



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 17, 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 June 7, 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 One

1. Were the notice letters sent to abutting property owners sent by certified mail? If yes, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?
2. Under Appendix H of the Application, does the list of abutters match the numbering on the aerial view drawing? If not, provide a corresponding numbered list of abutters to match the aerial view.
3. Which municipalities make up The United Illuminating Company's (UI) service area for electrical distribution service in Connecticut?
4. How many residences are located within 1,000 feet of the center of the proposed replacement substation?
5. What is the address and direction (from the center of the proposed replacement substation) of the closest residence?
6. How far away from the proposed replacement substation is the nearest state-designated or locally-designated scenic road? Would the proposed replacement substation be visible from such scenic road?
7. Estimate the area of the proposed replacement substation (as bounded by the proposed fencing) in both square feet and acres.
8. Page ES-4 of the Application notes that, "The substation components will be elevated 3 feet above the 14-foot Base Flood Elevation (BFE) for the area, as defined in 2013 by the Federal Emergency Management Agency (FEMA), and thus will be about 7 feet higher in elevation than the existing substation." Provide the following information related to flood elevations.
 - a) Is 2013 the most recently available FEMA flood information?
 - b) What is the 500-year flood elevation in the vicinity of the proposed replacement substation?
 - c) Is the 500-year flood based on a 0.2 percent probability of occurring in a given year?
 - d) Was any potential/projected sea level rise associated with climate change considered? Explain.
 - e) Was potential storm surge considered in the proposed replacement substation design? Explain.
 - f) As a comparison, provide the current 500-year flood elevation in the vicinity of the existing Pequonnock Substation.
 - g) Provide the elevation of the existing Pequonnock Substation in above mean sea level (amsl).
 - h) How would raising the proposed replacement substation's flood elevation affect flood water displacement?
9. What kind of "structural concerns" exist at the existing Pequonnock Substation as noted in bullet point two on page 1-6 of the Application?

10. Appendix F (Noise Study) indicates that the two proposed power transformers would be 30/40/50 megavolt-ampere (MVA) each. What is the MVA capacity of the proposed replacement substation? Given such capacity, has UI forecasted the distribution loads (i.e. ten-year forecast of projected MVA distribution loads) for the proposed replacement substation? If yes, provide such forecast. While the Application focuses on flooding and asset condition issues, does UI have any concerns about future load growth versus the MVA capacity of the existing Pequonnock Substation? Explain.
11. Referencing page 1-1 of the Application, the existing Pequonnock Substation has two transformers. How many MVA are each transformer? What is the MVA capacity of the existing Pequonnock Substation?
12. How would the new power transformers be delivered, e.g. by truck, rail, or barge?
13. Bridgeport Harbor Unit (BHU) #3 currently has a transmission line connection to the existing Pequonnock Substation. Does this transmission line connection also serve BHU #4? Based on UI's ad placed in the Connecticut Post, "The new substation is proposed to be completed and in-service by the end of 2021." However, according to Finding of Fact #193 of Petition No. 1218, "PSEG has committed to ending commercial operation of BHU #3 by July 1, 2021." Explain why the transmission connection to BHU #3 would be re-connected to the proposed replacement substation. For example, would this proposed transmission line connection also serve BHU #4?
14. Would the proposed replacement gas insulated substation utilize sulfur hexafluoride (SF₆)? Is SF₆ considered a greenhouse gas? Would there be any projected losses of SF₆? If yes, would the charge have to be topped off periodically?
15. Page ES-5 of the Application notes that, "Standard work hours will be 7:00 a.m. to 7:00 p.m., Monday through Saturday; however, some construction tasks will require work on Sundays or beyond these standard work hours." Would some of the non-standard work hours be potentially associated with construction in the railroad right-of-way? If yes, would UI consult with Metro-North Railroad and/or Amtrak regarding such construction hours as necessary?
16. Would any trees six inches or greater in diameter be removed to construct the proposed replacement substation (and associated connections) project? If yes, either estimate the number of trees or provide an estimate of the tree clearing area in acres.
17. Would the proposed overhead transmission structures all be galvanized steel?
18. Under Appendix B.2.2, UI provided proposed best management practices (BMPs) to protect the Peregrine falcon, a State-designated Threatened Species. Such BMPs were submitted to the Connecticut Department of Energy and Environmental Protection (DEEP). Did UI receive any follow-up correspondence from DEEP regarding the proposed Peregrine falcon BMPs?
19. Would the proposed project impact any federally-listed species? If yes, how would UI mitigate such impacts? Or alternatively, has UI received any written correspondence from the U.S. Fish and Wildlife Service regarding any federally-listed species? If yes, provide a copy of such correspondence.

20. Would the proposed project be located at least 0.25 miles from a known northern long-eared bat (NLEB) hibernaculum and at least 150 feet from a known (NLEB) maternity roost tree?
21. Page 2-6 references the decommissioning of the existing Pequonnock Substation. Would the existing concrete foundations remain in place, or has this not yet been determined?
22. Would the erosion and sedimentation controls comply with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*?
23. Calculate the amounts of cut and fill required to develop the proposed project.
24. Page 3-4 of the Application notes that, "This elevation will be achieved by a combination of grading and importing fill." Would this be clean fill, i.e. free of contamination, or alternatively, would it be tested for contamination before use?
25. Is any notice to the Federal Aviation Administration (FAA) required for any proposed structures within the replacement substation and/or any proposed transmission structures? If yes, what is the status of such FAA review? Would additional notice to FAA be required for temporary structures such as cranes? Explain.
26. Is the replacement substation expected to cause any interference with radio, wireless telecommunications, or cable or satellite television?
27. Did UI have to apply to the ISO New England (ISO-NE) Reliability Committee for a "no significant adverse effect on the transmission system" determination letter for the replacement Pequonnock Substation, or was it exempt because it would be a replacement of an existing facility, or is this otherwise not applicable? If yes, please provide a copy of such ISO-NE determination if available.
28. How many distribution feeders would leave the replacement substation?