



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

February 4, 2025

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

RE: **DOCKET NO. 490** - The United Illuminating Company Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by the United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements. **Development and Management Plan Interrogatories.**

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 25, 2025. 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 February 25, 2025 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 blue ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/MP

Enclosure: Revised Schedule dated February 4, 2025
c: Service List dated December 24, 2024



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DEVELOPMENT AND MANAGEMENT PLAN SCHEDULE

DOCKET NO. 490 - The United Illuminating Company Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by the United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements.

Application received	06/30/2020
Council request for more information per Section 16-50/-1a of the Regulations of Connecticut State Agencies	07/02/2020
Date Applicant submitted complete information per Section 16-50/-1a of the Regulations of Connecticut State Agencies	07/09/2020
Completeness review	08/27/2020
Council Interrogatories <ul style="list-style-type: none">Set-One IssuedSet-One Responses Due	09/08/2020 09/25/2020
Pre-hearing tele-conference 11:00 a.m.	09/23/2020
Final Exchange of Interrogatories between Participants	10/01/2020
Deadline for Pre-filed Testimony and Responses to Interrogatories	10/08/2020
Deadline to request Party/Intervenor status	10/08/2020
Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom conferencing	10/15/2020
Close of Evidentiary Record	10/15/2020
Close of Public Comment Period	11/14/2020
Draft Findings of Fact	01/14/2021
Draft Findings of Fact, Opinion & Decision & Order	01/28/2021
Deadline for Decision	12/27/2020
90-day extension of Deadline for Decision per Executive Order No. 7DDD	03/27/2021
Final Decision	02/03/2021
Development and Management (D&M) Plan received	12/26/2024
Council Interrogatories <ul style="list-style-type: none">Set-One IssuedSet-One Responses Due	02/04/2025 02/25/2025
Deadline for Decision for D&M Plan	02/24/2025
Deadline for Decision for D&M Plan with Extension	04/23/2025

Siting Analyst: Michael Perrone

Docket No. 490
The United Illuminating Company
Old Town Substation, 282, 312 and 330 Kaechele Place, Bridgeport

D&M Plan Interrogatories
February 4, 2025

1. The Certificate was issued on January 28, 2021. What circumstances caused delay in the submission of the Development and Management (D&M) Plan? Explain.
2. Referencing D&M Plan Volume I, p. 37, UI notes that the D&M Plan will be posted on the project website. Was it posted on the project website? Is UIRailroadTLineUpgrades.com the correct web address? If no, provide the correct web link for the Old Town Substation Rebuild Project.
3. Has UI received any comments from Eversource, the City of Bridgeport or the Town of Trumbull since the D&M Plan was filed with the Council? If so, summarize the comments, and indicate how UI addressed such comments.
4. Has UI received any concerns from neighbors since the D&M Plan was filed with the Council? If so, summarize the neighborhood concerns, and indicate how UI addressed such concerns.
5. Referencing D&M Plan Volume I, p. 3, which National Electrical Safety Code (NESC) standards apply to construction? Are any changes to the approved facility required to comply with updated NESC standards and if so, what are the standards?
6. Would a temporary fence be installed around the construction area? If yes, provide the type and height of the temporary fence. Where would such temporary fencing be located?
7. Referencing D&M Plan Volume I, p. 4, approximately how far to the south was the retaining wall along the northern property line (adjacent to the funeral home) shifted? Approximately how far to the west was the eastern fence shifted? Approximately how far to the east was the western fence (adjacent to Kaechele Place) shifted?
8. Referencing D&M Plan Volume I, p. 37, which portion(s) of the Project could potentially require the use of helicopters?
9. Referencing D&M Plan Volume I, p. 5, would screening panels be located on all of the 14-foot fencing, or only certain sections? Provide a specifications sheet photo or sample photo of the screening panels.
10. Referencing D&M Plan Volume I, p. 4, submit a copy of the more detailed engineering studies that UI performed subsequent to issuance of the Certificate.
11. Referencing D&M Plan Volume I, p. 5, based on UI's load forecast projections, in approximately how many years would a third transformer be necessary? Explain.
12. Referencing D&M Plan Volume I, p. 5, could the two new transformers be moved farther apart in the future to make space if the need arises for a third transformer? Explain.
13. Referencing D&M Plan Volume II, Figure 3, approximately how long is the 14-foot wide gravel access road that crosses City of Bridgeport property?

14. Referencing D&M Plan Volume I, p. 9, submit a copy of the fully executed Three Party Agreement for a Permanent Access Easement between UI, the City of Bridgeport and Eversource.
15. Referencing D&M Plan Volume I, p.13, submit a copy of the DEEP General Permit that was issued on November 4, 2024.
16. Referencing D&M Plan Volume I, p. 26, submit a copy of the December 1, 2023 DEEP NDDB Determination. When does such determination expire? Would UI need to seek an updated NDDB Determination prior to commencement of construction?
17. Provide a chart that compares the approved Project in Docket 490 and the revised Project included in the D&M Plan based on the following quantities: total cut, total fill, total disturbance area within the limits of disturbance, and total tree removal count (6" diameter or greater) or total acreage of tree clearing. Explain why each quantity changed, as applicable. (These quantities are inclusive of the access drive across City of Bridgeport property.)
18. Referencing D&M Plan Volume I, p. 23 and Appendix A, the 2004 Connecticut Erosion and Sediment (E&S) Control Guidelines are referenced. Which version of the Connecticut E&S Control Guidelines would be implemented for construction and why?
19. Referencing D&M Plan Volume I, p. 26, UI states it will not cut trees on the project site during the **NLEB** (Northern Long-Eared Bat) maternity roosting season, but the September 6, 2024 USFWS consultation described in the narrative identifies the **Tricolored Bat**. Are the season tree cutting restrictions for the NLEB and Tricolored Bat the same? Explain.
20. Could UI utilize netless E&S controls to prevent wildlife entanglement (e.g. eastern box turtle)?
21. How would UI prevent the introduction of invasive plant and insect species, such as mugwort, spotted lanternfly and jumping worm, during construction, restoration and throughout the useful life of the landscaping?
22. Referencing D&M Plan Volume I, pp. 29-30, what additional noise characteristics, if any, would the revised configuration introduce that are different than the noise characteristics evaluated in the approved configuration? Would operation of the facility still comply with DEEP Noise Control Regulations with the revised transformer locations?
23. Referencing D&M Plan Volume I, p. 29, describe UI's standard design for illumination of substation yards and the permanent lighting scheme at the existing Old Town Substation yard. Would any new lighting standards apply to the lighting scheme for the new Old Town Substation yard? Explain.
24. What is the approximate cost to decommission the existing Old Town Substation? Is this included in the total project cost?
25. What methodology does UI use to determine an acceptable delta between estimated project costs and actual project costs? What is the acceptable delta?

26. The estimated costs of the facility at the time the Certificate was issued were as follows according to Finding of Fact No. 154:

154. UI's estimated project cost is approximately \$39.1M*. Approximately \$23.4M of the project's costs would be regionalized across all New England ratepayers based on load share which is approximately 75 percent New England (or \$17.5M) and 25 percent Connecticut (or \$5.9M). The remaining \$15.6M of project costs are related to distribution and non-Pool Transmission Facilities costs which are typically borne by UI customers.

*The approximately \$3M cost for Eversource's portion of the project is not included in this total, and Eversource expects that the entire \$3M cost would be regionalized. (UI 2, response 6; Tr. 1, p. 30; Tr. 1, pp. 30, 81-82, 85)

- a. Provide the current estimated cost of the revised facility with details of any changes in specific cost categories and/or cost allocations.
- b. Are the current estimated costs for the revised facility more than 110% of the estimated costs for the approved facility? Explain.