

VIA US AND ELECTRONIC MAIL

12/13/2019

Melanie A. Bachman, Esq. Executive Director/Staff Attorney The Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re: The United Illuminating Company's Notice of Exempt Modification Pursuant to R.C.S.A. § 16-50j-58 to Existing Energy Facility Site at 40 Poland Street, Bridgeport, Connecticut ("Notice of Exempt Modification")

Dear Attorney Bachman:

Pursuant to Regulations of Connecticut State Agencies ("R.C.S.A.") §16-50j-58, The United Illuminating Company ("UI" or "Company") hereby notifies the Connecticut Siting Council (the "Council") of its intent to make exempt modifications to its substation at 40 Poland Street, Bridgeport, Connecticut ("Facility" or "Energy Facility"). The \$625 filing fees, along with 2 copies of this Notice of Exempt Modification, are enclosed herewith.

Existing Energy Facility

The Facility is located at 60, 86 and 92 Poland Street - AKA 40 Poland Street in the City of Bridgeport at $41^{\circ}09'22.6"$ N and $\Lambda 73^{\circ}14'02.9"$ W and is bounded as follows:

Beginning at a point in the southeasterly corner of the parcel herein described: Thence S 73°38'48" W a distance of 100'

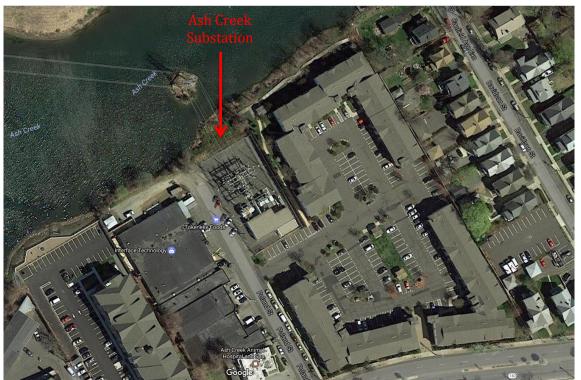
Thence Poland Street, in part, N 16°21'12" W to the high water mark of Ash Creek, 225' more or less

Thence bounded northerly by Ash Creek, to a point approximately 100' northerly of the herein described southerly boundary

Thence S 16°21'12" E 250' more or less to the point of beginning.



Ash Creek Substation is a 115-kV to 13.8-kV distribution substation located in Bridgeport, Connecticut. The station consists of two 115-kV incoming circuits with a 115-kV tie breaker. In addition, the station has two 13.8-kV distribution buses with a total of 16 feeder breakers and four main/tie breakers. The major substation yard equipment includes: two 36/48/60MVA station power transformers, a 115-kV tie breaker, two 115-kV breaker isolation disconnect switches, two transmission circuit disconnect switches, two transformer high side disconnect switches, and various PT's, CT's and station service transformers.



Aerial Photo of the Facility (Google 2017)

Proposed Modifications

UI is proposing to install a precast concrete utility shelter to house fiber optic network gear to connect this substation to others in the system in a ring fashion. This fiber network is part of a project to connect all the Operating Companies that make up AVANGRID, the parent company. This fiber optic network is a high speed communications link, with the potential to carry all needed corporate communications to and from the facility, including Security, SCADA, etc.

This network is private to UI and AVANGRID, and enhances cyber security for the grid by not allowing any internet or other outside access to same. The core controlling the system is state of the art, providing machine learning, artificial intelligence control, and behavioral analysis to detect, kill, track back and identify threats. This system is the first of its' kind in the United States designed solely to protect network traffic controlling and protecting the grid. It will materially enhance the reliability of the grid once fully deployed.

Proposed Shelter Location



Project Area (Google 2018)

The shelters themselves are manufactured by Thermobond buildings, a respected manufacturer of utility shelters. They are of precast concrete construction, able to withstand 150 MPH winds without damage, point blank discharge from high powered rifles, and high rot resistance.

Since this site is prone to flooding, we are proposing to install the shelter on a precast concrete Kenner® chainwall foundation, raising the floor level 4 ft. above surrounding grade. The shelter is clamped and bolted to the chainwall foundation with steel angle shapes. The raised foundation assures continuity or service and prevents potential flood damage.



Typical Shelter View on Kenner® Chainwall Foundation

Compliance with R.C.S.A. § 16-50j-57(b)

Pursuant to R.C.S.A. §16-50j-57(b), the proposed changes do not constitute a modification to an existing facility that may have a substantial adverse environmental effect and are exempt from the requirement to obtain a certificate pursuant to Section 16-50k of the Connecticut General Statutes. Specifically, consistent with R.C.S.A. § 16-50j-57(b), the proposed changes to the existing site <u>do not</u>:

- (A) Extend the boundaries of the site beyond the existing fenced compound;
- (B) Increase the height of existing associated equipment;
- (C) Increase noise levels at the site boundary by 6 decibels or more, or to levels that exceed state and local criteria;
- (D) Impact electric and magnetic field levels at the site boundary in a manner that is inconsistent with the Council's Best Management practices for Electric and Magnetic Fields;
- (E) Cause a significant adverse change or alteration in the physical or environmental characteristics of the site; or
- (F) Impair the structural integrity of the facility, as determined in a certification provided by a professional engineer licensed in Connecticut, where applicable.

The project would not have a substantial adverse environmental effect or cause a significant adverse change or alteration in the physical or environmental characteristics because:

- (A) The shelter would be located within the substation's existing fence line; the Substation's fenced area would not be expanded.
- (B) The equipment will be no taller than existing equipment within the Substation.
- (C) There would be no change to the existing television or radio interference resulting from the modifications of the Substation.
- (D) Sound-pressure levels at all points along properties lines would continue to meet state regulations set out in R.C.S.A. §§ 22a-69-1 et seq.
- (E) The project work would not affect water resource areas.
- (F) UI's review of the Connecticut Department of Energy and Environmental Protection's ("CT DEEP") Natural Diversity Data Base did not identify any state-listed endangered, threatened, or special concern species in the vicinity of the Project.

UI intends to initiate the project on or after the Council's acknowledgement that the proposed activities are exempt.

Please do not hesitate to contact me at 203-499-2586 should you have any questions regarding this notice.

Very truly yours,

Amy Hicks Outreach Specialist The United Illuminating Company

Enclosures

Cc: Amy Hicks, The United Illuminating Company, Permitting & Public Outreach Nicholas Cicale, UIL Holdings Corporation, Counsel for The United Illuminating Company