 13, 2022

The United Illuminating Company Docket No. 508

Witness: Shawn Crosbie

Page 1 of 2

Q-CSC-16: Referencing page ES-7 of Volume 1 of the Application, please describe any work limitations relating to working with or adjacent to MNR.

A-CSC-16: Work limitation relating to working with or adjacent to MNR are as follows:

- Any work within the CTDOT/MNR corridor would require UI and its contractors to
 - Obtain an Entry Permit for the proposed activity
 - Acquire the applicable insurance
 - Submit a work plan and drawings to be reviewed and approved by CTDOT/MNR outlining scope and schedule 15 days prior due starting work
 - Once approved, UI would coordinate with MNR to provide the appropriate MNR safety oversight and flaggers.
- MNR track outage requirements are reviewed with contractor work plans and site-specific walk-down with MNR and Project team to assess any outages needed. All outages are at the sole discretion of MNR. The Project team will have regular coordination with MNR for this support whilst in construction via weekly meetings. The Company has assumed outages and work outside of core hours (7 am - 7 pm) may be required for the following scenarios:
 - Any work within 20-25 feet of the MNR signal and feeder wires of unsecured equipment.
 - Excavation within the proximity of tracks where in the opinion of a qualified railroad employee, the stability of tracks may be affected.
 - Boom-equipped construction machinery where the booms, loads, leads for pile driving, etc., may be accidentally swung into the track area or affect electrical transmission systems, electrification wires, signal-systems power lines, electrical equipment, or communication wires.

Interrogatory CSC-16 Revised – May 13, 2022

The United Illuminating Company Docket No. 508

Witness: Shawn Crosbie

Page 2 of 2

 Any work that would require a person or piece of equipment to foul the tracks (meaning it would come within 4 feet of the tracks).

- Any work requiring installation or removal of wires crossing the tracks would require a 4-track outage, which is limited to work on weekends and outside of core hours, typically after all MNR core-hour scheduled trains have gone through.
 - UI anticipates multiple 4-track outages to be conducted on the Milvon West River Project due to the current substation alignment relative to the proposed double-circuit monopoles being predominantly located on the north side of the tracks.

UI fully understands that working within CTDOT/MNR and their operations along the railroad corridor pose assiduous work environments. UI's Project team continues as it has from the commencement of its Project to conduct bi-weekly coordination meetings with CTDOT/MNR along with ad-hoc meetings to discuss Project details such as but not limited to scope, schedule, construction, work area limitations, and real estate to minimizes challenges and limitations. Once in the construction phase the MNR coordination meetings will be weekly.