

February 8, 2024

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 Attorney Bachman:

The United Illuminating Company (“UI” or the “Company”) offers the following corrections/comments on the draft Findings of Fact issued by the Connecticut Siting Council (the “Council”) on February 1, 2024. UI appreciates the efforts of the Council’s staff in preparing the very comprehensive Findings.

1. FOF 131. UI suggests including the State Historic Preservice Office’s November 22, 2023 letter to the Council in the citation at the end of the Finding.
2. FOF 187. The Finding indicates that UI has a maintenance agreement with MNR for the bonnets on the catenaries. No such agreement exists. See UI 3, Response 19 (“There is no standing agreement with MNR that governs the maintenance of UI work activities ...”).
3. FOF 208. The Company suggests the Finding be revised to read: “The estimated costs of an underground route was \$8.5 to \$12.M per mile.”
4. FOF 222. The Company suggests the Finding be revised to read: “....after which the 1430 Line diverges from the railroad ROW and continues within an existing UI ROW as one of the two lines...”
5. FOF 263. The Company asks that this Finding be eliminated. During cross examination, Mr. Orton testified that he did not provide the Council with a cost to underground the project. December 12, 2023 Tr. at 62.

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6. FOF 265. The Company asks that this Finding be eliminated. During cross examination, Mr. Awad testified that he did not provide the Council with a cost to construct the project underground. December 12, 2023 Tr. at 172.
7. FOF 341. UI suggests the Finding be modified as follows: “The new monopoles would generally range in height...” As shown in UI 1, Vol. 1, page 2-7, there are two poles that would be taller than 145 feet agl.
8. FOF 451. The Company suggests that paragraph (a) under “Catenary Structure B648S to Ash Creek Substation Segment and Ash Creek Substation to UI Structure TP735S Segment” be modified as follows: “Remove 115-kV line (e.g. existing shield wires, conductors, hardware, and steel bonnets) from the southern side of the catenaries.” Similarly, UI suggests that paragraph (i) be revised as follows: “Remove 115-kV line (e.g. existing OPGW, conductors, hardware, and steel bonnets) from the northern side of the catenaries.”
9. FOF 460. Consistent with Exhibit UI 1, Vol. 1, page 3-7, the Finding should be revised to indicate that temporary erosion and sedimentation controls will be installed after initial vegetation removal.
10. FOF 478. The Finding should be modified to be consistent with the following: “Materials used to construct most work pads and all temporary access roads in upland areas will be removed, unless otherwise specified by the landowner.” Exhibit UI 1, Vol. 1, page 3-12.
11. FOF 495. UI requests that the Council change “0.4 acre” to “0.04 acre” consistent with Exhibit UI 1, Vol. 1, page 6-9.
12. FOF 497. The Company suggests the Finding be revised to read: “The Hannon-Morissette Alternative would generally avoid Wetlands W-B and W-F because these wetlands are located along the southern side of the railroad ROW although temporary impacts are anticipated.”
13. FOF 499. The Company notes that its application does not include specific references to a Wetlands Invasives Species Control Plan (WISCP). The citation for this Findings should be to page 3-17 of UI 1, Vol. 1.
14. FOF 511. To be consistent with UI 1, Vol. 1, page 6-7, the Finding should be modified to make clear the rebuilt 115-kV lines would span all watercourses along the Project route, including the Mill River, Ash Creek (at two crossings) and the Pequonnock River.

- 15.FOF 515. The Company suggests the Finding be modified to read: “East of Sasco Creek, near Ash Creek, Ash Creek Substation and the Pequonnock River the Project Area encompass tidal wetlands...” This is consistent with UI 1, Vol. 1, page 5-24.
- 16.FOF 524. The structure number should be “714WS-3”.
- 17.FOF 588. In paragraph (a) of the Finding, “listed” should be changed to “listing”.
- 18.FOF 597. The Finding should be revised to provide that “The potential indirect visual impacts would not be mitigated....”

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