

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements. : Docket # 461
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: November 16, 2015

Applicant

SECOND SET INTERROGATORIES OF PET PANTRY SUPER DISCOUNT
STORES LLC (PP) TO EVERSOURCE

The following interrogatories are submitted to the Siting Council for Responses by the Applicant:

PP(2):

1. Are the firefighters in the Greenwich area trained to combat an electrical disaster at the proposed facilities?
2. What was the response time for the firefighters who responded to the fire at Cos Cob.
 - a. How long did it take?
 - b. How long did it burn?
3. Is Amtrak a customer of Eversource? What percentage of overall use is used by them?
4. Is Metro North a customer of Eversource? What percentage of overall use is used by them?
5. Who owns the train electrical substations?

6. Who pays for the electric service to the trains in the Greenwich area? Does the public or the train companies privately? Are they subsidized by the state or federal government?
7. Eversource indicated previously that you have service personnel:
 - a. Who respond to emergencies at the substations?
 - b. Where are their offices located?
 - c. What happens if they are at other sites conducting emergency services?
 - d. What is the next available resource and where is located? What would be the response time?
 - e. What geographical areas does the one closest to Greenwich cover?
8. Eversource indicated that they did testing at the site at approximately 40 borings to test soil consistency and composition but other sampling may have to be undertaken? In what circumstances would that occur?
9. Would inconsistency of soil or its composition that may not have been discovered delay the Project and is there an estimate as to how long would it be delayed in worst case scenario and would it add to the cost of the Project?
10. Has the State disclosed the extent of the I-95 highway expansion in Greenwich and to what extent would the expansion prevent Eversource from installing lines in a longitudinal direction along the highway?
11. When is the ConnDot expansion to occur in the Greenwich area? Is it to be coordinated with Eversource and what is Eversource's role in that expansion.
12. Eversource claimed that there were 3 cable failures between Cos Cob and Prospect substations. What was the cause of the each failure and when did each occur?
13. What is the electrical consumption in the immediate areas next to Greenwich such as Norwalk, New Canaan, Stamford, Darien as compared to Greenwich?
14. Have new substations been installed in the last five years in any of those municipalities?
15. Do the new lines have an impact as to the distribution systems or will it only be as to Transmission?
16. What is the estimated cost and repair of existed lines as opposed to the cost and maintenance of newly installed lines?

17. What will happen to the soil that is excavated from the sites?
 - a. Will it be reprocessed, treated?
 - b. Will the soil be sold?

18. Eversource stated that in Summer of 2011 that the customer load was interrupted for several days
 - a. by what?
 - b. Why did that occur?
 - c. Was it preventable?
 - d. How was it preventable?

19. Did Eversource perform a study on the imposition of a microgrid in the Greenwich area?
 - a. Is that available?
 - b. Was it provided in the Application exhibits?
 - c. If Not, why not?

20. What other new substations have been built within the last 5-6 years in Connecticut and where?
 - a. What was their costs?
 - b. Did they have any project overruns?

21. What would an energy efficient program in the Greenwich area yield in reduced need?
 - a. Were there any studies done?
 - b. Were they submitted?
 - c. If not why?

22. Have you evaluated the top 25 users to get them on microgrids and other energy efficient systems, when, and what was the reductions yields.

23. When were the latest upgrade made to the substation at 330 railroad ave over the last 5-6 years. What was it for?

24. What will be the role of the operations at 330 railroad under the current plan.

25. As Eversource indicate, the site at 290 Railroad is to be demolished? Why can't the site at 330 be demolished and rebuilt with the additional height included? Is not that site larger than 290? Please explain?

PET PANTRY SUPER DISCOUNT STORES LLC Intervenor

s/ Mark L. Bergamo

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