



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

June 25, 2018

Bruce McDermott, Esq.  
Attorney  
Murtha Cullina LLP  
One Century Tower  
265 Church Street  
New Haven, CT 06510-1220

RE: **DOCKET NO. 483** - The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Pequonnock Substation Rebuild Project that entails construction, maintenance, and operation of a 115/13.8-kilovolt (kV) gas insulated replacement substation facility located 700 feet southwest of UI's existing Pequonnock substation on an approximately 3.7 acre parcel owned by PSEG Power Connecticut, LLC at 1 Kiefer Street, Bridgeport, Connecticut, and related transmission structure and interconnection improvements.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 17, 2018. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's pending matters website.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie Bachman  
Executive Director

MB/MP

c: Parties and Intervenors

**Docket No. 483**  
**Pre-Hearing Questions**  
**Set Two**

29. Referencing Figure ES-5 of the United Illuminating Company's (UI) Application, there appears to be an existing paved access drive on the southern portion of the site that runs in a roughly northeast to southwest direction. What is the purpose of an existing manhole cover roughly near the south side of that existing access drive?
30. On page 2-6 of the Application, the original projected cost of the proposed replacement substation project was in excess of \$125M. At the June 14, 2018 evidentiary hearing, UI testified that the updated cost was approximately \$170M. Provide a breakdown of the costs for the following including percentages of what are transmission and distribution costs:
  - a. Proposed solution (\$170M);
  - b. Rebuild substation on the same site; and
  - c. Construct replacement substation at the alternative site (375 Main Street).
31. What is the approximate ground elevation at the 375 Main Street alternative site? Are the 100-year and 500-year flood elevations the same at the alternative site as they are at the proposed site? If not, also provide the 100-year and 500-year flood elevations at the alternative site.
32. Generally, what are the feasible design options for an elevated substation at the proposed site to mitigate flood risk? Elevation by fill plus a gravel substation base? Elevation by fill plus a concrete substation base? Elevation by fill plus a gravel substation base surrounded by a concrete wall? A concrete base on silts such that flood waters could run under the substation (to handle potential sea level rise)? Comment on costs and feasibility of such options.
33. At the June 14, 2018 evidentiary hearing, UI testified that the Federal Emergency Management Agency (FEMA) recommends at least one foot of extra elevation to address sea level rise (barring a site-specific study or calculation of sea level rise). Provide a copy of the FEMA document that provides such recommendation.
34. How will the costs of the proposed project be allocated? What costs are regionalized and what costs are localized? Estimate the percentages of the \$170M that would be borne by UI ratepayers, Connecticut ratepayers, and remainder of New England (excluding Connecticut) ratepayers, as applicable. Estimate the incremental cost (per foot of additional elevation) to elevate the substation above its currently proposed elevation. Who would bear the additional costs of increasing the substation elevation above the FEMA standard?

35. At the June 14, 2018 evidentiary hearing, comparisons were made between the (administratively noticed) Petition No. 1218 PSEG Bridgeport Harbor Unit 5 Project design elevation and UI's proposed replacement substation elevation. The data are provided in the table below. Please comment on difference between the design elevations of the two adjacent projects.

	Petition No. 1218. BHU#5 Project	Docket No. 483 UI Pequonnock Replacement Substation Project
100-year flood elevation (BFE)	14 feet amsl	14 feet amsl
500-year flood elevation	15.3 feet amsl	15.9 feet amsl
Design Elevation	16.5 feet amsl	17 feet amsl
Design Elevation above BFE	2.5 feet	3 feet
Design Elevation above 500-year flood elevation	1.2 feet	1.1 feet

36. What is the role of ISO-New England Inc. (ISO-NE) for this project or what studies/determinations have been made by ISO-NE relative to the project? Has ISO-NE made any comments or recommendations regarding UI's proposed replacement substation flood design/elevation? If yes, provide ISO-NE's comments/recommendations.
37. Compare the costs of cross-linked polyethylene (XLPE) cable vs. high pressure gas filled (HPGF) cable on a per circuit-foot basis. Estimate the total XLPE cable costs for the proposed project and the total HPGF costs for the proposed project. Also provide the total length of XLPE and length of HPGF in circuit-feet for the proposed project.