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August 2, 2022

Melanie Bachman, Esq. Executive  
Director Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

RE: *Notice of Exempt Modification Pursuant to RCSA § 16-50j-57(a) to Existing Energy Facilities in the City of Milford, New Haven County, Connecticut (“Notice of Exempt Modification”): Separation of Eversource Devon 7R Substation and GennConn Devon Generating Station Service Assets*

Dear Attorney Bachman:

The Connecticut Light and Power Company dba Eversource Energy (“Eversource”) hereby gives notice to the Connecticut Siting Council (Council) of its intent, in accordance with Section 16-50j-57(a) of the Regulations of Connecticut State Agencies (“RCSA”), to undertake modifications at Eversource’s 115-kilovolt (“kV”) Devon 7R Substation (“Substation”) located at the Devon Generating Station, on property owned by GenConn Devon LLC (“GenConn”), 700 Naugatuck Avenue in the City of Milford, New Haven County, Connecticut.

The purpose of the proposed modifications (“the Project”) is to separate Eversource’s assets from those of GenConn, which acquired the Devon Generating Station from NRG Energy in the Fall of 2021. The modifications will provide reliable, Eversource-owned sources of primary and backup power to the Eversource facilities. Figure 1 provides an aerial view of the Substation and the location where the Project modifications will be performed.

The Project is necessary because GenConn plans to de-energize and decommission the generating station’s steam building, older generating units, and associated structures and electrical facilities, including switchgear that supplies primary and backup power to Eversource’s two relay and control enclosures at the Substation.<sup>1</sup> Given GenConn’s planned decommissioning work and the need for a reliable source of primary and backup power for the Substation’s two relay and control enclosures, Eversource proposes to install six 50-kilowatt station service voltage transformers (“SSVTs”) and two automatic transfer switches (“ATSs”).

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<sup>1</sup> NRG, the previous generating station owner, initiated the extensive work to remove dependence on and decommission the original steam turbine building. As the current generating station owner, GenConn is continuing this work. Overall, the GenConn generating station property encompasses approximately 34 acres. Within this area, Eversource’s Substation facilities occupy approximately 4 acres, consisting of two fenced station yards and a parking lot.

The Project work also will include the installation of new foundations and steel structures for the six SSTVs and a total of 550 feet of new below grade conduits for new power cables between the SSTVs and relay and control enclosures.

Each of the six SSTVs is approximately 30.5 inches wide x 30.5 inches inches deep x 8 feet tall and will be placed on individual support structures that are approximately 8.5 feet tall, 3 feet wide, and 2 feet 8 inches deep. Combined, the SSTV and steel structures will have a total height of approximately 16 feet 6 inches. This equipment will be significantly smaller than adjacent existing structures.

The existing source of power from GenConn will be disconnected. Temporary station power will not be required during the construction of the Project.

Eversource proposes to commence Project work on October 3, 2022 and to complete the asset separation by the end of December 2022.

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

- The Project work would be within Eversource's Substation within the Easement C area (refer to Figure 2), located within the GenConn generating station site.
- Construction equipment will use existing access from Naugatuck Avenue and access roads within the generating station to reach the Substation.
- All material and equipment required to support the Project work will be staged on Eversource's existing Easement C area.
- The work would not affect wetlands or waterways and will not require tree clearing.
- The Substation is not in a flood zone designated by the Federal Emergency Management Agency.
- Eversource's review of the Connecticut Department of Energy and Environmental Protection's Natural Diversity Data Base maps (June 2022) determined that the Project is within the general polygon identified for state-listed endangered, threatened, or special concern species associated with the Housatonic River. However, the Project will be located entirely on the developed portion of the Substation, within the generating station property that has long been used for industrial purposes, and no potential rare species habitat would be disturbed.
- The work would result in short-term noise typical of construction activities but would not result in any significant long-term changes to the noise environment because the new SSTVs are not noise-producing equipment (the SSTVs do not have fans). Moreover, all Project work will be confined to the generating station property, a long-established industrial use.

Ms. Bachman  
August 2, 2022  
Page 3

- The Project modifications will not affect noise levels<sup>2</sup> and will continue to be consistent with state noise regulations.
- Electric and magnetic field levels would not be altered by proposed Project.

Eversource is submitting this filing electronically and will provide three hard copies for the Council's records, along with the requisite fee of \$625.00.

A notice of this exempt modification filing has been provided to the Mayor of the City of Milford.

Communications regarding this Notice of Exempt Modification should be directed to Kathleen M. Shanley at (860) 728-4527.

By:



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Kathleen M. Shanley  
Manager - Transmission Siting

cc: Benjamin G. Blake, Mayor, City of Milford

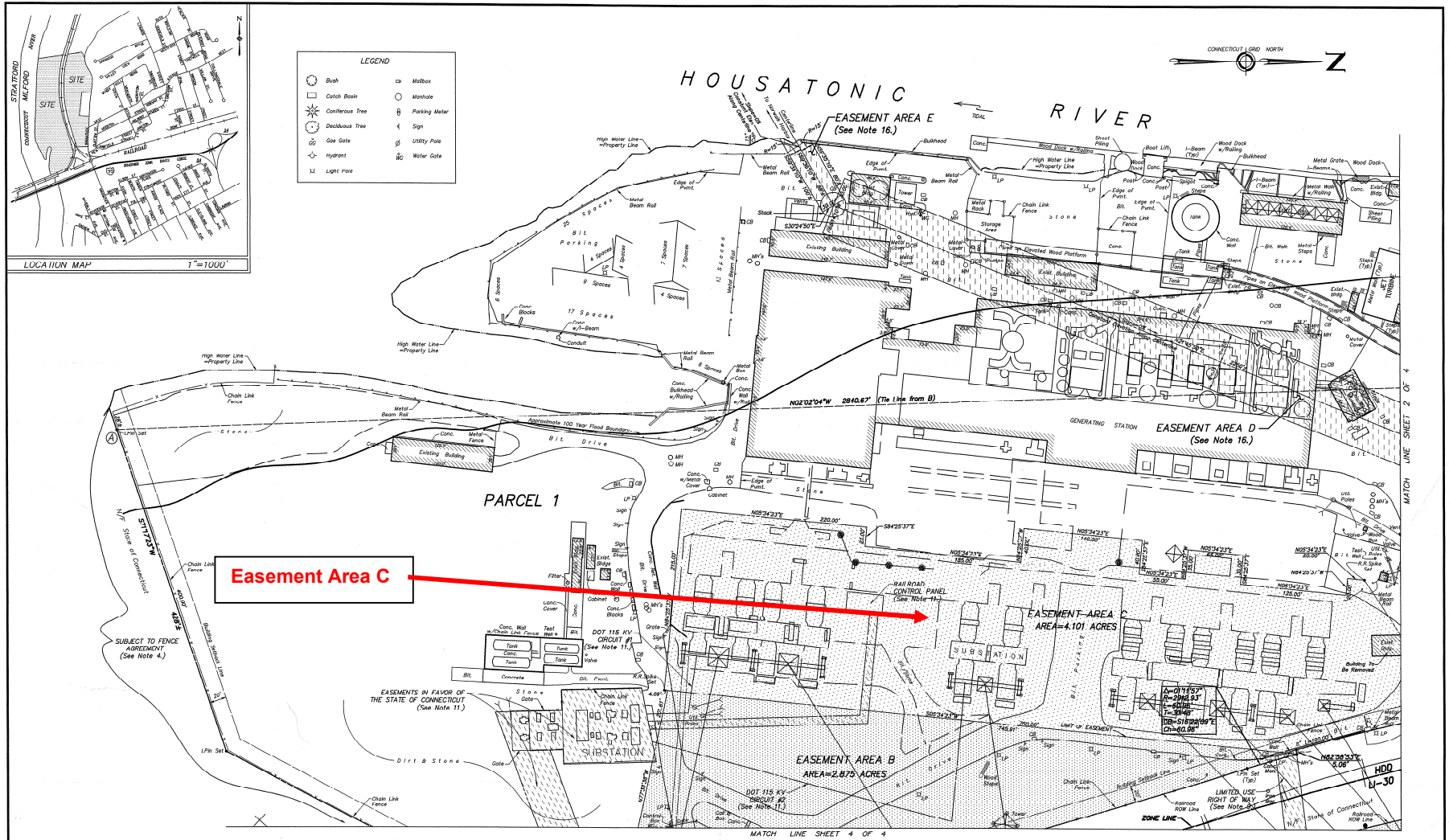
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<sup>2</sup> The SSVTs do not have fans and are not noisy.

Figure 1: Aerial View of Devon 7R Substation, City of Milford, CT



Figure 2: Devon 7R Substation Layout Schematic (All Project Modifications will be in "Easement C")



**Easement Area C**

To: The Connecticut Light and Power Company, Northeast Utilities Service Company, NRO Energy, Inc., Devon Power LLC and Commonwealth Land Title Insurance Company  
 This is to certify that this map or plat and the Survey on which it is based were made (i) in accordance with "Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys" jointly promulgated and adopted by ALTA, ACSM and NREIS in 1995, and include Table A from numbers 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 14 & 16 as specifically defined therein, and (ii) pursuant to the Accuracy Standards (as adopted by ALTA and ACSM and in effect on the date of this certification) of an Urban Survey.  
 MICHAEL C. WELLS Date: 12-6-99  
 MICHAEL C. WELLS Connecticut, C.S. No. 14200

No.	DATE	REVISION DESCRIPTION
1	12-12-99	Initial & Final Drawing
2	12-12-99	Correction System Name Added
3	1-8-99	Comments Added
4	1-11-99	Notes Revised
5	2-21-99	ALTA/ACSM Survey, FTS-20001774.03

TO MY KNOWLEDGE AND BELIEF THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.  
 MICHAEL C. WELLS, E.S.  
 TITLE AND VALID COVER OF THIS MAP OR PLAN MUST BEAR THE ORIGINAL SIGNATURE AND EMPLOYED SEAL OF THE ABOVE NAMED LAND SURVEYOR. UNAUTHORIZED REPRODUCTION OR ALTERATION IS FORBIDDEN.

Embossed seal

**URS Greiner Woodward Clyde**  
 Surveying and Mapping 550  
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 300 Enterprise Drive, Suite 300  
 Rocky Hill, Connecticut 06067-4002  
 Tel. (860) 238-0800  
 Project # F000017401  
 Date: NOVEMBER 1998  
 Field Book # 14609-01  
 Scale: 1" = 50'  
 Search # 2943  
 Drawn by E. LEWIS  
 Checked by M. GUY  
 Map File # T141-8

**NORTHEAST UTILITIES SERVICE CO.**  
 FOR: THE CONNECTICUT LIGHT & POWER COMPANY  
 TITLE: ALTA/ACSM LAND TITLE SURVEY  
 PROPERTY SURVEY-DEVON GENERATING STATION  
 SEPARATION PLAN SHOWING LAND TO BE CONVEYED AND EASEMENTS TO BE RESERVED  
 732 NAUGATUCK AVENUE  
 MILFORD, CONNECTICUT

SHEET 1 OF 4  
 SEE SHEET 4 FOR NOTES

FIG. NO. 03-1-1 DWG. NO. 1010 V.S. K-15-10