

## **Cecilia H. Morgan**

**3 Kinsman Lane  
Greenwich, CT 06830-7223**

**Phone: 203-869-0987**

**Cell: 203-856-3562**

**[cecimorgan@aol.com](mailto:cecimorgan@aol.com)**

May 16, 2017

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

Subject: Docket 461 Petition for Reconsideration

Dear Ms. Bachman,

As an Intervenor, I remain unconvinced of the need for any project put forth by Eversource at this time, with the exception of minor updates to the system. The Town of Greenwich has not grown in population and all new construction is energy efficient. Eversource should be considering newer methods of providing its services and not continuing the paths of using towers and drilling processes that may be outmoded as the dinosaurs, as soon as they are completed. Regarding Docket # 461A, as it is now called, I would also suggest that because of a proposed NEC High Speed train line close to the very routes that Eversource is considering for its use re #461A, there should be a dialogue with all parties who are vying for the necessary space required for any future undertakings involving the two routes up for consideration by the Siting Council. That said, I agree with the following directive from the Town.

1. If the Siting Council finds there is a need for this project, I object to the project as proposed down the railroad corridor and believe the fact pattern is clear that on issues of reliability, cost, environmental concerns and safety, the park route is far superior.

2. The true need for the new bulk Substation was not as previously elaborated to the Council; one of substantial load growth in the Town and limited capacity of existing 27.6 Kv facilities in the Cos Cob Substation. However, according to the utility's spokesperson, I have understood that the impetus for such a project was simply the need to replace aging infrastructure at both the Prospect and Byram 27.6 Kv substations.
  - a. During this past Summer, the hottest on record in Connecticut, the actual electrical usage for the Greenwich Service territory did not approach 85% of the available 27.6 Kv capacity at Cos Cob, and was substantially below the 2016 usage predicted by the utility in Table E-1, on Page E-5, of their June, 2015 application to the Council. It is expected that if the Council accepts the Petition for Reconsideration it is done in such a way that we will have the right to question the need for this new proposal.
  
3. The park route is superior because:
  - a. It is more reliable, (based on findings of the Federal Energy Regulatory Commission that underground is more reliable than overhead), safer, (moves the substation away from the compressed gas storage area and features a totally enclosed 115,000 volt facility), does not impact the Town's sewer infrastructure, AND, must represent the least costly alternative once the actual construction costs were incurred. On the premise there is simply not ample clearance for the Town to keep their force main in the same path as the proposed steel poles in the Hybrid Option, the Town could potentially be forced to remove and relocate its facilities. As Eversource points out, the only viable route is through Bruce Park. The cost and impact of running a pressurized sewer main through that park, is measurable only in the tens of millions of dollars. Furthermore, since it is pump driven effluent, all new hydraulic calculations would have to be examined, with the result possibly being new pumping plants. It is possible that the rerouting of the sewer facilities could approach a dollar amount well in excess of the cost differential presented by Eversource when they compared the cost of their two proposed routes.

- b. There would be no tree pruning or tree or vegetation removal in the park.
  - c. As part of this option, Eversource will build a new 115 Kv substation on the north side of Railroad Avenue on land the utility presently owns and controls (the vacant pole yard) and it will not displace an existing business.
  - d. The construction period will be shorter and therefore less disruptive given that the operation of a major metropolitan train line will not be in the way.
  - e. Eversource notes on Page M-1 of the June, 2015 application that underground feeders are superior to overhead feeders in mitigating the public's exposure to the potentially harmful environments caused by Electromagnetic Fields. If lines have to go through neighborhoods where people, many of which are children live and play, they should be done underground.
4. The Hybrid, Overhead Option is opposed for the following reasons:
- a. In their analysis of various overhead routings in the June 2015 application, Eversource wrote on Page H-19, "Construction would require removing the existing vegetation buffer for those homes to the north of the ROW. Based on preliminary communications with MNR, limited work hours would be imposed by the railroad to avoid conflicts with the rail line's active use, adding substantial time to the construction schedule." This would not just be a few trees here or there but the entire vegetative buffer.
  - b. The safety issues with an open air substation are of major concern considering that within a twenty foot radius of the perimeter of the proposed substation is Airgas, a supplier of compressed gases. Legally stored on their premises are pressurized cylinders of oxygen, acetylene, chlorine, as well as a 30,000 gallon propane storage tank. Eversource substations do not have attendants on premises, meaning the Greenwich Fire Department would have to wait to get in there. It is not logical to take this risk when there is a better solution for a smaller substation across the street in the pole yard.

5. In the 2015 application, in an effort to defend their choice of running the new circuits underground through Bruce Park, Eversource wrote, "The Preferred Route was selected by the Company as the most feasible route for building the new transmission supply lines based on its length and impacts to environmental, cultural and community resources." Eversource themselves have stated through the Park is the best route.
  
6. Considering the environmental issues and particularly the safety issues, we feel that should the Council dictate that the Hybrid route be constructed, we will have no choice but to continue our opposition until such time as every legal recourse has been exhausted.

I trust the Council will consider carefully all of the above factors. However, if the project is deemed necessary beyond any doubt, the Council members should approve the Alternative Modified Project through Bruce Park with the caveats expressed by the Town.

Respectfully yours,

Cecilia H. Morgan RTM District 2  
3 Kinsman Lane  
Greenwich CT 06830  
203 869-0987