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August 22, 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”) are The United Illuminating Company’s (the “Company”) responses to the Council’s August 1, 2023 interrogatories (Set Three).

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

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
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Interrogatory CSC 75

The United Illuminating Company
Docket No. 516

Witness: Leslie Downey
Page 1 of 2

Q-CSC 75: Referencing pages 8-7 and 8-8 of Vol. 1 of the Application, Table 8-2, please fill in the “Stakeholder Group” column for the City of Bridgeport and Town of Fairfield Pre-MCF Municipal Contacts.

A-CSC 75:

Pre-MCF Municipal Contacts		
City of Bridgeport, Town of Fairfield, Town of Westport	July 2021	First class mailing of letter and fact sheet. Overview of Project – need and scope.
City of Bridgeport		
Elizabeth Zamora, Tom Gill, Max Perez, Vincent Mobilio, Ronald Pachaca, Joseph Salvo, John Gomes	June 24, 2021	Webex to provide a Project overview, scope, need, and timeline
Jon Urquidi, Pawel Papazachariu	August 19, 2021	Webex to discuss Railroad Avenue traffic concerns with City Engineer and Traffic Planner
Tom Gill, Max Perez, Lynn Haig, Bill Coleman, Jon Urquidi, Vincent Mobilio	September 2, 2021	Webex to discuss several Project route considerations
Tom Gill, Max Perez, Lynn Haig, Bill Coleman, Jon Urquidi, Vincent Mobilio	October 6, 2021	Webex to discuss Project (summary and high-level overview)
Lynn Haig	May 9, 2022	Met with City staff to discuss all UI projects in Bridgeport also provided a Project overview
Lynn Haig, Bill Coleman, Jason Strong and other Bridgeport and Advisory Council officials	September 16, 2022	Discussion of the “Sliver by the River” parcel with advisory Council
John Urquidi, Angel DePara, Lynn Haig, Bill Coleman	Bi-monthly utility meetings	Discuss status of the Project and other UI/SCG Projects in Bridgeport
Town of Fairfield		
First Selectwoman Brenda Kupchick, Jackie Bertolone, Emmeline Harrigan, Sarah Neafse, Tom Bremer	July 13, 2021	Initial in-person meeting with Selectwoman Kupchick and staff to present Project overview, scope, need and timetable.
Sarah Neafsey, Tim Bishop	August 24, 2021	Environmental meeting with Conservation and Wetlands staff
First Selectwoman Brenda Kupchick, Jackie Bertolone, Emmeline Harrigan, Tim Bishop, Sarah Neafsey	September 13, 2021	In-person meeting with Selectwoman Kupchick to discuss Project updates based upon the feedback from the Town

Interrogatory CSC 75

The United Illuminating Company
Docket No. 516

Witness: Leslie Downey
Page 2 of 2

First Selectwoman Brenda Kupchick, Jackie Bertolone, Emmeline Harrigan, Eileen Flora & Mark Barnhart	October 14, 2021	Project status (overview), design of monopoles at train stations, vegetation removal
Emmeline Harrigan, Tim Bishop, Eileen Flora, Bill Hurley & Jeff Minder.	September 19, 2022	Discuss vegetation management along Project route in the town

Interrogatory CSC 76

The United Illuminating Company
Docket No. 516

Witness: Zachary Logan
Page 1 of 1

Q-CSC 76: Which types of Project changes would have a cost delta regionalized across New England versus a cost delta borne by Connecticut ratepayers?

A-CSC 76: The entire scope of work is to upgrade the 115-kV transmission lines which are pool-transmission facilities, and therefore, UI can expect the entire project cost to be regionalized. ISO-NE ultimately will make the final determination on the regionalization of the costs or if the costs are to be borne by Connecticut ratepayers. An example of a cost that could be borne by Connecticut rate payers is if a municipality requested the line in that municipality to be constructed underground in order to reduce the visual impact of the project in the municipality. The cost to underground the line is substantially more than the overhead solution. The delta between the overhead solution and the underground solution would likely be borne by Connecticut rate payers since the underground solution only benefits the residents of the municipality.

Interrogatory CSC 77

The United Illuminating Company
Docket No. 516

Witness: Brian Ragozzine
Page 1 of 1

Q-CSC 77: Referencing the response to Council interrogatory 10, there is an Allowance for Funds Used During Construction and Overheads of approximately \$78.2M. Explain what that fund would be used for.

A-CSC 77: The approximate \$78.2M shown in Interrogatory 10 for costs represented by Allowance for Funds Used During Construction ("AFUDC") and Overheads on the Project is a combination of both actual and forecasted costs for the Project. UI estimates that these costs will be broken up as follows: AFUDC will be approximately \$31.4M and Overheads will be approximately \$46.8M.

AFUDC are accrued interest on the funds invested in a utility capital project and Overheads are costs associated with the Project for certain services such as, but not limited to, labor, general construction, fleet, etc. which are a calculated % against the Project value.

Interrogatory CSC 78

The United Illuminating Company
Docket No. 516

Witness: Matthew Parkhurst
Page 1 of 1

Q-CSC 78: Referencing Volume 1A of the Application, Appendix C, Visual Assessment p. 1, elevations along the railroad corridor range from at or near sea level to approximately 40 feet above mean sea level (amsl). Which municipalities are the highest and lowest elevations located in?

A-CSC 78: The highest elevation is located in the Town of Fairfield. The lowest elevation is located within both the Town of Fairfield and City of Bridgeport.

Interrogatory CSC 79

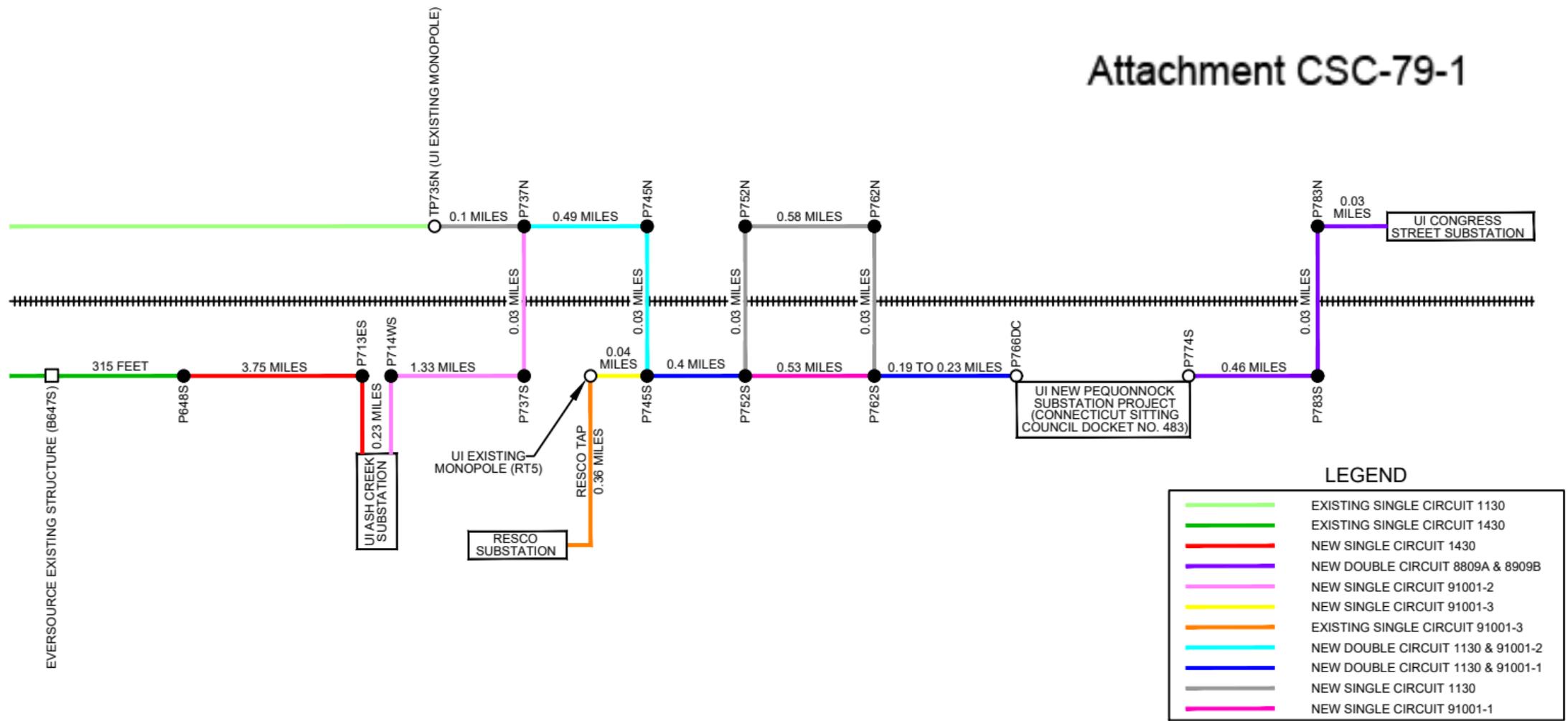
The United Illuminating Company
Docket No. 516

Witness: Matthew Parkhurst
Page 1 of 1

Q-CSC 79: Referencing Figure 2-1 on page 2-2 of Volume 1 of the Application, provide a similar figure depicting the existing configuration and include existing line numbers.

A-CSC 79: Please see Attachment CSC-79-1.

Attachment CSC-79-1



LEGEND

—	EXISTING SINGLE CIRCUIT 1130
—	EXISTING SINGLE CIRCUIT 1430
—	NEW SINGLE CIRCUIT 1430
—	NEW DOUBLE CIRCUIT 8809A & 8909B
—	NEW SINGLE CIRCUIT 91001-2
—	NEW SINGLE CIRCUIT 91001-3
—	EXISTING SINGLE CIRCUIT 91001-3
—	NEW DOUBLE CIRCUIT 1130 & 91001-2
—	NEW DOUBLE CIRCUIT 1130 & 91001-1
—	NEW SINGLE CIRCUIT 1130
—	NEW SINGLE CIRCUIT 91001-1

Interrogatory CSC 80

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-CSC 80: What is the existing conductor size and type of the 1430 Line?

A-CSC 80: The existing conductor size and type of the UI portion of the 1430 Line is 1590 kcmil ACSR (Aluminum Conductor Steel Reinforced) "Lapwing". The existing conductor size and type of the Eversource portion of the 1430 Line is 1272 kcmil ACSR "Bittern".

Interrogatory CSC 81

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-CSC 81: What is the distance from structure B647S to Sasco Creek Substation?

A-CSC 81: The distance between B647S and Eversource's Sasco Creek Substation is 0.68 miles.

Interrogatory CSC 82

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-CSC 82: Would the new 1430 Line with 1590 aluminum conductor steel supported (ACSS) conductors have the same operational characteristics as the Eversource facilities?

A-CSC 82: Yes, the UI 1590 ACSS lines would have the same physical and mechanical characteristics as any new Eversource 1590 ACSS conductors.

Interrogatory CSC 83

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-CSC 83: Would there be operating constraints on the 1490 Line prior to Eversource upgrading the 1430 Line to Sasco Creek? If so, would the 1430 Line not be able to utilize the additional capacity until such time as Eversource upgrades the 1430 Line?

A-CSC 83: The existing conductor on the Eversource portion of the 1430 line is 1272 Aluminum Conductor Steel Reinforced (ACSR). In general, the maximum operating temperature of ACSR is less than Aluminum Conductor Steel Supported (ACSS) because of the physical and mechanical property difference in the two conductor types. Because of this as well as the smaller Eversource conductor size (1272 vs. 1590) the existing Eversource conductor would constraint the overall rating until the Eversource side of the line is recondotored.

Interrogatory CSC 84

The United Illuminating Company
Docket No. 516

Witness: Matthew Scully
Page 1 of 1

Q-CSC 84: What would the work pads consist of if located within existing paved areas?

A-CSC 84: If a work pad is located within a paved area, it may consist of a certain type of construction matting (e.g., fiberglass, rubber or thick wood) to protect the asphalt, if required.

Interrogatory CSC 85

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
Page 1 of 1

Q-CSC 85: Referencing Docket No. 508 Findings of Fact 39 and 77, would both also be applicable to the proposed Project?

A-CSC 85: Yes. Please see the August 15, 2023 letter from Garrett Eucalitto, Commissioner, Connecticut Department of Transportation, to the Siting Council.

Interrogatory CSC 86

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-CSC 86: Do the National Electrical Safety Code conductor clearance requirements apply to billboards? Explain.

A-CSC 86: Yes, National Electrical Safety Code Rule 234C dictates conductor clearance requirements to billboards. For 115kV conductors, the code requires a 15.1' vertical clearance to be met. If this cannot be met, horizontal clearances of 9.1' with the conductor under an at rest (no wind) condition and 6.1' with the conductor under a blowout (6 psf or 48.4 mph wind) condition must be met.

Interrogatory CSC 87

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
Page 1 of 1

Q-CSC 87: Provide a copy of the July 24, 2023 correspondence from the State Historic Preservation Office.

A-CSC 87: Please see Attachment CSC-87-1.



Department of Economic and
Community Development

State Historic Preservation Office

July 24, 2023

Mr. David R. George
Heritage Consultants
PO Box 310249
Newington, CT 06131

Subject: Supplemental Information, Phase IA Cultural Resource Assessment Survey,
Visual Impacts
Fairfield to Congress Street Substation Railroad Transmission Line 115-kV
Rebuild Project
Fairfield and Bridgeport, Connecticut
ENV-24-0061

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the supplemental information prepared by Heritage Consultants, LLC (Heritage), dated June 29, 2023, regarding visual impacts of the proposed undertaking. The proposed activities are under the jurisdiction of the Connecticut Siting Council and are subject to review by this office pursuant to the Connecticut Environmental Policy Act (CEPA) and Section 106 of the National Historic Preservation Act of 1966, as amended. The proposed project includes the rebuilding of two single-circuit 115-kilovolt (kV) overhead lines along the Connecticut Department of Transportation (CT DOT) corridor from existing Catenary Structure B648S in Fairfield to the Congress Street substation (approximately 7.6 miles), which includes the removal of United Illuminating (UI) infrastructure from 157 existing railroad catenaries, as well as on lattice towers along a UI right of way from the railroad corridor to the Ash Creek Substation in Bridgeport.

In our letter of April 24, 2023, our office asked for information regarding potential alternatives to the proposed action, as well as clarification of the height and frequency of the new structures.

Regarding reuse of the catenary structures, this office concurs that the required structural reinforcement, coupled with the installation of larger bonnets, would adversely impact the catenaries, which are eligible as contributing resources to this segment of the New York, New Haven, & Hartford Railroad linear district, eligible for listing on the National Register of Historic Places. The current proposal avoids a direct impact to a historic resource. This office further acknowledges that leaving critical infrastructure within an active rail line, on property it does not own, does not meet the project objective of "reliability and resiliency of UI's electrical system." SHPO previously communicated this position during consultation for the Milvon-West River Railroad Transmission Line 115-kV Rebuild Project.

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

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Department of Economic and
Community Development

State Historic Preservation Office

After viewing the requested photosimulations, it is the opinion of this office that the introduction of the monopole structures will visually adversely impact resources within the area of potential affect, an indirect effect, to varying degrees. Impacts appear to be the greatest within the Southport Historic District (NR# 71000898), Barnum-Palliser Historic District (NR# 82000995), William D. Bishop Cottage Development Historic District (NR# 82004388), and the former New York, New Haven, & Hartford Railroad corridor itself.

As such, the proposed scope of work will have an adverse effect to historic resources. This office requests that the proponent consults with this office regarding mitigation for the adverse impacts. SHPO recognizes that construction plans are not final and are subject to change, and also requests to be sent any changes or updates as they develop.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's cultural resources. We look forward to additional consultation and a successful resolution for all parties. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jonathan Kinney
State Historic Preservation Officer

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

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Interrogatory CSC 88

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
Page 1 of 1

Q-CSC 88: Referencing Vol. 1 of the Application, p. 5-35, are there any state-designated scenic roads located within the one-mile Study Area? If yes, describe the visibility of the proposed Project from such locations.

A-CSC 88: There are no state-designated scenic roads located within the one-mile Study Area.

Interrogatory CSC 89

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
Page 1 of 1

Q-CSC 89: Are there any “blue-blazed” hiking trails maintained by the Connecticut Forest and Park Association within one-mile of the Project route? If yes, describe the visibility of the proposed Project from such locations.

A-CSC 89: There are no “blue-blazed” hiking trails maintained by the Connecticut Forest and Park Association within one-mile of the Project route.

Interrogatory CSC 90

The United Illuminating Company
Docket No. 516

Witness: Benjamin Cotts
Page 1 of 1

Q-CSC 90: Which residential structure is located closest to the proposed rebuilt 115-kV lines? Provide the distance, address and calculated/projected pre-construction and post-construction magnetic field levels based on the proposed Project configuration.

A-CSC 90: The closest residential structure is the Windward apartment building at 20 Johnson Street, Bridgeport. Exhibit 3 to Attachment CSC-69-1, Figure 6, shows pre-construction and post-construction magnetic-field levels at the front edge of the building, closest to the transmission line. A tabular summary of the calculated magnetic-field levels shown in Figure 6 for pre-construction and post-construction (including the increase in conductor height at the apartment building i.e., Option 1) magnetic field-levels is shown below in Table CSC-90-1. At the front of the building the maximum pre-construction magnetic-field level at this apartment building at average loading is calculated to be approximately 50 mG at 35 ft above ground. The maximum calculated post-construction magnetic field level (including the increased conductor height at the apartment building i.e., Bridgeport Option 1 described in Exhibit 3 to Attachment CSC-69-1) is 106 mG at the roof, 55 ft above ground. In residential portions of the building below the roof level, existing magnetic-field levels are calculated to vary between 21 and 51 mG. The proposed magnetic-field levels (including the increased conductor height at the apartment building, i.e., Option 1) are calculated to vary between 23 and 61 mG.

Calculated magnetic-field levels at for specific heights above ground at the Windward apartment building in Bridgeport.

Height above ground (ft)	Magnetic-field levels (mG) at front edge of the Windward apartment building		
	Pre-Construction	Post-Construction Redesigned (Option 1)	Difference between Pre-construction and Post-Construction
5	21	23	2.1
15	28	30	1.3
25	39	40	1.1
35	51	46	-4.2
45	49	61	12
55 (roof level)	48	106	58

Interrogatory CSC 91

The United Illuminating Company
Docket No. 516

Witness: Benjamin Cotts
Page 1 of 1

Q-CSC 91: Which residential structure would have the largest increase in magnetic field levels from pre-construction to post-construction by the proposed Project configuration? Provide the distance, address and calculated/projected pre-construction and post-construction magnetic field levels based on the proposed Project configuration.

A-CSC 91: The residential structure that would have the largest increase in magnetic-field levels from pre-construction to post-construction is the Windward apartment building at 20 Johnson Street, Bridgeport. As discussed in response to CSC-90, the maximum calculated increase in magnetic field level from pre-construction conditions to post-construction conditions is, 58 mG at the roof, 55 ft above ground. In residential portions of the building, below the roof level, magnetic-field level changes are calculated to vary between a decrease of 4.2 mG (at a height of 35 ft above ground) and an increase of 12 mG (at a height of 45 ft above ground).