



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

July 5, 2022

Bruce McDermott, Esq.
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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 Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 21, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. 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 requests 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.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the July 21, 2022 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

c: Service List dated June 9, 2022

**Docket No. 3B
Pre-Hearing Interrogatories
Set One**

Notice and Public Outreach

1. Referencing page 8-2 of the Overview in Support of the Motion to Reopen and Modify Docket No. 3 (OSPRM), has The United Illuminating Company (UI) received any comments on the Project from abutting property owners since the Motion to Reopen and Modify was submitted to the Council? If yes, please indicate what such comments were and how UI addressed such comments.

General

2. Would any federal initiatives e.g. U.S. Department of Energy “Building a Better Grid” support the proposed project? Explain.
3. What other permits are required from what other entities for the Housatonic River Crossing?
4. What modifications, if any, are necessary at Derby Junction to connect the UI circuits to Eversource-owned and operated facilities? Referencing page 3-12 of the OSPRM, what is the status of collaboration with Eversource for the tie-in?
5. What other existing collocated uses (ex. wireless telecommunications equipment, water and sewer lines, etc.) are within the Project area? Would any have to be removed, relocated or modified, either temporarily or permanently, for construction of the Project?
6. Are the proposed monopoles capable of hosting telecommunications equipment collocations? Does UI have a policy related to telecommunications equipment collocations on its transmission line structures? If so, please provide the policy.

System Planning and Asset Conditions

7. Is the proposed project identified in any ISO-New England, Inc. (ISO-NE) needs and solutions analyses? Is the proposed project on the ISO-NE Regional System Plan (RSP), RSP Project List and/or Asset Condition List?
8. Referencing page 1-5 of the OSPRM, UI notes that it conducted engineering studies in 2020-2021 that indicated asset condition issues and National Electrical Safety Code (NESC) clearance issues and gave a presentation to ISO-NE in September 2021. Please provide a copy of ISO-NE presentation (any portions of the presentation that contain Critical Energy Infrastructure Information may be submitted with a motion for protective order).
9. Please describe how the proposed project is consistent with the recommendations of the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation Report on Transmission Facility Outages During the Northeast Snowstorm of October 29-30, 2011 – Causes and Recommendations.

Construction

10. Referencing page 1-1 of the OSPRM, the 115-kV lines must be rebuilt in conformance with the NESC and UI standards. What are the NESC and UI standards?
11. Referencing page 2-6 of the OSPRM, please explain in further detail what is meant by “[S]ingle-circuit monopoles will be installed...as required to correctly align the phases of different circuits to the existing line terminal switches in each substation yard.”
12. Referencing Section 9-4 of the OSPRM, what is the status of coordination with DEEP regarding the proposed expansion of the ROW across Osbornedale State Park?
13. Referencing page 2-8 of the OSPRM, in both existing and expanded easement areas, would any existing sheds, outbuildings, or other structures have to be removed for the construction of the Project? Are there any uses that are incompatible with the UI easement?
14. For Project work to be completed within the ROW at present and in the future, are the costs associated with removal and/or rebuilding of sheds, outbuildings or other structures borne by the ratepayers? Have these costs been factored into the total Project cost?
15. Referencing page 9-22 of the OSPRM, what is the status of the analysis for the use of temporary structures? What is the cost to use temporary structures?

Cost

16. Referencing page 2-9 of the OSPRM, what are the major components driving the total cost for the Project?
17. Referencing page 2-9 of the OSPRM, of the \$57.2M total capital cost, approximately how much is associated with transmission line upgrades, and how much is associated with the substation upgrades?
18. Of the approximately \$57.2M cost total, what costs would be regionalized, and what costs would be localized? Estimate the percentages of the total cost that would be borne by UI ratepayers, Connecticut ratepayers and the remainder of New England (excluding Connecticut) ratepayers, as applicable.
19. What methodology does UI use to determine an acceptable delta between estimated Project costs and actual Project costs? What is the acceptable delta?

Historic/Scenic and Visual

20. The entire Project area in Shelton is located within a coastal management area. How does the Project comply with the Act?
21. Referencing page 6-19 of the OSPRM, has UI received any correspondence from the State Historic Preservation Office (SHPO) since the application was submitted? If yes, provide copy of such correspondence.
22. Referencing Appendix C of the OSPRM, Visual Assessment, page 1, the ground elevation for the Project area ranges from approximately 500 feet above mean sea level (amsl) to approximately 35 feet amsl. In which municipalities are these highest and lowest points in the Project area located?

Vegetation Management

23. Please identify the types of acceptable low growth vegetative species referenced on page 5-12 of the OSPRM.
24. Could the revegetation of the ROW include a pollinator species seed mix (ex. milkweed for the Monarch butterfly)?
25. Page 3-5 of the OSPRM mentions hazard trees outside the UI right-of-way would be removed in coordination with the landowner. Is landowner permission required? What if the landowner denies the request?

Wildlife

26. What is the status of the avian survey referenced on page 6-15 of the OSPRM?
27. What best management practices or other design considerations could be employed to deter bird roosting and nesting on transmission structures?

Public Safety

28. Page 6-20 of the OSPRM indicates the Federal Aviation Administration issued Determinations of No Hazard to Air Navigation for the Project and no special lighting or markers would be required on the rebuilt lines. In footnote 37, UI indicates that it proposes to install marker balls on the lines across the Housatonic River. What is the proposed marker ball scheme? What is the purpose of the proposed marker ball scheme?