

stated that UI's proposed substation would be served by and interconnected with two of Eversource's 115-kV transmission lines. Those transmission lines are located as follows: The 1710 Line extends between Eversource's Devon Substation in Milford, CT and UI's Pequonnock and Old Town Substations in Bridgeport, CT. Eversource's 1222 Line extends between UI's Old Town Substation, in Bridgeport, CT and its Hawthorne Substation in Fairfield, CT. In addition, a third Eversource 115-kV transmission line (the 1714 Line), which presently bypasses UI's existing Old Town Substation and connects UI's Trumbull Substation and Eversource's Weston Substation, would be re-routed to the new substation yard to accommodate a future connection to the Old Town Substation. Eversource Exh. 1, pp. 1-2. The Council granted Eversource's Motion for Party Status on October 8, 2020.

If the Council approves the Certificate for the Project, then Eversource's proposed facilities would include the facilities and upgrades to be owned by Eversource that would be necessary for the associated electrical interconnection to Eversource's electric transmission system, namely:

- (1) Installation of four new transmission structures; and
- (2) Relocation and/or replacement of transmission line conductors, communication and shield wires and other associated fixtures and appurtenances from Eversource's two existing lattice structures to the four new monopole structures.

In addition, the operation of UI's rebuilt substation would need to be appropriately integrated into Eversource's transmission network. Eversource Exh. 2, p. 3. All of Eversource's proposed facilities are hereinafter referred to as the "Eversource Proposed Facilities". Eversource would

also remove the two existing steel lattice structures and the attachments to such structures.

Eversource Exh. 2, p. 5.

Significantly, the construction and operation of the Eversource Proposed Facilities would not have any substantial adverse effects on the environment. Eversource Exh. 2, p. 5. Wherever possible, Eversource has incorporated measures into its construction process to protect the environment. Eversource Exh. 2, p. 8; Transcript [Tr.], pp. 80-81.

II. DISCUSSION

A. BACKGROUND

Eversource is participating in Docket 490 solely to allow the Council to consider not only the Project proposed by UI, but also the facilities and upgrades to Eversource's transmission system that are required for the Project. Such consideration would promote efficiency and economy of the Council's resources, in lieu of an additional filing by Eversource after the conclusion of the Docket 490 proceedings. Eversource Exh. 2, pp. 2-3; Tr. p. 82.

B. THE EVERSOURCE PROPOSED FACILITIES WOULD NOT CAUSE ADVERSE ENVIRONMENTAL EFFECTS OR POSE AN UNDUE HAZARD (Conn. Gen. Stats. § 16-50p(a)(3)(B), (C) & (E))

As explained below, the nature of the effects of the Eversource Proposed Facilities will not conflict with the policies of the State of Connecticut that the Public Utility Environmental Standards Act ("PUESA") protects concerning "the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife". (*Conn. Gen. Stats. § 16-50p(a)(3)(B)*) Therefore, Eversource respectfully requests that the Council find that the Eversource Proposed Facilities would not have a substantial adverse environmental effect.

Based on information provided by UI and Eversource's evaluation of its proposed structure locations, the proposed facilities would have no substantial adverse environmental effects, as follows:

- The height of the new transmission structures would be approximately the same height as the existing structures.
- No wetland area within the existing Eversource ROW would be permanently impacted by the work of installing Eversource's new transmission structures or removing its existing transmission structures.
- Eversource would comply with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and follow its Best Management Practices.
- Eversource would employ wildlife protection measures depending on the wildlife species identified, such as time of year construction.
- Visual effects in the ROW of Eversource's structures would be minimal and slightly improved with the elimination of a lattice tower structure and the installation of the two new monopole structures that have a more streamlined appearance.
- For the access easement area, no tree clearing would be necessary. However, the removal of overgrown vegetation, such as bushes and shrubs and some tree-trimming, would be required within the access easement area.

Eversource Exh. 2, pp. 5-8; Tr., pp. 80-81.

C. EVERSOURCE'S WORK WOULD BE CONDUCTED AND ITS FACILITIES WOULD BE OPERATED IN A MANNER THAT PROTECTS PUBLIC SAFETY

All of Eversource's work would be designed, constructed and operated in accordance with sound engineering practices and in full compliance with Eversource's standards, the National Electrical Safety Code and good utility practices. Eversource Exh. 2, p. 8.

III. CONCLUSION

The overriding purpose of PUESA is to balance proposed utility facilities with the protection of environmental resources. The Eversource Proposed Facilities achieve this purpose. The Record reflects that Eversource's construction would avoid permanent environmental effects. Any short-term environmental effects during construction can and would be mitigated.

Eversource has demonstrated that the Eversource Proposed Facilities would comply with all governing statutes and regulations, as well as the requirements and standards of the Council. Therefore, Eversource respectfully asks that the Council find that the Eversource Proposed Facilities would not have a substantial adverse environmental effect if the Council approves the application for UI's Old Town Substation Rebuild Project.

Respectfully submitted,

THE CONNECTICUT LIGHT AND
POWER COMPANY DOING BUSINESS
AS EVERSOURCE ENERGY

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NOTICE OF SERVICE

I hereby certify that a copy of Eversource's Post-Hearing Brief has been electronically sent on this 6th day of November, 2020 to all parties as referenced in the Connecticut Siting Council's Service List dated July 10, 2020, as updated on October 8, 2020 (grant of party status to Eversource).


Marianne Barbino Dubuque