

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 :

FEBRUARY 7, 2024

**BJ’S WHOLESALE CLUB, INC.’S COMMENTS TO CONNECTICUT SITING
COUNCIL’S DRAFT FINDINGS OF FACT**

Pursuant to R.C.S.A. § 16-50j-31, BJ’s Wholesale Club, Inc. (“BWC”) respectfully submits comments in response to the draft findings of fact prepared by the Connecticut Siting Council (the “Council”) and dated January 25, 2024.

Paragraph 413 of the Council’s draft findings of fact provides as follows:

413. The placement, installation and maintenance of proposed Struture P724S, the temporary work pad and the related easement in the loading dock area of BWC’s property would have short-term and long-term adverse impacts on BWC’s business operations. BWC requests reasonable, prudent alternative locations for P724S that would not cause adverse impacts to BWC’s business operations. (BWC 2, Pre-filed Testimony of Patrick Ntreba dated August 22, 2023, pp. 2-4)

BWC respectfully requests that the Council amend Paragraph 413 of the draft findings of fact to further state the following:

- The placement, installation and maintenance of proposed Structure P723S and P724S, the Proposed Temporary Construction Area, the Proposed Temporary Bonnet Removal Work Pad Area and any related easements would have short-term and long-term adverse impacts on BWC's business operations. (BWC, Pre-filed Testimony of Patrick Ntreba dated November 2, 2023, pp. 1-5)
- An alternative location for the Proposed Temporary Construction Area, Proposed Temporary Bonnet Removal Work Pad Area and any related easements, whereby none are located on BWC's property, is necessary to avoid significant, permanent disruptions to BWC's property, loading dock area and business operations. (BWC, Pre-filed Testimony of Patrick Ntreba dated November 2, 2023, pp. 1-5)

Paragraph 414 of the Council's draft findings of fact provides as follows:

414. BWC suggests that P724S be located on the railroad ROW or on the Feroletto Steel Co Inc. property. (BWC 2, Pre-filed Testimony of Patrick Ntreba dated August 22, 2023, p. 3)

BWC respectfully requests that the Council amend Paragraph 414 of the draft findings of fact to state the following:

- BWC urges UI and the Council to relocate P724S and any associated easements to the Feroletto Steel Co., Inc. property or the railroad ROW to avoid significant, permanent disruptions to BWC's loading dock area and business operations, as well as potential damage to BWC's parking deck. (BWC 2, Pre-filed Testimony of Patrick Ntreba dated August 22, 2023, pp. 3-4; BWC Pre-filed Testimony of Patrick Ntreba dated November 2, 2023, pp. 4-5)

Paragraph 417 of the Council's draft findings of fact provides as follows:

417. BWC requests that UI avoid access across the parking deck. UI could accommodate that request. (BWC 6, p. 5; Tr. 6, pp. 164-165)

BWC respectfully requests that the Council amend Paragraph 417 of the draft findings of fact to state the following:

- BWC urges UI to avoid access across the parking deck because it is BWC's experience in operating its property that commercial trucks cannot pass over the parking deck. (BWC, Pre-filed Testimony of Patrick Natreba dated November 2, 2023, pp. 4-5)

BWC further comments and requests that the Council condition approval of the United Illuminating Company's application on the relocation of Structure P723S, Structure P724S, the Proposed Temporary Construction Area, Proposed Temporary Bonnet Removal Work Pad Area and any related easements entirely off BWC's property.

RESPECTFULLY SUBMITTED,

BJ'S WHOLESALE CLUB, INC.

By:



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CERTIFICATION OF SERVICE

I certify that on February 7, 2024, a copy of the foregoing was sent electronically to the following counsel and parties of record:

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