

April 11, 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:

On March 17, 2022, The United Illuminating Company (the "Company") submitted to the Connecticut Siting Council ("Council") the recommendations of the City of Milford (the "City") provided to the Company as part of the municipal consultation in connection with the Milvon to West River Railroad Transmission Line 115 kV Rebuild Project. Enclosed for filing with the Council are the Company's responses to each of the City's recommendations.

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: John Knuff, Esq.  
Sara A. Sharp Esq.  
Jonathan D. Berchem, Esq.

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## Recommendation Miford-1

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R-MILFORD-1: Investigate and provide supplemental data regarding the economic and environmental viability of rebuilding any portion of the transmission line between Beardsley Avenue and River Street (P905N to P912N) in an underground configuration.

A-MILFORD-1: UI estimates the cost to construct both lines underground between P905N and P912N to be approximately \$66M. This is a conceptual grade estimate and does not include any relocation of underground utilities or other engineering studies needed to formalize the design. The estimate to install the portion of the transmission line between Structures P905N through P912N aboveground as proposed in the Company's Application is approximately \$9M.

Additionally, the environmental and construction impacts from underground construction is likely to be greater than from overhead construction. These impacts may include (1) an increase to the size of work platforms and construction access areas, (2) closing of parking spots within the train station, (3) additional permanent and temporary easements, (4) congestion within downtown Milford, (5) significant increases in volume to the management of soil and groundwater, (6) relocating of existing underground utilities, (7) transition stations with a large visual impact and (8) an increase to the EMF levels based on the closer proximity of transmission equipment to public areas.

Recommendation Miford-2

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R-MILFORD-2: Identify the height of proposed structure P912N, which we were unable to locate in the Cross Section Dimension Tables (Rev. 0-OA, dated 9/10/2021).

A-MILFORD-2: Structure 912N is 130 feet tall.

### Recommendation Miford-3

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R-MILFORD-3: Identify the number additional structures required, and approximate locations of such additional structures, if the maximum height of P908N (130), P910N (140), P912N (130), P914N (135), P915N (145), P916N (135), P918N (130) is limited to 120 feet.

A-MILFORD-3: A minimum of three structures would need to be added should the height of structures P908N, P910N, P915N, P916N, and P918N be limited to 120 feet. Structures 912N and 914N can only be brought down to 130 feet due to needed vertical clearances from existing features. Two of these structures would be located in the section between the currently proposed locations of P906N and P910N, west of High Street, and the third pole would be located in the grassy median north of the Milford Train Station, east of High Street. All three structure locations will be within the CT DOT right-of-way.

Recommendation Miford-4

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R-MILFORD-4: Investigate and provide supplemental data regarding the economic and environmental viability of constructing the new transmission line with the alternative maximum structure heights identified in #3.

A-MILFORD-4: The Company estimates that the installation of the three additional structures at 120 feet will increase project costs by approximately \$5.7M or \$14.7M total (\$9M + \$5.7M). Please note that due to vertical clearances from existing features, structures 912N and 914N can only be brought down to 130 feet.

Additionally, the environmental impact due to the three additional transmission line structures at a height of 120 feet may cause an increase to the following (1) footprint of work platforms and access areas, (2) temporary easements areas, (3) tree line/vegetation clearing, (4) more visual impacts, (5) cumulative wetland area impacts based on relocation of work platforms, and (5) the length of construction relative to schedule.

Recommendation Miford-5

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R-MILFORD-5: For the area between Beardsley Avenue and River Street, provide photo simulations/renderings sufficient to allow a visual comparison of the number, height, and design of the proposed structures under UI's current proposal vs. the alternative maximum structure heights identified in #3.

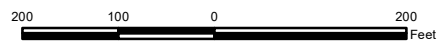
A-MILFORD-5: Please see Exhibit Recommendation Milford-5-1 which are visual simulations of the structures between Beardsley Avenue and River Street based on UI's current proposal vs. the alternative maximum structure heights.



**EXISTING**

Legend

- Proposed Structure
- Project Transmission Line

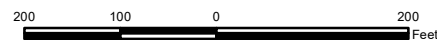




**CSC PROPOSED DESIGN**

Legend

- Proposed Structure
- Project Transmission Line







**EXISTING**

LOCATION  
**VIEW FROM 1 DARINA PLACE – MILFORD**

ORIENTATION  
**SOUTHWEST**



PHOTOGRAPHED ON 3/31/2022



**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM 1 DARINA PLACE - MILFORD**

ORIENTATION

**SOUTHWEST**



**ALTERNATE DESIGN**

LOCATION

**VIEW FROM 1 DARINA PLACE – MILFORD**

ORIENTATION

**SOUTHWEST**



**EXISTING**

LOCATION  
**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION  
**SOUTHWEST**



PHOTOGRAPHED ON 3/31/2022



**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION

**SOUTHWEST**





**ALTERNATE DESIGN**

LOCATION

**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION

**SOUTHWEST**





**EXISTING**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**



**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**







**ALTERNATE DESIGN**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**