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September 27, 2019

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

Re: *Docket No. 461A: Greenwich Substation and Line Project  
Development and Management Plan 115-kilovolt (kV) Double Circuit Underground  
Transmission Lines: Request for Modifications to Work Hours for Vault 6A/6B Installation and  
to Schedule and Staging in Bruce Park, Town of Greenwich*

Dear Ms. Bachman:

In accordance with the above-referenced Development and Management (D&M) Plan for the Greenwich Substation and Line Project (GSLP, Project), the Connecticut Light and Power Company doing business as Eversource Energy (Eversource) requests from the Connecticut Siting Council (Council) staff approval of extended work hours for the excavation and installation of Vault 6A/6B within Railroad Avenue, as well as for modifications to the schedule for and staging of work in the Town of Greenwich's Bruce Park.

The requested D&M Plan changes are summarized below.

**1. Railroad Avenue: Vault 6A/6B Installation.**

Vaults 6A and 6B will be located beneath Railroad Avenue, opposite one of the entrances to the GSLP contractor yard at 281 Railroad Avenue (refer to the underground transmission line D&M Plan, Appendix F, map sheets 16 and 17). As defined in the GSLP Traffic Management Plan (D&M Plan Appendix C, Section 4.1, Traffic Segment 26), the approved work hours for the installation of Vaults 6A/6B are 9 PM to 5 AM (8 hours), Sunday to Thursday. During the installation of the vaults, Railroad Avenue will be closed between Field Point Road and Arch Street and Detour Plan 11, as specified in the TMP, will apply.

To improve the efficiency of the vault installation process (which involves pavement removal, excavation, vault burial, backfill, asphalt patch), Eversource requests extended work hours, so that the work hours would be from 7 PM to 6 AM commencing on Tuesday, October 1, 2019 through Thursday, October 3, 2019 (a total of 3 extra hours for each of the 3 overnight shifts). Starting at 7 PM on each of the specified days, Eversource's contractor will commence the vault work, but will maintain two-way traffic on Railroad Avenue until 8 PM. Starting at 8 PM, Railroad Avenue will be closed to traffic and Detour Plan 11, per the TMP will be implemented. All construction activities in the road will cease by 6 AM, at which time the road will be fully reopened to two-way traffic.<sup>1</sup>

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<sup>1</sup> Note: Via separate D&M Plan change request to the Council, Eversource also seeks extended work hours (5 AM to 7 PM) on October 2, 2019 (contingency date October 3, 2019) to perform a concrete pour for transformer foundations at Greenwich Substation, located at 290 Railroad Avenue. The planned substation work will not conflict with the Vault 6A/6B construction because the early morning work at the substation will involve only on-

The extended work hours will allow extra time for construction crew mobilization / demobilization (including daily installation and removal of road plates over the vault excavations), thereby allowing a full 8 hours or more of work during each overnight shift. This will promote efficiency in the Project schedule and minimize the number of days required to perform the work, while still avoiding peak travel times and potential inconveniences to pedestrians and motorists using Railroad Avenue during peak daytime travel times.

## **2. Bruce Park Fall 2019 Start of Construction and Use of Wood Road for Additional Staging**

Per the D&M Plan, GSLP construction activities in the Town of Greenwich's Bruce Park are to be performed from November 1, 2019 through April 30, 2020 (refer to the TMP, TMP Segments 10-15). This work schedule recognizes that Bruce Park is a popular multiple-use recreational area particularly in the late spring, summer, and early fall.

To facilitate construction in the Park over the winter of 2019-2020, Eversource proposes to stage up to four fractionization (frac) tanks along Wood Road, which will be closed to traffic during the GSLP construction work (per the D&M Plan). Further, to take full advantage of the more favorable weather conditions that typically characterize the late Fall, Eversource seeks approval to commence certain work in Bruce Park on October 28, 2019, rather than on November 1, 2019.

Specifically, Eversource proposes to perform the following activities starting on October 28, 2019:

- A. **Wood Road.** Close the road to traffic, staging the frac tanks there, installing protective fencing and erosion / sedimentation (E&S) controls, and commencing trench excavation work within the road.
- B. **Other Areas of Bruce Park (e.g., Bruce Park Drive, Davis Avenue).** Perform site preparation activities, such as installing traffic signs (for construction zones, detours) and erecting temporary protective fencing and E&S controls. However, no excavation would commence in these areas prior to November 1, 2019.

Staging the frac tanks along Wood Road would facilitate excavation dewatering activities within Bruce Park, where high groundwater and extensive areas of unconsolidated rock were encountered in the cable trenches during construction in the late winter-spring of 2019. Similar challenging conditions for construction are expected to be encountered along the remainder of the 115-kV cable route within the Park.

Placing frac tanks along Wood Road also would eliminate the need for multiple daily vacuum truck trips on local roads between Bruce Park work sites and the Project's Railroad Avenue staging yard, where the frac tanks are presently located.<sup>2</sup> The use of the frac tanks is expected to create construction efficiencies and potentially minimizing the overall time required for work within the Park.

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site set-up for the concrete pour; the first concrete truck is not scheduled to arrive at the substation until after 6 AM, when vault work for the day is complete and Railroad Avenue is re-opened to two-way traffic.

<sup>2</sup> During construction in the late winter-spring of 2019, vacuum trucks were used to pump water from the cable trench and from Vaults 3A/3B (located beneath Wood Road); other forms of E&S controls, involving discharge to municipal catch basins proved ineffective for the volumes of groundwater and suspended sediment encountered.

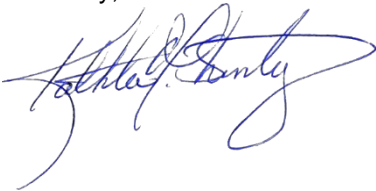
Ms. Bachman  
September 27, 2019  
Page 3

**Summary**

The proposed D&M Plan modifications are intended to promote construction efficiencies, minimize potential inconvenience to the public, and facilitate the overall Project construction schedule. Eversource has consulted with representatives of the Town of Greenwich regarding these proposed D&M Plan modifications.

Attached to this original are two copies of this request. Should you have any questions regarding these D&M Plan change requests, 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

Cc: Mr. James Michel, Deputy Commissioner of Public Works, Town of Greenwich