

**TOWN OF GREENWICH
DOCKET NO. 461A**

**PRE-HEARING INTERROGATORIES
DATED: JULY 18, 2017**

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Has the Town determined the exact route of the replacement force main between proposed Eversource structures 14012 and 14005? If so, provide a drawing indicating the proposed route.

- Has the town provided detailed drawings to Eversource depicting the location of the replacement force main?
- Have permits/approvals been received from the CT DOT and other entities for the installation of the replacement force main in this area?

If no, when does the Town anticipate the completion of the replacement force main design, completion of required permitting/approvals, and commencement and completion of construction?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

The replacement force main is depicted on the Reopened Application site plans as being on the north side of the Interstate 95 right-of-way. What is the route of the replacement force main west of proposed Eversource structure 14006 to the wastewater treatment plant?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

How will the replacement force main cross Interstate 95, the Metro North Railroad and/or Indian Harbor? What construction methods would most likely be used to install the replacement force main in these areas?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:
What is the anticipated life-span of the replacement force main?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Is the Town required by any State or Federal agency to maintain the existing force main in an operable condition once the replacement force main goes into service?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Is the existing force main installed within Indian Harbor? If the existing force main deteriorated and leaked within Indian Harbor, how would the Town access the force main within the harbor to repair the leak?

RESPONSE:

Because this interrogatory relates to the Proposed Modified Project, which has been withdrawn, the issue is moot and no response is required.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Reference Reopened Application Vol. 1, Exhibit B, p. A-5. Is the Town opposed to the 290 Railroad Avenue substation site? If so, list specific concerns and how the location at 281 Railroad Avenue would address these concerns.

RESPONSE:

The Town would support a substation located at 290 Railroad Avenue only if it is a fully-enclosed indoor substation and Eversource demonstrates that it has thoroughly studied the potential safety risks posed by siting the substation at that location and taken all necessary measures to address such risks. For the Town's specific concerns relating to the location of any proposed new substation, please see Pre-Filed Testimony dated July 18, 2017, at pp. 25-29.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Regarding the 281 Railroad Avenue substation site, are lighting and noise issues during site construction and substation operation of concern?

RESPONSE:

Regarding the 281 Railroad Avenue substation site, lighting and noise issues during site construction and substation operation are less of a concern for the following reasons:

- Fully-enclosed indoor substations such as the proposed substation at 281 Railroad Avenue create far less audible noise from their operations than open air substations.
- The building of new substations such as the proposed substation at 281 Railroad Avenue is customarily done during daylight hours and most often, provided the construction schedule is not condensed, does not require weekend and night-time work. Because the work is confined to daylight hours, there is no need for site lighting during night-time hours.
- Reference Reopened Application Vol. I, Exhibit B, p. C-12, in which Eversource states, "Noise from the new facility will be minimal. The predominant noise contribution from the Substation would be steady state noise from the new transformers. Infrequent impulse noise would be generated from switching and circuit breaker opening and closing. The projected noise levels at the Property lines will comply with applicable levels permitted by both the Town of Greenwich Noise Ordinance and CT DEEP's noise regulations. Noise levels will be at or below the most restrictive regulation, which is the Greenwich Noise Ordinance. Neighboring properties in the Business Zone will not be subjected to substation noise in excess of 62 dBA. Neighboring properties in the Residential Zone will not be subjected to substation noise in excess of 55 dBA during the day or 45 dBA at night."

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Regarding the 281 Railroad Avenue substation site, would the Town accept a brick wall around the substation instead of the townhouse house facade design?

RESPONSE:

The Town objects to the use of a brick wall around a proposed substation at 281 Railroad Avenue. Brick walls are typically used with open-air substations as visual barriers, security fences or for sound absorption.

The proposed new substation at 281 Railroad Avenue would be a fully-enclosed, indoor substation. In addition, because the proposed new substation at 281 Railroad Avenue will be situated near other residential structures, the substation should blend in with the adjacent residential structures and, therefore, the Town supports Eversource's proposed enclosure of the substation within a "structure that would resemble an apartment building." See Docket 461A, Pre-Filed Testimony of Kenneth Bowes, at p.19; Petition for Reconsideration, Appendix 10.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

When was the Airgas facility at 255 Field Point Road permitted by the Town? Since the permit was issued, is the Airgas facility still compatible with surrounding land uses and traffic patterns? If not, list specific concerns.

RESPONSE:

The Airgas facility at 255 Field Point Road was first permitted by the Town in 1966 under Permit No. F-5277 for welding supply and storage. The site is located in the GB (General Business) zone where this use is permitted subject to special exception approval from the Zoning Board of Appeals. The Zoning Board of Appeals makes that special exception determination on a case-by-case basis pursuant to the standards outlined in the Town's zoning regulations, and the Town has no reason at this time to believe that the Airgas facility is not compatible with surrounding land uses and traffic patterns.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Reference Reopened Application Vol. 1, Exhibit B, p. A-11, bullet 1. Is the Town opposed to a jack and bore cable installation under Interstate 95 near Indian Field Road? If so, list specific concerns.

RESPONSE:

The Town prefers that the cable system cross Interstate 95 by attaching it to the underside of the overpass bridge following Indian Field Road South, as is commonly done in other locales. However, the Town is not opposed to a jack and bore cable installation under Interstate 95 near Indian Field Road, provided there are no other viable means to cross Interstate 95 and that great care is exercised to ensure there are no impacts to the Town's force main and no permanent alterations to existing terrain in and around the work sites.

Regardless of the methodology employed, the Town urges construction methods that preserve the environment as much as possible. For this reason, the Town is opposed to any overhead structures crossing Interstate 95, which also pose electrical safety issues. Relay protection on underground circuits that have any form of overhead components is not as effective as if the entire run of the circuit is underground.

WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL

QUESTION:

Reference Reopened Application Vol. 1, Exhibit B, p. A-11, paragraph 1. Is the Town opposed to a coffer dam crossing of Indian Harbor? If so, list specific concerns.

RESPONSE:

The Town has not received details from Eversource as to how it proposes to build a cofferdam crossing of Indian Harbor. The Town has the following concerns related to the utilization of a cofferdam:

- If the intent is to position cranes on land and build the dam by reaching out over the dam site, such an operation could permanently and adversely impact Bruce Park. However, if Eversource's intent is to build the cofferdam with cranes mounted on a floating barge system in a way that does not impose an unacceptable environmental impact on Bruce Park, use of a cofferdam may present a viable construction option at a cost savings.
- The Town is concerned that the shores along Indian Harbor do not present amply-sized work areas. Specifically, the site of the proposed cofferdam is not accessible by barge and therefore, the crane needed to drive the sheet piles would need to be set on the shore. Because Indian Harbor is over one hundred feet wide at that location, the height and reach of the crane would have to be significant. For this reason, only a floating barge system would mitigate significant environmental impact and would be acceptable to the Town.
- The Town is concerned by the risk of flooding posed by the cofferdam. Even if the cofferdam could be erected, it would by its design, stem the flow of water into the dammed area from either the south from Long Island Sound or from the north from the estuary. Significantly large areas have their storm water runoff migrate into the estuary. The cofferdam design would need to address how flow would be maintained through the area and would be required to address the risks of riverine and coastal flooding.
- Reference Docket 461, December 1, 2015 Hearing Tr. at p. 164, line 15, in which Eversource's witness stated, "If we were to do the cable crossing and do cofferdams and impact directly the wetlands, we would get into an Army Corps permit jurisdiction." The Town is concerned that receiving such approval from the Army Corps of Engineers is an extremely lengthy and arduous process.

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- The area around the location of the potential cofferdam experiences tidal exchange daily and also is an outlet for fresh water. As a result, appropriate measures should be taken in order to limit the environmental impact of locating the circuits under the stream bed of Indian Harbor.

It should be noted that the Town is currently working on a design to replace the existing bridge crossing Indian Harbor. If Eversource receives approval for the Alternate Modified Project, and the Town's construction schedule is coordinated with Eversource's, the Town would have no objection to accommodating the installation of Eversource's cables as part of construction of the new bridge.

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**WITNESS: WITNESS PANEL
REQUEST FROM: CONNECTICUT SITING COUNCIL**

QUESTION:

Is the Town opposed to splice vaults outside of the travel surface of all roadways? If so, list specific concerns.

RESPONSE:

The Town objects to any splice vaults located anywhere within the confines of Bruce Park, whether within or outside of the travel surface of Bruce Park Drive.

In order to locate manholes for splicing, a detailed analysis of the projected tension anticipated during the pulling of the cable must be performed. The changes in elevations of the conduit as well as the number, severity and gradualness of all the cable bends impact the final numbers. There are limits to the tension any cable can be subjected to. Only via these studies can one precisely know the number of splice vaults that would be necessary and their location.

As a result, the Town does not object to splice vaults outside of the travel surface of non-Park roads, provided that there is a reasonable basis to do so based on the results of pull tension studies conducted by Eversource, and provided that the sites are chosen carefully so as to avoid disruption to surrounding areas including trees or other vegetation.

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and intervenors of record, as follows:

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