

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 & Requests for Production (Set Two) of Sasco Creek Neighbors Environmental Trust Incorporated, Stephen Ozyck, Karim Mahfouz, William Danylko, David Parker, 2190 Post Road, LLC, Invest II and International Investors 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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Witness: Shawn C Crosbie Page 1 of 1

- Q-SCNET 2-1: Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of The United Illuminating Company (hereinafter "UI" or the "Applicant").
- A-SCNET 2-1: Individuals responsible for the preparation of a response to an interrogatory are identified on each response. Also refer to UI's prehearing submission filed on July 18, 2023 as amended on August 11, 2023.

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Witness: Meena Sazanowicz Page 1 of 1

- Q-SCNET 2-2: Please provide copies of all National Electrical Safety Codes (NESC) which substantiate UI's position that the 115-kV transmission lines must be rebuilt on new monopoles.
- A-SCNET 2-2: The NESC does not dictate when or how assets are to be replaced. It is the minimum design standard that is used in designing electrical supply facilities to safeguard the general public and utility workers.

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Witness: Meena Sazanowicz Page 1 of 1

- Q-SCNET 2-3: Please identify all Eversource transmission lines located within one mile of UI's proposed project.
- A-SCNET 2-3: The Eversource transmission lines located within 1 mile of the proposed Project include the Eversource-owned extensions of the 1130 and 1430 115-kV lines, which are aligned along the north and south portions, respectively, of the CT DOT/MNR corridor west of Sasco Creek (in the Town of Westport). The 1430 Line terminates at Eversource's Sasco Creek Substation in Westport. From Sasco Creek Substation, Eversource's overhead 1578 Line (115 kV) extends west along the south side of the railroad corridor; the eastern portion of this transmission line is within 1 mile of the western terminus of UI's Project. In addition, two underground 345-kV lines, which were installed per the joint UI-Eversource Middletown-Norwalk Project (CSC Docket 272) are located within 1 mile of the Project in the eastern portion of Westport, as well as in Fairfield and Bridgeport.

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- Q-SCNET 2-4: Please describe the steps taken by UI to identify properties and structures located within the proposed right-of-way ("ROW") which are either eligible for state and/or federal-historic designation, locally designated, or which otherwise contribute architecturally, historically or culturally to Southport, the Town of Fairfield and the City of Bridgeport.
- A-SCNET 2-4: UI contracted with Heritage Consultants, LLC to perform a Phase IA cultural resources assessment survey, the purpose of which was to research and provide an inventory of previously identified archaeological sites and above-ground historic resources that are listed on the National and State Registers of Historic Places (NRHP/SRHP), as well as within Local Historic Districts (LHD) and that are situated in the vicinity of the proposed Project area (i.e., along the CT DOT railroad corridor and UI's existing ROW that extends from the CT DOT corridor to Ash Creek Substation). Heritage's Phase 1A reports (initial report dated September 2022 and supplemental report regarding viewshed analyses dated February 2023) are provided in Appendix D of UI's CSC Application.

This inventory was provided to SHPO in a Project Notification Form (PNF). The SHPO reviewed the PNF and the Phase IA report and acknowledged that the submitted materials were sufficient to assess Project effects. SHPO made a determination that the Project would have an adverse effect related to indirect visual impacts to above-ground historic resources in the viewshed of the Project area (refer to SHPO correspondence in Appendix A of the UI Application and Attachment CSC-87-1).

SHPO did not request that UI perform any study of the Project area in order to identify properties that could potentially be considered eligible for, but which are not yet listed on the NRHP/SRHP, or that could potentially be added in the future to a LHD, or that otherwise may contribute architecturally, historically, or culturally to Southport, the Town of Fairfield, and the City of Bridgeport.

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- Q-SCNET 2-5: Please list all properties identified in UI's application which are not listed on the National Register of Historic Places, but are either eligible for state and/or federal designation, are locally designated, or otherwise contribute architecturally, historically or culturally to Southport, the Town of Fairfield or the City of Bridgeport.
- A-SCNET 2-5: As part of the Phase 1A and Supplemental report (Volume 1A, Appendix D) and as summarized in the Application (Sections 5.7 and 6.8), Heritage performed extensive research to identify existing NRHP/SRPH listed districts and properties, along with LHDs. With respect to the listed NRHP/SRHP and LHDs, Heritage's summary identifies the number of buildings within each district that are contributing elements to the listing.

Neither UI nor Heritage Consultants have the authority to make determinations regarding the potential eligibility of properties for listing on the NRHP or SHRP. That authority rests with SHPO. Similarly, neither UI nor Heritage have the authority to identify properties that may be considered for inclusion in LHDs. SHPO has determined that the MNR Corridor and its historic elements are eligible for listing on the National Register as a linear district. In a letter dating July 24, 2023, however, the SHPO, stated "The current proposal avoids a direct impact to a historic resource." See Attachment CSC-87-1.

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- Q-SCNET 2-6: If the answer to interrogatory 5 is "none," please explain why such resources were omitted in the original application.
- A-SCNET 2-6: Please refer to the Company's responses to SCNET 2-4 and SCNET 2-5.

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- Q-SCNET 2-7: For any property or structure identified in response to Interrogatory No. 5, please respond to the following:
 - a. Please qualify with specificity the potential impact of UI's proposed project on said property or structure and identify the nearest proposed monopole.
 - b. Please quantity the exact size, with dimensions, of any temporary or permanent easement on each identified parcel.
 - c. Please identify any alternative configurations or designs, including entirely underground or entirely on rebuilt catenary structures or a combination of both, that would minimize the impact of UI's proposed project on said property or structure.
 - d. Please provide a cost comparison for any alternative configuration or design identified in response to Interrogatory 7(c). In providing a comparison in any cost increases, use consistent general assumptions.
- A-SCNET 2-7: Please refer to the Company's responses to SCNET 2-4 and SCNET 2-5.

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- Q-SCNET 2-8: In its Supplemental Viewshed Analysis (Supplement to the Phase 1A Cultural Resources Assessment Survey), UI concludes that "Project components may be visible from the historic districts (and their contributing elements) and individually-listed properties. Since all of these districts and individually-listed properties, as well as many of their contributing elements are listed on the [National Register of Historic Places] or [State Register of Historic Places] or both or are part of a [Local Historic District] or [National Historic District], it is recommended that UI work in consultation with the SHPO, as well as any other appropriate stakeholders, to either further evaluate or offset visual impacts." Please respond to the following:
 - a. Please identify with specificity the "other appropriate stakeholders" referenced in said Supplemental Viewshed Analysis. Please indicate whether it is anticipated that other appropriate stakeholders may include, the Town of Fairfield, its Historic District Commission, individual property owners in Southport and/or the Sasco Creek Neighbors Environmental Trust Incorporated.
 - b. Please state whether UI has held any meetings with an "appropriate stakeholder" regarding mitigation of adverse visual impacts to historic resources. Please identify all parties who participated in the meeting and the date, place and time of that meeting.
 - c. Please identify with specificity any design or configuration alternatives, or other forms of mitigation, submitted, proposed or discussed, or expected to be submitted, proposed or discussed, by UI which would "offset [the] visual impacts" to the historic districts (and their contributing elements) and individually-listed properties identified in the above-referenced Supplemental Viewshed Analysis.
 - d. Please provide a narrative as to whether the reuse of the existing catenary structures has been considered, and if so, why their reuse did not meet the needs of the project. This response should also consider reuse of a limited number of catenary structures located within the viewshed of the enumerated historic resources.

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- f. Please provide a narrative as to whether undergrounding the 115kV transmission lines has been considered, and if so, why undergrounding did not meet the needs of the project. This response should also consider undergrounding limited to the areas within the viewshed of the enumerated historic resources.
- g. Please provide a narrative as to whether installation of additional structures of lower height was considered, rather than the submitted design of fewer, taller monopoles.
- h. Please provide a detailed, line-item cost comparison for any alternative design or configuration identified in response to Interrogatories 8(c) though 8(g). In providing a comparison in any cost increases, use consistent general assumptions.

A-SCNET 2-8:

- a. Other stakeholders may include the City of Bridgeport, Town of Fairfield, its Historic District Commission, individual property owners in Southport and/or the Sasco Creek Neighbors Environmental Trust, as determined by SHPO.
- b. UI has not held meetings with stakeholders regarding potential mitigation for indirect visual impacts on designated historic resources. As the SHPO has not indicated to UI what mitigative efforts may be suitable for the Project, because the Project design has not been finalized and this CSC proceeding is ongoing, specific impacts are not yet known. When it is appropriate to conduct discussions concerning mitigation for the Project's indirect visual effects on historic resources, UI will follow SHPO guidance regarding the inclusion of other stakeholders.
- c. Please see response to "b".

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- d. Yes. A s an alternative to the proposed Project, UI evaluated the reuse and potential reinforcement of the existing railroad catenary structures in order to maintain the UI infrastructure atop the railroad catenary support columns. The catenary structures themselves are not owned by UI and the continued use of these structures for UI's rebuilt transmission line infrastructure would require consent from CT DOT. However, CT DOT prefers that the UI and railroad facilities be separated. Please see the CT DOT's August 15, 2023 letter. In addition, UI evaluated the potential for rebuilding the 115-kV lines on the catenary structures as part of its 2018 Solution Study phase of the project (that study estimated that the reuse of the existing catenary structures would cost be approximately 200% more than the preferred solution. See Application, Section 9.3 and Exhibit CSC-12-1, which is part of the Company's response to Siting Council Interrogatory CSC-12 in Docket 508.
- e. Yes, UI evaluated an all-underground alternative as well as a partial underground design between proposed monopole P648S and Ash Creek outside of the railroad corridor. See discussion of this alternative in Section 9 of the Application. Construction of an underground section in the middle of two overhead sections will require an additional overhead to underground transition station at one side of the underground section which consists of a 0.3 acre of fenced in area with control enclosure, riser poles and stoned in yard.
- f. Due to the required clearances that UI must maintain between the 115-kV conductors and the existing railroad infrastructure, it is not expected that any new monopole could be less than 100 feet in height along the railroad corridor. UI's proposed Project design takes into consideration a variety of factors, including the width of the CT DOT corridor, conductor clearance requirements, and the avoidance or minimization of impacts to environmental resources and land uses.

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As described in the Application, Volume 1, Section 2.3.3, UI did initially "spot" the proposed rebuilt lines commencing with the assumption that a new monopole could be located adjacent to each catenary structure. As work on the Project design proceeded, proposed poles were shifted or eliminated to account for sitespecific constraints (e.g., longer than originally planned span lengths to avoid or minimize work in wetlands/watercourses). As a result, 33 of the originally planned monopoles were eliminated (the numbers of the structures that were eliminated from the Project design are: 653, 658, 660, 662, 670, 672, 674, 680, 683, 687, 694, 697, 702, 707, 715, and 722 – all in Fairfield; and 729, 731, 733, 736S, 741, 747, 757S, 759S, 761, 763, 764, 776, 777, 778, 780, 781, and 782).

Shorter monopole heights would be possible if a new monopole were to be aligned adjacent to, but offset from, every railroad catenary structure. However, as described in the Application (Section 2.3.3), under this approach, new monopoles theoretically would be placed at intervals of approximately 300 feet along the railroad corridor. As a result, there would be an increase in environmental impacts (to wetlands, watercourses, and floodplains), and an increase in the temporary workspace that would be required, including on private property. In actuality, due to topographic or development constraints along or near the railroad corridor, placement of the new monopoles offset from every catenary structure would not be feasible. However, in response to the concerns of residents and business owners, as identified during this CSC hearing process, UI is currently evaluating locations where structure heights could potentially be reduced of up to 5 to 10 feet without adding additional structures.

g. UI respectfully objects to this item because it seeks confidential and proprietary information.

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- Q-SCNET 2-9: Please identify all properties or structures which are designated or eligible for designation on the National Register of Historic Places or the State Register of Historic Places or are locally designated which will be directly impacted by UI's proposed project. Please also define "direct impact" as the term is generally understood and used by UI and Heritage Consultants.
- A-SCNET 2-9: Of the designated NRHP/SRHP or LHDs in the Project vicinity, only portions of the Southport Historic District (NRHP/SRHP/LHD) and the Railroad Avenue Historic District (NRHP) intersect the CT DOT railroad corridor. See CSC Application, Volume 2, 400 scale map sheets 1, 2, 5, and 6. In these areas, direct impacts* will relate to the excavation for and installation of the transmission line monopoles. However, in the proposed monopole locations within these districts, there are not above-ground structures or elements that contribute to the NRHP, SRHP or LHD eligibility of these districts.

*A direct impact is one that will occur within the footprint of a known archaeological site or will cause direct harm to an above-ground resource. Direct impacts, if any, to archaeological sites that may result from the Project will not be identified until the construction of the Project commences. To assess the potential for such impacts, UI will retain an archaeological expert from Heritage to be present on-site to perform construction monitoring. The SHPO has endorsed this approach as stated in their January 17, 2023 letter to UI included in Appendix A of the Application. In addition, as part of the D&M Plan for the Project, UI will prepare a plan for implementation in the event that archaeological resources are unexpectedly encountered during construction. This Unanticipated Discoveries Plan will describe the procedures for dealing with unexpected archaeological finds and will be provided to Project field personnel.

The Project will not cause any direct impacts to above-ground historic resources. The SHPO has determined that effects to above-ground historic resources will pertain to indirect visual impacts. UI expects to coordinate with the SHPO to identify and implement appropriate mitigation for these impacts.

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- Q-SCNET 2-10: If the answer to interrogatory 9 is "none," please explain UI's reasoning and identify the procedures adopted to ensure that no such properties or structures were directly impacted.
- A-SCNET 2-10: Please refer to the Company's response to SNET 2-9.

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- Q-SCNET 2-11: Please identify all properties either designated on the National Register of Historic Places, the State Register of Historic Places or eligible for such designation(s), which may be subject to UI's potential exercise of eminent domain. Please quantify and qualify, with specificity, the direct impact to each property identified in response to this interrogatory.
- A-SCNET 2-11: No properties on the Project are anticipated to be subject to eminent domain. UI has designed the project with a goal of minimizing property impacts by staying on or as close to the CT DOT Corridor as possible.

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Witnesses: Shawn C Crosbie/ Annette Potasz Page 1 of 1

- Q-SCNET 2-12: If the answer to Interrogatory 11 is "none," please explain UI's reasoning and identify the procedures adopted to ensure that no such properties will be subject to eminent domain.
- A-SCNET 2-12: UI will begin good-faith negotiations with impacted property owners shortly after receipt of the CSC's approval of the Project. During that process, UI will review the details of each property with the owner to determine how the construction and permanent easements impact them. Fair compensation will be paid to each property owner based on these negotiations. UI's expectation and goal is to avoid the use of an eminent domain proceeding.

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- Q-SCNET 2-13: Please provide the date, time and location of all meetings held between UI and the Fairfield Historic District Commission to discuss the impact of UI's proposed project on Fairfield's historic resources.
- A-SCNET 13: UI has not met with the Fairfield Historic District Commission to discuss the impact of the Project on Fairfield's historic resources. UI continues to consult with the SHPO regarding overall mitigation for the Project. If directed to by SHPO, coordination with the Fairfield Historic District Commission would be scheduled after initial mitigation options have been identified by the SHPO. Based on prior experience, UI expects that discussion with the SHPO would continue throughout the CSC process (e.g., preparation of Development and Management Plan(s)) and that final mitigation measures would not be defined until the end of the CSC process.

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- Q-SCNET 2-14: Please provide the date, time and location of all meetings held between Heritage Consultants and the Fairfield Historic District Commission to discuss the impact of UI's proposed project on Fairfield's historic resources.
- A-SCNET 2-14: Heritage Consultants did not hold any meetings on behalf UI with the Fairfield Historic District Commission to discuss the impact of UI's proposed project on Fairfield's historic resources.

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Witnesses: Correne Auer/ Leslie Downey Page 1 of 1

- Q-SCNET 2-15: Please provide the date, time and location of all meetings held between UI and the Bridgeport Historic District Commission to discuss the impact of UI's proposed project on Bridgeport's historic resources.
- A-SCNET 2-15: UI has not met with the Bridgeport Historic District Commission to discuss the impact of the Project on the city's historic resources. UI continues to consult with the SHPO regarding overall mitigation for the Project. If directed to by SHPO, coordination with the Bridgeport Historic District Commission would be scheduled after initial mitigation options have been identified by the SHPO. Based on prior experience, UI expects that discussion with the SHPO would continue throughout the CSC process (e.g., preparation of Development and Management Plan(s)) and that final mitigation measures would not be defined until the end of the CSC process.

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- Q-SCNET 2-16: Please provide the date, time and location of all meetings held between Heritage Consultants and the Bridgeport Historic District Commission to discuss the impact of UI's proposed project on Bridgeport's historic resources.
- A-SCNET 2-16: Heritage Consultants did not hold any meetings on behalf of UI with the Bridgeport Historic District Commission to discuss the impact of UI's proposed project on Bridgeport's historic resources.

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- Q-SCNET 2-17: Please explain UI's and Heritage Consultants' methodologies for identifying and protecting areas of archeological concern, including, but not limited to, identifying and locating Native American artifacts on previously disturbed properties and/or within wetland soils, which now or formerly were part of the Pequot (Munnacommock) Swamp.
- A-SCNET 2-17: As also described in A-SCNET-9, Heritage Consultants will monitor excavations related to monopole construction in archaeologically sensitive areas and will be prepared to address finds related to either historical or Native American occupations.

According to current Project plans, the Pequot (Munnacommock) Swamp will not be impacted by construction, because it is located outside of the Project corridor and any proposed off-corridor Project access roads.

As an overall protection measure for minimizing or avoiding soil disturbance, UI plans to use timber (or equivalent) temporary matting for work pads and access roads in all areas of archaeological concern (with the exception of monopole locations). The use of such matting would avoid ground disturbance and impacts to any archaeological resources that may exist outside of the monopole foundation footprints.

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- Q-SCNET 2-18: Please explain why it is not possible to complete hand excavations in the vicinity of the former Pequot (Munnacommock) Swamp. Will a professional archeologist be on site for any planned excavation activities in areas between proposed structures P648S and P665S?
- A-SCNET 2-18: According to Project plans, the Pequot (Munnacommock) Swamp will not be impacted by construction and thus no archaeological testing of this area is planned. See A-SCNET-17.

If requested by SHPO, UI can make archaeologists available to monitor construction at proposed monopole P648S and P665S and associated access road locations.

If an unexpected archaeological find is made during construction in this area, UI will implement the procedures of a Unanticipated Discoveries Plan that will describe the procedures for dealing with unexpected archaeological finds and will be provided to Project field personnel.

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- Q-SCNET 2-19: Will a Phase 1B professional cultural resources assessment and reconnaissance survey be conducted for areas impacted by the installation of proposed structures P655S, P654S, P652S and/or P651S? Will a professional archeologist be on site for any planned excavation in these areas? If UI and/or Heritage Consultants conclude that these areas do not have the potential to contain intact deposits, please explain why.
- A-SCNET 2-19: No, a Phase 1B was not requested by SHPO. However, during construction, UI will prepare an Unanticipated Discoveries Plan that will specify procedures to be followed in the case of an unexpected archaeological find.

UI and Heritage concluded that these areas contain fill and have been disturbed by heavy equipment in the past, rendering them as areas of little, if any, archaeological potential.

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- Q-SCNET 2-20: Referencing the letter from SHPO dated October 31, 2022, which identifies the railway corridor itself as a historic resource eligible for listing on the National Register of Historic Places, identify with particularity all 19th and 20th century structures, electrical wires, and/or equipment that will be removed as a result of UI's proposed project.
- A-SCNET 2-20: UI plans to remove wires, bonnets on top of the existing catenaries, and a 1940s era lattice tower above the Bridgeport Bus Terminal. In a letter dated July 24, 2023, the SHPO indicated that the replacement UI infrastructure off the MNR corridor would not constitute a direct adverse effect to a historic resource. See Attachment CSC-87-1.

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Witnesses: David George/ Brian Gaudet Page 1 of 1

- Q-SCNET 2-21: Referencing Table 1 of Heritage Consultants' Cultural Resources Report, please explain the basis for Heritage Consultants' finding that UI's proposed project will have no visual impact on the Pequot Library.
- A-SCNET 2-21: The initial finding of no visual impact to the Pequot Library, as described in Table 1 (page 17) of Heritage's September 2022 Phase 1A report (refer to the Application, Volume 1, Appendix D) was based on a computerized model of the potential viewshed the Project corridor and perceived effects on various above-ground historical buildings identified during the Phase IA survey. Subsequently, All-Points Technology Corporation completed photo-simulations of this area (February 2023), as requested by the SHPO. Based on the results of the photo-simulations (see Application, Volume 1, Appendix C), an indirect visual impact to the Pequot Library was evident. However, the entry in Table 1 regarding the Pequot Library inadvertently was not updated from "none" to "yes".

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- Q-SCNET 2-22: Please provide a copy of 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.
- A-SCNET 2-22: See Attachment SCNET 1-27-1.

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- Q-SCNET 2-23: Please provide photo simulations of the Project as proposed from the following locations:
 - a. All historic resources (including contributing resources to identified historic districts) located within 0.5 miles of any new proposed monopole.
 - b. The Pequot Library from Westway Road (proximate to the vehicular entrance to the Pequot Library).
 - c. The Southport Congregational Church from Pequot Avenue and, to the extent, possible from the rear of the property adjacent to the Church's playground and outdoor daycare space.
 - d. Sasco Hill looking towards the Village of Southport.

A-SCNET 2-23:

a. During UI's consultation with the SHPO, the agency requested photo-simulations from numerous locations within the 0.5 mile viewshed of the proposed Project. The UI Application Volume 2 maps identify the locations of these historic resources, which are also summarized in the Application Volume 1 (Sections 5.7 and 6.8) and in Heritage's February Supplemental Report (Volume 1, Appendix D).

Due to the number of designated historic resources within this viewshed, the SHPO determined that the selected locations would adequately represent the areas in question. The resultant photosimulation package and 0.5-mile historic resource viewshed mapping that were submitted to the SHPO are provided under the Applicant's Exhibit 6.

- b. See Attachment SCNET 2-23-1 for the photo-simulation from Westway Road proximate to the vehicular entrance to the Pequot Library.
- c. See Attachment SCNET 2-23-1 for the photo-simulations from Pequot Avenue at the Southport Congregational Church and adjacent to the Church's playground/outdoor daycare space.

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d. See Attachment SCNET 2-23-1 for the photo-simulation taken from Sasco Hill Road looking towards the Village of Southport.

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- Q-SCNET 2-24: State whether any mitigation strategies that would reduce or eliminate visual impacts to historic resources have been discussed with or presented to the State Historic Preservation Office (SHPO). If so, please explain.
- A-SCNET 2-24: UI has been coordinating with the SHPO regarding the proposed Project since 2022. Since the Project is under review pursuant to the CSC process and Project plans have yet to be finalized, no specific options for mitigating indirect visual impacts to historic resources have been identified by the SHPO.

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- Q-SCNET 2-25: State whether any mitigation strategies directly tied to impacted National Register of Historic Places or State Register of Historic Places resources within the Town of Fairfield were discussed with or presented to SHPO. If so, please explain.
- A-SCNET 2-25: Please see the Company's response to SCNET 2-24.

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- Q-SCNET 2-26: Please explain whether any alternative design or configuration considered by UI, including but not limited to, locating UI's transmission lines and electrical equipment on existing or rebuilt catenary structures and undergrounding UI's transmission lines and electrical equipment, will:
 - a. Reduce the project's impact to wetlands and watercourses. Explain.
 - b. Reduce the need for new easements. Explain.
 - c. Reduce tree clearing. Explain.
 - d. Reduce or eliminate visual impacts to historic resources.
- A-SCNET 2-26: CT DOT will not allow UI infrastructure to be rebuilt on the existing catenaries or an underground alignment within the CT DOT corridor. CT DOT's position was reflected in UI's CSC application (see Volume 1, Section 9) and is also presented in correspondence that the CT DOT provided to the CSC as part of this proceeding (see CT DOT correspondence as part of Docket 516, dated August 15 and September 27, 2023).

After eliminating the potential for rebuilding the 115-kV lines atop the catenary structures and for rebuilding the lines in an underground configuration within the CT DOT corridor, as part of the CSC Application (Volume 1, Section 9.2), UI considered an underground solid dielectric cable alignment, principally within road rights-of-way. For the alignment of the cables underground within municipal or state roads (Figure 9-1 in CSC Application, Volume 1), please note the following:

a. Impacts to wetlands or watercourses at Ash Creek and Sasco Creek would be significantly larger due to having to align with the existing substation and Eversource at structure P647S. UI would also still have impacts to wetlands and watercourses based on the removals of the lattice towers and existing facilities on the CT DOT catenary structures.

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- b. Easements would still be required with an underground alignment in the streets. The amount of proposed permanent and temporary easements in the streets for the underground configuration would be determined once subsurface surveys were completed to determine where the splice chambers and duct banks could be located in the already congested roadways.
- c. At a minimum, additional tree clearing between P648S and Westway Road, on private property, would be required to install the duct bank and no permanent vegetation or structures would be allowed over the underground transmission line. Depending on the finalized location of the splice chambers and underground line location (i.e., any locations on private property that are needed) additional permanent clearing would be required.
- d. Yes, visual impacts of an all-underground design would be reduced compared to the proposed all overhead design. However, a riser pole of the same height and location as P648S would still be needed to connect the overhead section that continues to Eversource's Sasco Creek Substation to the underground Project.

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- Q-SCNET 2-27: Describe the process for obtaining DOT approval for undergrounding new transmission lines within DOT's railway ROW and for locating new lines on existing or rebuilt catenary structures and identify any individuals or divisions within DOT responsible for reviewing or approving such request.
- A-SCNET 2-27: UI and CT DOT meets on a monthly and sometimes more frequent basis to discuss projects along the CT DOT corridor. During these meetings, UI reviews its design milestones to obtain comments, recommendations, or direction from CT DOT on the Project. As part of this CSC proceeding, CT DOT provided correspondence stating that neither the rebuilding of UI's lines on the existing catenaries nor an underground alignment within the CT DOT corridor would be permitted. Please also see the formal letters from CT DOT that were submitted as part of this docket as well as Docket 508 describing what CT DOT would support in terms of rebuilding of UI's transmission facilities within the rail corridor. See also A-SCNET 2-26.

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Witnesses: Matt Parkhurst/ Brian Gaudet Page 1 of 3

- Q-SCNET 2-28: In connection with the proposed work pad related to proposed Tower P655S:
 - a. 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 (e.g. the Pequot Library) as a result of the activities in and around the work pad area.
 - b. When designing this work pad, including its location and size, did UI evaluate whether the location and size of the work pad would impede the public's access to and use and enjoyment of the Pequot Library or the ability of emergency services to access the Pequot Library.
 - c. Please describe in detail the impact of P655S, and all activities that will take place in the work pad area, on the inland wetland or watercourse identified on Sheet 1 of 7 of UI's Project Mapping as WC 2.
 - d. Has UI conducted a vibration analysis or study to determine the impact of the construction associated with Tower P655S and its associated work pad on the Pequot Library's one hundred and twenty-five (125) year old Tiffany stained-glass windows (circa 1898).
- A-SCNET 2-28: Proposed monopole P655S, adjacent to the CT DOT corridor north of the Pequot Library, is illustrated on the Application Volume 2 maps (400 scale, Sheet 1 of 7; 100 scale, Sheet 2 of 29).
 - a. As illustrated on the aerial maps in the Application, the proposed work pad would extend south from the CT DOT property and would be located on the northern portion of the library property. Trees would have to be removed for the Project in this area.

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Witnesses: Matt Parkhurst/ Brian Gaudet Page 2 of 3

In general, the work pad would be occupied by construction equipment during the installation of the monopole foundation, steel pole, insulators, hardware for the rebuilt transmission line, as well as for the removal of the existing UI infrastructure from the CT DOT catenary structures. The work pad is sized to accommodate construction equipment vehicular turning radii and movement. At any one time, equipment will not take up the entire work pad. Additional information regarding the dimensions of the work pad, as well as construction work hours in this area, would be included in the Project's D&M Plan.

UI will coordinate with the Pequot Library in order to avoid or limit the potential impacts to library operations. Where the existing surface area is not pavement or gravel, the contractor will utilize timber or composite matting laid upon the existing ground surface to limit earth disturbance and support the construction equipment. In pavement and gravel areas, the contractor will stage their equipment on the existing paved surfaces. Matting and cribbing will be used to support any equipment outriggers.

Anticipated work activities and durations include:

- Site Prep: 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: 2 to 3 nights

An additional 6 days or nights for access to the work pad positioned adjacent to proposed structure P656S is also expected.

UI does not anticipate any restrictions in the areas adjacent to the work pads.

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Witnesses: Matt Parkhurst/ Brian Gaudet Page 3 of 3

- b. Yes. The size and location of the work pad will still allow for through traffic associated with library patrons and workers to access the parking area on the east side of the building. Access for emergency services will also be left unimpeded.
- c. No inland wetlands are located near P655S. One watercourse (identified as WC-2) on the Project mapping, is located immediately west of, but will not be affected by, the work pad for P665S.
- d. No. However, during construction, vibration monitoring can be performed by qualified personnel to ensure that there are no impacts to the Pequot Library's windows. This is a typical procedure performed in other sensitive areas where excessive vibration from construction activities is of a concern.

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Witnesses: Leslie Downey Page 1 of 1

- Q-SCNET 29: Referencing UI's Outreach Log, please provide the name and title of the UI representative who contacted the Pequot Library on January 26, 2023. Please provide the approximate time of the call, the telephone number used to contact the Pequot Library, and the name of the Pequot Library representative to whom the UI representative spoke.
- A-SCNET 29: On January 26, 2023, UI held a Teams webinar call at 11:00 AM to present an overview of the Project, as well as to review the proposed Project design relative to the Pequot Library. Attendees on the call were:
 - Pequot Library: Nelson North, President of the Board of Trustees; and
 - UI: Hallie Rimkunas, Project Manager; Annette Potasz, Energy Land Management (ELM); Jason Vincent, ELM; and Leslie Downey, Project Outreach.

The January 26, 2023 meeting was a result of UI's previous contact with Mr. North. Specifically, Mr. North attended the Public Informational Meeting that UI held regarding the Project at the Fairfield Library on January 11, 2023. Because Mr. Nelson had additional questions regarding the Project, a further Project briefing was suggested. Leslie Downey contacted Mr. North on Friday, January 20 via email to set up the January 26 meeting.

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Witnesses: Matt Parkhurst Page 1 of 1

Q-SCNET 2-30: Can the proposed Project be constructed without obtaining any permanent easement over private property located in Southport?

A-SCNET 2-30: No.

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- Q-SCNET 2-31: Can the proposed permanent easement in Southport be reduced in size or scope?
- A-SCNET 2-31: In most locations in Southport, the new permanent easement widths, as proposed in the Application, cannot be reduced due to constructability of the proposed drilled pier monopole foundations, the existing configuration of the Metro North owned communication and signal cables, the width of the CT DOT corridor, and site topography. However, in the final Project design, for properties between SAS-1595 and SAS-1702 (between the crossings of Old Post Road and the Post Road; refer to the Volume 2 100 scale mapping, Map Sheet 4), easements could be decreased by up to 1-2 feet in width. For properties SAS-1715 and SAS-1716 (west of the Mill River crossing, Volume 2, 100 scale Map Sheet 5), the proposed permanent easement width could be decreased if an additional structure is added adjacent to existing Catenary Structure B670.

The United Illumina Docket No. 516	ating Company	Witnesses: Shawn Crosbie/ Meena Sazanowicz Page 1 of 1			
Q-SCNET 2-32:	analysis of an alternative to the	available to UI, provide a good faith proposed option that balances costs tervenors' preference to minimize and natural resources.			

A-SCNET 2-32: Please see Section 9, Volume 1 of the Application, which describes the alternatives that were considered as part of the Project planning process.

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Witnesses: Shawn Crosbie Page 1 of 1

- Q-SCNET 2-33: Please confirm whether it is UI's position that keeping its electrical equipment located on structures owned by another entity does not meet the core project objectives of enhancing the reliability of UI's system.
- A-SCNET 2-33: Yes, keeping the existing UI circuits, hardware, and bonnets on CT DOT catenaries or structures owned by another entity does not meet the Project objective of enhancing the reliability on UI's transmission system and the regional transmission grid.

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Witnesses: Shawn Crosbie/ Meena Sazanowicz Page 1 of 1

- Q-SCNET 2-34: If Interrogatory 32 is answered in the affirmative, please explain and quantify the alleged diminution in reliability of the lines rebuilt on catenary structures vs. new monopoles.
- A-SCNET 2-34: Based on the asset condition assessment that UI and its engineering firm performed in 2018 (see A-SCNET 2-8(d)), the UI infrastructure on the CT DOT/MNR catenaries cannot be maintained as existing today as there are structural concerns along with UI facilities not meeting today's design criteria. Reinforcing these assets on the catenaries would incur a significant cost increase to the overall project somewhere in a +200% range along to modifications to facilities not owned by UI. Modifications to CT DOT catenaries for UI's project would also not be supported by CT DOT per their letter submitted as part of this proceeding as well as Docket 508.TNew monopoles will be inherently more resilient in that they will be constructed to the latest safety and UI design criteria (i.e., 1.5" radial ice, hurricane category 3 wind loading) which the existing UI facilities on top of the catenaries are not designed to withstand.

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Docket No. 516

Witnesses: Meena Sazanowicz Shawn Crosbie Page 1 of 1

- Q-SCNET 2-35: With reference to Connecticut Siting Council Docket 272, please provide the actual first cost (i.e. cost to design, permit and build) of constructing an underground 345-kV circuit from the Singer Substation to the Norwalk Substation. Please also provide the actual annualized operations and maintenance costs (O&M) associated with the aforementioned underground 345-kV circuit.
- A-SCNET 2-35: Please see the Connecticut Siting Council Life Cycle report which addresses these costs. The report is available at https://portal.ct.gov/CSC/Common-Elements/Common-Elements/Publications

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Witnesses: Meena Sazanowicz Page 1 of 1

- Q-SCNET 2-36: With reference to Connecticut Siting Council Docket 272, please compare the actual annualized O&M costs associated with the underground 345-kV circuit from the Singer Substation to the Norwalk Substation to the actual annualized O&M costs of new overhead transmission lines.
- A-SCNET 2-36: See SCNET 2-35.

The United Illuminating Company Docket No. 516

- Q-SCNET 2-37: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of property owned by the Pequot Library Association at 720 Pequot Avenue in Southport, Connecticut ("Pequot Library Property"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to the library building at the Pequot Library Property.
- A-SCNET 2-37: UI's proposed monopole labeled as P655S is 92 feet away from the library building at the Pequot Library property. See Attachment SCNET 2-37-1.

The United Illuminating Company Docket No. 516

Witnesses: Matt Parkhurst Page 1 of 1

- Q-SCNET 2-38: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of properties owned by the Trinity Episcopal Church at 651 Pequot Avenue, 678 Pequot Avenue and 288 Center Street in Southport, Connecticut ("Trinity Church Properties"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to any building(s) on the Trinity Church Properties.
- A-SCNET 2-38: There are no proposed monopoles within 25 feet of the property owned by the Trinity Episcopal Church located at 651 Pequot Avenue. Based on the current design, UI's proposed P657S is located within the 288 Center Street property. The center of proposed P657S is located 61'11" from the property's southwestern property line (Center St) and is 8'2" from the CTDOT corridor property line to the northwest. There are no buildings located on the property owned by the Trinity Episcopal Church located at 288 Center Street.

Ul's proposed monopole labeled as P656S is 151 feet away from the nearest building located on the property at 678 Pequot Avenue.

See attachment SCNET 2-38-1 for 678 Pequot Avenue mapping and SCNET 2-38-2 for 288 Center Street mapping.

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- Q-SCNET 2-39: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of property owned by the Southport Congregational Church at 524 Pequot Avenue in Southport, Connecticut ("Southport Church Property"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to any building(s) at the Southport Church Property.
- A-SCNET 2-39: There are no proposed monopoles within 25 feet of the Southport Church Property.

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- Q-SCNET 2-40: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of property owned by the 2190 Road Post Road, LLC at 2190 Post Road in Fairfield, Connecticut ("2190 Post Road Property"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to any building(s) at the 2190 Post Road Property.
- A-SCNET 2-40: There are no buildings located at the 2190 Post Road property. There are not proposed poles within the property. Three poles (P673S, P675S, and P676S) are proposed within 25 feet of the property along its boundary with the CTDOT corridor. Based on the current design, the center of P673S will be 6'9" from the property line, the center of P675S will be 11'6" from the property line, and P676S will be 12'9" from the property line. See Attachment SCNET 2-40-1.

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- Q-SCNET 2-41: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of property owned by the Invest II at 111 Black Rock Turnpike in Fairfield, Connecticut ("111 Black Rock Tpk Property"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to any building(s) at the 111 Black Rock Tpk Property.
- A-SCNET 2-41: UI's proposed monopole labeled as P721ES is 83 feet away from the nearest building located on the property at 111 Black Rock Turnpike as depicted in Attachment SCNET 2-41-1.

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- Q-SCNET 2-42: Provide the precise location for any proposed UI tower/monopole that is located on and/or within twenty-five feet (25 ft) of property owned by the International Investors at 1160 Kings Highway in Fairfield, Connecticut ("1160 Kings Hwy Property"), including the precise location of the UI tower/monopole depicted on a survey with sufficient detail to understand the proximity of any proposed UI tower/monopole to any building(s) at the 1160 Kings Hwy Property.
- A-SCNET 2-42: UI's proposed monopole labeled as P703S is 88 feet away from the nearest building located on the property at 1160 Kings Highway as depicted in Attachment SCNET 2-42-1.

Attachment SCNET-2-23-1

VISUAL SIMULATIONS



The United Illuminating Company

Town of Southport

CSC DOCKET NO. 516 RESPONSE TO INTERROGATORY Q-SCNET 2-23

JI FAIRFIELD TO CONGRESS 15KV RAILROAD REBUILD PROJECT



















1

WESTWAY ROAD - SOUTHPORT

NORTHEAST







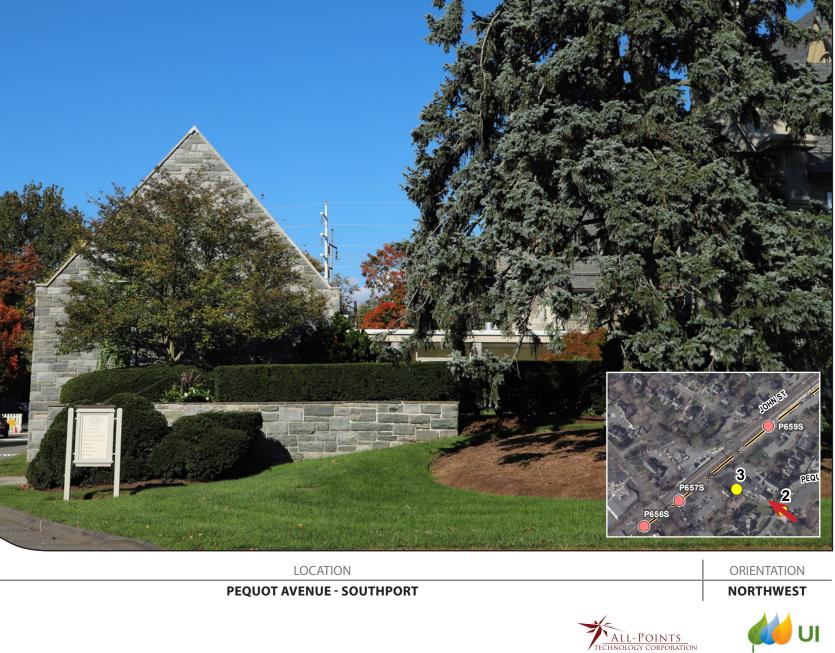
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WESTWAY ROAD - SOUTHPORT

NORTHEAST



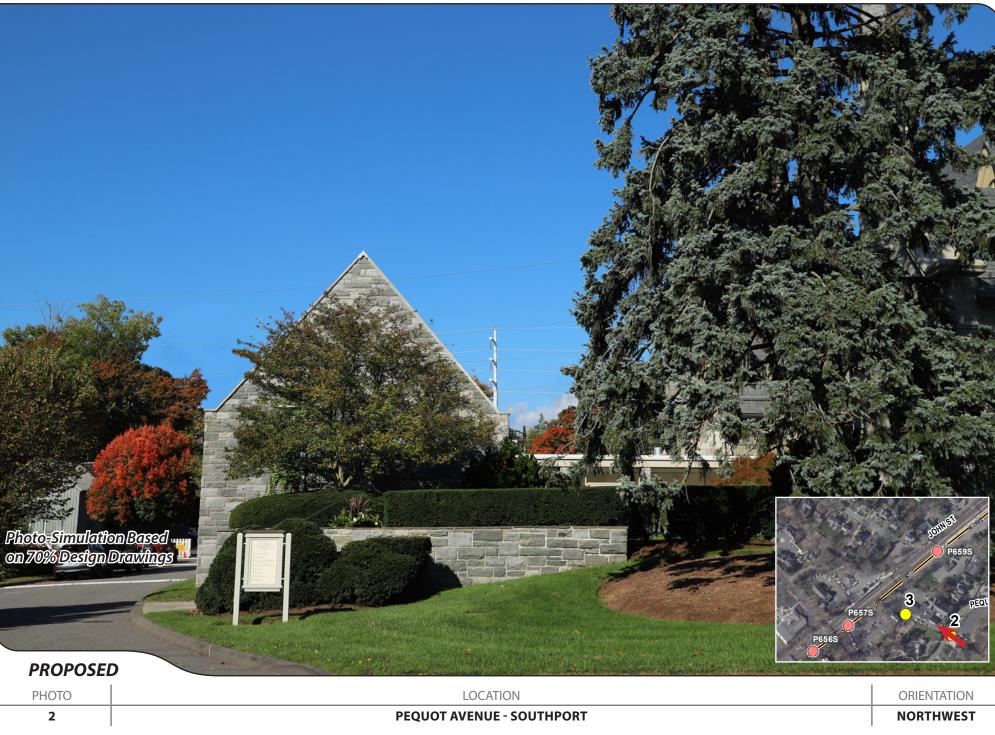




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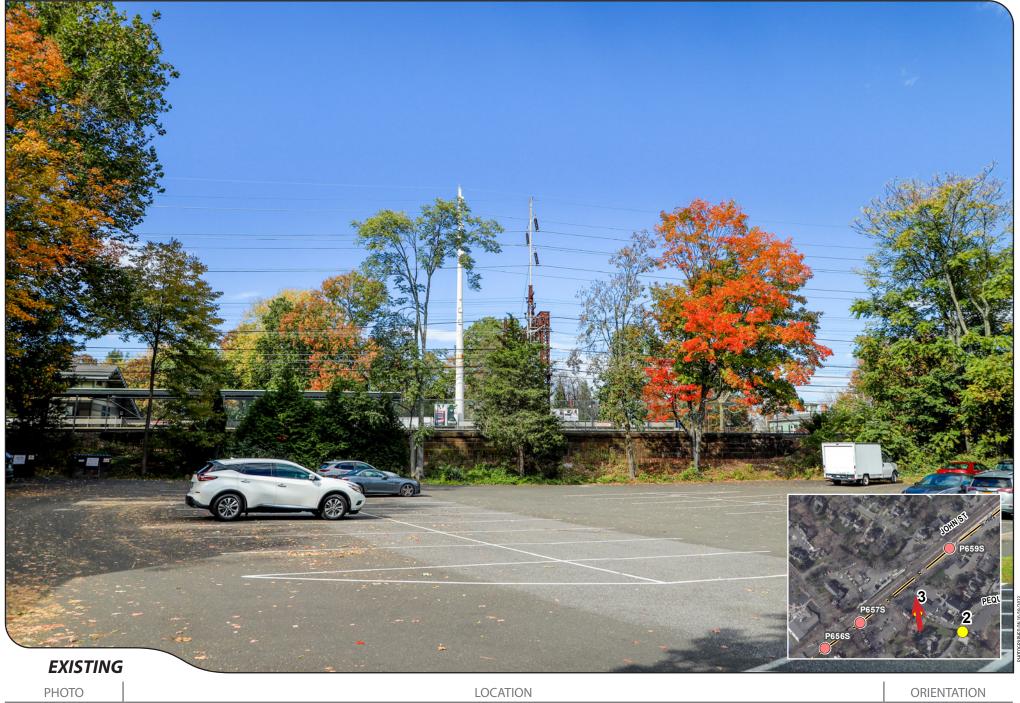
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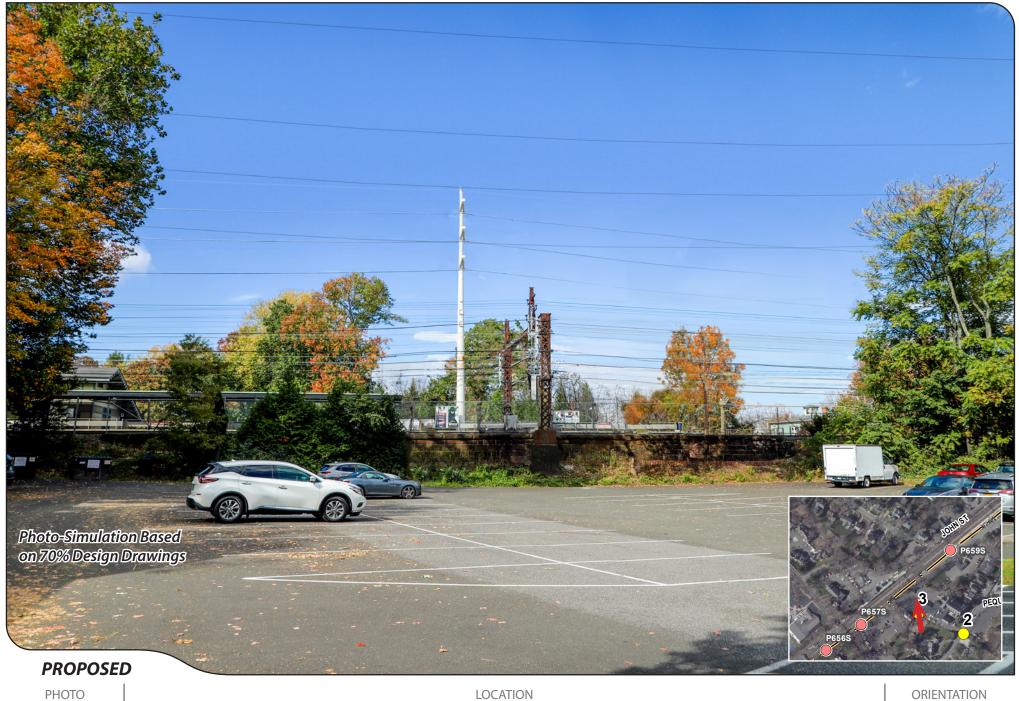
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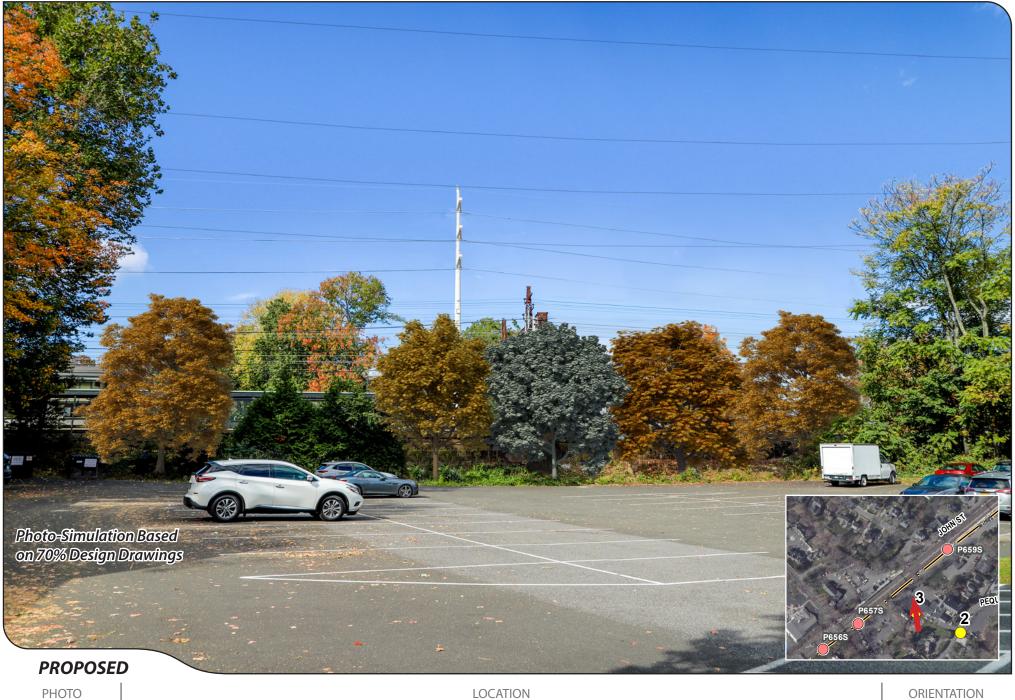
NORTH





3

SOUTHPORT CONGREGATIONAL CHURCH PARKING LOT - SOUTHPORT



3

SOUTHPORT CONGREGATIONAL CHURCH PARKING LOT - SOUTHPORT















4

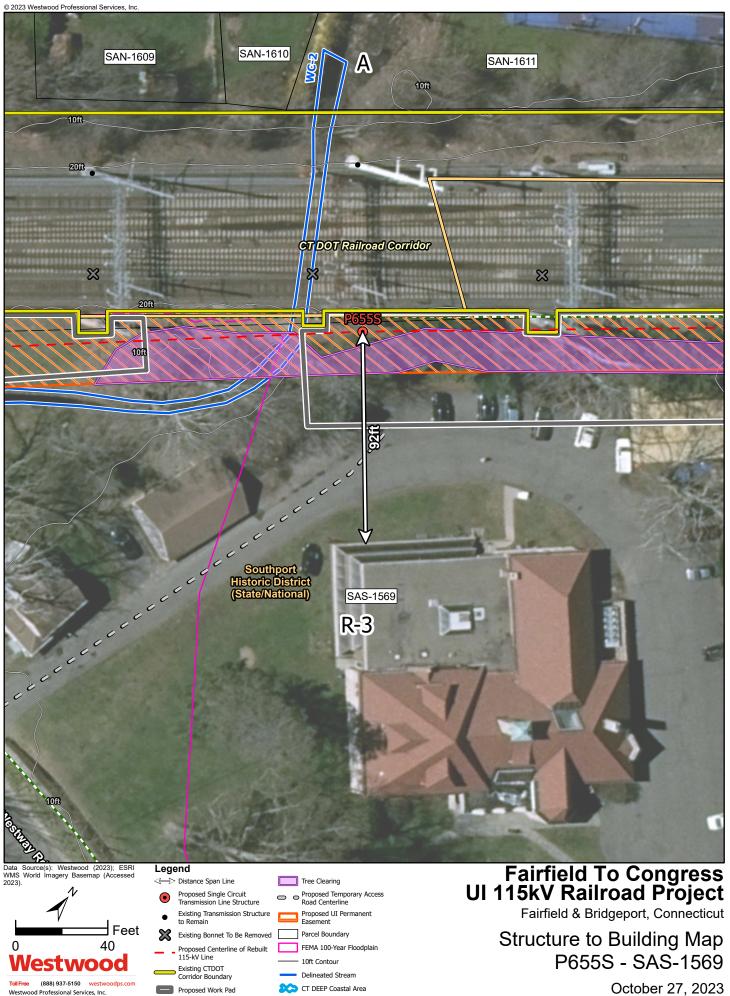
SASCO HILL ROAD - FAIRFIELD



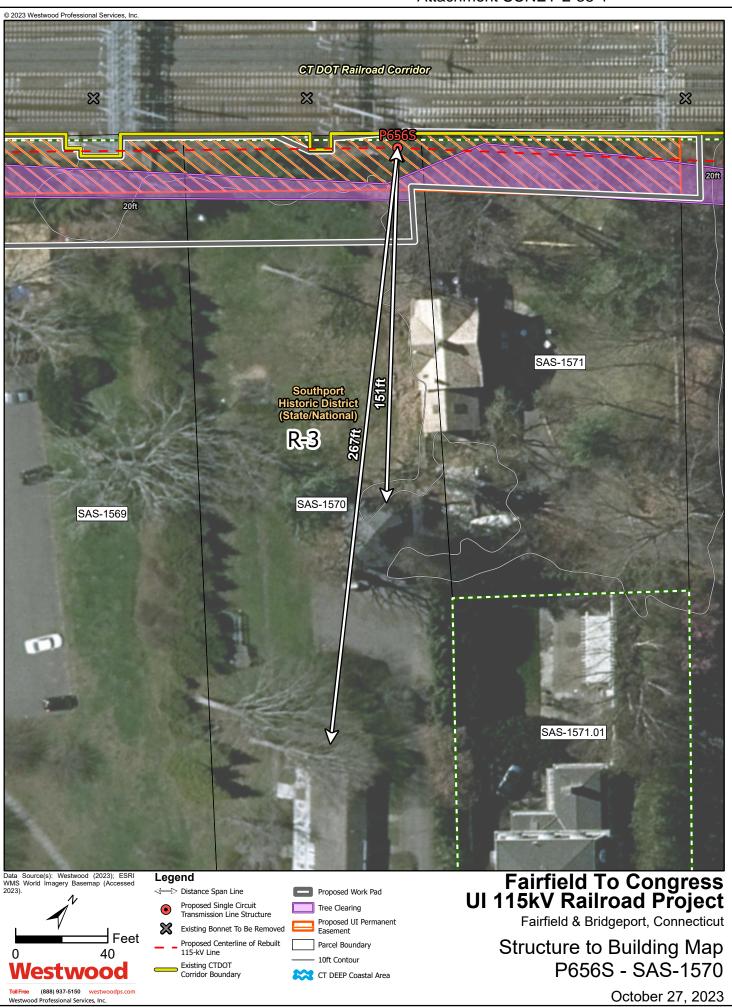




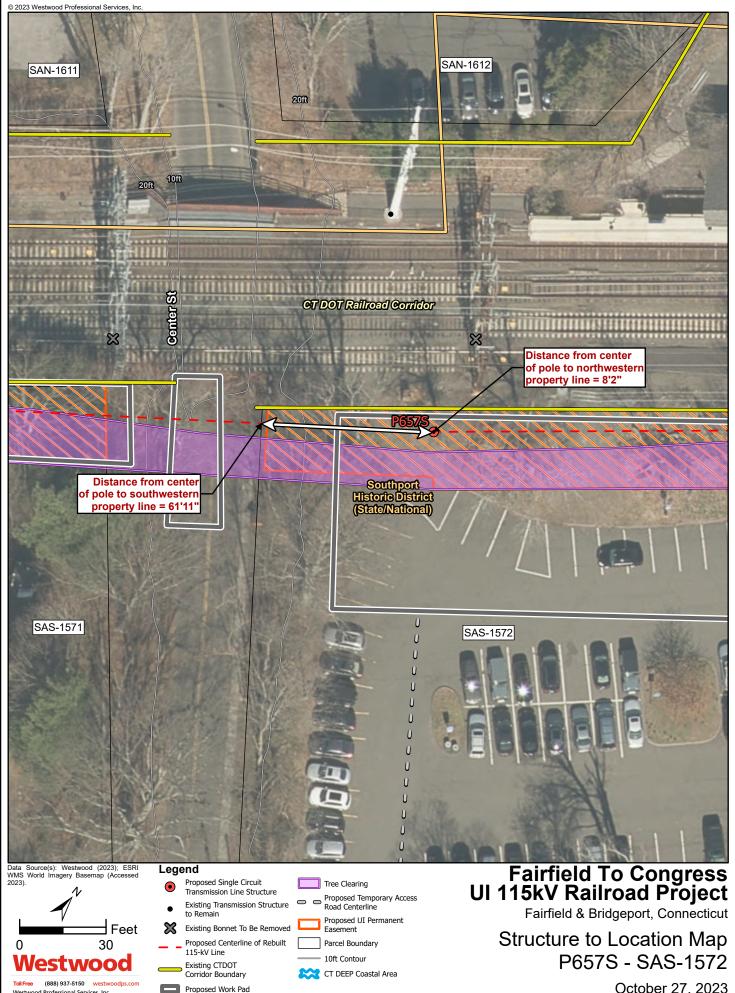
Attachment SCNET-2-37-1



Attachment SCNET-2-38-1



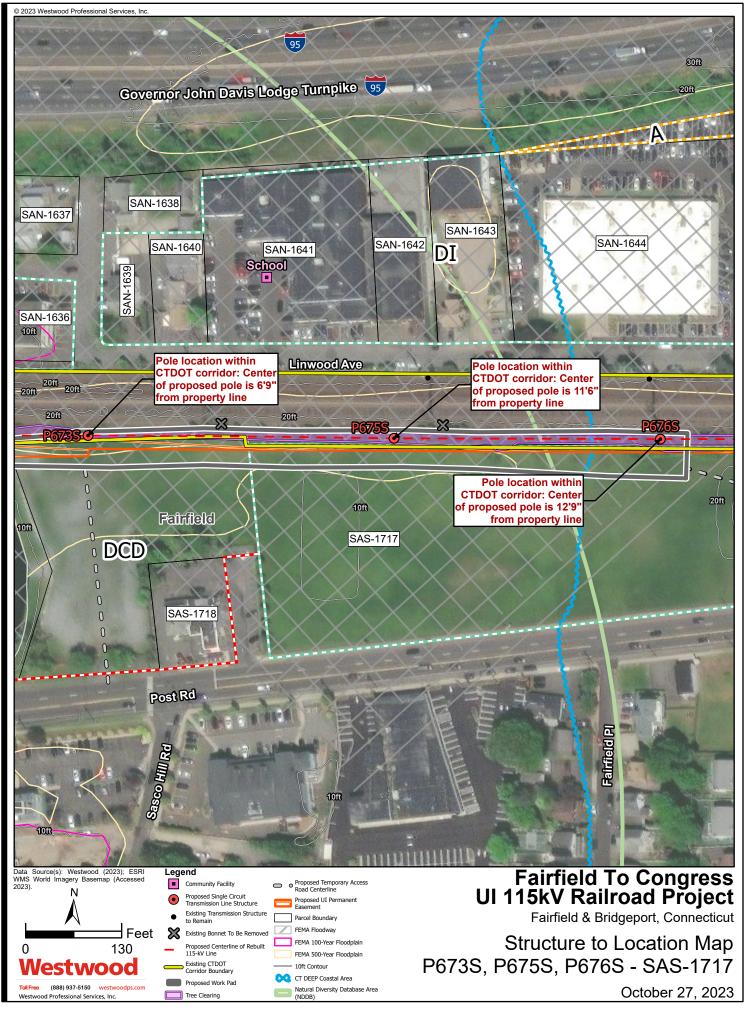
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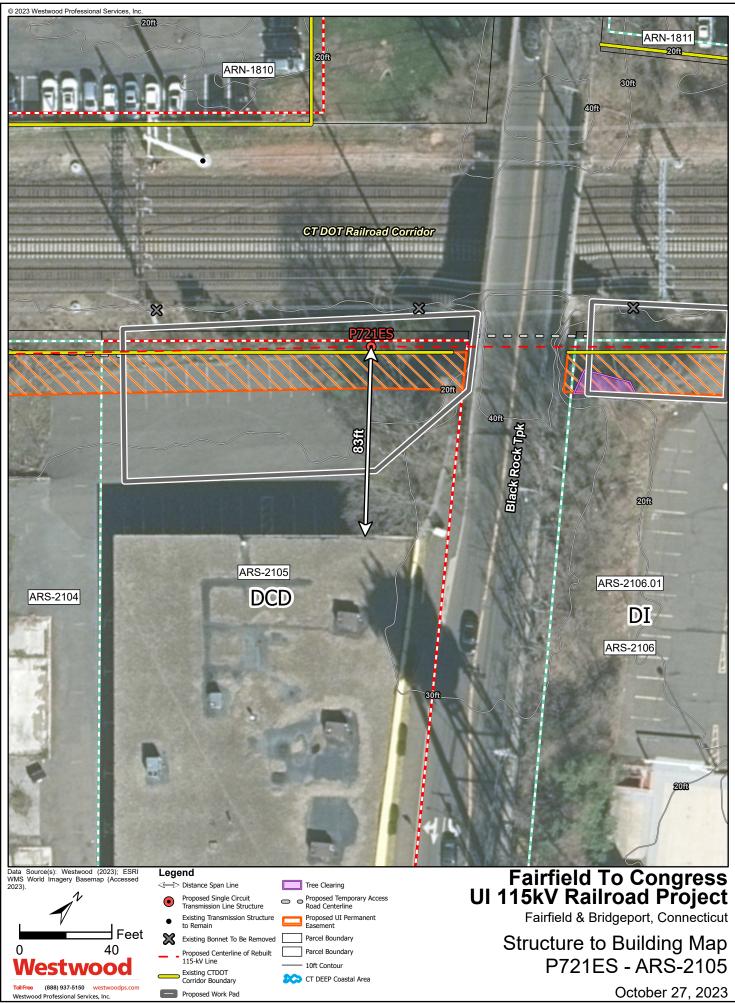
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Westwood Professional Services, Inc.

October 27, 2023



Attachment SCNET-2-41-1



Attachment SCNET-2-42-1



Westwood Professional Services, Inc.

October 27, 2023