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November 2, 2023

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

Re: Docket No. 516 – The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project

Dear Ms. Bachman:

On behalf of The United Illuminating Company (“UI”), enclosed please find UI’s responses to Pre-Hearing Interrogatories (Set One) of the Grouped LLC Intervenors dated October 12, 2023.

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

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

cc: Service List (via Electronic Mail only)

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Interrogatory GLI 1

The United Illuminating Company
Docket No. 516

Witness: Matt Parkhurst
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- Q-GLI 1: In connection with the design of the proposed Project in this Docket, did anyone from UI conduct an in-person field visit to the vicinity of the following properties, identified by their property address or as noted on the Applicant's submitted plans, after October 2022? If so, provide a date(s) and the names of any UI personnel, consultants, or contractors present and any written reports or analyses based on such visit(s).
- a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPA-1945

A-GLI 1: Yes. After UI's submission, members of the UI conducted a field reconnaissance of the proposed Project route. UI team members attending the field reconnaissance included Hallie Rimkunas, Aziz Chouhdery, Abdallah Yahiaoui, Correne Auer, Jason Vincent, Matt Scully, Pete Zaffino, Matthew Parkhurst, Kyle Saba, Joe Dietrich, and Aaron Davis. The purpose of the field reconnaissance was to further team discussions and refine Project planning with respect to the proposed locations of monopoles along the CT DOT corridor, constructability, and construction sequence. No separate written reports were created as a result of the field reconnaissance. However, UI incorporated the results of the field investigation into the Project's CSC Application.

NOTE: Because a majority of the GLI interrogatories pertain to the nine properties identified above, for ease of reference, UI has excerpted from the CSC Application, Volume 2, the 100 scale maps that illustrate the locations of these parcels in relation to the proposed Project. In addition, UI has compiled a table that lists these properties, along with relevant information regarding the relationship of the proposed Project facilities to the properties and including information that is responsive to the applicable GLI interrogatories. This information is included in Attachment GLI-1-1 to this response and referred to hereafter as "Attachment GLI-1-1".

Interrogatory GLI 2

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- Q-GLI 2: Provide the precise location for the proposed following structures, including the precise location depicted on a survey with sufficient detail to understand the proximity of the proposed structure to the specified property and the actual distance from the proposed structure to the nearest portion of the building on the property indicated.
- a. Structure P659S to SAS-1574
 - b. Structure P664S to SAS-1596
 - c. Structure P737N to ARN-1829
- A-GLI 2: Please Attachment GLI-1-1 and Attachments GLI-2-1, GLI-2-2 and GLI-2-3 and the 100 scale maps.

Interrogatory GLI 3

The United Illuminating Company

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Witnesses: Matt Parkhurst/
Matt Scully

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Q-GLI 3: When deciding on the location of proposed work pads in proximity to SAS-1574 and 96 Station Street in Southport, CT, did UI consider if the location would impede access to these properties for, among other things, emergency services and patron access? If so, how did that impact the proposed location of those proposed work pads? Has UI considered staggering the timing of use of those work pads? Why was the work pad placed directly in front of the business located at 96 Station Street, Southport, Connecticut rather than to the west?

A-GLI 3: See Sheet 3 of 29 in Volume 2 of the Application and Attachment GLI-1-1.

UI does not propose a work pad on SAS-1574. The work pad proposed on the adjacent CT DOT property is required to stage equipment to remove UI's existing electrical infrastructure (bonnet and wires) from the adjacent railroad catenary structure and to install new monopole, P659S. The "work pad" area shown in the mapping, in gray, is to illustrate the work area. Within the paved surface along Station Street, construction equipment will be staged on the existing paved surface. Similarly, the work pad located outside of 96 Station Street is associated with the removal of UI's existing electrical infrastructure (bonnet and wires) from the adjacent catenary structure and is located entirely on the existing paved area and within CT DOT property.

If equipment is not on site, there will be no obstructions to vehicular traffic along Station Street. Regardless, the entrance to the parking lot associated with SAS-1574 will not be impacted at any time during construction activities. As discussed in UI's Application, more specific information regarding the work pad dimensions and construction timing/scheduling would be included in the Development and Management Plan. UI will also work with property owners to evaluate timing of construction activities which cause zero or the least amount of impacts to the activities on their property.

Interrogatory GLI 4

The United Illuminating Company
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Q-GLI 4: Will electric transmission lines travel over the following properties? If so, how far will the lines encroach onto or over those properties?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 4: See Attachment GLI-1-1.

Interrogatory GLI 5

The United Illuminating Company

Witnesses: Matt Parkhurst/
Meena Sazanowicz

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Q-GLI 5: Will permanent easements travel over the following properties? If so, how far will the easements encroach onto or over those properties?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 5: See Attachment GLI-1-1.

Interrogatory GLI 6

The United Illuminating Company
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Q-GLI-6: What is minimum height that an electric transmission lines will hang over the following properties? All at max op

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 6: See Attachment GLI-1-1.

Interrogatory GLI 7

The United Illuminating Company
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Witness: Matt Parkhurst
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Q-GLI 7: What is the closest distance between an electric transmission line and the highest point of the existing buildings on the following properties? (worst case weather case)

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 7: See Attachment GLI-1-1.

Interrogatory GLI 8

The United Illuminating Company

Witness: Matt Parkhurst/
Meena Sazanowicz

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Q-GLI 8: Does the distance between (i) proposed structures and all electric transmission lines to located on and over the following properties meet or exceed current National Electrical Safety Code standards and UI's electrical safety standards? If not, provide a list of standards not met, as well as what modifications to the Project will be required to meet or exceed these standards?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 8: Yes. The proposed transmission line design, inclusive of all proposed structures and conductors, meets or exceeds current National Electric Safety Code standards and UI's electrical safety standards.

Interrogatory GLI 9

The United Illuminating Company
Docket No. 516

Witnesses: Meena Sazanowicz
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Q-GLI 9: Did UI evaluate the feasibility of rerouting the electric transmission lines to a double -circuit configuration north of the CT DOT corridor? If not, describe in detail why this option was not evaluated. If so, provide all written reports and analyses where this alternative is discussed.

A-GLI 9: As part of conceptual engineering studies conducted in 2018, to identify overall alternatives for rebuilding the 115-kV lines along the CT DOT corridor between Catenary Structure B648 and Congress Street Substation, UI did not evaluate, in detail, a double-circuit configuration, to be located on the north side of the railroad tracks. See Exhibit CSC-12-1 which is part of the Company's response to Siting Council Interrogatory 12 in Docket 508.

This option was not evaluated in detail during the conceptual design studies because the existing 115-kV 1130 Line, located along the north side of the MNR tracks was constructed on single-circuit monopoles in the 1990s. The 1130 Line has no current asset condition issues, and at present, there are no electrical capacity demands / forecasts that would dictate a need upgrade or replace the 1130 Line with larger conductors.

Furthermore, the existing 1130 Line structures are not designed to accommodate an additional transmission circuit. UI's rationale for eliminating the potential use/reuse of the 1130 Line as an option for the Project is discussed in Section 9.3.3 of the Project Application.

UI conducted additional analyses of potential 1130 Line modifications. Please see Late Filed Exhibit 2-5(a) for conceptual level design details.

Interrogatory GLI 10

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Witness: Meena Sazanowicz
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Q-GLI 10: Did UI evaluate the feasibility of installing the electric transmission lines in an underground duct bank north or south of the CT DOT corridor? If not, describe in detail why this option was not evaluated. If so, provide all written reports and analyses where this alternative is discussed.

A-GLI 10: A north or south alignment within the CT DOT corridor was not evaluated because an underground parallel alignment with the railroad tracks would not be supported by CT DOT. An underground alignment within the street to the south of the railroad tracks, as described in Section 9 of the Project Application, was evaluated.

Interrogatory GLI 11

The United Illuminating Company

Witnesses: Matt Parkhurst/
Matt Scully

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Q-GLI 11: In connection with the proposed work pad in proximity to the following properties, please (i) Describe in detail the nature of this work pad, including the activities that will take place in the work pad area, expected duration of this work pad area, and any restrictions that will impact adjacent areas and roadways as a result of the activities in and around the work pad area; (ii) does this work pad extend onto the following properties, and if so, where and for what purpose; (iii) will this work pad be secured with fencing or other perimeter control measures; (iv) can this work pad be reduced in size or moved away from existing buildings, building entrances and abutting roadway to avoid impacting the following properties; and (v) when designing this work pad, including its location and size, did UI evaluate whether the location and size of the work pad would impede access to the buildings, the ability of emergency services to access the buildings and parking areas and the safety of vehicles utilizing reduced and reconfigured parking areas?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 11: In general, work pads are the proposed areas that will be temporarily occupied by construction equipment during the installation of the structure foundation, steel monopole pole, insulators, hardware, and wire. In addition, activities related to the removal of UI's existing transmission line infrastructure from the existing CT DOT catenary structures will be performed from work pads.

Where work pads are to be located on existing surfaces that are not paved or graveled, UI's Project construction contractor will utilize timber or composite matting laid upon the existing ground surface to limit earth disturbance and to support the construction equipment. In pavement and gravel areas, the contractor will stage equipment on the existing paved or gravel surfaces. Matting and cribbing will be used to support any equipment outriggers. There is no intention to install any fencing or perimeter control measures around these work areas. However, if a work area needs to be secured in a manner of security fencing UI could install. In all cases, UI will coordinate with the property owner to minimize impacts to the operations of their businesses.

Interrogatory GLI 11

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- a. There is no proposed work pad to be located on the property associated with SAS-1574. The entrance to the parking lot associated with SAS-1574 will not be impacted at any time during construction activities. Access to the parking lot will be maintained at all times from Pequot Avenue via Station Street. Anticipated work activities at the work pad adjacent to SAS-1574 and estimated durations include:
 - Site preparation: 3 days or nights
 - Foundation drilling and concrete pouring: 3 days or nights
 - Pole installation: 2 days or nights
 - OPGW and 115-kV conductor installations: Portions of 3 days or nights
 - Grounding installation and restoration: Portions of 4 days or nights
 - Existing infrastructure removal: 1 to 2 nights
 - Restoration: 1 to days, contingent on permit requirements for stabilization
- b. Please refer to the Company's response to Interrogatory GLI-3. In addition, the work pad adjacent to this building is only intended to be in use for 1 to 2 nights.
- c. There is no proposed work pad to be located on the property associated with SAS-1595, with the exception of a temporary access path for vehicular traverse between Pequot Avenue and the property to the east, SAS-1596. Vehicles will traverse over the existing pavement. Equipment will not occupy this area for any significant duration.
- d. Please refer to A-GLI-21. Anticipated work activities at the work pad located on SAS-1596 and estimated durations include:
 - Site preparation: 3 days or nights
 - Foundation drilling and concrete pouring: 3 days or nights
 - Pole installation: 1 day or night
 - OPGW and 115-kV conductor installations: Portions of 3 days or nights
 - Grounding installation and restoration: Portions of 4 days or nights
 - Existing infrastructure removal: 1 to 2 nights
 - Restoration: 1 to days, contingent on permit requirements for stabilization
- e. No work pad is proposed for location on to be located on property SAS-1598.
- f. The work pad proposed to be located on SAS-1729 is for infrastructure removal only. This work pad is only intended to be in use for 2 to 3 nights. All activities are planned to take place after normal business hours.

Interrogatory GLI 11

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- g. The work pad proposed to be located on ARN-1829 will take up the parking area on the south side of the property adjacent to CT DOT railroad corridor. Access to the McDonald's restaurant building and parking on the north and east sides of the building will remain accessible for patrons, emergency services, and workers through the entire course of the construction process. The drive-thru will remain accessible as well through the course of the construction process with the exception of two consecutive Friday and Saturday nights. Anticipated work activities at this location and estimated durations include:
- Site preparation: 3 days or nights
 - Foundation drilling and concrete pouring: 3 days or nights
 - Pole installation: 1 day or night
 - OPGW and 115-kV conductor installations: Up to 2.5 weeks split up into three (3) 4 to 6 day/night segments
 - Grounding installation and restoration: Portions of 4 days or nights
 - Existing infrastructure removal: 1 to 2 nights
 - Restoration: 1 to days, contingent on permit requirements for stabilization
- h. The portion of the work pad proposed to be located on RPS-1944 is associated OPGW and 115-kV conductor installations. Equipment needed to support these activities may need to be located on this work pad for portions of up to 4-5 days/nights. UI will work with the property owner to minimize any impacts to business operations. The portion of the work pad adjacent to RPS-1944, within Railroad Avenue, is for infrastructure removal only and is intended to be in use for 1 to 2 nights.
- i. No work pad is proposed for location on the property associated with RPS-1945. The work pad within Railroad Avenue adjacent to this property is for infrastructure removal only and is intended to be in use for 1 to 2 nights.

Interrogatory GLI 12

The United Illuminating Company
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Witnesses: Matt Parkhurst
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Q-GLI 12: According to UIs Application, UI intends to obtain a permanent easement over a portion of the following properties. What are the dimensions of these permanent easements?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 12:

- a. No easement is currently proposed to be obtained on SAS-1574.
- b. 96 Station Street is a tenant within the CTDOT railroad corridor. UI also has a lease agreement with CTDOT to be able to install their overhead 115kV facilities in this same corridor.
- c. 449 square feet (0.01 acre)
- d. 4450 square feet (0.10 acre)
- e. 3013 square feet (0.07 acre)
- f. 3461 square feet (0.08 acre)
- g. 8508 square feet (0.20 acre)
- h. 2473 square feet (0.06 acre)
- i. 1759 square feet (0.04 acre)

Interrogatory GLI 13

The United Illuminating Company
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Witnesses: Annette Potasz
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Q-GLI 13: Describe in detail the nature of the permanent easement UI intends to obtain over the following properties, including but not limited to the purpose of the permanent easement and any and all restrictions that such permanent easement will impose on the following properties.

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 13: See Attachment GLI-1-1.

Permanent easements on the above referenced properties will be for the purposes of operational compliance with clearance requirements, vegetation clearing and maintenance purposes in perpetuity.

UI's easement will include restrictions against excavation, fill, grade changes and construction of permanent structures as well as vegetation that creates a hazard to the electric facilities or access and maintenance thereof.

Interrogatory GLI 14

The United Illuminating Company

Witnesses: Matt Parkhurst/
Annette Potasz

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Q-GLI 14: If UI's proposed structures can reach a height of 150' and the proposed transmission lines are depicted over existing buildings, why does the permanent easement requested by UI prevent the construction of any building within the proposed easements when local municipal zoning regulations contain maximum height standards far below the possible height of the transmission lines? Could a permanent easement permit the construction of buildings within the easement area while restricting certain construction techniques that could interfere with the transmission lines and UI structures, i.e. prohibit the use of cranes?

A-GLI 14: UI does not propose to install any monopoles with heights of 150 feet near existing buildings.

The heights of the proposed monopoles do not govern clearances, which are based on the height and location of the lowest 115-kV conductor. These aboveground distances vary throughout the Project, and from property to property. From a safety and reliability perspective, restricting construction of permanent structures in the utility easements is the only feasible and consistent practice across the limits of the Project and UI's service territory. In addition, the permanent easement allows UI an encumbered right to access their infrastructure. Construction of permanent structures within the easement could impede the ability for UI to access and maintain its assets.

Finally, the Council has exclusive jurisdiction over the construction, maintenance, operation and modification of electric generating facilities in the state. Under Connecticut General Statutes §16-50i(a)(1), the Council has jurisdiction over an "electric transmission line of a design capacity of sixty-nine kilovolts or more." Additionally, Connecticut General Statutes §16-50x(a) states in pertinent part; "Notwithstanding any other provision of the general statutes to the contrary, ... the council shall have exclusive jurisdiction over the location and type of facilities and over the location and type of modifications of facilities subject to the provisions of subsection (d) of this section... Whenever the council certifies a facility pursuant to this chapter, such certification shall satisfy and be in lieu of all certifications, approvals and other requirements of state and municipal agencies".

Interrogatory GLI 15

The United Illuminating Company
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Witnesses: Annette Potasz
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- Q-GLI 15: Under the relevant municipal zoning regulations, does the proposed UI permanent easement reduce the lot area as calculated by said zoning regulations of the following properties? If so, what is the size of the reduction in lot area and what is the remaining lot area of the following properties? Are any of the following properties rendered nonconforming as to lot area under said zoning regulations?
- a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945
- A-GLI 15: The size of the permanent easements are shown in A-GLI-13. None of the properties are rendered nonconforming as to lot area under the zoning regulations.

Interrogatory GLI 16

The United Illuminating Company
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Witness: Annette Potasz
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Q-GLI 16: Is it UI's practice to obtain permanent easements over existing buildings or structures?

A-GLI 16: It is not UI's preference to obtain permanent easements over existing buildings or structures and all efforts are made during the design of a rebuild project to avoid it. However, due to the narrow width of the existing railroad corridor and the urban environment surrounding it, in order to maintain required clearances and protect the facilities in perpetuity, the conclusion may be that there are no other options available.

Interrogatory GLI 17

The United Illuminating Company

Witness: Matt Parkhurst/

Annette Potasz

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Q-GLI 17: Can the proposed Project be constructed without obtaining any permanent easement over the following properties?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 17: a. No easement is currently proposed to be obtained on SAS-1574.

b. No easement is currently proposed to be obtained at 96 Station Street. This location is within the boundary of the CT DOT railroad corridor.

c through f. No. Due to the narrow width of the existing CT DOT railroad corridor, combined with the configuration of Metro North's existing catenary structures and associated facilities, the proposed Project cannot be constructed without obtaining a permanent easement on these properties.

g. No. Due to system outage limitations and Project construction sequencing, proposed pole P737N needs to be offset from the existing 115-kV conductors so that these conductors can remain energized for a time after the new pole is installed. Due to this requirement, combined with the narrow width of the existing CT DOT corridor, the proposed Project cannot be constructed without obtaining a permanent easement on the subject property.

h and i. No. Due to the surrounding built environment, the proposed transmission line must be placed on private property adjacent and south of Railroad Avenue.

Interrogatory GLI 18

The United Illuminating Company

Witness: Matt Parkhurst/

Meena Sazanowicz

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Q-GLI 18: Can the proposed permanent easement over the following properties be reduced in size or scope?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729

A-GLI 18: a. No easement is currently proposed to be obtained on SAS-1574.

b. No easement is currently proposed to be obtained at 96 Station Street. This location is within the boundary of the CT DOT railroad corridor.

c through f. Specific easement width requirements will be refined during final project design and reflected in the Development and Management Plan. Based on the current design, it is estimated that a reduction of one to two feet in easement width may be feasible.

Interrogatory GLI 19

The United Illuminating Company
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Witnesses: Correne Auer
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Q-GLI 19: Is UI aware of the presence of Bald Eagles along Mill River? Has UI analyzed the impact of the Project on Bald Eagles? Has UI analyzed the presence of Bald Eagle nests in proximity to Mill River? Does any part of the Project violate the Bald and Golden Eagle Protection Act or the Migratory Bird Treaty Act?

A-GLI 19: Based on discussions with CT DEEP, UI is aware that Bald Eagles may occur within Connecticut coastal areas characterized by open water and fisheries resource. Such areas could include drainages along the Project corridor, including the Mill River. However, as part of the Project planning process, UI coordinated with CT DEEP's Wildlife Division representatives regarding known Bald Eagle nests in the Project vicinity, as well as conducted a survey for Bald Eagles and raptor nests in general along the Project corridor. The survey, which was designed to identify raptor nests within 660 feet of the Project corridor, did not identify any Bald Eagle nests in the immediate vicinity of the Project corridor, either near the Mill River or elsewhere. However, based on coordination with CT DEEP, UI is aware of a Bald Eagle nest in the Southport Harbor area; this nest is approximately 660 feet south of the Project, in a highly urbanized area. CT DEEP's Wildlife Division representative consulted for the Project indicated that they are not concerned about disturbance to this Bald Eagle from UI's Project.

The Migratory Bird Treaty Act (MBTA) of 1918 provides for the protection of migratory birds. The Bald and Golden Eagle Protection Act (BGEPA) of 1940 was enacted to offer additional legal protection for these eagles. In addition, 1972 amendments to the MBTA included Bald Eagles and other raptors in the definition of a migratory bird. UI plans to construct the Project in accordance with applicable guidance from and requirements of the CT DEEP and USFWS and will be consistent with the MBTA and BGEPA. UI's plans for the protection of raptors and birds in general during construction would be included in the Project's Development and Management Plan, which must be approved by the CSC prior to the start of construction.

Interrogatory GLI 20

The United Illuminating Company
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Witnesses:
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Q-GLI 20: Has UI analyzed the approvals will be needed from municipal inland wetlands and watercourses commissions? Will UI need any approvals from municipal inland wetlands and watercourses commissions for work proposed on the following properties? Does UI have a plan if a violation is caused under municipal inland wetlands and watercourses regulations? If so, please share said plan.

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

A-GLI 20: No. The Council has exclusive jurisdiction over the construction, maintenance, operation and modification of electric generating facilities in the state. Under Connecticut General Statutes §16-50i(a)(1), the Council has jurisdiction over an “electric transmission line of a design capacity of sixty-nine kilovolts or more.” Additionally, Connecticut General Statutes §16-50x(a) states in pertinent part; “Notwithstanding any other provision of the general statutes to the contrary, ... the council shall have exclusive jurisdiction over the location and type of facilities and over the location and type of modifications of facilities subject to the provisions of subsection (d) of this section... Whenever the council certifies a facility pursuant to this chapter, such certification shall satisfy and be in lieu of all certifications, approvals and other requirements of state and municipal agencies”.

Interrogatory GLI 21

The United Illuminating Company

Docket No. 516

Witnesses: Matt Parkhurst/
Matt Scully
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Q-GLI 21: For the property identified as SAS-1596, did UI analyze the impact on the parking area of said property by the proposed work pad? Did UI intend to block access to all on-site parking?

A-GLI 21: This work pad is proposed for a location within an existing paved area. Construction equipment will be staged on the existing paved surface. If equipment is not on site, there will be no obstructions to the entry of the parking lot. UI will work with the property owner to limit the impacts to the property. For example, work can be scheduled during off-hours such as weekends and/or nights.

Interrogatory GLI 22

The United Illuminating Company
Docket No. 516

Witness: David George
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Q-GLI 22: Did UI analyze any historical information regarding properties or historic districts in its design of the Project? What measures did UI take to mitigate the impact to historical resources? Did UI consider burying lines solely in areas designated as historic? If so, why did UI not pursue this alternative?

A-GLI 22: UI retained Heritage Consultants LLC to conduct comprehensive cultural resource analyses of the Project area, including the identification of designated historic resources within and in the vicinity of the CT DOT railroad corridor, along which the existing 115-kV lines would be rebuilt. The results of Heritage's analyses are provided in UI's CSC Application. See Volume 1 (including Appendix D, which contains Heritage's reports) and Volume 2 (which contains maps that illustrate the designated federal, state, and local historic districts in relation to the proposed Project.

UI submitted the Heritage reports to the State Historic Preservation Office (SHPO). The SHPO determined that the Project would have an indirect adverse (visual) effect on historic resources. See SHPO correspondence in the Application, Volume 1, Appendix A. UI continues to coordinate with the SHPO, which is responsible for identifying options for mitigating the indirect visual effects of the Project.

UI evaluated underground cable configuration alternatives for the Project as a whole. See Application, Volume 1, Section 9.2.2. UI did not evaluate options for undergrounding the rebuilt 115-kV lines only in areas designated as historic because: (a) the proposed Project will not directly affect any standing historic structures; (b) the potential indirect visual effects of the Project would not be mitigated by burying the cables only in the designated historic districts through which the Project traverses along the CT DOT corridor.

Attachment GLI-1-1

SUMMARY OF LOCATIONS, CORRELATED TO UI 100-SCALE MAPPING (CSC APPLICATION, VOLUME 2), REFERENCED BY GROUPED INTERVENORS

GLI Property (UI Line List No.)	Address	100 Scale Map #	Location in Relation to CT DOT Corridor; Current Land Use & Zoning	Nearest Proposed Monopole Location(s): Proposed Monopole on Property (Y or N)	Proposed Work Pad on Property (Y or N) (A-GLI-11, partial)	Proposed Access Road on Property (Y or N)	Locations of Proposed 115-kV Conductors (A-GLI-4) ¹	Proposed Permanent Easement on Property (Y or N) (A-GLI-5) ² and Dimensions of Proposed Easement [square feet, acres] (A-GLI-12)	Proposed Minimum Height of Transmission Lines over Property (A-GLI-6) ³	Closest Distance Between Conductors and Highest Point of Existing Buildings on Property (A-GLI-7) ⁵
Fairfield										
SAS-1574 (a)	65 Station Street	3	South of and abutting CT DOT corridor Land Use = 3400 - Office C (Commercial) Zoning = NDBD	P659S (N)	N	N	Conductors will not extend over this property	N [N/A]	N/A; conductors will not extend above this property	84'-2"
96 Station Street, Southport, CT (b)	96 Station Street	3	South; within CT DOT property Land Use = Train Station Zoning = N/A CT DOT property	Between P659S and P661S (P659S (Y), P661S (N))	Y (CT DOT parking area)	Y Existing CT DOT Access	Within CT DOT property conductors will extend over the 96 Station Street property	N [N/A; CT DOT property]	Conductors will extend across CT DOT property per at a distance of 30'-10" to the existing building in the corridor. ⁴	30'-10"
SAS-1595 (c)	250 Pequot Avenue	4	South of and abutting CT DOT corridor; proposed UI permanent easement on southeast corner of property Land Use = 3400 - Office C (Commercial) Zoning = NDBD	P663S (N)	N	Y (from Pequot Avenue)	Conductors will not extend over this property	Y Permanent easement will extend, at maximum width, 13' south from the CT DOT corridor onto this property [449 sf; 0.01 acre]	N/A; conductors will not extend above this property	118'-4"
SAS-1596 (d)	200 Pequot Avenue	4	South; proposed UI permanent easement Land Use = Office C (Commercial) Zoning = NDBD	P664S (Y)	Y	Y (from Pequot Avenue)	Conductors will not extend over this property	Y Permanent easement will extend, at maximum width, 19'6" south from the CT DOT corridor onto this property [4,450 sf; 0.1 acre]	N/A; conductors will not extend above this property	65'-5"
SAS-1598 (e)	156 Pequot Avenue	4	South of and abutting CT DOT corridor; proposed UI permanent easement on property Land Use = 1040 - 2 Family (Residential) Zoning = C	Between P644S and P665S (N)	N	N	Conductors will extend above the northern portion of this property, 14 feet south of the boundary between this property and the CT DOT corridor. MNR wires presently extend above this property.	Y Permanent easement will extend, at maximum width, 39'3" south from the CT DOT corridor onto this property [3013 sf; 0.07 acre]	58'	54'-10"

GLI Property (UI Line List No.)	Address	100 Scale Map #	Location in Relation to CT DOT Corridor; Current Land Use & Zoning	Nearest Proposed Monopole Location(s): Proposed Monopole on Property (Y or N)	Proposed Work Pad on Property (Y or N) (A-GLI-11, partial)	Proposed Access Road on Property (Y or N)	Locations of Proposed 115-kV Conductors (A-GLI-4) ¹	Proposed Permanent Easement on Property (Y or N) (A-GLI-5) ² and Dimensions of Proposed Easement [square feet, acres] (A-GLI-12)	Proposed Minimum Height of Transmission Lines over Property (A-GLI-6) ³	Closest Distance Between Conductors and Highest Point of Existing Buildings on Property (A-GLI-7) ⁵
SAS-1729 (f)	1916 Post Road	7	South of and abutting CT DOT corridor; proposed UI permanent easement on property Land Use = 3220 - Store C (Commercial) Zoning = DCD	Between P679S and P681S (N)	Y (for existing UI infrastructure removal from catenary structure)	Y (via existing access from Post Road)	Conductors will not extend over this property	Y Permanent easement will extend, at maximum width, 17'9" south from the CT DOT corridor onto this property [3461 sf; 0.08 acre]	N/A; conductors will not extend above this property	42'-7"
Bridgeport										
ARN-1829 (g)	1900 Fairfield Ave.	20	North of and abutting CT DOT corridor; proposed UI permanent easement on property Land Use = 221 - Fast Food (Commerical) Zoning = MX2	P737N (Y)	Y	Y (from Commerce Drive)	Conductors will extend above the southern portion of this property, 20 feet north of the boundary between this property and the CT DOT corridor	Y Permanent easement will extend, at maximum width, 44'9" north from the CT DOT corridor onto this property [8505 sf; 0.2 acre]	65'-9"	68'-2"
RPS-1944 (h)	476 Lafayette Street	26	South of and abutting Railroad Avenue; proposed UI permanent easement on property Land Use = 920 - Mun Lnd Com (Vacant Lot/Parking) Zoning = RX2	Between P762A and P762AS (N)	Y	N	Conductors will not extend over this property	Y Permanent easement will extend, at maximum width, 24' south from property line shared with Railroad Avenue [2473 sf; 0.06 acre]	N/A; conductors will not extend above this property	No buildings are located on this property
RPS-1945 (i)	461 Broad Street	26	South of and abutting Railroad Avenue; proposed UI permanent easement on property Land Use = 300 - Industrial Mdl 96 (Industrial/Warehouse) Zoning = RX2	Between P762A and P762AS (N)	N (work to remove UI infrastructure from railroad catenary expected to be from Railroad Avenue)	N	Conductors will not extend over this property	Y Permanent easement will extend, at maximum width, 15'6" south from property line shared with Railroad Avenue [1759 sf; 0.04 acre]	N/A; conductors will not extend above this property	40'

Notes:

1. A-GLI-4: Conductor positions in relation to these properties are pursuant to normal, conductors at rest operating conditions and the proposed Project design.
2. A-GLI-5: The need for a permanent easement, in a majority of cases, is defined by the requirements of NERC FAC-003-4 (North American Electric Reliability Corporation, Facilities Design standard) to allow for adequate vegetation management adjacent to the transmission lines. In some limited instances the easement area is defined by the conductor position under Hurricane Category 3 wind loads + 1' where this criteria governs over the NERC requirement.
3. A-GLI-6: Conductor positions in relation to these properties are pursuant to the wires at maximum sag, at rest and the proposed Project design.
4. The existing 115-kV conductors are approximately 17' to the top of the building.
5. A-GLI-7: Conductor positions in relation to the buildings on these properties are pursuant to the weather/operating case that provides the least clearance (i.e., maximum operating temperature, 6spf or cat. 3 wind loading).

6. Zoning Classifications (refer to the Application, Volume 2, 100 scale maps, aerials and Zoning Description Key): Fairfield: A= Residence A District; C = Residence C District; DCD= Designated Commercial District; NDBD = Neighborhood Designed Business District Bridgeport: MX-2 = Mixed Use Center; RX-2 = Residential Office Center

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Data Source(s): Westwood (2023); ESRI WMS World Imagery Basemap (Accessed 2023).



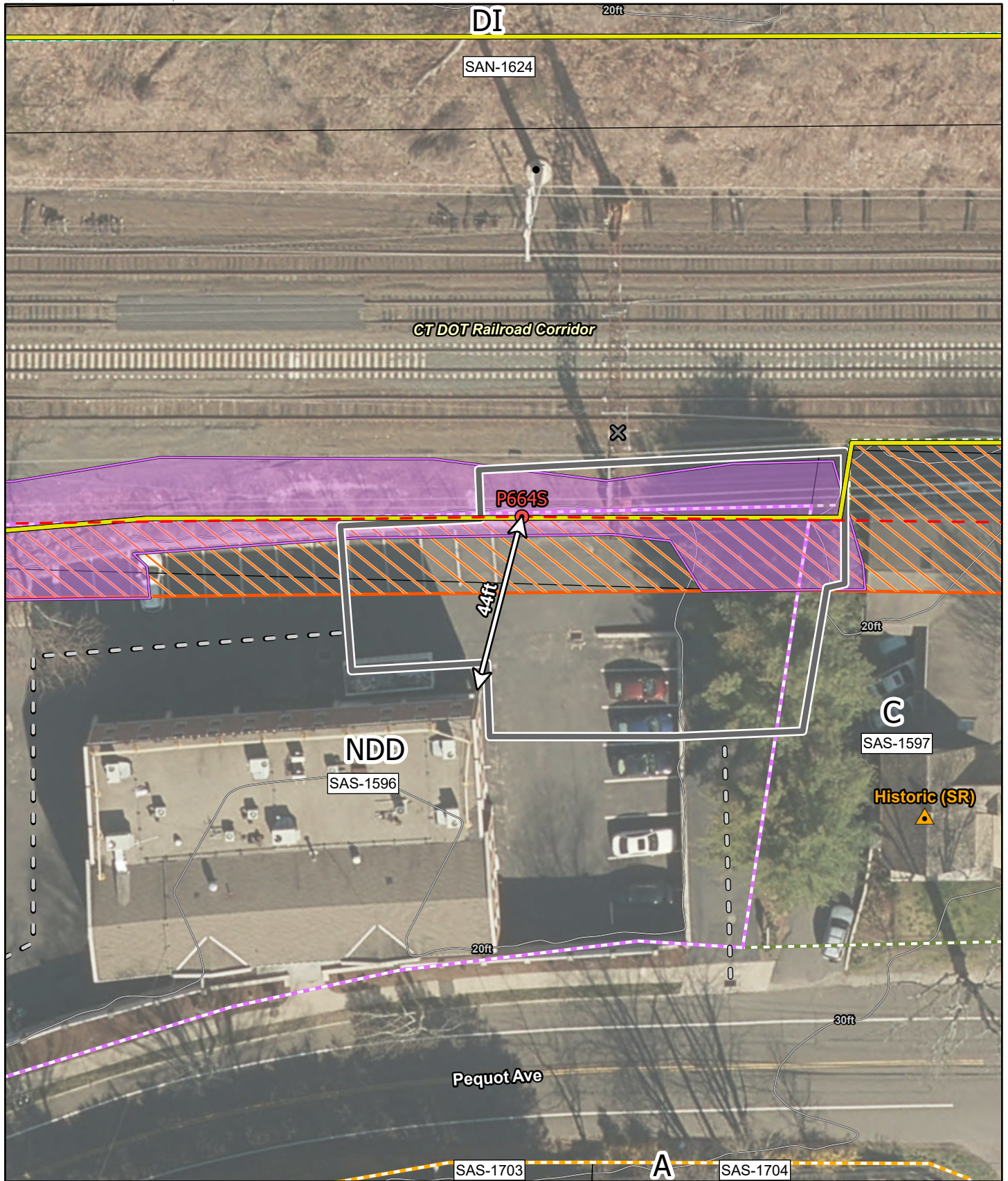
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- Legend**
- Distance Span Line
 - Proposed Single Circuit Transmission Line Structure
 - Existing Transmission Structure to Remain
 - Existing Bonnet To Be Removed
 - Proposed Centerline of Rebuilt 115-kV Line
 - Existing CT DOT Corridor Boundary
 - Proposed Work Pad
 - Tree Clearing
 - Proposed Temporary Access Road Centerline
 - Parcel Boundary
 - FEMA 100-Year Floodplain
 - 10ft Contour
 - CT DEEP Coastal Area

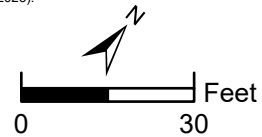
**Fairfield To Congress
UI 115kV Railroad Project**
Fairfield & Bridgeport, Connecticut
Structure to Building Map
P659S - SAS-1574

October 27, 2023

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Data Source(s): Westwood (2023); ESRI WMS World Imagery Basemap (Accessed 2023).



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Legend

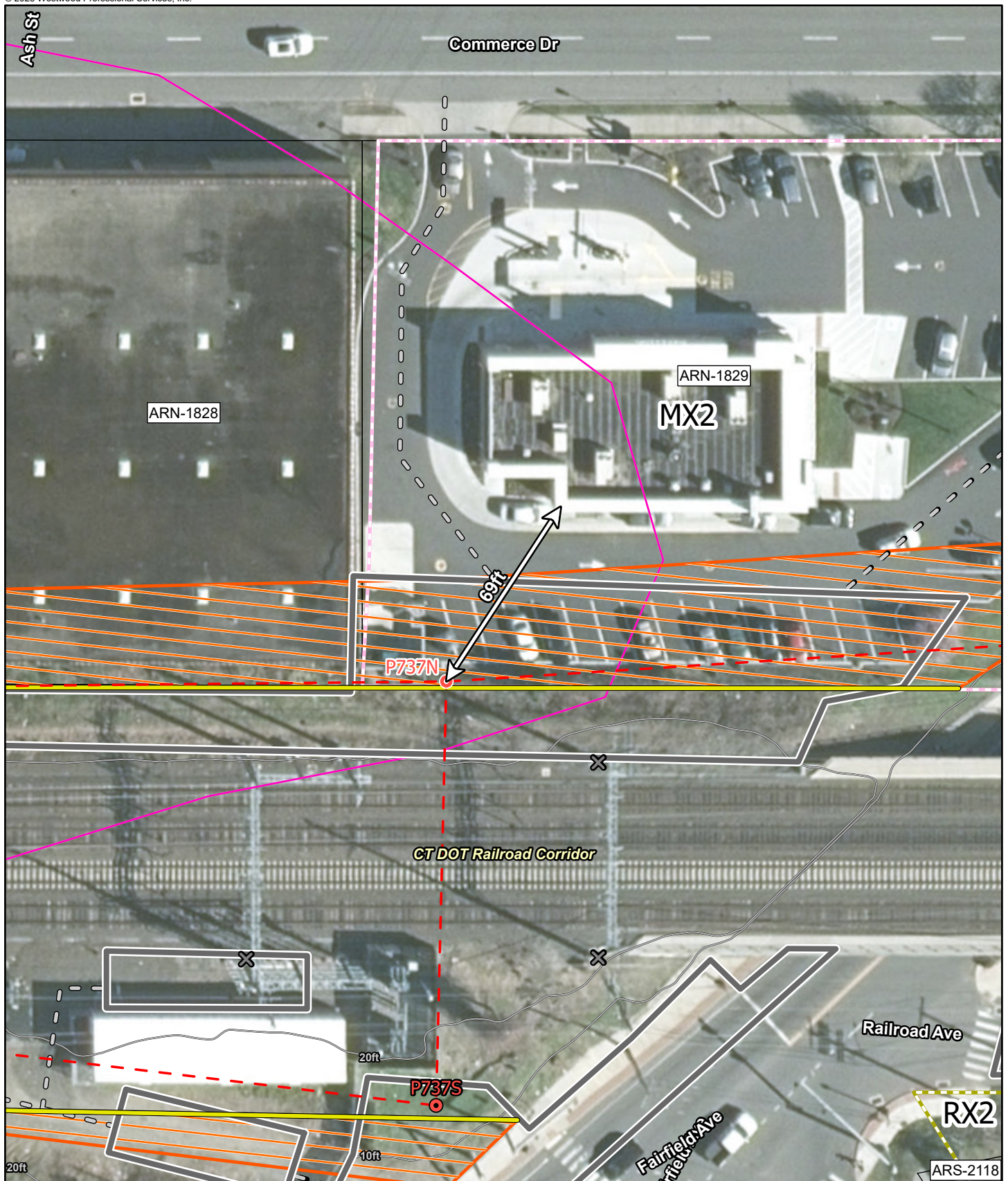
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- Historic (SR) Resource
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- Tree Clearing
- Proposed Temporary Access Road Centerline
- Proposed UI Permanent Easement
- Parcel Boundary
- 10ft Contour

**Fairfield To Congress
UI 115kV Railroad Project**
Fairfield & Bridgeport, Connecticut
Structure to Building Map
P664S - SAS-1596

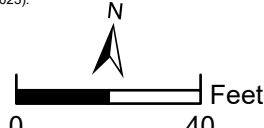
October 27, 2023

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Data Source(s): Westwood (2023); ESRI WMS World Imagery Basemap (Accessed 2023).



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Legend

- Distance Span Line
- Proposed Single Circuit Transmission Line Structure
- Proposed Double Circuit Transmission Line Structure
- Existing Bonnet To Be Removed
- Proposed Centerline of Rebuilt 115-kV Line
- Existing CTDOT Corridor Boundary
- Proposed Work Pad
- Proposed Temporary Access Road Centerline
- Proposed UI Permanent Easement
- Parcel Boundary
- FEMA 100-Year Floodplain
- FEMA 500-Year Floodplain
- 10ft Contour

**Fairfield To Congress
UI 115kV Railroad Project**
Fairfield & Bridgeport, Connecticut
**Structure to Building Map
P737N - ARN-1829**

October 27, 2023