



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

June 22, 2020

Kathleen M. Shanley  
Manager - Transmission Siting  
Eversource Energy  
56 Prospect Street  
P.O. Box 270  
Hartford, CT 06141-0270

RE: **DOCKET NO. 461A** - Eversource Energy 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 transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.

Dear Ms. Shanley:

Pursuant to Regulations of Connecticut State Agencies §16-50j-62 (b) and in response to your email correspondence dated June 18, 2020, the Connecticut Siting Council (Council) staff hereby approves a temporary change to the Development and Management (D&M) Plan to allow for extended day and nighttime work hours, by a maximum of 2 additional work hours per day (**in no case later than 8 PM for daytime shifts and 7 AM for nighttime shifts**), for all segments of underground transmission line work identified in Volume 2, Parts 1 & 2, on an as needed basis to complete critical construction activities that are delayed due to certain factors beyond Eversource's control, as detailed in the June 18, 2020 correspondence. Work shift extensions will be reported in Eversource's monthly construction progress reports.

This approval applies only to the time period of June 23, 2020 through October 30, 2020 and will exclude Saturday and Sunday work. Extended work hours on Saturdays and Sundays will continue to require approval on a case-by-case basis. Also, work hours required beyond the times and activities specified in the June 18, 2020 correspondence will continue to require approval on a case-by-case basis.

This approval applies only to the temporary changes detailed in your correspondence dated June 18, 2020. Any additional changes to the D&M Plan require advance notification and approval in accordance with the Council's approval of the D&M Plan Volume 2, Part 1 on January 17, 2019 and Volume 2, Part 2 on May 24, 2019. Furthermore, the Certificate Holder is responsible for reporting requirements pursuant to Regulations of Connecticut State Agencies Section 16-50j-62.

Please be advised that deviations from this plan are enforceable under the provisions of the Connecticut General Statutes § 16-50u.

Thank you for your attention and cooperation.

Sincerely,

*s/Melanie Bachman*

Melanie Bachman  
Executive Director

c: Susan J. Bellion, Eversource



56 Prospect Street  
P.O. Box 270  
Hartford, CT 06141-0270

**Kathleen M. Shanley**  
Manager – Transmission Siting  
Tel: 860-728-4527

June 18, 2020

Ms. Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: Docket 461A: Greenwich Substation and Line Project (GSLP), Underground Transmission Line and Indian Harbor Crossing Development and Management (D&M) Plans (Volume II- Parts 1 and 2), Request for Extended Work Hours to Accommodate Limited Additional Work due to Delays in Material / Equipment Delivery and Unforeseen Subsurface Conditions: June 23, 2020 through October 31, 2020.

Dear Ms. Bachman:

The above-referenced D&M Plans include typical work hours for construction along the 30 different segments of the 115-kV transmission line portion of the Greenwich Substation and Line Project (GSLP, Project); refer to the Traffic Management Plans ([TMP] - Volume II, Part 1, Appendix C; Volume II, Part 2, Appendix D). For all segments of the Project, Eversource Energy (Eversource) has made and continues to make every effort to perform construction within the allowed work hours or to otherwise seek approval, well in advance, from the Connecticut Siting Council (Council) staff for amended work hours if needed to best facilitate construction when faced with challenges or field conditions that warrant additional time to complete critical tasks.

However, the Project recently has begun to experience last-minute delays in the delivery of materials, most notably the concrete and flow fill needed to backfill the 115-kV duct bank trench and the asphalt needed to pave the roads over the trench. Such delays, which Project field personnel typically only become aware of in the midst of a construction day, have been linked to unanticipated traffic congestion or accidents, and CT DOT work / lane closures on I-95, as well as to the recent increased demand for construction materials in general, which has caused scheduling issues at the concrete and asphalt batch plants.

Eversource cannot predict in advance when concrete /asphalt plant workloads or other uncontrollable circumstances (e.g., difficult subsurface conditions, material delivery times linked to traffic congestion, or issues with other materials) will cause delays that trigger the need for its Project crews to work a slightly longer shift to complete critical tasks, such as backfilling a trench section with concrete / flow

fill or paving over the trench so the road can be re-opened to the public.<sup>1</sup> As a result, on several recent occasions, Eversource has had to seek Council staff review, on a same-day basis, for urgent work shift extensions. It is likely that similar situations will continue to unavoidably occur in the coming months as Eversource moves to complete Project construction and as both general construction activities and traffic volumes increase due to the relaxation of certain COVID-19 restrictions.

Accordingly, to avoid the repeated need to request from Council staff same-day limited work-shift extensions, Eversource seeks Council staff's approval to increase specific Project work shifts by a maximum of 2 additional work hours per day to complete critical construction tasks. The following conditions would apply to this request:

- A. The extended work hours would be limited to a day-specific basis and would be used only if needed to complete critical construction activities that are delayed due to certain factors beyond the Project's control. These activities are listed below:
  - (1) Deliveries of critical project materials (concrete, flow fill, asphalt) that are behind schedule for non-Project reasons (e.g., undue traffic congestion, delays on the part of the material provider such as asphalt or concrete batch plant bottlenecks) delays; or
  - (2) Unforeseen issues during duct bank installation activities (i.e., unmarked subsurface utility line that must be shored; damage to a utility line that occurs and must be replaced; presence of excessive subsurface rock, unstable soil conditions, groundwater / soil contamination) that arise during the course of a construction day and that require additional time to address in order to safely complete the day's task-specific work; and,
  - (3) Though delays are not anticipated, Eversource would like to include cable pulling as an activity that may be subject to this work hours extension request in the event that the reel transport gets stuck in traffic, de-watering of vaults is required or if pulling operations encounter an obstacle or some other issue that temporarily halts the cable pull and needs to be resolved before safely continuing the activity so as not to damage the cable.
  
- B. Project crews are working both daytime and night time shifts, per the approved work hours. Accordingly, if situations arise during a shift's work, as described in (A), above, limited additional time could be extended into the evening (for daytime shifts) or early morning hours (for nighttime shifts). For daytime Project work, the proposed 2-hour limited work hour extension would be until 8 PM Monday-Friday (typical work hours are 7 AM to 6 PM). For Project night time work, the proposed 2-hour limited work hour extension would be until 7 AM Monday to Thursday (typical work hours are 8 or 9 PM to 5 AM).  
  
Eversource would still submit individual requests for extended Saturday or Sunday work hours to the Council on an as needed basis.
  
- C. Eversource requests such approval from June 23, 2020 through October 30, 2020.

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<sup>1</sup> Note: The concrete and flow fill used on the Project must meet specifications. Because there is a defined "life" and cure time for the concrete and flow fill – approximately 90 minutes - the truck deliveries must be timed to arrive at intervals to the GSLP work sites.

- D. In its monthly construction progress reports to the Council, Eversource would report, as a Minor D&M Plan change, each day on which any limited extended hour shifts were required. For each such Minor D&M Plan Change, Eversource would list the TMP segment, the actual additional hours worked, and the reason(s) for the extended work hours.
- E. Work hours required beyond the times and activities specified in this request would continue to be submitted individually to Council staff for approval.

During any extended work hour construction, Greenwich police would be on hand to direct traffic.

Eversource discussed this extended work hour approach with the Town of Greenwich representatives, who concur with the above-referenced provisions. In addition, Eversource would provide to the Town of Greenwich same-day notification regarding the need for an extended work shift.

Thank you for your consideration for this request. Should you have any questions regarding this request, please do not hesitate to contact me at via e-mail at [kathleen.shanley@eversource.com](mailto:kathleen.shanley@eversource.com) or telephone at (860) 728-4527.

Sincerely,



Kathleen M. Shanley