

September 29, 2015

Mr. Robert Stein
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 461 - CSC 461 Greenwich Substation and Line Project

Dear Mr. Stein:

This letter provides the response to requests for the information listed below.

Response to PANTRY-01 Interrogatories dated 09/22/2015

PANTRY-001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026, 027, 028, 029, 030, 033, 034, 035, 036, 037, 039, 040, 041, 042, 043, 045, 046, 048, 049, 051, 052, 053, 056, 057, 059, 061

Very truly yours,

John Morissette
Project Manager
Siting
As Agent for CL&P
dba EversourceEnergy

cc: Service List

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-001
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Are there any studies as to the impact of lack of parking due to the trenching and laying of lines in the Greenwich area?

Response:

Eversource has not conducted a study of the impact to parking due to trenching. However, a parking plan will be conducted if the Siting Council approves the Project and determines the route for the transmission lines.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-002
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has Eversource received any permissions or authorization from either the Federal or State government for the construction and laying of lines or by the I-95 highway in Greenwich?

Response:

No. As it relates to the Greenwich Substation and Line Project, Eversource has not received any permissions or authorization from either the federal or State government for the construction and installation of transmission lines along the I-95 corridor.

Witness: **Witness Panel**
Request from: **Pet Pantry Super Discount Stores**

Question:

In Eversource's excavation Sites:

- a. How wide are the open trenches going to be?
- b. What is the width of area on the outer sides of the trenches going to be?
- c. Where excavated materials are going to set?
- d. How wide will be the areas from the sides of open trenches going to be notwithstanding the storage of excavated materials stored on the side of such trenches?
- e. Would not the areas be much wider than initially disclosed because of the size or the machines used to excavate and the need for the machines to get around the trenches?

Response:

- a. The typical trench width is approximately 4.5 feet.
- b. The area affected by trenching will be approximately 25 feet wide to provide a work area for construction equipment such as excavators and dump trucks and to provide for a safe work zone for the construction workers.
- c. The excavated materials would be trucked away to a designated area where soils will be categorized and then disposed of accordingly.
- d. The total width of the work zone will vary, and the width on each side of the trench will vary and will require more than 10 feet. Excavation materials will not be stored on site but rather trucked away to a designated area.
- e. Machinery used for construction, such as excavators and dump trucks, do require space to operate between the edge of the trench and the traffic safety cones. The area required will vary depending upon the specific site requirements. Typically, a width of 24 - 30 feet is considered adequate space alongside the trench.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-004
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Does Eversource have any studies which indicates the decibel levels of its construction sites and the potential sounds caused by such construction and have those been submitted? Why have those studies not been disclosed as part of the record?

Response:

No studies were performed for the potential construction sites. Construction noise is temporary and is exempt from State regulations.

**CL&P dba Eversource Energy
Docket No. 461**

**Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-005
Page 1 of 1**

**Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores**

Question:

As Eversource has indicated, it has not yet engaged any contractors for the proposed improvements, how can it predict how long it will take to complete the project?

Response:

While it is true that estimating construction durations can be a challenge with limited information, Eversource has performed some field investigations and has past experience with productivity rates under similar conditions. In addition, the Project's outside engineering consultant, Power Engineers, has significant experience across the country with installing similar underground facilities. Based on this information and experience, Eversource believes that the construction durations provided are reasonable.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-006
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is it not true that construction of the Project may be delayed because certain unknown factors in the composition of soil such as ledge, bedrock and other impediments not yet foreseen by Eversource in their preliminary review?

Response:

It is true that subsurface conditions, such as rock, water and other utilities can affect the productivity rates for underground construction. The Company has completed some investigations in that area to help quantify those factors and adjust estimated construction durations to account for those factors.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-007
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is it not true that no full studies have yet been undertaken to assess the full impact of the construction because Eversource cannot determine the extent of the variations in the composition of the soil in the various areas?

Response:

Eversource has taken greater than 40 soil and water samples along the proposed and alternative routes to obtain initial data with respect to quality and compatibility with the proposed Project. These samples were taken to assist Eversource and its Engineers in preparing its preliminary engineering designs and developing a conceptual construction approach that would be in compliance with applicable regulations and permits. A Connecticut certified wetland scientist has also surveyed the Project area for the presence of wetlands. Wetland boundaries and locations will be used to mitigate and avoid potential effects. If the Siting Council approves the Project, the location of the new substation and the route of the Project transmission lines Eversource will take additional samples to refine this analysis.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-008
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

What type of covering on excavations will be used to insure the protection and safety of the public? How big will it be?

Response:

Steel trench cover plates with size of 8'L x 4'W and 1" or thicker are to be used to cover the excavations. In addition, message boards, barrels and traffic roll up signs and stands, will be used to help ensure the protection and safety of the public.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-009
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has Eversource conducted any traffic studies of the areas in which construction, excavation and or demolition will occur and have those studies been disclosed?

Response:

Eversource has not conducted any traffic studies. Eversource is committed to working with the Town on a detailed construction vehicle routing plan and an overall plan for traffic management during construction.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-010
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

How will traffic be redirected around the proposed substation and how long will that take?

Response:

During the construction of the substation, there will be occasional deliveries of equipment and materials which will affect traffic flow. Depending on the type and size of equipment and materials, the traffic impact would be a few minutes (similar to the tractor trailer deliveries to the current business at 290 Railroad Ave.), or possibly up to an hour for the larger equipment such as the transformers.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-011
Page 1 of 1

Witness: **Witness Panel**
Request from: **Pet Pantry Super Discount Stores**

Question:

Has Eversource conducted studies of the impact its construction, excavation and demolition, if any on each potential site and why haven't those detailed studies not been disclosed?

Response:

Some information is provided in the Application. Further detail will be developed as engineering continues and after a general contractor is on board. This detail will be provided in the Development & Management Plan, if and when the Connecticut Siting Council approves of the Project.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-012
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Will any of the transmission/distribution lines be laid be active (live) during the Project?
Explain. If any of the lines are active or alive what security precautions are to be taken to protect the public?

Response:

No. Transmission and distribution lines will not be energized while being installed during the Project construction.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-013
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has a study (studies) been conducted that show the impact of how Greenwich town services will be impacted should there been emergencies such as a fire at the potential substations?

Response:

Eversource has not conducted such a study.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-014
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Out of any current or potential substation, which lot is the largest of all? By what percentage in comparison with all other sites?

Response:

See Section H.2.3 of the Application. The Old Track Road site is more than twice the size of the other sites, however this site has significant challenges listed in Section H.2.2.4 of the Application.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-015
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Will the current operating substation still be in operation after the Project?

Response:

See Section E.4.4 of the Application, which describes how the new Greenwich Substation capacity would allow for the equal division of load between the two bulk substations, Cos Cob and the proposed Greenwich Substation. The new transformer capacity of 180 MVA for the proposed Greenwich Substation will allow the company to retire the entire transformer capacity of Prospect Substation. As explained in Section E.4.4 of the Application, the Prospect Street substation would remain as a switching station for the existing 27.6-kV system, including customers directly supplied at 27.6 kV and the secondary network.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-016
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

What is the amount of proposed impervious surface in relationship to open space for each potential substation location?

Response:

A percentage calculation of impervious surfaces within the proposed substation, or any potential substation location, has not been completed. However, the majority of surface within the substation will consist of trap rock, a permeable surface. Major equipment and the planned enclosure building and pump house constitute as impervious surfaces within the substation.

Witness: **Witness Panel**
Request from: **Pet Pantry Super Discount Stores**

Question:

What is the current percentage of commercial users and the amount of service use by commercial users as opposed to residential?

- a. Who are the top ten users of such electrical service and their percentage use as opposed to residents in Greenwich?
- b. Who will be the specific beneficiaries of the new substation and lines other than businesses and residents of Greenwich? Who else will the new system benefit?
- c. Is not the actual need for more load capacity and distribution for the benefit of customers outside of Greenwich? By how much?
- d. Is this for electricity outside the area or only for use in Greenwich, and how would we monitor that, or know that to be true?

Response:

As of 2015, Eversouce customers in the Town of Greenwich are 90.3% residential and 9.7% commercial/manufacturing.

- a. Customer names are confidential. Please see the response to Q-OCC-024 for data on peak demand of the 25 largest end-use customers served out of the 27.6 kV Cos Cob substation in 2014 and 2015.
- b. The Greenwich Substation will serve only Greenwich customers; both business and residential customers will benefit from the increased capacity and reliability of a new bulk substation.
- c. No customers outside of Greenwich will be served by the proposed Greenwich Substation.
- d. See c. above.

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**Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-018
Page 1 of 1**

**Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores**

Question:

Could not a new substation be located in the Stamford area and not the Greenwich area which could re-distribute electrical transmission more efficiently and reduce any need for additional service for Greenwich?

Response:

No, a new substation located in Stamford, even if achievable, would not be more efficient to serve the load pocket in Greenwich. The proposed new Greenwich Substation is planned to be located in the heart of the area of the greatest demand in Greenwich. Please see sections E.4 and E.4.1.4 of the Application. See response to Q-OCC-009.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-019
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Why couldn't the Substation located at 330 Railroad be brought current to address the potential needs of customers and use the vacant land owned by it for supplemental use?

Response:

See Section H.2.2.3 of the Application for detail as to why 330 Railroad was not selected as the location of the new Greenwich Substation.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-020
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Why was the market study for evaluating potential sites for substations not submitted as evidence for the record?

Response:

Eversource did not conduct a market study. Eversource used an area real estate broker to assist with the identification of available properties that were situated within the load pocket and that met certain physical criteria. Eversource then used a multi-disciplinary team to conduct the site evaluations. See Sections H.1. and H.2. of the Application.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-021
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is not the current plan too speculative at this time and highly dependent on obtaining permissions from other agencies to be submitted at this time?

Response:

No, it is not too speculative; information compiled from the Connecticut Siting Council (CSC) Application process is used for regulatory permit applications and approvals. In addition, submitting the CSC Application while seeking other required regulatory approvals is consistent with prior projects.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-022
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Who are the commercial users in Stamford and how much do they use? Is this the reason for putting the sub-station in Greenwich and expanding Cos Cob?

Response:

The proposed new substation will only serve customers in Greenwich.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-023
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has Eversource conducted any studies on how the market value of real estate will be effected during the construction period?

Response:

No.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-024
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

What injurious impact the substations can have on public health? Have you submitted any studies? If so, please indicate to which report that the public may refer to?

Response:

It is Eversource's position that there will be no injurious impacts on public health from the proposed Substation and transmission lines. Please see Sections L. and M. of the Application.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-025
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:
How much will this Project cost to the ratepayers?

Response:
See Eversource's response to PANTRY-025.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-026
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Have all studies been submitted on the use of chemicals used to break on rocks that Eversource intends to use on the Project been disclosed to the Public? Please indicate which report/study has been submitted? Does this study disclose the nature of the chemicals it will use and its toxicity or caustic nature in relationship to the environment it will be using it in and the potential danger caused by seepage or leakage to surrounding areas.

Response:

No studies have been submitted. See Eversource response to CSC-02; Q-CSC-005 for additional information.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-027
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has Eversource conducted an independent study- to find out whether that putting in another substation would not be injurious to everyone's health?

Response:

See Eversource's response to Q-PANTRY-024.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-028
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:
How is the Project going to affect the residents in Rye.

Response:
The proposed new substation will only serve customers in Greenwich, Connecticut. The Project will have no affect on residents in Rye, New York.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-029
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:
In what manner is Eversource going to drill through wetland areas?

Response:
See Section K.1.3 of the Application for information on how the drill will go under the wetland areas.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-030
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is Eversource going to designate the Pole Site for a future-designated substation?

Response:

No, if the proposed new substation at 290 Railroad Avenue is approved by the Connecticut Siting Council, there will be no need for a substation at this location.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-033
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Has Eversource ever embarked on a project of this size without a substantial cost overrun?
What makes this Project different from all other that overruns will not occur?

Response:

Yes, Eversource just completed an underground cable project in Stamford that involved similar construction complexities that came in under budget. . As of today, Eversource is in the process of final closing out for the Greater Springfield Reliability Project the Greater Springfield Reliability Project which came in under budget.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-034
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Who are the biggest users in Stamford on the same system as Greenwich and their load usage?

Response:

None of the customers in Stamford are supplied by substations located in Greenwich.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-035
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

What is the time sequence- from start to finish - should the Siting Council initially give its approval. Does Eversource not have to obtain further studies and permits?

Response:

Should the Connecticut Siting Council (Council) approve the proposed Project, the Company will file a Development & Management Plan for the Council's approval. Additional approvals/permits are listed in Section O. of the Application.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-036
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

How will the building of the new substation impact the Assessor's office in Greenwich in evaluating the properties that are in close proximity to this monolithic structure?

Response:

Eversource disagrees with the characterization of the building as a "monolithic structure". Eversource cannot address this question since it should be directed to the Assessor.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-037
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Were not the actual load values been reduced in 2014 and are actually going down because of more efficient ways of reducing load levels rather than by putting in a new substation?

Response:

Please see the pertinent discussion included in Eversource's Supplemental Testimony (Bowes/Gagnon/Gardell) filed September 29, 2015.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-039
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

There is an existing substation, prospect station, across the street, 100 yards away. If you were going to enhance the power availability why could Eversource not do it in that location?

Response:

See Section H.2.2.3 of the Application as to why the expansion of Prospect Substation at 330 Railroad Avenue was not selected as the site for the new Greenwich Substation.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-040
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:
Have the closing of title occurred at 330 Railroad?

Response:
No.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-041
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is there any final design of the substation building and has it met with approval of the Town of Greenwich?

Response:

The final design of the Greenwich Substation GIS building is subject to the approval of the Connecticut Siting Council. There have been several comments from town agencies and officials submitted to the Connecticut Siting Council.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-042
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Do you need any consents from the Department of Transportation. A letter indicates that utilization of I-95 Corridor or the New Haven Line Corridor would not be endorsed by DOT, is that a final decision?

Response:

Yes, see correspondence received from the Department of Transportation in Appendix E of the Application. The Department of Transportation letter is not a final decision.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-043
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

What is the preferred route with Eversource intends to use in installing its lines?

Response:

Eversource intends to construct the route approved by the Connecticut Siting Council. Based on route evaluation in Section H.3 of the Application Eversource prefers the Preferred Route set forth in Section G.4 of the Application with the Green Variation in Section G.4.1 "(referred to as MNRR/I-95 Crossing Variation HDD)"

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-045
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Isn't the area of the existing substation and the potential new one within a 100 year floodplain? Isn't the proposed substation at 290 only several feet away from the existing site? When was the last flood that occurred?

Response:

The existing substation located at 330 Railroad Ave is entirely within the 500-year flood plain of the Horseneck Brook and not within a 100-year flood plain. The proposed substation to be located at 290 Railroad Ave would not be located within the 100- or 500-year flood plain of Horseneck Brook. The edge of the 500-year flood plain is located approximately 10 feet from the southwest corner of the 290 Railroad Avenue site. Eversource has no documentation on the last flood to occur at 330 Railroad Avenue. However, based on the criteria for determination of the 500-year flood plain boundary, this property has a 0.2% chance of flooding on an annual basis or from a 500-year storm event.

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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-046
Page 1 of 1

Witness: **Witness Panel**
Request from: **Pet Pantry Super Discount Stores**

Question:
When has the last blackout taken place in Greenwich?

Response:
Storm Sandy's outage event on 10/30/2012 at 1:00:00 PM adversely affected 87% of Greenwich.
A tree related event on 08/06/2012 adversely affected 99.5% of Greenwich.

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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-048
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is system proposed at the Railroad St. site a generation system or distribution system?

Response:

The substation proposed at Railroad Avenue will be a transmission/distribution substation feeding the electric distribution system in Greenwich.

CL&P dba Eversource Energy
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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-049
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Is this for electricity outside the area or only for use in Greenwich, and how would we monitor that, or know that to be true?

Response:

The proposed new substation will only serve customers in Greenwich. This response and the Supplemental Testimony (Bowes/Gagnon/Gardell) which also contains this information will be sworn testimony in this proceeding.

CL&P dba Eversource Energy
Docket No. 461

Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-051
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

If you look at Page 3 of Eversource's letter of March 19th what does it mean when they say that "the Cos Cob Substation Transformer overloads under certain contingency events starting in 2017"? What events are they referring to?

Response:

Based upon current load forecasts, the loss of one of the power transformers at Cos Cob (which would create a contingency event) could cause the load on remaining transformers in the year 2017 (and thereafter) to exceed the substation's permissible load rating of 135 MVA in peak load conditions.

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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-052
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

In 2 on Page 3 of Eversource's letter of March 19th what does it mean when they say; "the distribution feeder overloads supplying power to Prospect substation under certain contingency conditions"? What conditions are they referring to?

Response:

A contingency event such as the loss of one or more of our 27.6 kV feeders supplying Prospect Substation could overload the remaining 27.6 kV feeders out of Cos Cob Substation.

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Data Request PANTRY-01
Dated: 09/22/2015
Q-PANTRY-053
Page 1 of 1

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

In 3 of Eversource's letter of March 19th what do it mean by "Prospect substation transformer overloads in normal operating conditions under peak load starting 2021 "? Is this caused by population increase, what is it caused by?

Response:

Based on projected load growth, the total 13.2-kV load at Prospect Substation will exceed the substation's capacity of 55 MVA starting in year 2021. The increase in load is due to the forecast 1% load growth in the area, which is attributable to a general increase in usage of electricity.

Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Page 6 of Eversource's letter of March 19th , Eversource states that the project would achieve reduced dependents on heavily loaded Cos Cob which they forecast to exceed it permissible load reading.

- a. Why would it exceed it?
- b. What's the forecast based on?
- c. They also say this project will reduce dependence on the heavily loaded 9 transmission Prospect substation.
- d . What's the basis for that?

Response:

- a. Because of economic growth in Town of Greenwich which results to an increased demand for energy.
- b. Based on normal load growth of 1% and taking into account weather effects.
- c. Prospect Substation does not have any transmission lines. The establishment of Greenwich Substation will allow for the permanent load transfer from Cos Cob to Greenwich Substation, effectively reducing Prospect's feeder dependency on Cos Cob.
- d. Greenwich Substation will be the new source to the existing 13.2 kV Prospect feeders. This will remove permanently the load from Cos Cob Substation and Prospect Substation.

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Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Eversource also claims that the project would provide increased reliability for Greenwich customers by providing an independent separate source for distribution fees. That in turn , they claim significantly reduces the risk that one system interruption would create additional outages. Is Eversource guaranteeing there won't be outages if this goes in?

Response:

As set forth in Section E.2 of the Application, this Project will greatly improve reliability of electric service in the Town of Greenwich. However, outages could also be caused by other events such as severe weather or third party dig-ins. Accordingly, Eversource can not guarantee that there will never be outages in the future.

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Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Page 7 of Eversource's letter of March 19th Eversource discusses about this new substation will accommodate the current forecast for growing customer demand as well as future demand. What do they base that statement on?

Response:

Upon energizing the Greenwich Substation it will add 134 MVA capacity in the Town of Greenwich.

CL&P dba Eversource Energy
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Witness: Witness Panel
Request from: Pet Pantry Super Discount Stores

Question:

Why didn't Eversource just utilize 330 Railroad and put it there? Their claim is there's an 80 year old culvert that goes down the middle of the property that's in the flood plain. However, we can agree the flood has never occurred.

Response:

See Sections H.2.2.3 and H.2.3 of the Application for the explanation to 330 Railroad Avenue not being a suitable location for the new substation.