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October 3, 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:

Enclosed for filing with the Connecticut Siting Council ("Council") is The United Illuminating Company's Pre-Filed Testimony of Mathew Parkhurst concerning the change of the location of Structure P689S near the Fairfield Station Lofts.

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

Enclosure

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STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

The United Illuminating Company Application for a : Docket No. 516

Certificate of Environmental Compatibility and Public

Need for the Fairfield to Congress Railroad:

Transmission Line 115-kV Rebuild Project : October 3, 2023

PRE-FILED TESTIMONY OF MATTHEW PARKHURST

Q. Please state your name, relation to the applicant and business address.

A. My name is Matthew Parkhurst. I am a Transmission Engineering Supervisor for Westwood Professional Services, acting as an engineering consultant for The United Illuminating Company. My business address is 1684 S. Broad Street, Suite 120, Lansdale, PA, 19446.

- Q. What is the purpose of your testimony in this proceeding?
- A. The purpose of my testimony is to describe a change to the location of Structure P689S, following submission of the application. A visual comparison of the location in the application and the revised location is found as an attachment to the Fairfield Station Lofts interrogatories (Attachment FSL-1-1).
- Q. Please describe the process for selecting the initial location of Structure P689S.
- A. Designing a transmission line is a multi-step process. Prior to the Siting Council application, there are 30%, 50%, and 70% design stages. The 70% design is what the Siting Council application is based on. The 90% design stage follows the 70% design stage which incorporates additional field findings and incorporates new information and addresses requests from the Siting Council and other external

stakeholders. These changes are brought to the Siting Council's attention through the D+M Plan. Typically, field walkdowns are scheduled to kick off a design stage. For example, on this project, there was a project initiation kick-off walkdown and walkdowns to kick off the 50% design stage, 70% design stage, and 90% design stage. Walkdowns are a critical component of the design process and enable project engineers and other team members to visualize and take measurements in the field which help to create a better design. Field conditions also are constantly changing and any base survey data is stagnant in time and can be limited in extent depending on access permissions.

The initial location for structure P689S was about halfway in between an existing concrete pier anchor for a guy wire and what were formerly guy anchors associated with an overhead distribution line (which UI knew was going to be removed). In July 2021, UI met with the Town of Fairfield and received plans for the Fairfield Station Lofts, which were dated April 2020. Per those plans, on the western side of the building, there was going to be a 10' setback between the northern property line and the building. This resulted in the center of the proposed pole location being approximately 23' from the closest building corner. Given this setback and the distance from the building it was deemed that emergency vehicles could traverse around the north side of the building.

- Q. Please describe what led to the decision to move Structure P689S from the location that is reflected in the application.
- A. During the field walkdown in December 2022, to kick off the 90% design, UI noticed the field conditions at this location. Due to additional above grade features located

near the northwestern corner of the building, the means of traverse discussed above was no longer available. Thus, the design was reviewed further to evaluate the possibility of moving Structure P689S to a new location to allow vehicular traverse around the building. The design change occurred as part of the standard UI design review process between December 2022 and mid-March 2023 and was finalized and formally incorporated into the design on March 14, 2023. By this point, it was too late to incorporate into the CSC application, but would be shown on the Project Development and Management Plans, as will other project modifications. In addition, the move of Structure P689S also took place to make it easier to construct the foundation and monopole, given the field conditions.

- Q. Please describe the new location of Structure P689S and specifically how far it is from the Fairfield Station Lofts.
- A. The new location of Structure P689S is located 18' west from the location shown on Sheet 9 of 29 of the 100 Scale Maps in the application. This move places the center of the structure 36'-3" from the closest building corner. The new location of Structure P689S and revised shape of associated work pad is shown in Attachment FSL-1-1, Exhibit 1B.
- Q. Who owns the property on which the structure will be located?
- A. Structure P689S is located on existing CTDOT property.

- Q. Has an analysis of the EMF associated with the new location been performed and if so where is that analysis in the record?
- A. Yes. As discussed above, the new location of Structure P689S was completed on March 14, 2023. The data inputs to the EMF report (Exhibit 3 to Attachment CSC 69-1) dated May 30, 2023 were based on the new design location of Structure P689S and thus incorporated the latest design into the EMF evaluation.
- Q. Are there any additional benefits to the new location?
- A. Yes, the new location would shift the associated work pad fully off the sidewalk adjacent to the west side of the Fairfield Station Lofts, reducing impacts to residents entering and exiting the building.
- Q. Does this conclude your testimony?
- A. Yes.