

October 20, 2022

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Re: Docket No. 3B - The United Illuminating Company Amended Certificate of Environmental Compatibility and Public Need for replacement of a portion of the existing Derby – Shelton 115-kV electric transmission line facility. Reopening of this Certificate based on changed conditions pursuant to Connecticut General Statutes §4-181a(b)

Dear Melanie:

The United Illuminating Company (“UI”) offers the following corrections/comments on the draft Findings of Fact (“FOF”) issued by the Connecticut Siting Council (the “Council”) on October 13, 2022. UI appreciates the efforts of the Council’s staff in preparing the very comprehensive FOFs. Additions are underscored while deletions are in strikethrough.

1. FOF 41: UI suggests the finding be revised to read: “Currently, the two existing 115-kV lines are arranged in a double-circuit configuration on a total of 40 structures: 29 lattice steel towers; 4 self-supported steel monopoles; 2 direct embed monopoles; 1 wide-flange column pole; and 4 substation takeoff structures. (UI 1, OSPRM, pp. ES-1 and ES-2).”
2. FOF 56: The Total Project Cost of \$57,199,494 is correct. However, UI has identified an error in response to interrogatory CSC 1-16 that listed miscellaneous project costs of \$19,357,331 which the Council relied on in preparing FOF 56. The correct miscellaneous project cost amount is \$19,703,112 and when used as part of the table in the finding results in total project costs of \$57,199,494.
3. FOF 64(c): UI suggests the finding be revised to read: “Option 1C – Reduced ROW Expansion. This would be similar to the proposed project, except that rebuilt Structure No. 11 would be 185 feet as compared to 120 feet for the

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proposed project. The ROW would be expanded by 40 feet to the west but to increase the height of Structure No. 11, the heights of Structures 10, 12, and 13 would also have to increase from 150 to 190 feet. The smaller additional easement would be approximately 1.35 acres. Option 1C would have a cost delta (increase), compared to the proposed Project segment across the State Park, of approximately \$2.8M.” See Figure 19.

4. FOF 64(d): UI suggests the finding be revised to read: “Option 1D – ROW Expansion to the East. This would require expanding the ROW approximately 30 feet to the east between Structure Nos. 10 through 12. The heights of the new Structure Nos. 10 through 12 would be comparable to the proposed Project. This eastern boundary of UI’s ROW currently extends across the back or side yards of 7 residential properties between Division Street/Silver Hill Road and existing Structure No. 11. The expanded ROW would also extend into the backyards of 3 residential properties along Reichelt Terrace. This option was rejected due to impacts to the residential seven-abutting properties.
5. FOF 66(a): UI suggests the finding be replaced with: “The Company originally anticipated that the 115-kV transmission line rebuild work would require 41 new self-supporting galvanized steel monopoles (25 double-circuit monopoles, 15 single-circuit monopoles and one single-circuit H-frame structure). However, UI later determined that it was feasible to install a double-circuit monopole instead of two single-circuit monopoles at Structure 4 (in Derby), thereby, changing the monopole count. (UI 1, OSPRM p. 1-5; UI 6, Response CSC 1-15).”
6. FOF 68: UI suggests the finding be revised to read: “The monopoles would support conductors arranged in a vertical configuration. ~~25~~ 26 proposed monopoles would be double-circuit, and ~~45~~ 13 proposed monopoles would be single-circuit. One single-circuit H-frame structure would also be installed. (UI 1, OSPRM, p. ES-3; UI 6, Response CSC 1-15).”
7. FOF 81: As discussed above in relation to FOF 68, after the submission of the OSPRM, UI analyzed the feasibility of using temporary structures to allow the installation of double-circuit monopoles (instead of the proposed two single-circuit monopoles) at Structures 3, 4, 17, 18, and 19. As a result of these investigations, UI determined that a double-circuit monopole can feasibly be installed at Structure 4 and now proposes this as the preferred configuration for Structure 4 instead of two single-circuit monopoles. Accordingly, the finding should be revised to read: “In this section, UI proposes to install the two rebuilt transmission lines supported by ~~45~~ 13 single-circuit monopoles and ~~44~~ 12 double-circuit monopoles. (UI 1, OSPRM, pp. 2-3 and 2-4; UI 6, Response CSC 1-15)

8. FOF 82: UI suggests the finding be revised to read: “The proposed monopoles would range in height from 75 feet to ~~125~~ 135 feet.”
9. FOF 84: UI suggests the first sentence be revised as follows so as to reflect the fact the Derby Junction to Indian Well Substation segment contains the Housatonic River crossing where the UI easement is 180 feet wide. See page OSPRM Table 2-2. “The existing ROW from Derby Junction to Indian Well Substation is approximately 180 feet wide.”
10. FOF 113: UI suggested the finding be revised to read: “UI would utilize a combination of public roads and proposed or existing access roads within or proximate to the ROW. Temporary Access access roads across wetlands and watercourses would utilize timber mats or equivalent. Permanent access roads located in uplands would typically consist of gravel and would be approximately 12 to 16 feet wide. Temporary timber mats or equivalent will be used to cross 3 small watercourses and 2 wetlands, as well as to install a work pad in one wetland. In Shelton, 2 permanent culverts will be installed across one intermittent stream (WC2) to create a permanent access road, which will also result in permanent fill in one wetland (W4). (UI 1, OSPRM, pp. 3-7 and 3-8, 3-14 and 3-15; 6-6 and 6-7).
11. FOF 116: Revise the citation to read: “UI 1, OSPRM, pp. 6-11 and 6-12”.
12. FOF 148(a): Change “would be cleared marked” to “would be clearly marked”.
13. FOF 153: The finding should be revised to read: “A total of 10 wetlands areas (9 non-tidal and 1 ~~non~~-tidal) were delineated within the existing Project ROW.”
14. FOF 163: Change “August 21” to “August 31”.
15. FOF 173. UI suggests the finding be replaced with the following: “The Project is located near various public recreational and open space areas, including the Paugussett Trail (maintained by the Connecticut Forest and Park Association) and municipal conservation lands in Shelton, Osbornedale State Park in Derby and Ansonia, and the Nolan Field Athletic Complex in Ansonia, among others. The existing 50-foot-wide ROW extends for approximately 1,465 feet across the northeastern, undeveloped portion of Osbornedale State Park (UI 1, OSPRM, pp. 1-4, 1-6, 5-20, 5-20 - 5-22).”
16. FOF 176: Change “UI has identified and evaluated a potential route and 115-kV rebuild configurations” to “UI has identified and evaluated a-potential routes and 115-kV rebuild configurations”.

17. Figure 6 – Structure Nos. 3A, 3B, 4A, 4B, 18A, and 18B – Cross Section XS-5: This is no longer the cross section for Structure 4 which is now a double circuit monopole. See Response to Council Interrogatory CSC 1-15.
18. Figure 19 – Cost Table. Figure 19 combines: (1) the four rebuild alternatives that UI evaluated for the entire 4.1-mile length of the 115-kV lines between Derby Junction, Indian Well Substation, and Ansonia Substation (transmission costs only); and (2) the options that UI identified and assessed for the expansion of the ROW across Osbornedale State Park.

The four transmission line rebuild alternatives are already presented in FOF 62 and therefore do not need to be repeated in Figure 19. Therefore, UI suggests that Figure 19 be revised as shown below and included with the following explanation.

“UI identified and evaluated nine route/configuration options (identified as Options 1A, 1B, 1C, 1D, 2A, 2B, 3, 4, and 5) to avoid or minimize the need to expand its existing 50-foot-wide easement across Osbornedale State Park. Of these nine options, Options 1D, 2A, 2B, and 3 were eliminated due to overriding constraints. Three of the options (1A, 1B, and 1C) involve configuration options along the UI ROW within the park, while two (Options 4 and 5) would entail underground alignments that would replace the portion of the proposed Project from Structure 10 to Ansonia Substation.

For each of these five options, UI evaluated environmental and land use impacts, as well as costs, compared to the portions of the proposed Project that each option would replace. Figure 19 summarizes the cost differentials between the proposed Project and each of the five Osbornedale State Park options.”

**Figure 19: Cost Comparison of Proposed Route and Osbornedale State Park Options**

Osbornedale State Park Option No. / Description		Total Estimated Cost for Option (A)	Total Estimated Cost for Proposed Project Segment Replaced by Option (B)	Cost Delta: Option vs. Proposed Project (A-B)
1A	Underground Along Existing ROW	\$35M	\$3.6M <sup>^</sup>	\$31.4M
1B	No ROW Expansion (Taller Poles along Existing ROW)	\$4.6M	\$3.6M <sup>^</sup>	\$1M
1C	Reduced ROW Expansion	\$6.4M	\$3.6M <sup>^</sup>	\$2.8M
4	Underground Structure No. 10 to Ansonia Substation – Northern Route	\$170M	\$22M <sup>*</sup>	\$148M
5	Underground Structure No. 10 to Ansonia Substation – Southern Route	\$207M	\$22M <sup>*</sup>	\$185M

<sup>^</sup>Options 1A, 1B, and 1C would be along the existing ROW across the State Park.

<sup>\*</sup>Options 4 and 5 would install underground cable systems to replace the portion of the proposed Project overhead route from Structure 10 to Ansonia Substation.

(UI 1, OSPRM pp. 9-9 to 9-21)

An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,

Bruce L. McDermott

cc: Service List