



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 9, 2026

Bruce L. McDermott, Esq.
Harris Beach Murtha
265 Church Street
New Haven, CT 06510
bmcdermott@harrisbeachmurtha.com

RE: **DOCKET NO. 208** - Cross-Sound Cable Company, LLC Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of a high-voltage direct current (HVDC) submarine electric transmission and fiber optic cable system from One Waterfront Street, New Haven, Connecticut to Brookhaven, New York.
Compliance with Decision and Order Condition Nos. 7 and 8.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) is in receipt of your correspondence dated March 6, 2026 regarding compliance with Condition Nos. 7 and 8 of the Council's January 3, 2002 Decision and Order (D&O) for the above-referenced facility.

In response to the U.S. Army Corps of Engineers (USACE) proposal to deepen the Federal Navigation Channel (FNC), the correspondence includes notice of cooperation with USACE regarding the development of a schedule for deepening the FNC to an authorized depth of -40 feet mean lower low water and a plan for the relocation and burial of the certificated electric transmission and fiber optic cable system.

Therefore, the Council acknowledges that Cross Sound Cable Company, LLC is in full compliance with D&O Condition Nos. 7 and 8 of its January 3, 2002 Certificate.

Thank you for your attention and cooperation.

Sincerely,

Melanie A. Bachman
Executive Director

MAB/CMW/laf

March 6, 2026

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Via Electronic-Mail

Ms. Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 0605

Re: Docket No. 208 – Cross-Sound Cable Company, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of a high-voltage direct current (HVDC) submarine electric transmission and fiber optic cable system from One Waterfront Street, New Haven, Connecticut to Brookhaven, New York

Dear Ms. Bachman:

In January 2002, the Connecticut Siting Council (“Council”) issued Cross-Sound Cable Company LLC (“Cross Sound”) a Certificate of Environmental Compatibility and Public Need for installation of a 24-mile electric transmission cable across New Haven Harbor and Long Island Sound (the “Project”). In approving the Project, the Council provided that Cross Sound is to notify the Council and to provide a plan for the relocation or deepening of the Project should the U.S. Army Corps of Engineers (“USACE”) propose to deepen the New Haven Federal Navigation Project (“FNP”). Decision and Order, Condition 8. In March 2002, USACE and the Connecticut Department of Energy and Environmental Protection (“DEEP”) also approved installation of the Project.

In approving the Project, USACE required installation of the Project to a depth of 6 feet below the seabed surface or -48’ mean lower low water (“MLLW”) within the FNP. Following installation of the Project, Cross-Sound notified USACE that the required burial depth was not achieved in a few discrete locations. In June 2004, additional burial activities were undertaken and the Project was installed to the required depth in all but one location known as Area 6/7 which is approximately 800’ long. Ultimately it was decided that the cable was safely buried and routine USACE maintenance dredging activities could be performed with the cable at the installed depth so no additional burial efforts were needed.

The current authorized depth of the FNP is -35’ MLLW but USACE has now been authorized to deepen the FNP to an authorized depth of -40’ MLLW. This will require Cross Sound to further bury the cable or relocate it to achieve its permitted burial depth of -48’ MLLW in Area 6/7.

The Area 6/7 Cable Relocation Process

Cross Sound will perform mechanical dredging to facilitate both removal of the existing cable in Area 6/7 and burial of the relocated cable in the FNP and to the west of the proposed FNP sideslope. The dredging will take place in two locations within Area 6/7 – each centered on the north and south relocation alignment legs that bring the relocated cable from the existing cable location in the FNP to west of the proposed FNP sideslope and also extending along the alignment of the existing cable to facilitate deburial

of the cable to support the relocation. This portion of the dredging activities will be coordinated with USACE or performed directly by Cross Sound for the USACE in order to get the cable relocated and buried.

The dredge areas will be dredged to a depth of -42' MLLW. Along each cable relocation leg, the bottom width of the dredging at -42' MLLW will be 160' to provide a path for the cable burial tool and to accommodate laying the second cable splice Omega loop along one of the legs – final second splice location to be determined during relocation operations. The southerly leg will have an area along the existing cable that is dredged to -44' and -48' MLLW to facilitate existing cable deburial. The dredge areas will be dredged with 5H:1V sideslopes within the channel limits to reduce the potential for sediment in-fill between the time the dredging is completed and when the cable relocation activities occur. The sideslopes along the NHHNIP channel sideslope will be dredged to the USACE's specified 3H:1V sideslope. The two dredge areas in Area 6/7 will have a combined footprint of approximately 259,000 SF. The estimated dredge volume in Area 6/7 is approximately 48,000 CY. Approximately 500 CY of material will be dredged to elevations within the channel below the NHHNIP dredge prism to facilitate cable deburial.

Cross Sound plans to dispose of its dredged material at the Central Long Island Sound Disposal Site as authorized by permits issued to the USACE and the state and federal permits issued to Cross Sound.

Cable Removal

To begin cable removal operations in Area 6/7, the Cable Repair Barge ("CRB") will be positioned at the initial cut point, which is expected to be located to the east of USACE Sta. 105+00(±). The controlled flow excavator ("CFE") which fluidizes and displaces sediment will then be deployed to expose the cable at the cut point and along the length of cable required to bring the cable to the CRB deck. The cable will then be cut to begin recovery operations. One end of the cable will be temporarily sealed by divers to prevent water intrusion and the other end will be raised to the CRB's deck.

The CRB and CFE will then move along the lengths of cable to be removed. Additional tools may also be used to expose the cable as needed. The cable will then be cut and the remaining ends capped/sealed to prevent water intrusion. The remaining cable ends will be moved to their planned positions and lowered to the bottom and their positions marked by buoys.

Approximately 1,250' of the existing cable within the FNP at Area 6/7 will be removed from the FNP. Some portions of this 1,250' length of cable may be repositioned along the proposed relocation alignment as previously described. The cable that is removed and not repositioned will be recovered onboard the CRB and ultimately recycled or disposed of in accordance with applicable regulations.

Cable Installation

To begin installation operations, the SeaRhino jetting tool will be used to perform a proving run along the proposed alignment of the relocated cable. The proving run will verify that the tool can achieve the required burial depth and will verify that the top of bedrock elevation does not affect Cross Sound's ability to bury the cable. There is a possibility that this proving run step may be performed before the cable removal operations described above.

After the proving run, the CRB will be moved over one of the sealed cable ends, which will then be recovered and pulled to the in-line splice location. The final determination of whether the in-line splice will be located on the north or south leg of the relocated cable alignment will be determined based on conditions encountered during operations.

Once the raised cable end is secured on the CRB, the splicing of the cable with the new length of cable will begin onboard the CRB. The splicing operation will take place within a shelter onboard the CRB to provide a controlled climate. Each of the two HVDC conductors and the fiber optic cable will each be spliced during this operation. The splices will be tested upon completion. The in-line splice work is expected to require five to six days to complete.

The completed in-line splice will then be lowered to the seabed. The CRB will then lay the new section of cable on the seabed along the proposed alignment.

When the location of the second splice is reached, the capped/sealed end of the existing cable will be raised from the seabed onto the CRB. The cable splicing and testing operation will be repeated. The second splice work is expected to require five to eight days to complete.

The second splice will be deployed to the seabed in the form of an Omega loop in one of the pre-dredged areas. At this point, the entire length of relocated cable in Area 6/7 will be resting on the seabed.

The SeaRhino will be the primary tool for cable burial in Area 6/7. The SeaRhino will be lowered to seabed and the cable acquired. The SeaRhino will then jet embed the cable to the required burial depth (i.e., -48' MLLW within the proposed NHHNIP widened federal channel limits, 6' below present bottom to the west of the proposed NHHNIP top of sideslope, and transitioning between these two depths within the proposed NHHNIP sideslope). Additional tools will be used as needed to achieve the required burial. For example, the CFE and/or diver jetting tools will be used to bury the Omega loop at the second splice location.

Cross Sound's USACE permit specifies burial "a minimum of -4' below the substrate outside of the FNP". Cross Sound will achieve the burial depths specified in the permit as required or deeper as can be achieved. Cross Sound's objective is to achieve a burial depth 6' below the substrate outside of the FNP.

The USACE's 2024 marine survey and jet probe surveys conducted by CSCC in August and November 2025 indicate an area to the west of the proposed NHHNIP top of sideslope where the bedrock surface may be shallow. The SeaRhino proving run will be used to verify the cable can be jetted to the required burial depth of 6' below present bottom in this area or to identify an alignment that can achieve the depth within the proposed Cross Sound Cable Relocation Corridor. Cross Sound's objective is to achieve a burial depth 6' below the substrate outside of the FNP. In the event that the bedrock surface does not allow the cable to be buried to the required depth of 6' below present bottom in this area, Cross Sound is requesting authorization to place up to 4,000 SF of articulated concrete mattresses (each mattress is 8' wide by 20' long) above this portion of the relocated cable to provide cable protection as shown in the attached permit plans, noting actual mattress locations will be in response to areas where 6' of burial could not be achieved. Cable protection measures will only be utilized if absolutely necessary.

After burial operations are complete, a multibeam bathymetric survey will be performed in the relocation area to confirm no shoals above -35' MLLW (the currently authorized FNP depth) have been left within the existing FNP limits. The processed data from the survey will be provided to the USACE, DEEP and National Oceanic and Atmospheric Administration for mapping purposes.

Schedule

Assuming Cross Sound has all permits in hand by July 15, 2026, cable relocation activities will begin in the fall of 2026 with completion prior to May 2027.

Melanie Bachman
March 6, 2026
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Please feel free to contact me if you have any questions or concerns regarding this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott", with a long horizontal flourish extending to the right.

Bruce L. McDermott

cc: Michael Madia, Argo Infrastructure Partners
Brian Reinhart, Cross-Sound Cable Company, LLC
Julie Byars, USACE
Christina Comeau, USACE
Kelly Egan, USACE
Craig Martin, USACE