

July 17, 2017

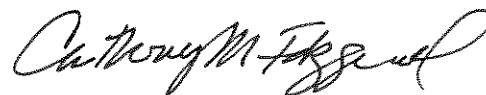
Attorney Melanie Bachman
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: DOCKET NO. 461A – Greenwich Substation and Line Project

Dear Attorney Bachman:

On behalf of Eversource Energy, I enclose an original and fifteen copies of *Second Supplemental Direct Testimony of Kenneth B. Bowes*, d. July 18, 2017.

Very truly yours,



Anthony M. Fitzgerald

AMF/kas
Enc.
cc(w/enc): Attached Service List dated July 11, 2017

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-Mail	Eversource Energy	<p>Kathleen Shanley Manager-Transmission Siting Eversource Energy 56 Prospect Street Hartford, CT 06103 kathleen.shanley@eversource.com</p> <p>Raymond Gagnon Director – Transmission Projects Eversource Energy 56 Prospect Street Hartford, CT 06103 Raymond.gagnon@eversource.com</p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 jeffery.cochran@eversource.com</p> <p>Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702 mdubuque@carmodylaw.com</p> <p>Anthony M. Fitzgerald, Esq. Carmody Torrance Sandak & Hennessey LLP 195 Church Street New Haven, CT 06509 afitzgerald@carmodylaw.com</p>
Party Approved on July 23, 2015	<input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel	<p>Lauren Henault Bidra, Esq. Staff Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Lauren.bidra@ct.gov</p>

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Party Approved on July 23, 2015	<input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel continued	Joseph A. Rosenthal, Esq. Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Joseph.rosenthal@ct.gov
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Parker Stacy 1 Kinsman Lane Greenwich, CT 06830 pstacy@optonline.net	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Field Point Estate Townhouses, Inc.	Carissa Depetris Dwight Ueda Field Point Estate Townhouses 172 Field Point Road, #10 Greenwich, CT 06830 carissa.depetris@gmail.com d_ueda@yahoo.com
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Christine Edwards 111 Bible Street Cos Cob, CT 06807 SeeEdwards@aol.com	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Richard Granoff, AIA, LEED AP Granoff Architects 30 West Putnam Avenue Greenwich, CT 06830 rg@granoffarchitects.com	
Grouped Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Anthony Crudele Bella Nonna Restaurant & Pizzeria 280 Railroad Avenue Greenwich, CT 06830 bellanonnagreenwich@gmail.com	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Cecilia H. Morgan 3 Kinsman Lane Greenwich, CT 06830 cecimorgan@aol.com	

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Grouped Intervenor Approved on September 17, 2015	<input checked="" type="checkbox"/> E-Mail	Joel Paul Berger 4208 Bell Boulevard Flushing, NY 11361 communityrealty@msn.com	
Grouped Intervenor Approved on October 1, 2015	<input checked="" type="checkbox"/> E-Mail	Meg Glass 9 Bolling Place Greenwich, CT 06830 glass50@hotmail.com	
Party Approved on January 12, 2016	<input checked="" type="checkbox"/> E-Mail	The Honorable Peter J. Tesei First Selectman Town of Greenwich 101 Field Point Road Greenwich, CT 06830 ptesei@greenwichct.org	David A. Ball, Esq. David E. Dobin, Esq. Cohen and Wolf, P.C. P.O. Box 1821 Bridgeport, CT 06601 dball@cohenandwolf.com ddobin@cohenandwolf.com (203) 368-0211 (203) 394-9901 – fax
Intervenor Approved on May 25, 2017	<input checked="" type="checkbox"/> E-Mail	Morningside Circle Association	P. Jude Collins, President Morningside Circle Association 67 Circle Drive Greenwich, CT 06830 (203) 918-1076 Mail@morningsidecircle.org

CONNECTICUT SITING COUNCIL

<p>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.</p>	<p>DOCKET NO. 461A</p> <p>July 18, 2017</p>
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SECOND SUPPLEMENTAL DIRECT TESTIMONY OF KENNETH B. BOWES

1 **Q. Mr. Bowes, what is the purpose of this supplemental testimony?**

2 A. The purpose of this testimony is to advise the Council, parties, and intervenors of
3 Eversource’s recent analyses of the project now proposed – formerly called the Alternate
4 Modified Project, which I will now call just the Project, except as necessary for clarity in
5 historical references.

6 **Q. In your initial pre-filed testimony, you expressed concern that the**
7 **underground route to be installed in roads through Bruce Park might not be constructible**
8 **if the Council adopted the Town’s recommendation that there be no vegetation removal**
9 **and that all construction activities be strictly confined to the paved road surfaces. Has**
10 **Eversource done anything since then to address those concerns?**

11 A. Yes. On July 11, a small Eversource team of civil engineering and construction
12 experts and an arborist met with a delegation of Town officials, including the First Selectman
13 and the Superintendent of the Parks and Trees Division of the Department of Recreation, and
14 performed a joint walk-down of the proposed route through Bruce Park. We pointed out

1 locations where we believed tree trimming would be necessary, a few locations where there were
2 constraints that would make it difficult to stay completely within the pavement, and some
3 potential vault locations, and we discussed construction practices and post-construction
4 restoration. It was a good meeting, and our team came away with the impression that the Town
5 would be reasonable in its demands concerning the construction in the Bruce Park roads.

6 **Q. How do you propose to address the Town's specific restrictions of Bruce**
7 **Park construction and exceptions to them, in order to assure that disturbance to the use of**
8 **the park and any environmental effects will be minimized, while still allowing for the**
9 **efficient installation of the underground line?**

10 A. We will propose to work out a Memorandum of Understanding (MOU) with the
11 Town concerning the construction of the line, as we have sometimes done with other towns in
12 which we perform significant underground construction. Typically, such MOUs address such
13 subjects as work hours, traffic control, emergency response, laydown areas, and other topics of
14 local concern. In this case, the MOU could also address construction within Bruce Park. We
15 would expect to negotiate the MOU before filing our draft Development and Management
16 (D&M) Plan, so that the draft plan would be consistent with the MOU. Of course, the
17 provisions of the MOU would be subject to the Council's approval of consistent provisions in the
18 D&M Plan.

19 **Q. Have you given any further consideration to the choice of locating the new**
20 **Greenwich Substation at either 290 Railroad Ave. or 281 Railroad Ave?**

21 A. Yes, we have. To provide some context for that choice, I should mention that we
22 have resolved the status of the Pet Pantry lease, so that we will have unimpaired access to both of
23 these sites during construction, and we will use both of them. Whichever site is not chosen for

1 the substation will be used as a materials laydown yard and likely also a site for a construction
2 office. In my initial testimony, I said that Eversource continued to prefer the 290 Railroad Ave.
3 (Pet Pantry) site because the adjoining land uses there are commercial and industrial, whereas
4 there are residential uses abutting the 281 Railroad Ave. (Pole Yard) site. The Pet Pantry site is
5 also larger, and it would be simpler and less expensive to connect the distribution feeders there,
6 as compared to the Pole Yard site.

7 However, the Town continues to strongly favor the Pole Yard, on the ground that the Pet
8 Pantry site would be hazardous because it would be located nearby the Airgas premises.
9 As we have continued to study this choice, we have decided that either location would be
10 satisfactory to Eversource.

11 If the substation were located at the Pole Yard site, concerns about noise affecting
12 residential abutters and visual impacts could be fully addressed by using the architectural
13 building enclosure shown at page 2 of Appendix 10 of Volume 2 of our Motion to Reopen. In
14 fact, residents would probably prefer a view of that structure to a view of the industrial landscape
15 of their current view of the Pole Yard. On the other hand, if the new substation were located at
16 the Pet Pantry site, use of that same type of architectural enclosure may resolve the Town's
17 concern about the proximity of the station to the Airgas facility.

18 To sum up, the site for the new substation is a close choice. The larger size of the Pet
19 Pantry site has less significance than it did in the original Docket 461 proceeding, because the
20 proposed substation footprint is now smaller. Similarly, the potential noise issue is of less
21 concern because there will be less noise generating equipment in the substation, wherever it is
22 located. Eversource still has a marginal preference for the 290 Railroad Ave. (Pet Pantry) site.
23 But either site will meet our needs. And the Council may conclude that the building type

1 enclosure could be justified at either site. We are ready to execute whatever choices the Council
2 makes.

3 **Q. In your initial pre-filed direct testimony (p. 20), you explained that the**
4 **method by which the new line would cross I-95 at Indian Field Road has not been resolved.**
5 **Have you made any progress with respect to that issue?**

6 A. We are still working on it. As a practical matter, the crossing method is likely to
7 be determined by CDOT Highways. In response to Council Q-CSC-042, we reported that so far,
8 CDOT has said that they are “heavily opposed” to attaching the cables to the I-95 bridge but
9 would look favorably on the more expensive underground trenchless crossing. Such crossings
10 are routine for both Eversource and CDOT. During the field review, a question was raised as to
11 the feasibility of an overhead crossing of I-95 in this area. Additional review would need to be
12 done to establish the feasibility of this option as well, and whether it would provide any cost
13 savings.

14 Quite recently, we have received a number of questions from CDOT about the bridge
15 attachment, which pointed out potential issues for both them and for Eversource. Both we and
16 CDOT have concerns about potential risks and maintenance issues of this attachment, which
17 would have to be worked out before we both could get CDOT’s approval and develop
18 confidence in the installation ourselves. In the course of our meetings concerning the
19 development of the current Project, the Town claimed that it could influence CDOT to authorize
20 the bridge, and recent events suggest that this could well be the case. Given all of these
21 unresolved issues, it would be most efficient to defer the specification of the method of crossing
22 I-95 to the D&M Stage. If we are able to come to a three way agreement with CDOT and the
23 Town, the crossing method would also be another item for the MOU.

1 **Q. Finally, in your Supplemental Direct Testimony, you mentioned that as part**
2 **of the former Alternate Modified Project, the Town had specified that to cross Indian**
3 **Harbor, the cables should be attached to a new pedestrian bridge that Eversource would**
4 **build as part of the Project, whereas a conventional trenched crossing of the river would be**
5 **less expensive. What is the status of that issue?**

6 A. Eversource is concerned that the pedestrian bridge solution would be less secure
7 and reliable than installing the cable in a trench across the river, which would be constructed
8 using cofferdams; and we have concerns about ongoing maintenance of the pedestrian bridge (as
9 opposed to the cables), which we would want the Town to assume, along with accepting
10 ownership of the bridge. The Town has indicated that it might find the open trench crossing
11 acceptable, but that it would have to see a detailed presentation of the construction methodology
12 and materials first. So this is another item that we suggest should be deferred to the D&M stage.
13 I would hope that Eversource and the Town can reach agreement on one or the other of these
14 crossing methods and associated future maintenance obligations, which would be included in the
15 MOU before being presented to the Council in the draft D&M.

16 **Q. Does this conclude your testimony?**

17 A. Yes.

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