STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company Application for a Certificate of Environmental Compatibility and Public Need for the Stamford Reliability Cable Project, which consists of construction, maintenance, and operation of a new 115-kV underground transmission circuit extending approximately 1.5 miles between Glenbrook and South End Substations, Stamford, Connecticut and related substation improvements.	DOCKET NO. 435 August 13, 2013

COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY REGARDING THE DRAFT FINDINGS OF FACT DATED AUGUST 2, 2013 OF THE CONNECTICUT SITING COUNCIL

The Connecticut Light and Power Company ("CL&P") files these comments regarding the Draft Findings of Fact issued by the Connecticut Siting Council (the "Council") dated August 2, 2013 ("DFOF"). For the Council's convenience, CL&P's suggested revisions, with comments where applicable, have been incorporated in the attached Word version of the DFOF. Please note that Figures 1-5 were intentionally omitted to facilitate the electronic filing. Also, CL&P understands that the Drawing filed as part of CL&P 4, depicting the Preferred Route with Canal Street Option, will be added at the Council's request.

As a general comment, throughout the DFOF, it appears that "SRCP" or "SRCPs" is inadvertently used in lieu of a more general intention to refer to "project" or "projects". CL&P believes that to be the case for the references in the caption and in DFOF ## 1, 19 (2), 37 (2), 47 (2), 59, 60, 62, 66, 74, and 78. CL&P recommends that the remaining references to "SRCP" and

"SRCPs" be reviewed individually to verify the intention to use "SRCP" to refer only to the Stamford Reliability Cable Project.

CL&P requests that the Council consider the following findings of fact, which were included in CL&P's Proposed Findings of Fact ("PFOF") filed with the Council on July 2, 2013. CL&P has included its rationale for its request below.

9. CL&P developed a project website, e-mail address and hotline through which residents and stakeholders could communicate with project representatives. (CL&P 6, p. 37)

11. On January 8, 2013, CL&P held an open house in Stamford at the Government Center. (CL&P 6, p. 37)

Comment: PFOF ## 9 & 11 reflect CL&P's substantial communication and outreach efforts.

15. The Council published legal notice of the time and place of the public hearing in The Advocate and Connecticut Post on February 27, 2013. (Tr. 2, pp. 4-5)

27. The East Side Partnership submitted comments dated May 24, 2013 in support of the underground route for the Project. (East Side Partnership Comments dated May 24, 2013)

Comment: PFOF ## 15 & 27 are recommended for completeness.

34. The Project was listed in CL&P's *2012 Forecast of Loads and Resources For the Period 2012-2021*, dated March 1, 2012 and in CL&P's *2013 Forecast of Loads and Resources For the Period 2013-2022*, dated March 1, 2013. (CL&P 1, p. B-4; CL&P Admin. Notice 1)

61. The cost consequences of an outage are significant as compared to the costs of infrastructure improvements to protect and ensure the reliability of electric services to customers in a service area. (Tr. 1, pp. 51-52)

65. As part of the ISO-NE planning process, market participants are allowed to participate in an open forum. As part of such process, no generation proposals were proposed as alternatives to the Project. (Tr. 1, p. 62)

Comment: PFOF ## 34, 61 & 65 support CL&P's need analyses and conclusions.

68. CL&P rejected a route along I-95 because ConnDOT policies limit the longitudinal occupation of interstate corridors and the I-95 corridor is raised above grade for most of the Project area. (CL&P 6, p. 7)

69. Any overhead route along the railroad corridor presents severe practical challenges because MNRR policies limit colocations, and potential conflicts arise with developments abutting the railroad as well as construction obstacles with above- and below-grade railroad crossings. Additionally, the MNRR corridor is already occupied with multiple overhead transmission lines and therefore is significantly congested. (CL&P 6, p. 7)

72. ConnDOT plans to expand Route 1 and the I- 95 exit ramp and MNRR is planning several bridge replacements projects. (Tr. 1, p. 45)

74. In the future, ConnDOT plans to expand the wing-wall for Atlantic Street and to move the wall along South State Street approximately 15 feet thereby eliminating one of the South State Street lanes to accommodate an additional rail. (Tr. 1, p. 46; CL&P 13, p. 10)

87. CL&P identified site-specific challenges with replacing the 1977 Line structures including:

(a) Twenty-four drill rig platforms would be required primarily along South State Street and the railroad corridor. For the platforms in South State Street, two lanes would need to be closed. For the platforms in the railroad corridor, the drill rigs must be elevated to the same ground level as the finished foundation;
(b) A high stone wall supports the railroad on South State Street near Atlantic Street, requiring a very high drill rig platform to be erected; and
(c) Access to structures would be difficult from the rear yards of homes along Culloden Road. All of these properties have very small lots.

(CL&P 13, p. 7)

90. CL&P reported that ConnDOT would not allow the use of the railroad catenary structures for utilities. (CL&P 13, pp. 9-10)

Comment: PFOF ## 68, 69, 72, 74, 87 & 90 were important considerations in CL&P's analysis of overhead options.

124. The tallest proposed structure, a riser pole with lightning arresters, to be installed within the fenced-in substation would be approximately 37 feet in height. This structure would be substantially lower than the height of the existing tallest structure, which has a total height of approximately 100 feet. (CL&P 6, p. 10)

127. The tallest proposed structure, a termination structure with lightning arresters, to be installed within the fenced-in substation would be approximately 22 feet in height. This structure would be substantially lower than the height of the existing tallest structure, which has a total height of approximately 65 feet. (CL&P 6, pp. 11-12)

Comment: PFOF ## 124 & 127 provide findings that demonstrate the absence of an adverse visual effect associated with planned substation equipment.

166. The Project is consistent with the *Conservation and Development Policies Plan for Connecticut 2005-2010* and serves a public need for a reliable source of electricity, which such plan recognizes as necessary for development in Connecticut's Regional Centers. (CL&P 1, pp. G-8, G-9).

167. The Project is consistent with the future land-use and planning objectives of the Southwestern Regional Planning Agency's *2006-2015 Regional Plan of Conservation and Development.* (CL&P 1, P. G-9)

172. There are no aquifer protection areas in the vicinity of the Project. (CL&P 1, p. F-4)

175. No portion of the Project routes are within a 500 year flood hazard area. (Tr. 1, p. 30; Tr. 3, p. 45)

180. There are no areas of municipal land, scenic areas, open space, recreational areas or parks immediately adjacent to the Project. The nearest open space is Dasham Park located approximately 1,000 feet away. (CL&P 1, p. F-9)

181. Due to its location in a highly urbanized area of Stamford and the underground installation, there are no adverse visual effects. (CL&P 1, p. G-9)

Comment: PFOF ## 166-167, 172, 175 & 180-181 strongly support CL&P's position that there are no significant permanent adverse environmental effects on the existing environment or on the scenic, historic or recreational values of the surrounding area.

198. MF levels directly over the cable and for a distance of 25 feet will be higher than existing fields. At distances of more than 50 feet from the trench, the MF levels on the Project will be lower than existing fields after accounting for interactions between the proposed underground cable and the existing overhead lines. (CL&P 1, pp. I-14 to I-19 Appendix D.3, Table 1; Tr. 1, pp. 74-75)

199. The changes in the MF levels away from the underground cable at residences are very small and not at levels that have been determined to be of a health risk. (Tr. 1, p. 75)

Comment: PFOF ## 198 & 199 provide important site-specific MF information.

207. Recent studies do not provide evidence to alter the conclusion of the World Health Organization and other health and scientific agencies that the research suggests that EMF exposure is not the cause of cancer or any other disease process at the levels we encounter in our everyday environment. (CL&P 1, Appendix D.4, p. 46)

Comment: This finding is consistent with findings in recent transmission projects, namely #361 in Doc. No. 424 (Council Admin. Notice No. 32) and #285 in Doc. No. 370 (Council Admin. Notice No. 31).

221. High-speed protective relaying equipment would automatically detect abnormal system conditions (e.g., a faulted overhead transmission line) and would send a protective trip signal to circuit breakers to isolate the faulted section of the transmission system. Protection would also be provided by a Supervisory Control and Data Acquisition system (SCADA). The SCADA system allows for remote control and equipment monitoring by the Connecticut Valley Electric Exchange (CONVEX) System Operator. (CL&P 1, p. H-1; CL&P 6, p. 36)

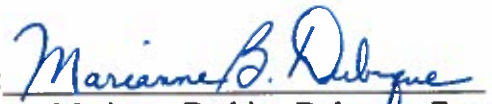
222. Fire/Smoke detection at Glenbrook Substation and at South End Substation, would automatically activate an alarm at CONVEX and the system operators would then take appropriate action. (CL&P 1, pp. H-1, H-2; CL&P 6, p. 36)

223. South End and Glenbrook Substations are gated and enclosed with a 7-foot high chain-link fence with an additional foot of 3 strands of barbed wire on top. Gates would be padlocked at all times. Signage is posted alerting the public of high voltage facilities. (CL&P 1, p. H-2)

Comment: PFOF ## 221-223 provide appropriate information on the safety features associated with the transmission line facilities and the Glenbrook and South End Substations.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

By: 

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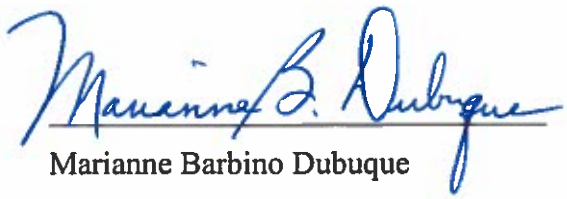
NOTICE OF SERVICE

I hereby affirm that a copy of the Comments of the Connecticut Light and Power Company Regarding the Draft Findings of Fact Dated August 2, 2013 of the Connecticut Siting Council with attached suggested revisions to the Siting Council's Draft Findings of Fact was sent to each Party on the service list dated March 7, 2013, with method of service to each party listed via e-mail on August 13, 2013.

Dated: August 13, 2013



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