

DAVID E. DOBIN

Please Reply To Bridgeport  
E-Mail: [ddobin@cohenandwolf.com](mailto:ddobin@cohenandwolf.com)

November 1, 2018

**Via Electronic Filing and Federal Express Overnight**

Attorney Melanie Bachman,  
Acting Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Re: *Docket No. 461A - 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.***

Dear Attorney Bachman:

Enclosed please find one (1) original and fifteen (15) copies of the written comments of the Town of Greenwich Department of Public Works to Eversource's Development and Management Plan, Volume II, Part i filed on October 5, 2018.

I certify that copies have been sent on this date to all participants of record as reflected on the Council's service list.

Please do not hesitate to contact me if you have any questions regarding this filing.

Very truly yours,



David E. Dobin

DED/lcc  
Enclosures

cc: Service List

**AMY J. SIEBERT, P.E.**  
COMMISSIONER

**JAMES W. MICHEL, P.E.**  
DEPUTY COMMISSIONER



BUILDING INSPECTION  
BUILDING MAINTENANCE  
ENGINEERING  
HIGHWAY  
SEWER  
WASTE DISPOSAL

**DEPARTMENT OF PUBLIC WORKS**

November 1, 2018

Attn: Melanie Bachman, Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: Greenwich Substation and Line Plan  
Development and Management Plan Comments  
Volume II – Part 1 – Cos Cob Substation Modifications  
Town Project No. 18-15

Dear Siting Council,

The Town of Greenwich is in receipt of the Greenwich Substation & Line Project Development & Management Plan, Volume II, Part 1 filed by Eversource on October 5, 2018 relating to 115-kV Double Circuit Underground Transmission Lines (the "Line Work D&M"). The Town met with Eversource approximately every two weeks from March through September 2018 prior to the submittal of the Line Work D&M to work together to resolve the concerns the Town had related to the plan. Unfortunately, a few of the Town's concerns are not addressed in the Line Work D&M. Below is a list of the concerns that have been presented to Eversource but are not incorporated into the plan.

1. During the Siting Council Hearings and also in prior D&M phases, blasting was not proposed for this project. Eversource now has stated that blasting may be required. While the Town understands exploring the option of blasting if it helps to minimize the construction timeframe, such plans should obtain approval of the Town Department of Public Works and the Town Fire Marshal's office. If blasting is proposed, the Town would require pre and post blasting CCTV inspections of all Town infrastructure.
2. The D&M Plan should provide more detail on Eversource's plan for road restoration as part of the project. Appendix E gives a vague overview of the required restoration. The text references the plan and profile pages for details. However, Appendix B does not include details related to pavement thickness, pavement sections, concrete pavement replacement, curb replacement, sidewalk replacements, etc. The Town has requested much more detail and was led to believe during the biweekly meetings that it would be included in the D&M plans submitted to the CSC. However, these details have not been provided nor are they in the Line Work D&M, and the Town has now been informed that this information would instead not be provided until it is included in the Underground Civil Duct Bank Contractor's scope of work. These responsibilities and details should be outlined in the Line Work D&M.
3. The location and details of the duct bank near between Steamboat Road and Exit 3 on Arch St. (Appendix B, Page 13) conflicts with the Town's storm drainage system. As currently designed, the duct bank would impede future maintenance and/or replacement of at least three storm drains, by the installation of a wide and shallow duct bank requiring a steel plate across it for a significant distance. The Town has recommended an alternative design which provides adequate separation distance to the

Town storm drainage system and would address future constructability issues for stormwater infrastructure in this area. A copy of the Town's proposed alternative design is attached hereto as Attachment A. The Town therefore requests that the Council require Eversource to adopt this alternative design to avoid the significant risk of damage to the Town's storm drainage system.

4. Appendix C – TMP – Segments #20 & #21 – During the summer months of June, July and August, working hours will be 9 PM to 5 AM due to the proximity to the playground on Museum Drive.
5. Appendix C – Detour Plan #1 – This plan indicates that access to Cos Cob Park will be completely closed during the work on “Segment 2”. Access to the park should be maintained at all times.
6. Appendix C – Detour Plan #4 – A Variable Message Sign should be placed on northbound I-95 in advance of Exit 3 stating Indian Field Road Closed, Use Exit 3.
7. Appendix C – Detour Plan #9B – This is a new plan but it is incomplete. There are no travel arrows shown. Signage is incomplete. This detour plan should be completed.
8. Appendix E – When doing curb to curb restoration, Americans With Disabilities Act provisions relating to accessibility require any agency doing milling and paving in a road to update the ramps to current accessibility standards. This information has been provided to Eversource; however, Eversource has not yet agreed to make these updates. The Council should require that Eversource include such updates in the Line Work D&M.

We have provided these comments recognizing that the Town's Appeal of the final decision in this matter is pending, and we do so without waiving any rights.

We trust that the Siting Council will require Eversource to incorporate these comments into the D&M plan prior to approval. The Town is willing to discuss the above comments if you have any questions or concerns. Please contact me at (203) 622-7813.

Sincerely,

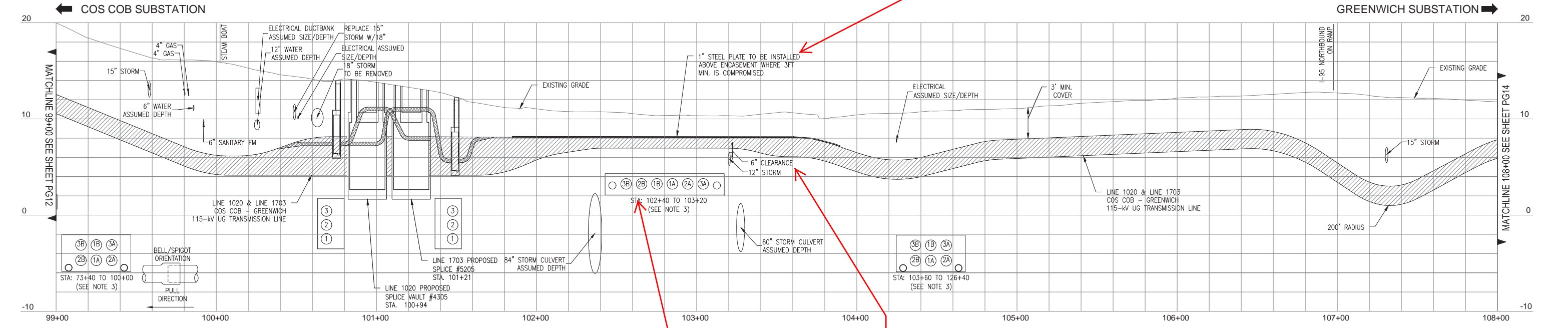
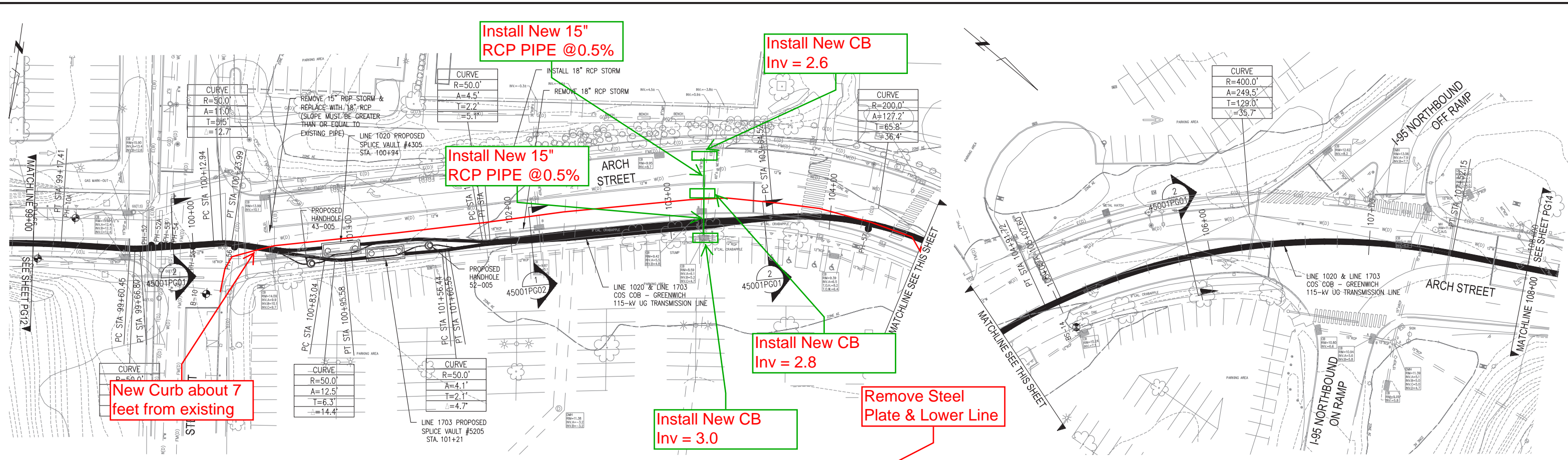


James W. Michel, P.E.  
Deputy Commissioner of Public Works

cc: A. Siebert (Greenwich DPW) P. Tesei (Greenwich First Selectman)  
Eversource Energy File 18-15  
Service List, Connecticut Siting Council Docket 461A

**ATTACHMENT A**

9/18/2018 11:14 AM - joneal - R:\SIP\Projects\136082\DD\DWG\08 Const\DWG\01242-10001PG13 Plan and Profile - REV.dwg - 01242-10001PG13 Plan and Profile



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