



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

August 9, 2018

TO: Parties and Intervenors

FROM: Melanie Bachman, Executive Director *NAB*

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.

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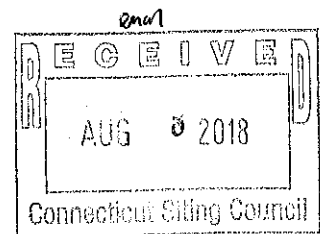
Additional comments have been received from the Connecticut Department of Energy and Environmental Protection, dated August 8, 2018. A copy of the comments is attached for your review.

MB/MP/lm

c: Council Members

August 8, 2018

Robert Stein, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, Connecticut 06051



RE: Pequonnock Substation Rebuild Project  
United Illuminating Company  
Bridgeport, Connecticut  
Docket No. 483

Dear Chairman Stein:

A review of the transcript of the Council's July 24 public hearing on United Illuminating's proposed Pequonnock Substation Rebuild Project reveals multiple references to DEEP's comments of June 6, 2018 at that hearing. These references occurred during the extensive discussions of what the appropriate elevation for the substation equipment should be in light of the site's vulnerability to coastal flooding events both now and in the future, and how the passage of Public Act 18-82 would affect this aspect of the substation design. In light of this, DEEP felt it might be helpful to the Council to offer a second comment letter affirming our comments of June 6 relative to the appropriate level of resiliency for this substation.

Federal standards of the FEMA National Flood Insurance Program, as contained in 44CFR60.3 require the lowest floor of any structure, or any critical equipment or infrastructure to be sited above the base flood elevation, i.e., the 100-year storm elevation, which at the Pequonnock Substation site is now stipulated at 14.0' NAVD88. Testimony given at the July 24 hearing attests to an informal utility industry standard of siting critical equipment at or above the 100-year storm elevation plus one foot, a standard referred to informally as 100 plus 1.

Public Act 18-82 mandates standards for certain residential and community structures, as well as for municipal evacuation and hazard mitigation plans, to reflect rising

sea levels when assessing flooding threats. Specifically, a sea level change assessment developed and updated by the University of Connecticut Marine Sciences Division is to be the official metric used when planning for future coastal flooding hazards and facility resiliency. Public Act 18-82 further states that a minimum of two feet of freeboard above base flood elevation shall be assumed and provided for when floodproofing coastal structures to account for sea level change. To use the above informal shorthand, this standard would be referred to as 100 plus 2. The 24" increase actually includes a safety margin above the 1' 8" rise predicted by 2050 by the Connecticut Institute for Resilience and Climate Adaptation (CIRCA) in their modeling.

United Illuminating is proposing to elevate all functional components of the new substation to an elevation of 17.0', which is three feet above the base flood elevation, or 100 plus 3. Therefore, as stated in our comments of June 6, the design standard proposed by United Illuminating is consistent with, and in fact exceeds, the requirements of Public Act 18-82 and the planning recommendations of the CIRCA study.

DEEP in no way intends to constrain the Council's prerogative in making its decision relative to the design of the Pequonnock Substation. Rather, it appeared that our comments of June 6 were perhaps being called into question, so we revisited this issue internally and want to reaffirm our previous guidance, and give the Council the benefit of that confirmation.

Thank you for the opportunity to submit these follow-up comments to the Council. Should you, other Council members or Council staff have any questions, please feel free to call me at (860) 424-4110.

Respectfully yours,



Frederick L. Riese  
Senior Environmental Analyst

cc: Commissioner Rob Klee

# Memorandum

**To:** Rob Klee

**From:** Fred Riese (x4110)

**Date:** 8/9/2018

**Re:** Follow-up Comments to Siting Council on UI's Pequonnock Substation, Bridgeport

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The attached comments are pretty self-explanatory. At the Siting Council's July 24<sup>th</sup> public hearing on the proposed new UI substation at Bridgeport Harbor, there was substantial questioning concerning the appropriate elevation the substation should be built to for flood resiliency considerations. Though UI cited DEEP's previous comments of June 6, several Council members continued to debate and cross-examine UI about the feasibility of elevating the substation above the proposed 17' elevation. Nicole Lugli and Kirsten Rigney thought follow-up comments to the Siting Council to affirm our previous guidance might be useful. Those follow-up comments, which went out moments ago this afternoon, are attached and were based on further discussions of the issue with Jeff Caiola.

Feel free to call me if you have any questions concerning these comments.