STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

April 1, 2022

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RE **DOCKET NO. 508**– The United Illuminating Company (UI) application for a Certificate of Environmental Compatibility and Public Need for the Milvon to West River Railroad Transmission Line 115-kV Rebuild Project that consists of the relocation and rebuild of its existing 115- kilovolt (kV) electric transmission lines from the railroad catenary structures to new steel monopole structures and related modifications to facilitate interconnection of the rebuilt 115-kV electric transmission lines at UI's existing Milvon, Woodmont, Allings Crossing, Elmwest and West River substations along approximately 9.5 miles of the Connecticut Department of Transportation's Metro-North Railroad corridor traversing the municipalities of Milford, Orange, West Haven and New Haven, Connecticut.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 21, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the April 21, 2022 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

c: Service List dated March 3, 2022

Docket No. 508
Pre-Hearing Interrogatories
Set One

Notice and Public Outreach

1. Referencing Volume 1A of the Application, Appendix F, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?

2. Has The United Illuminating Company (UI) received any comments on the Project from abutting property owners and/or any of the municipalities since the application was submitted to the Council? If yes, please indicate what such comments were and how UI addressed such comments.

General

3. Which municipalities are within UI's service area?

4. Pursuant to CGS §16-50o, please submit any agreements entered into with any third party in connection with the construction or operation of the proposed project.

5. Does UI have a license agreement with Metro-North Railroad (MNR) for the proposed project?

6. Does the Project support MNR rail lines operations? Explain.

7. Referencing page ES-1 of Volume 1 of the Application, UI notes that "...recent Federal commitments are to modernize the nation's power grid to facilitate the transmission and delivery of clean and resilient energy to consumers." Identify which recent federal commitments are being referred to. How would the Project facilitate the transmission and delivery of clean and resilient energy to customers?

8. What is the status of upgrades to the north of West River Substation and south of Milvon Substation?

9. What other existing collocated uses (ex. wireless telecommunications equipment, water and sewer lines, etc.) are within the project area? Would any have to be removed, relocated or modified, either temporarily or permanently, for construction of the proposed project?

10. Are the proposed monopoles capable of hosting telecommunications equipment collocations? Does UI have a policy related to telecommunications equipment collocations on its transmission line structures? If so, please provide the policy.

System Planning and Asset Conditions

11. Is the proposed project identified in any ISO-New England, Inc. (ISO-NE) needs and solutions analyses? Is the proposed project on the ISO-NE Regional System Plan (RSP), RSP Project List and/or Asset Condition List?

12. Referencing page ES-3 of Volume 1 of the Application, UI notes that, "[T]he transmission lines exhibit age-related physical limitations." Identify such age-related physical limitations/conditions. Please provide sample photos to depict such age-related conditions.

13. Referencing page 1-7 of Volume 1 of the Application, UI notes that it conducted engineering analyses of the 115-kV lines between Milvon and West River Substations in 2018. Please provide a copy of the engineering studies.

14. Please describe how the proposed project is consistent with the recommendations of the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation Report on Transmission Facility Outages During the Northeast Snowstorm of October 29-30, 2011 – Causes and Recommendations.

Construction

15. Referencing page ES-5 of Volume 1 of the Application, explain why the Milvon to Woodmont segment would be constructed before the Woodmont to Allings Crossing Segment?

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

17. Referencing page ES-7 of Volume 1 of the Application, explain why the construction time period spans roughly six calendar years. Could any of the four segments be constructed in parallel to expedite the schedule?

18. Referencing page 1-7 of Volume 1 of the Application, the 115-kV lines must be rebuilt to current National Electrical Safety Code (NESC) and UI standards. What are the NESC and UI standards?

19. Would the Project comply with the 2004 Stormwater Quality Manual to the extent applicable?

20. Referencing page 2-3 of Volume 1 of the Application, what is the source of the 25-foot minimum clearance requirement? For example, is it due to the MNR requirements, the NESC, or vegetation management? Why would the clearance be less than 25 feet in some areas?

21. Referencing Drawings XS-1 of Volume 2 of the Application, would the existing distribution lines remain on the catenary structures? Are such distribution lines for MNR's use? If the catenaries were rebuilt and the 115-kV transmission lines were re-installed on the catenaries, what height would be required to meet clearance requirements?

22. Referencing page 2-4, Section 2.1.2 of Volume 1 of the Application, please explain in further detail what is meant by "[S]ingle-circuit monopoles and/or new monopoles…will be installed…as required to correctly align the phases of different circuits to the existing line terminal switches in each substation yard."

23. Referencing page 2-9 of Volume 1 of the Application, when does UI anticipate a future conductor upgrade to 2156 ACSS conductors?

24. Referencing page 2-9 of Volume 1 of the Application, explain why galvanized steel finish was selected for the proposed monopoles versus, for example, weathering steel? What is the cost difference among these two structure types?

25. Referencing Page 2-10 of Volume I of the Application, would the existing catenary support columns from which MNR electrical facilities would be transferred remain in place or would they be removed? If they remain in place, which entity would own the columns? If removed, which entity would be responsible for decommissioning the columns and how would the columns be decommissioned?

26. Referencing Table 2-2 on page 2-2 of Volume I of the Application, would UI replace the estimated 14 bonnets to support a shield wire to protect MNR signal and feeder wires? Why would 43 remaining bonnets support UI shield wire?

27. Page 2-10 of Volume I of the Application states there are some locations where MNR electrical facilities will be transferred from the existing catenary support columns and underbuilt on the new UI-owned monopoles. Please respond to the following:
    a) What type of MNR electrical facilities would be transferred?
    b) At what height would the MNR electrical facilities be underbuilt on the monopoles?
    c) Which entity is responsible for the costs associated with the transfer of the MNR electrical facilities?
    d) If UI is responsible for the costs, what are the costs, are the costs included in the total project cost and would the costs be recovered from UI ratepayers?

28. Referencing page 2-11 of Volume I of the Application, how many new monopoles would be required directly adjacent to the existing catenary support columns? At what height?

Cost

29. Referencing page ES-10 of Volume 1 of the Application, what are the major components driving the total cost for the Project?

30. Referencing page ES-10, of the $295M total capital cost, approximately how much is associated with transmission line upgrades, and how much is associated with the substation upgrades?

31. Of the approximately $295M cost total, what costs would be regionalized, and what costs would be localized? Estimate the percentages of the total cost that would be borne by UI ratepayers, Connecticut ratepayers and the remainder of New England (excluding Connecticut) ratepayers, as applicable.

32. What methodology does UI use to determine an acceptable delta between estimated project costs and actual project costs? What is the acceptable delta?

33. Referencing page 9-2 of Volume 1 of the Application, UI notes that Overhead Alternatives 3 and 4 would involve significantly higher costs (approximately 200% more than the proposed Project). Page 9-10 indicates $315 million and $291 million for Overhead Alternatives 3 and 4, respectively, which does not appear to be consistent with a 200% increase. Please reconcile. Also, estimate the costs of Alternatives 3 and 4 in 2022 dollars.

34. Referencing page 9-14 of Volume 1 of the Application, the estimated cost of Overhead Alternative 2 was approximately $245M based on a 2018 study. Estimate the cost of Overhead Alternative 2 in 2022 dollars.

35. Referencing pages 9-5 through 9-8 of Volume 1 of the Application, estimate total cost of the Underground Alternative with the CT DOT Corridor and the Underground Alternative within public road ROWs as compared to the $295M for the proposed configuration.

36. Referencing the March 16, 2022 correspondence from the City of Milford, what is the technical feasibility and costs associated with the following:
    a) an underground configuration between Beardsley Avenue and River Street; and
    b) an overhead configuration of the structures identified in City recommendation #3 with structure heights of 120 feet.

Safety

37. Referencing page 3-22 of Volume 1 of the Application, UI notes that, at the five substations, "The relay/control enclosures are equipped with fire extinguishers." Are they manual fire extinguishers, or are they part of an automatic fire suppression system? Explain.

38. Referencing Volume 1A of the Application, Appendix A, Federal Aviation Administration (FAA) consultation, prior to commencement of construction, would UI file with the FAA for review of its temporary structures (e.g. cranes)?

39. Referencing page 5-14 of Volume 1 of the Application, have any flood mitigation measures been installed at Milvon Substation? If no, are any proposed as part of the Project?

40. Referencing page 6-12 of Volume 1 of the Application, what protection measures will be utilized in the flood zones?

CDOT

41. Referencing the July 5, 2017 correspondence from the Connecticut Department of Transportation (CDOT) Rail Administrator to Kenneth Bowes of Eversource from Council Docket No. 461A available at this link: https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_461A/Pre-Filed_Exhibits/Eversource/461A20170710SupplementalTestimonyBowespdf.pdf
    Please explain how the proposed project would not impact the New Haven Line service as described in each numbered paragraph of the DOT Rail Administrator correspondence.

42. Referencing Page 5-38 and 5-39 of Volume I of the Application, how do the future CDOT Plans impact the design, construction or schedule for the rebuilding of the electric transmission line? Please explain.

Historic/Scenic and Visual

43. Referencing the December 22, 2021 State Historic Preservation Office (SHPO) letter in Volume 1A – Appendix A of the Application, please respond to the following:
    a) Where is Charles Island located? Please provide a map.
    b) What is the closest distance between the proposed project and Charles Island?
    c) Would the proposed project be visible from Charles Island? Please characterize any visibility.
    d) How does SHPO's recommendation for historic research of Charles Island and installation of interpretive signage on Charles Island mitigate the indirect visual impacts of the proposed project from the 5 identified historic properties?
    e) Does UI have an in-house historian?
    f) Would the costs of performing SHPO's recommended historic research of Charles Island and installation of interpretive signage on Charles Island be recovered from the ratepayers?

44. Please describe how the proposed project is consistent with the Federal Energy Regulatory Commission Guidelines for the Protection of Natural, Historic, Scenic and Recreational Values in the Design and Location of Rights-of-Way and Transmission Facilities.

45. Please describe how the proposed project is consistent with the DEEP Long Island Sound Blue Plan.

46. Referencing Appendix C of Volume 1A of the Application, Viewshed Analysis Maps 1 through 3, of the approximately 14,015-acre (or one-mile radius) study area, approximately how many acres would have year-round views of the Project, and how many acres would have seasonal views of the Project?

47. Referencing Appendix C of Volume 1A of the Application, Viewshed Analysis Maps 1 through 3, as a comparison, provide similar viewshed maps based on the existing catenaries only. Of the approximately 14,015-acre (or one-mile radius) study area, about how many acres have year-round views of the existing catenaries, and how many acres have seasonal views of existing catenaries?

Vegetation Management

48. Please identify the types of acceptable low growth vegetative species referenced on page 6-15 of Volume I of the Application.

49. Referencing the footnote on page 2-8 of Volume I of the Application, what are UI's standards relative to the width of the permanent easement for transmission vegetation management? What are the mandated electric transmission line standards?

50. Page 3-6 of Volume I of the Application mentions hazard trees outside easement areas would be removed in coordination with the landowner. Is landowner permission required? What if the landowner denies the request?

Wetlands

51. Referencing pages 6-12 and 6-13 of Volume 1 of the Application, the square footage numbers in paragraph 4 on page 6-13 do not appear to match the numbers on Table 6-3 on page 6-12. Please reconcile.

52. Referring to the Wetland Report Volume 1A, Appendix B, in the Application, what precautions would be taken in the area identified as "prohibited" on wetland maps?

Agricultural Soils

53. Referencing page 5-5 of Volume 1 of the Application, provide the total number of acres of prime farmland soils within the project area, and indicate how many acres of prime farmland soils within the project area would be impacted by the Project.