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August 22, 2023

Melanie A. Bachman, Esq.  
Executive Director  
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 BJ's Wholesale Club, Inc. ("BWC"), enclosed for filing with the Connecticut Siting Council (the "Council") are the following:

1. BWC's pre-hearing submission; and
2. BWC's pre-filed testimony.

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

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

Sincerely,

Daniel E. Casagrande, Esq.  
Cramer & Anderson, LLP  
30 Main Street, Suite 204  
Danbury, Connecticut 06810

**CONNECTICUT SITING COUNCIL**

RE: : DOCKET NO. 516  
:  
Application submitted by the United :  
Illuminating Company for a Certificate of :  
Environmental Compatibility and Public Need :  
for the Fairfield to Congress Railroad :  
Transmission Line 115-kV Rebuild Project that :  
consists of the relocation and rebuild of its :  
existing 115- kilovolt (kV) electric transmission :  
lines from the railroad catenary structures to :  
new steel monopole structures and related :  
modifications along approximately 7.3 :  
miles of the Connecticut Department of :  
Transportation’s Metro-North Railroad :  
corridor between Structure B648S located :  
east of Sasco Creek in Fairfield and UI’s :  
Congress Street Substation in Bridgeport, :  
and the rebuild of two existing 115-kV :  
transmission lines along 0.23 mile of existing :  
UI right-of-way to facilitate interconnection :  
of the rebuilt 115-kV electric transmission :  
lines at UI’s existing Ash Creek, Resco, :  
Pequonnock and Congress Street Substations :  
traversing the municipalities of Bridgeport :  
and Fairfield :

AUGUST 22, 2023

**PRE-HEARING SUBMISSION OF BJ’S WHOLESALE CLUB, INC.**

BJ’s Wholesale Club, Inc. (“BWC”), a party-intervenor in this proceeding, hereby submits its response to the June 21, 2023 memorandum issued by the Connecticut Siting Council (the “Council”) in preparation for the August 29, 2023 hearing before the Council on the above-referenced application filed by The United Illuminating Company (“UI”):

**A. Witnesses**

BWC does not anticipate calling any witnesses at the August 29, 2023 hearing but reserves the right to conduct a cross-examination of UI’s witnesses.

**B. Pre-Filed Testimony**

BWC is submitting the pre-filed testimony of Patrick Netreba. Mr. Netreba is the Director of Real Estate at BJ's Wholesale Club, Inc., with a corporate office located at 350 Campus Drive, Marlborough, Massachusetts 01752.

**C. Documents to be Administratively Noticed**

At this time, BWC does not ask that the Council take administrative notice of any documents other than those previously identified in the Council's Administrative Notice List.

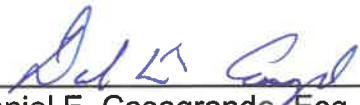
**D. Exhibits to be Offered**

BWC intends to offer the following exhibits that are referenced in and attached to BWC's pre-filed testimony:

1. Exhibit A: curriculum vitae of Patrick Netreba
2. Exhibit B: plan of BWC's loading dock area, prepared by Solli Engineering, dated August 17, 2023, entitled "Truck Turn Figure."
3. Exhibit C: street level picture of BWC's loading dock area.
4. Exhibit D: graphic illustrating the travel path for BWC's trucks that enter and exit BWC's property.
5. Exhibit E: street level picture of Feroletto Steel Co., Inc.'s property.
6. Exhibit F: street level picture of Feroletto Steel Co., Inc.'s loading dock area.

Respectfully Submitted,

BJ'S WHOLESALE CLUB, INC.

By:   
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## CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was electronically mailed to the following service list electronically on August 22, 2023:

Melanie A. Bachman, Esq.  
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melanie.bachman@ct.gov

Bruce McDermott, Esq.  
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\_\_\_\_\_  
Daniel E. Casagrande

CONNECTICUT SITING COUNCIL

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AUGUST 22, 2023

**BJ’S WHOLESALE CLUB, INC.’S PRE-FILED TESTIMONY OF PATRICK NETREBA**

- Q. Please state your name, title and business address.**
- A. My name is Patrick Netreba. I am the Director of Real Estate at BJ’s Wholesale Club, Inc. (“BWC”). My business address is 350 Campus Drive, Marlborough, Massachusetts 01752.
- Q. Please state your current responsibilities as an employee of BWC and professional experience.**
- A. In my current capacity as the Director of Real Estate, I manage the development of new retail stores in the northern United States. I also currently manage BWC’s gas station expansion program. In my seventeen (17) years of professional experience with BWC, I have been involved in and managed dozens of new developments from Maine to Florida. Prior to my existing position with BWC, I managed the identification, acquisition and development of over twenty four (24) commercial retail projects in New England. For additional information regarding

my professional experience, please refer to my curriculum vitae attached to this pre-filed testimony as Exhibit A.

**Q. *What is the purpose of your pre-filed testimony?***

A. My pre-filed testimony is intended to demonstrate that the placement, installation and maintenance of P724S and the related easement in the loading dock area of BWC's property, as illustrated on Sheet 17 in Volume 2 of the United Illuminating Company's ("UI") application, will have short-term and long-term adverse impacts on BWC's business operations. Another reason for my pre-filed testimony is to illustrate that UI and the Siting Council (the "Council") should consider reasonable, prudent alternative locations for P724S that will not cause adverse impacts on BWC's business operations.

**Q. *What specific tasks did you and BWC undertake in preparing this pre-filed testimony?***

A. To prepare this pre-filed testimony, I undertook the following tasks with the assistance of various BWC personnel:

- Reviewed UI's application materials;
- Performed a financial analysis of BWC's wholesale property at 40 Blackrock Turnpike, Fairfield, Connecticut 06825 and the extent to which the proposed location, installation and maintenance of P724S, the temporary work pad area and associated easement could adversely impact BWC's loading dock area and overall business operations;
- Prepared engineering plans to illustrate the existing site conditions at BWC's property; and
- Conferred with legal counsel and consultants at SLR International Corporation regarding UI's application and impacts to BWC's property.

**Q. *Please provide a brief summation of BWC's business model.***

A. Although BWC and large wholesale clubs may be classified as retail from a zoning or land use perspective, a very substantial part of BWC operation consists of its logistics business. BWC's business model is predicated on the efficiency at which BWC moves product from its distribution centers to its wholesale stores. Therefore, each step of the supply chain process is carefully monitored, evaluated and managed to accentuate efficiency. The timely, reliable movement and delivery of product is one of the central ways in which BWC offers value to its members/customers in the form of low prices for everyday items. If this synchronization is disrupted or delayed, BWC's services and value as a wholesale club is substantially diminished.

**Q. *Please describe the typical loading dock operations at BWC's property.***

A. At least fifteen (15) to twenty (20) trucks (the majority being full size (WB-67 semi-trailers) enter and exit BWC's loading dock on a daily basis. The semi-trailers require the entire loading dock area—which is very constricted in its current state—to perform their turning maneuvers for the loading berths. To illustrate the confined nature of BWC's loading dock area and the requisite turning maneuvers for BWC's

semi-trailers, please see the plan prepared by Solli Engineering, dated August 17, 2023, entitled "Truck Turn Figure" and attached to this pre-filed testimony as Exhibit B. Additionally, to further illustrate BWC's loading dock area, please see the street level picture of the loading dock attached to this pre-filed testimony as Exhibit C. Lastly, see Exhibit D, which illustrates the travel path for BWC's trucks that enter and exit BWC's property.

**Q. Please identify properties that, in BWC's opinion, can serve as alternative locations for P724S.**

A. Based on BWC's review of UI's application materials as well as the existing configuration of surrounding properties, BWC submits that P724S can and should be located on either (1) the adjacent Metro North Railroad property; or (2) the property owned by Feroletto Steel Co., Inc. ("Feroletto Steel") and located at 300 Scofield Avenue, Bridgeport, Connecticut 06605.

**Q: Please provide a general description of the existing conditions at the Feroletto Steel property.**

A. By way of background, Feroletto Steel is a wholly owned subsidiary of Toyota Tsusho America, Inc. and processes steel for various businesses. Feroletto Steel offers a paved area in the rear of the property that is not encumbered by an active loading dock or subject to other commercial activities. A picture of the paved area is attached to this pre-filed testimony as Exhibit E. In fact, Feroletto Steel's loading dock for its commercial trucking operations is located on the opposite northern side of its property. A picture of Feroletto Steel's loading dock is provided in Exhibit F. Therefore, BWC submits that installing P724S in the rear paved area of Feroletto Steel's property is a more than reasonable alternative that will avoid long-term harm to BWC's loading dock area and not adversely impact Feroletto Steel's loading dock or commercial operations.

**Q. What would be the operational and/or logistical effect on BWC's property if P724S is not relocated to an alternative property and UI is able to utilize a permanent right-of-way?**

A. BWC will face significant, long-term operational and logistical impediments if P724S is not relocated to an alternative property and remains in the loading dock area. Additionally, UI utilizing a permanent right-of-way and UI machinery, vehicles, personnel or equipment positioned in the proposed temporary work pad area or loading dock area would prevent BWC from utilizing its loading dock, as the semi-trailer maneuvers would be physically impossible to achieve. Currently, without any additional third-party activity in the loading dock area, BWC semi-trailers encroach on the vegetated area by the loading dock when a similar vehicle is parked in the first loading bay, or incoming vehicles must carefully maneuver to avoid the vegetated area.

BWC's receiving operations truly are a 24/7 business. Deliveries are scheduled by a computerized inventory management system during the day and at night based on customer demand of product. Therefore, the volume of trucks per hour on a



given day fluctuates based on consumer behaviors and habits, as well as the time of year. Deliveries to BWC are highly time sensitive. If BWC's deliveries were delayed on any given night or day, BWC would experience considerable difficulty with resupplying the store, as the overwhelming majority of restocking only occurs at night to ensure that BWC is safe for families and young children that frequent the store during the day for their shopping needs. Trucks arrive to the loading dock area all day to deliver product which is stored in BWC's backroom. Upon BWC's closing, the receiving team moves the product to the sales floor. Additional trucks are scheduled to arrive during the overnight hours to resupply BWC and the process repeats. If BWC's ability to accept deliveries during the day or night is compromised to any degree, BWC simply would not have enough product to resupply the store for the next selling day. Furthermore, if access to BWC's loading bays were restricted or prohibited for several hours on a particular day, BWC would face a deluge of trucks that would be constrained in terms of their delivery time, the number of loading bays available for their use, and the physical amount of backroom space that is available. This situation presents challenges for perishable items, which comprise a substantial portion of BWC's business. BWC would have to store these trucks in the parking lot, which may not be acceptable to the Town of Fairfield and presents traffic and congestion issues. Disruptions to BWC's synchronized receiving operations also create the situation where BWC would receive too many deliveries in too small a timeframe to move the delivered product from the backroom out to the sales floor by the receiving team. Each of these business realities illustrates the logistical and operational impacts of locating P724S on BWC's property and UI utilizing a permanent right-of-way and temporary work pad area on the property.

**Q: *What would be the financial effect on BWC's property if UI is afforded a permanent right-of-way, places P724S on BWC's property and requires a temporary work pad on BWC's property as presented in the application?***

A. Historically, BWC's daily gross sales at all days of the year, including nationally recognized holidays, constitute hundreds of thousands of dollars. Since the proposed installation and maintenance of P724S in addition to a permanent right-of-way, as well as the location of the temporary work pad in BWC's loading dock area, will invariably cause disruptions and delays to loading dock operations, and there will be a corresponding reduction in product movement and delivery. This reduction will result in lower daily gross sales. Furthermore, repeated business interruptions will lead to an unsatisfactory BWC customer/member experience, compromise members' trust and reliability in BWC's supply chain management, and result in loss of customer base (membership). BWC customers/members pay between \$50 and \$100 per year to shop at BWC; repeated, insufficient product availability due to loading dock interruptions will erode member confidence and disincentivize continued BWC membership.

**Q: *Is BWC willing to make a sizeable monetary contribution to UI for purposes of relocating P724S to the adjacent Feroletto Steel property?***

A. Yes, BWC is prepared to make a major financial contribution in the interest of preserving the critical functioning of its loading dock operations and avoiding significant and lasting financial losses, logistical challenges, business interruptions and reputational harm.

**Q: Does this conclude your pre-filed testimony in connection with UI's application?**

A: Yes.

# EXHIBIT A

- 16+ years of real estate development experience with BJ's.
- Completion of over 50 new club developments comprising nearly 5M SF.

## **Summary of Work Experience**

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### **Director of Real Estate**

BJ's Wholesale Club, Inc.

January 2020 – Current

Marlboro, MA

- Oversight and management of all new Club development for the northern U.S. and the entire BJ's Gas expansion program.

### **Manager of Real Estate**

BJ's Wholesale Club, Inc.

September 2018 – January 2020

Westborough, MA

- Managed the identification, acquisition, and development of new Clubs throughout the eastern U.S.

### **Senior Manager of Development**

Lisciotti Development Corporation

February 2016 – September 2018

Leominster, MA

- Managed the identification, acquisition, and development of over two dozen commercial retail projects in New England.

### **Manager of Site Development**

BJ's Wholesale Club, Inc.

May 2007 – February 2016

Westborough, MA

- Negotiated leases and contracts, and reviewed and analyzed all due diligence materials
- Communicated corporate and project goals to a diverse audience consisting of developers and Landlords, federal and state regulatory agencies, local municipal officials, and the general public
- Assembled and managed multi-disciplinary development teams to permit, design, and construct new retail shopping centers and gas stations in highly urban to rural locales

### **Senior Construction Administrator**

Erickson Retirement Communities

January 2007 – May 2007

Hingham, MA

- Responsible for the development and construction management of large residential retirement facilities

### **Development Manager**

BJ's Wholesale Club, Inc.

March 2006 – January 2007

Natick, MA

- Supervised multi-disciplinary development teams to permit, design, and construct retail stores and gas stations over a wide geographic area

### **Development Coordinator**

BJ's Wholesale Club, Inc.

July 2004 – March 2006

Natick, MA

- Completed internal due diligence research for site selection and coordinated civil engineering design consultants to develop and construct BJ's buildings and gas stations

### **Geotechnical & Environmental Engineer**

Weston and Sampson Engineers, Inc.

July 2002 – July 2004

Peabody, MA

- Designed, monitored, and supervised geotechnical field exploration programs for the development of bid documents for the construction of dams, foundations, retaining walls, and other below grade structures
- Provided engineering design support and construction supervision/administration for numerous environmental and hazardous/solid waste remediation projects

### **Project Engineer**

Weston and Sampson Engineers, Inc.

June 2001 – July 2002

Foxboro, MA

- Designed and developed construction documents for new traffic and roadway improvements as well as medium-sized wastewater treatment systems using AutoCAD-based design tools

## **Education**

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### **Syracuse University**

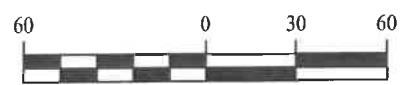
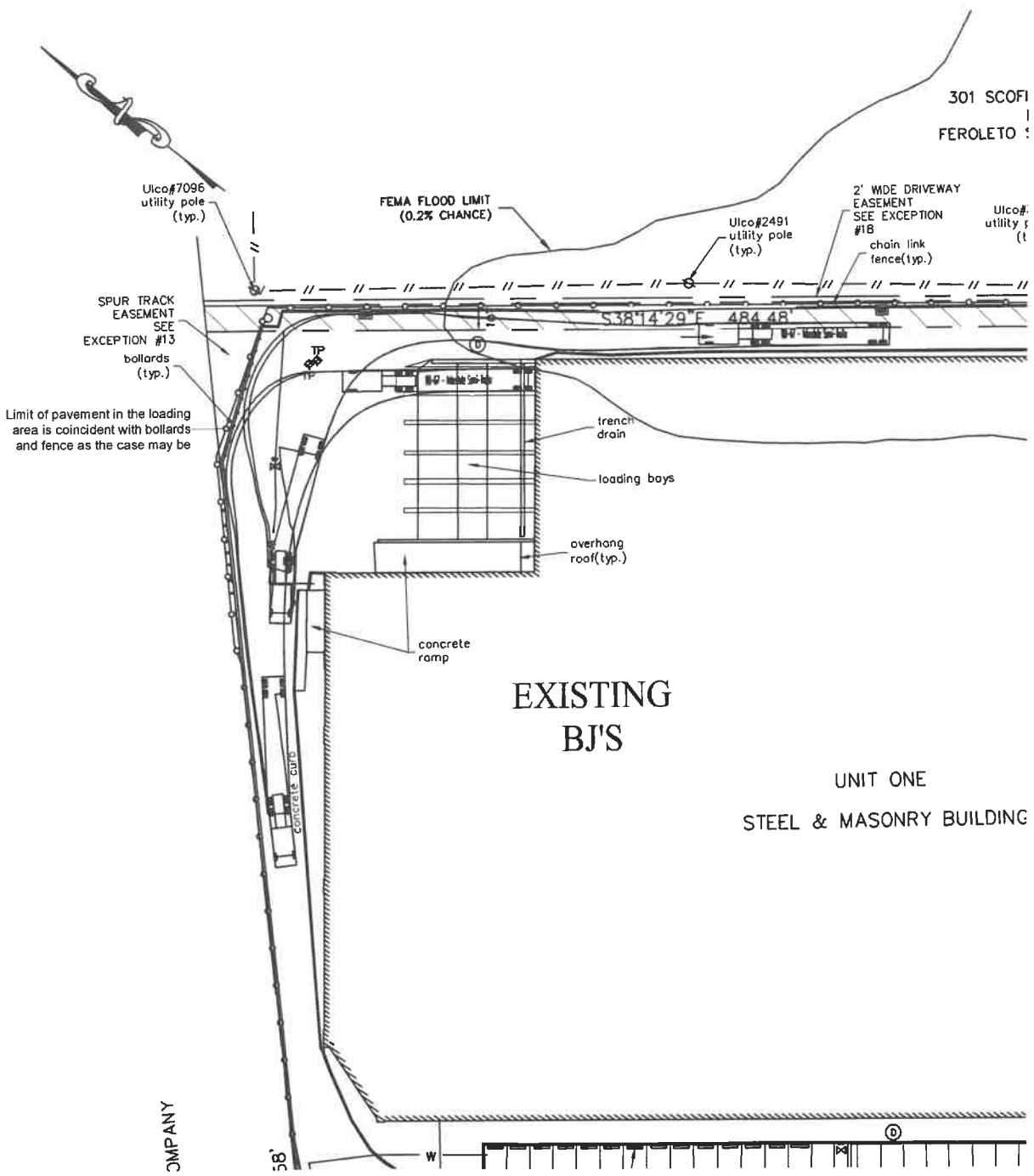
College of Engineering and Computer Science

1997 – 2001

Syracuse, New York

- Bachelor of Science, Civil Engineering
- Engineer in Training, Massachusetts Certificate Number 20344

# EXHIBIT B



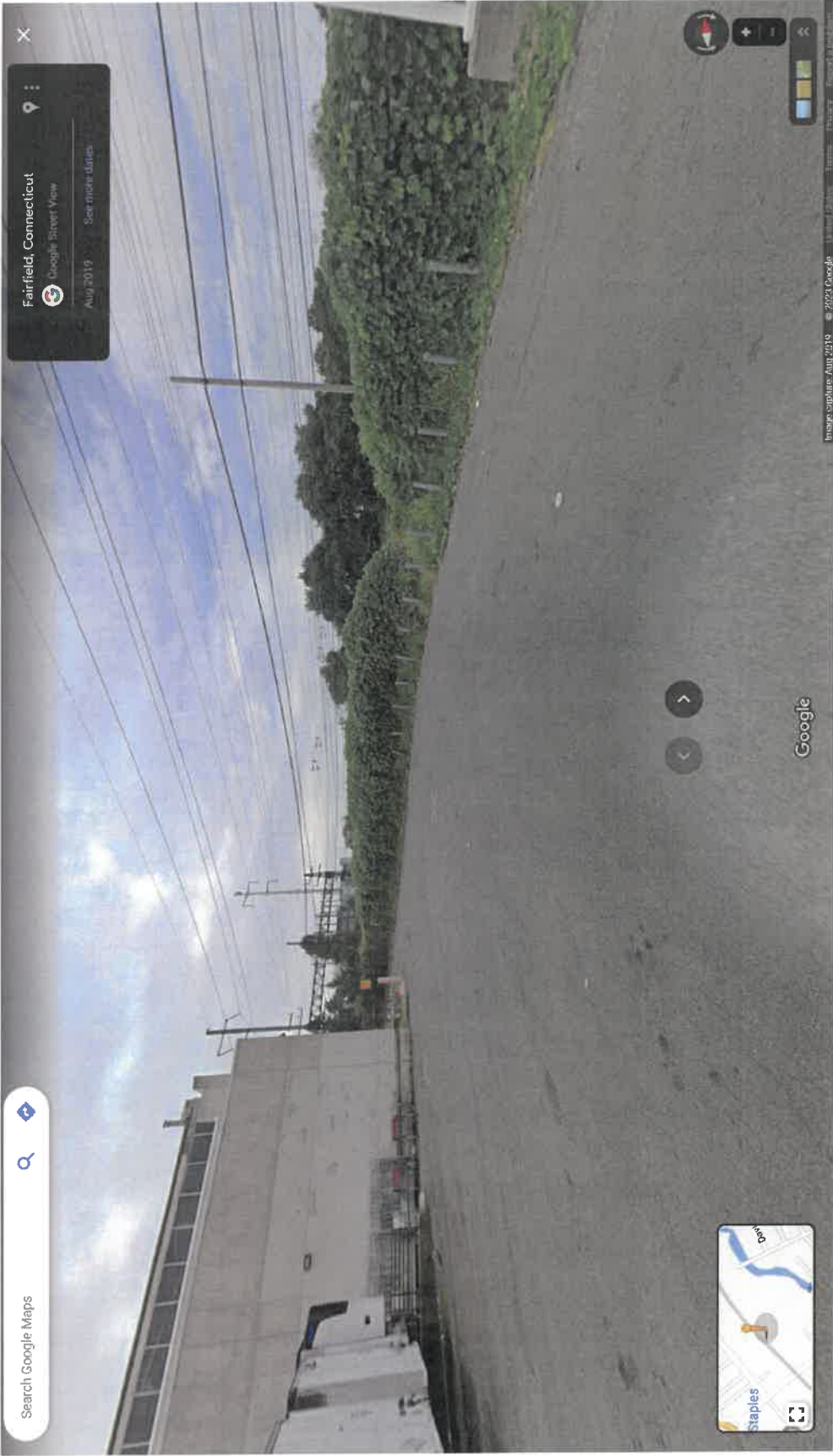
**SOLLI**  
ENGINEERING  
501 Main Street, Monroe, CT 06468  
T: (203) 880-5455 F: (203) 880-9695

**TRUCK TURN FIGURE**  
40 BLACK ROCK TURNPIKE  
FAIRFIELD, CONNECTICUT

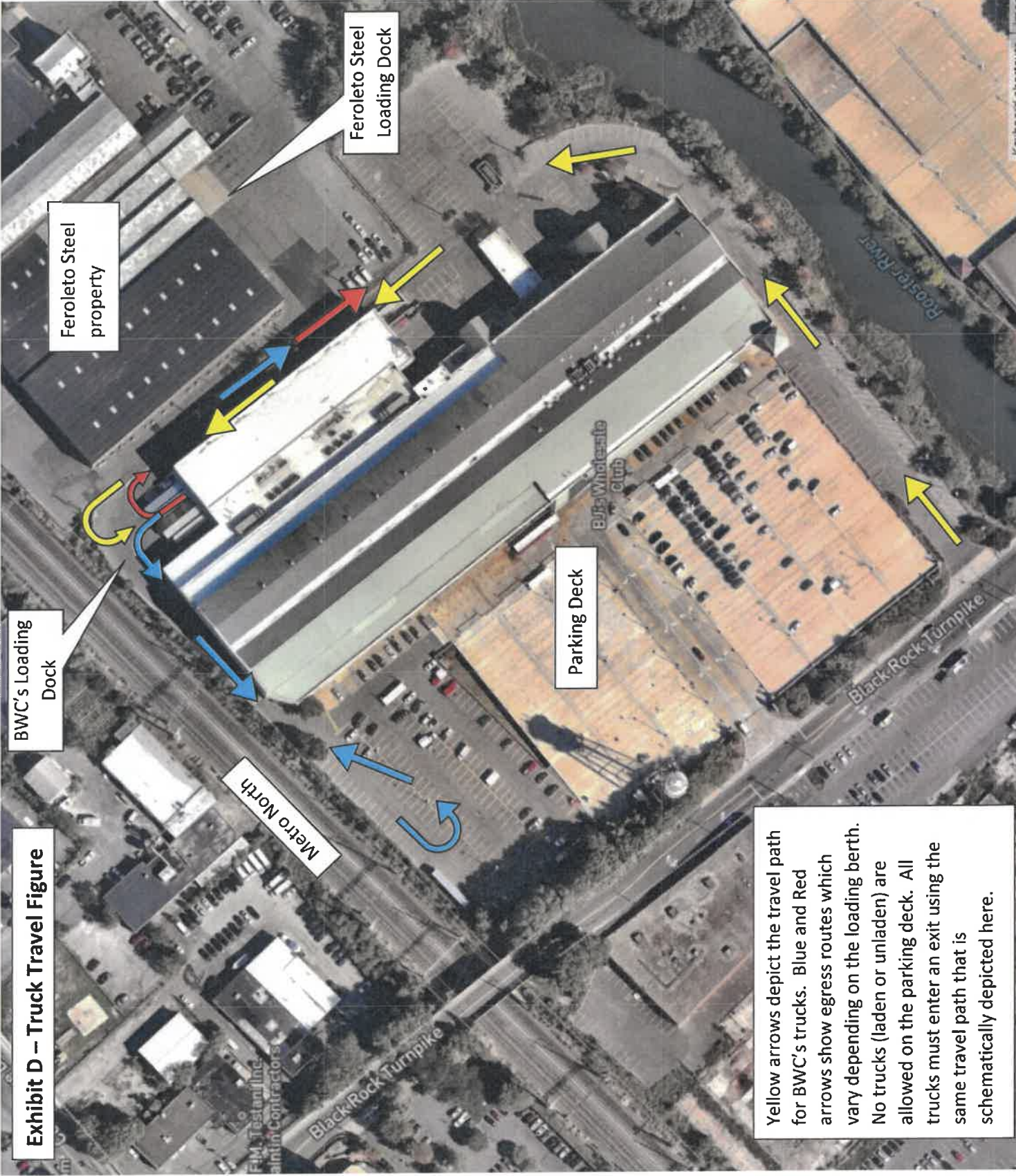
Project #:	22106501
Plan Date:	08/17/23
Scale:	1" = 60'
Figure:	1

# EXHIBIT C









**Exhibit D - Truck Travel Figure**

Feroleto Steel property

Feroleto Steel Loading Dock

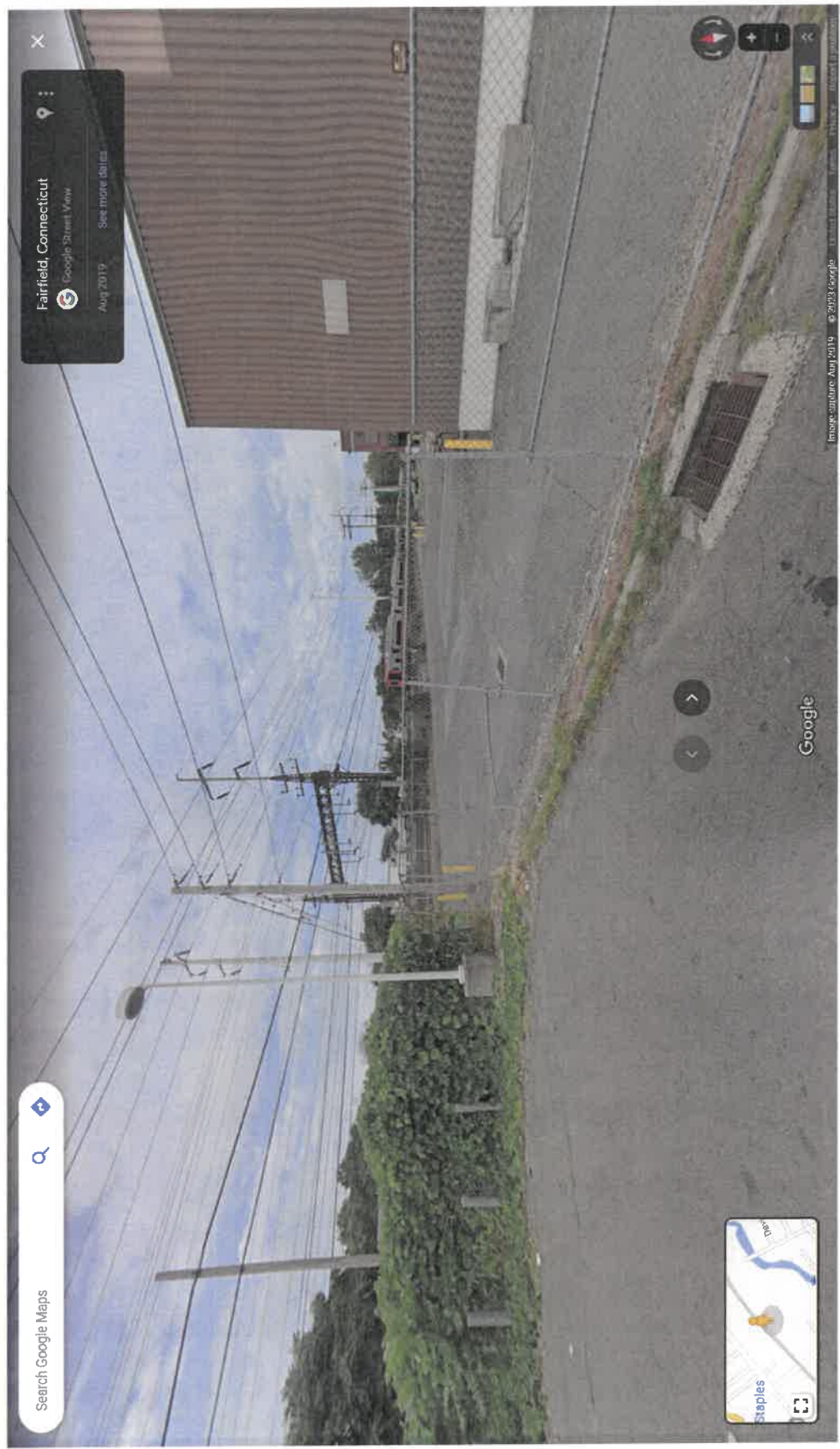
BWC's Loading Dock

Metro North

Parking Deck

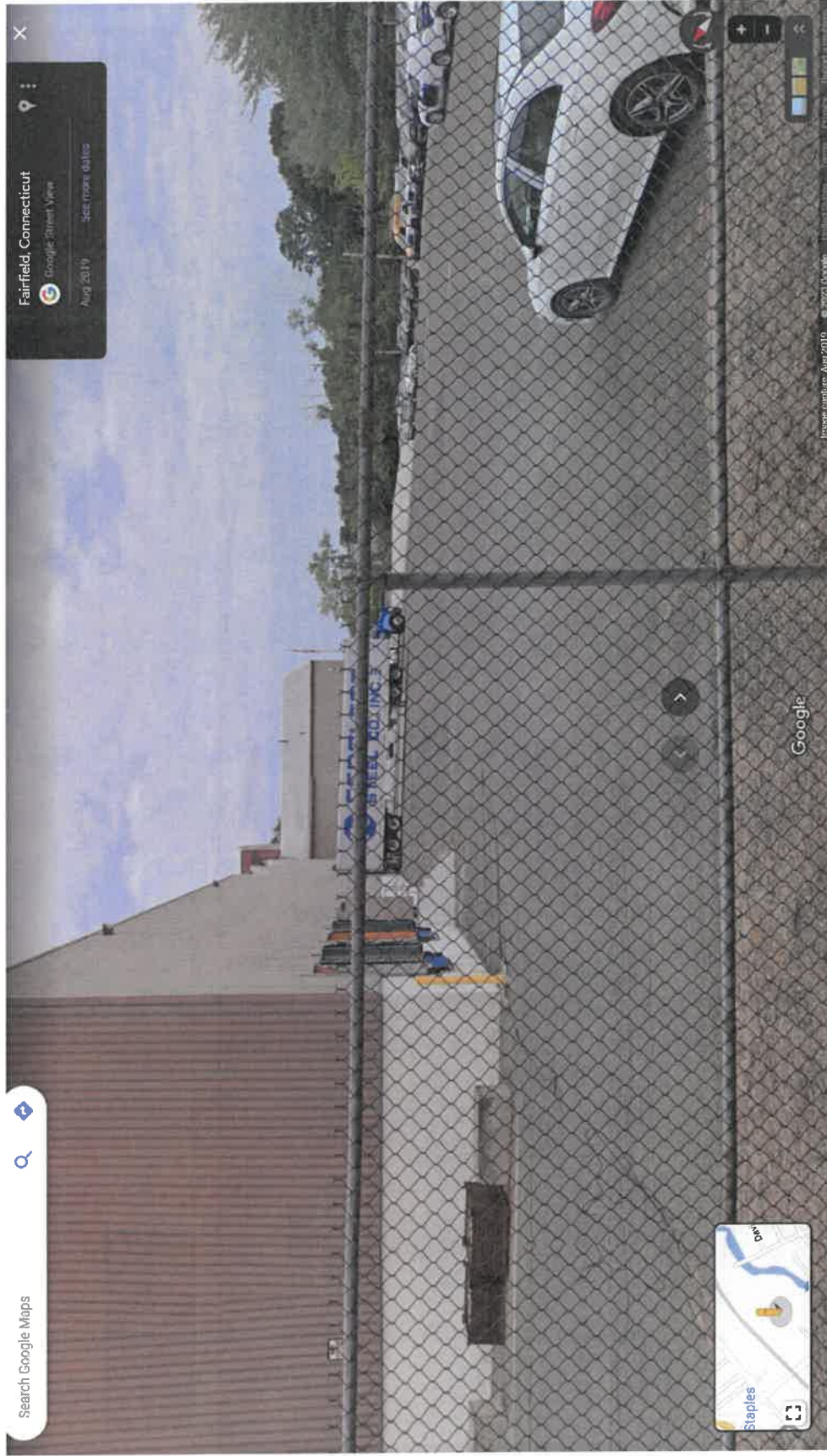
Yellow arrows depict the travel path for BWC's trucks. Blue and Red arrows show egress routes which vary depending on the loading berth. No trucks (laden or unladen) are allowed on the parking deck. All trucks must enter an exit using the same travel path that is schematically depicted here.

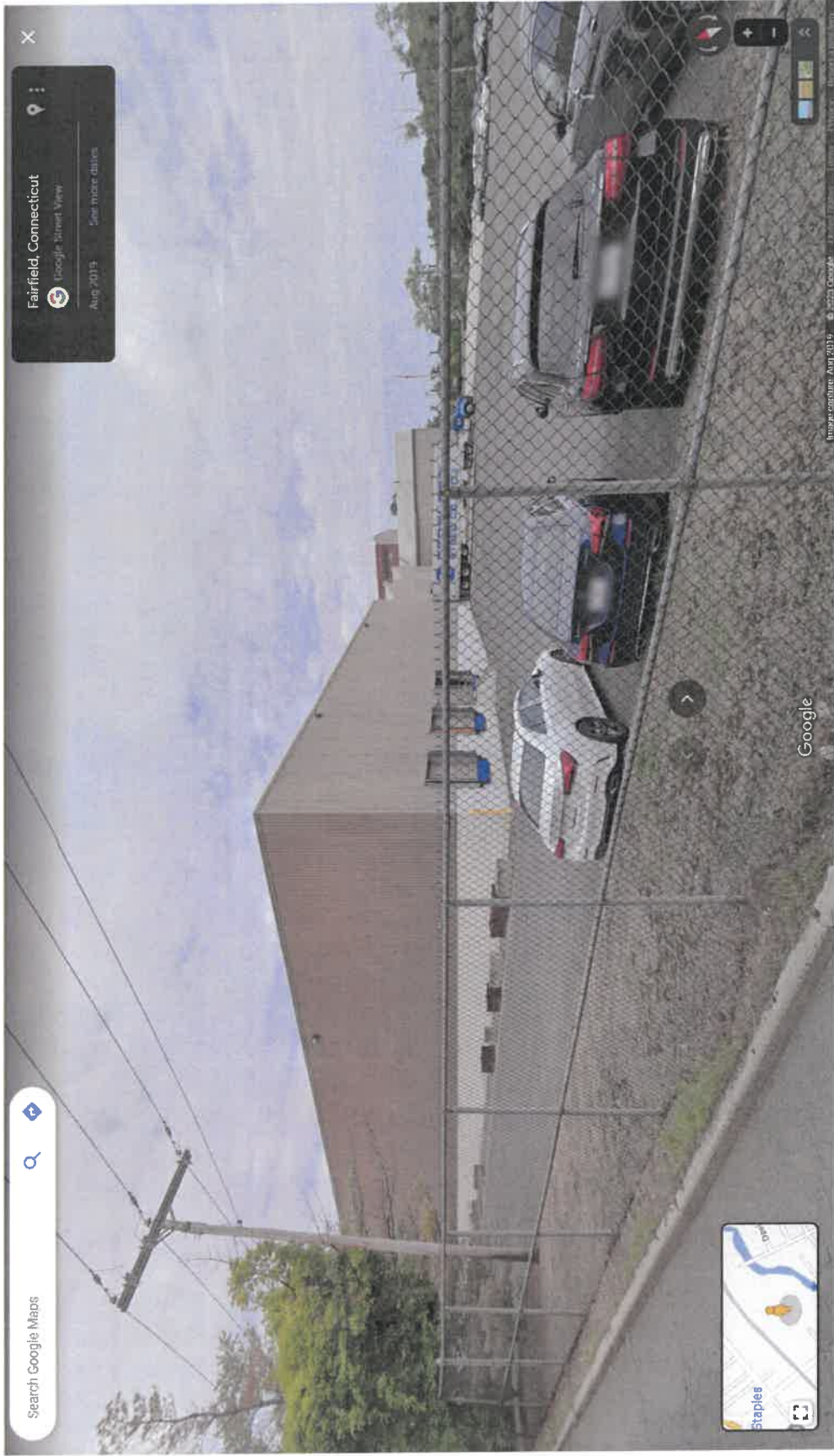
# EXHIBIT E





# EXHIBIT F





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Aug 2017

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Staples

Google



Image captured Aug 2017 © 2022 Google 11.1 m 17.7° 73° 30' W