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Deborah Denfeld Team Lead – Transmission Siting Tel: (860) 205-9368

August 29, 2023

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

Re: Sub-Petition No. 1293-BPKP-01: 1505/1607 Transmission Lines Structure Replacement Project (Towns of Brooklyn, Pomfret, Killingly, and Putnam) - Amendment Request pursuant to Condition 2 of the Connecticut Siting Council Sub-Petition Approval

Dear Attorney Bachman:

On February 24, 2020, the Connecticut Light and Power Company, doing business as Eversource Energy ("Eversource"), filed a Sub-Petition for the above-referenced Project with the Connecticut Siting Council ("Council"), regarding asset condition maintenance work within its 1505/1132¹ transmission lines right-of-way ("ROW") in Brooklyn, Pomfret, Killingly, and Putnam Connecticut. On March 26, 2020, Eversource received from the Council acknowledgment of the subject Sub-Petition's intent to replace 50 existing transmission structures within the ROW². On June 1, 2022, Eversource also received from the Council a second acknowledgement of the need to replace an additional two transmission structures within the ROW, also due to asset condition maintenance work.

Subsequent to these acknowledgements, Eversource has identified 40 additional structures on the 1505/1132 Lines that require replacement due to asset condition³. Eversource plans to conduct the transmission structure replacement work to remediate age-related degradation including wood decay, splitting and rotting pole tops, and woodpecker damage. Sample photos of the asset conditions associated with the structures to be replaced are shown in Attachment A: Sample Photos.

In support of the additional structure replacements, the following work ("Work Activities") will be performed:

- Replace 30 existing single-circuit wood H-frame structures with 30 single-circuit weathering steel H-frame structures.
- Replace eight existing single-circuit wood three-pole structures with eight single-circuit weathering steel three-pole structures.
- Replace two existing single-circuit wood three-pole structures with two single-circuit weathering steel two-pole structures.

¹ The 1607 Line occupying this section of the ROW was renamed to the 1132 Line from the Canterbury Switching station, which supports the Quinebaug Solar facility, to Killingly Substation.

² On January 13, 2023, the Council granted Eversource an extension of time until March 26, 2024 to complete the maintenance improvements associated with the above-referenced Sub-Petition.

³ Once completed, all remaining wood structures will be replaced on the 1505 and 1132 Lines from Brooklyn Substation to Killingly Substation.

The replacement structures will require an increase in structure height as compared with the corresponding existing structures. The existing heights of the structures range from 38.5 feet to 88 feet. The replacement structures will range in height from 47.5 feet to 106 feet. The proposed structure height increases range from 4.5 feet to 31.5 feet above the corresponding existing structure heights⁴. Structure 7358A would increase by 22.5 feet for an overall height of 101.5 feet above ground level and structure 7357 would increase 31.5 feet⁵ for an overall height of 106 feet above ground level. Replacement structure height increases are driven by the need to adhere to the current National Electrical Safety Code and Eversource clearance requirements. Please see revised map sheets 1-10 in Attachment B: Maps.

Eversource respectfully submits that the proposed structure replacements would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- All Work Activities would take place in areas within Eversource's property and existing ROW utilizing existing access roads, as well as some temporary access roads (collectively the "Work Areas"). Some of the existing access roads would be improved. Eversource can access each of the structure replacement locations utilizing its existing rights.
- Thirty-five of the replacement structures would be installed within 20 feet or less of the existing structure locations. Structure 7317A would be moved 125 feet from the existing structure to avoid a stream. Structure 7339 would be moved 30 feet to relocate it off a rocky knoll, enabling the safe replacement of the structure. Structures 7321, 7347, and 7358 on the 1132 Line would be moved 23 feet, 30 feet and 35 feet respectively to align them with the adjacent structures on the 1505 Line to ensure proper conductor to conductor clearance and synchronize blowout of the adjacent lines. The new structure locations will all be located on the same parcels compared to the existing structure locations.
- Collectively, utilizing existing and temporary access roads, the Work Activities would result in approximately 32,644 square feet ("SF") of temporary wetland impacts from the temporary use of matting required for the construction of access roads and work pads for seven structures as follows:

Wetland Number	Structure Number	Construction Work Pads Temporary Impacts (SF)	Access Roads Temporary Impacts (SF)
W05	7314 / 7314A	0	±578
W05	7315A	±1,932	0
W14	7330 / 7330A	±19,370	±539
W21	7347 / 7347A	±8,367	±1,858
Subtotals:		±29,669 ±2,975	
	TOTAL:	±32,	644

Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements), April* 2022 ("BMPs").

 No direct impacts to vernal pools ("VPs") or vernal pool envelopes ("VPEs") would result from the proposed Work Activities. However, two VP habitats have been identified within Work Areas, VP03 and VP04. Portions of the existing access road for Structures 7348 and 7348A traverse through VPE03 and VPE04. In addition, the temporary work pad at Structures 7348 and 7348A will be located within VPE04. No road improvements are needed on the existing access roads and construction matting will be utilized for the work pad to avoid impacts to VPE04. Vernal pool species protection

⁴ Thirty-two of the replacement structures would increase 10 feet or less. Six of the replacement structures would increase 20 feet or less.

⁵ Structure height increase required to achieve required clearance over Interstate 395.

measures will be implemented where Work Activities extend into the VPEs and vegetation removal would be limited to hand clearing only. With the implementation of these protective measures, no adverse impacts to the VPs or VPEs are anticipated from the proposed Work Activities.

- Based on review of the Connecticut Department of Energy and Environmental Protection's ("CT DEEP") Natural Diversity Database ("NDDB"), the Work Activities associated with Structures 7330, 7330A, 7347, and 7347A are proposed within NDDB mapped areas and/or wetland jurisdictional areas, and therefore subject to a NDDB review request. Eversource is currently in consultation with CT DEEP regarding Eversource's proposed work in these areas and will adhere to any state-listed species protection measures recommended by CT DEEP, as necessary. Work will also be conducted in accordance with Eversource's BMPs to further avoid or minimize impact to terrestrial habitats that may support state-listed species. With these protective measures, no adverse impacts to state-listed species are anticipated.
- The Work Activities will not require any tree clearing. However, Eversource may need to undertake tree trimming and/or vegetation removal/mowing for conductor clearance and/or to improve access to portions of the Work Areas.
- A Phase 1A assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") did not identify any National or State Register of Historic Places properties/districts or archeological sites within 500 feet of the Work Areas. Based on the results of a Phase 1A and Pedestrian Survey conducted by Heritage, 24 of the structure work pad locations have been identified to possess the potential for moderate to high archaeological sensitivity. However, Eversource plans to use temporary matting at the locations, as a result, only the ground disturbing locations within these work areas (i.e., new structure locations) will require Phase IB a Cultural Resource Assessment and Reconnaissance Survey (shovel pit testing) prior to construction. Fieldwork for the Phase IB survey is currently underway with an anticipated completion date of early September. Results of this testing will be submitted to SHPO for their review and any protection measures recommended by SHPO will be incorporated into Eversource's BMPs during construction.
- Work Activities associated with Structures 7347 and 7347A are located partially within the mapped 100-year flood zone associated with the Quinebaug River and Work Activities at Structures 7330 and 7330A are located within the mapped 100-year flood zone and floodway associated with the Quinebaug River. Eversource would utilize its BMPs to minimize any impacts to the flood zone and floodway by utilizing temporary construction matting and/or by not placing fill that would increase the elevations of the existing or proposed road surfaces or work pads to ensure that the floodplain and floodway hydrology would not be adversely affected. With these protective measures and the use of the BMPs, no adverse impact to the 100-year flood zone and floodway would result from the proposed Work Activities.
- No change in noise levels would result from the installation of the new structures and the applicable lines would continue to comply with the State of Connecticut noise regulations.
- Any changes in electric and magnetic field levels outside the ROW would be negligible.
- Temporary environmental effects from construction will be mitigated as referenced in Sub-Petition 1293-BPKP-01.

• Eversource will access the Work Areas by entering its property and/or ROW from existing access points on public roads as follows:

Brooklyn

○ Day Street for Structures 7314, 7314A, 7315, 7315A, and 7316A

Pomfret

- o Day Street for Structures 7317, 7317A, 7318, 7318A, 7319, and 7319A
- o Woods Hill Road for Structures 7320, 7320A, 7321, 7321A, 7322, 7322A, 7323 and 7323A
- Hartford Providence Turnpike for Structures 7324, 7325 and 7325A
- Killingly Road for Structures 7330 and 7330A

Killingly

- o Lake Road for Structures 7333, 7333A, 7334, 7334A, and 7339
- Louisa Viens Drive for Structures 7355A, 7357, and 7357A

<u>Putnam</u>

- River Road for Structures 7347, 7347A, 7348, 7348A, 7353, and 7353A
- Park Road for Structures 7358 and 7358A

Eversource herewith respectfully requests approval for the requested changes. Enclosed please find an original and 3 copies of this submission. Should you, the Council members or Council staff have any questions regarding this request, please do not hesitate to contact me via e-mail at <u>deborah.denfeld@eversource.com</u> or telephone at (860) 205-9368.

Sincerely,

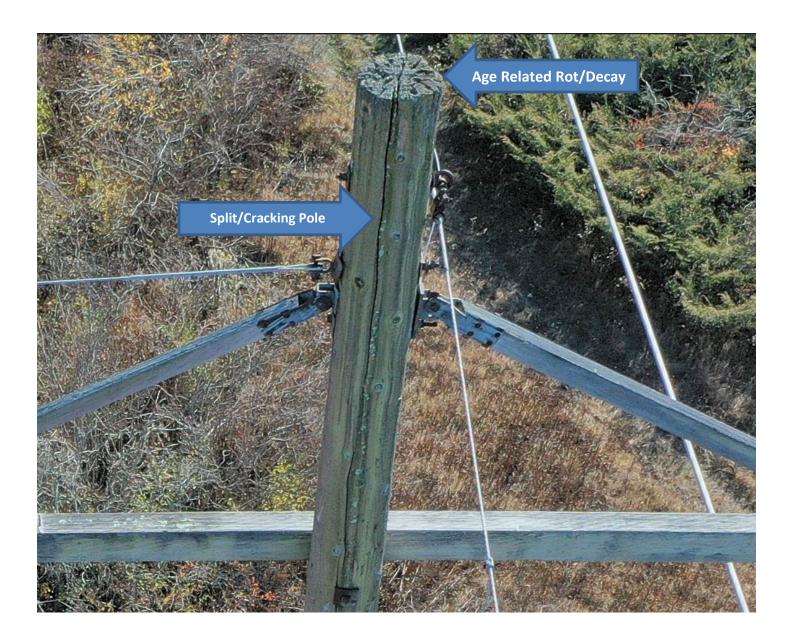
Deborah Denfeld ℓ Team Lead - Transmission Siting

<u>List of Attachments</u> Attachment A – Sample Photos Attachment B – Maps

ATTACHMENT A

SAMPLE PHOTOS

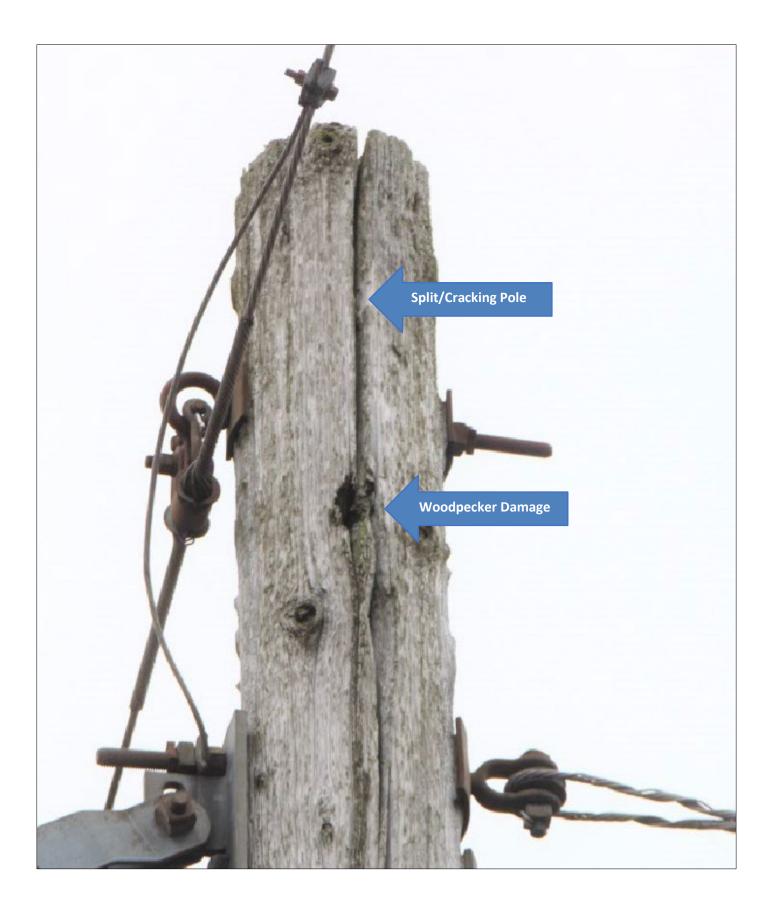
Structure #7318A



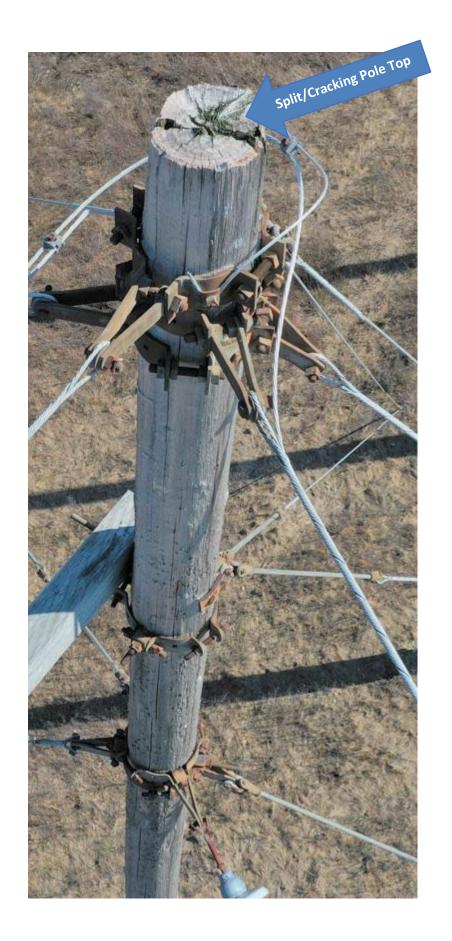
Structure #7320



Structure #7323A



Structure #7357A

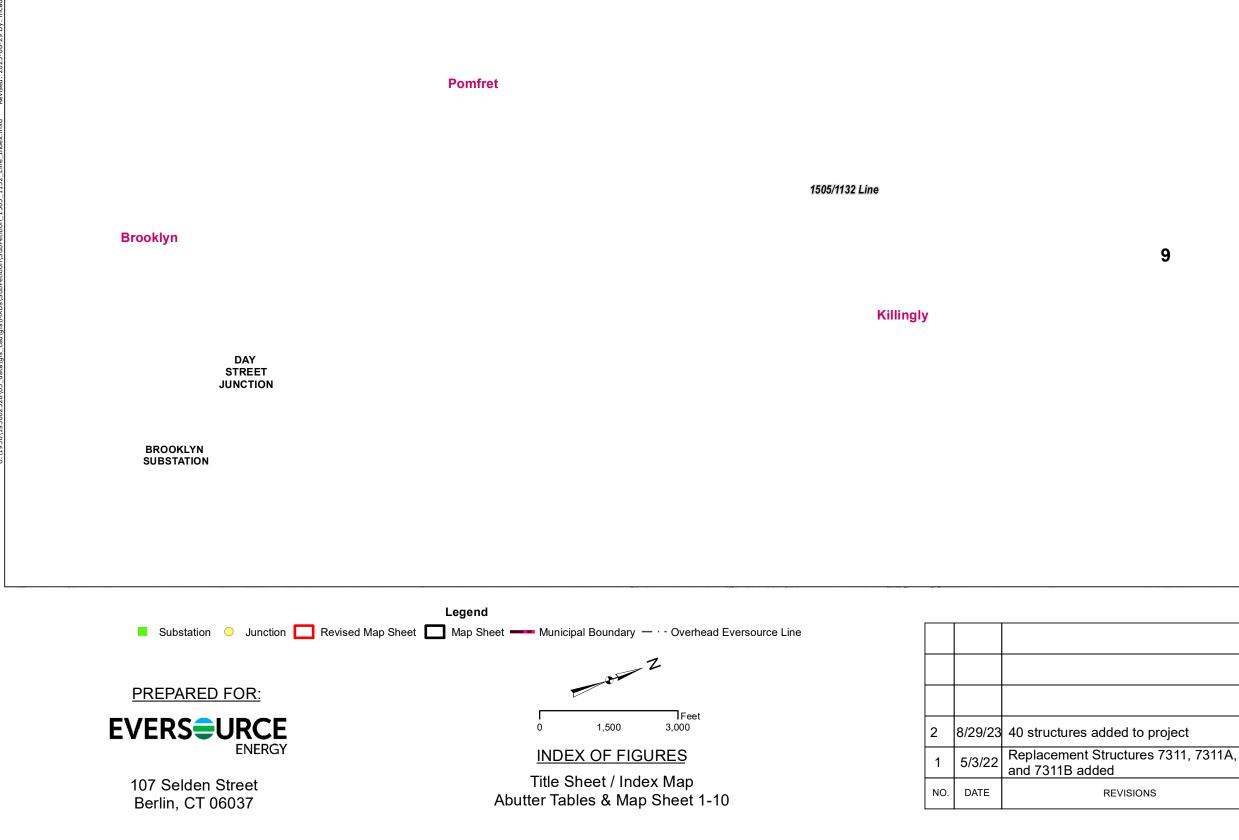


ATTACHMENT B

MAPS

1505 & 1132 (formerly 1607) Line - Structure Replacement Project

Brooklyn, Pomfret, Killingly, Putnam, CT Sub-Petition Map Set Date: February 17, 2020 Revised August 29, 2023



Putnam

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10

KILLINGLY SUBSTATION

PREPARED BY:

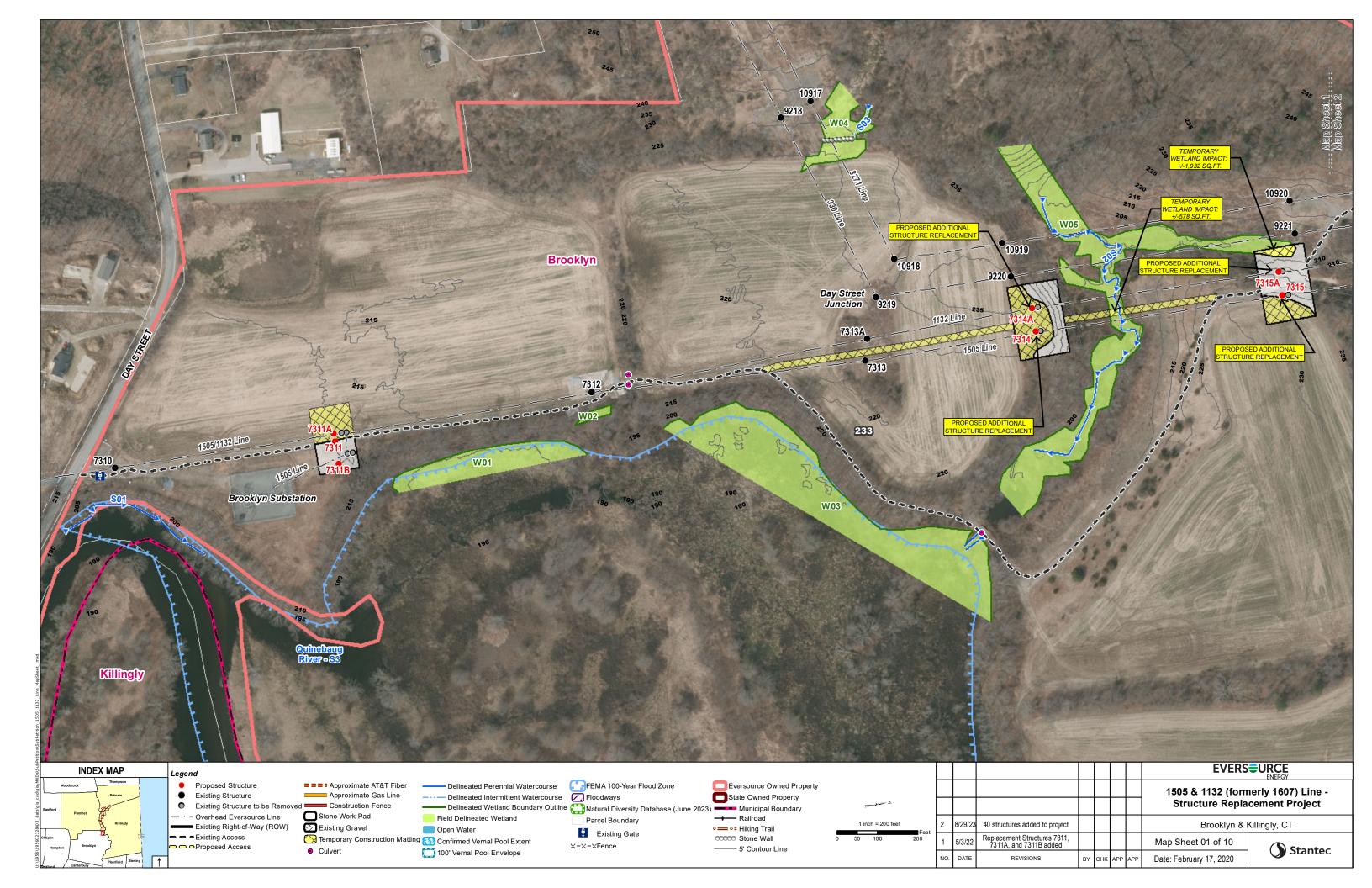


30 Park Drive Topsham, ME 04086

1505/1132 Line - Structure Replacement Map Sheet 1 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
233	ROCKY RIVER REALTY CO		DAY ST	BROOKLYN	СТ	06234

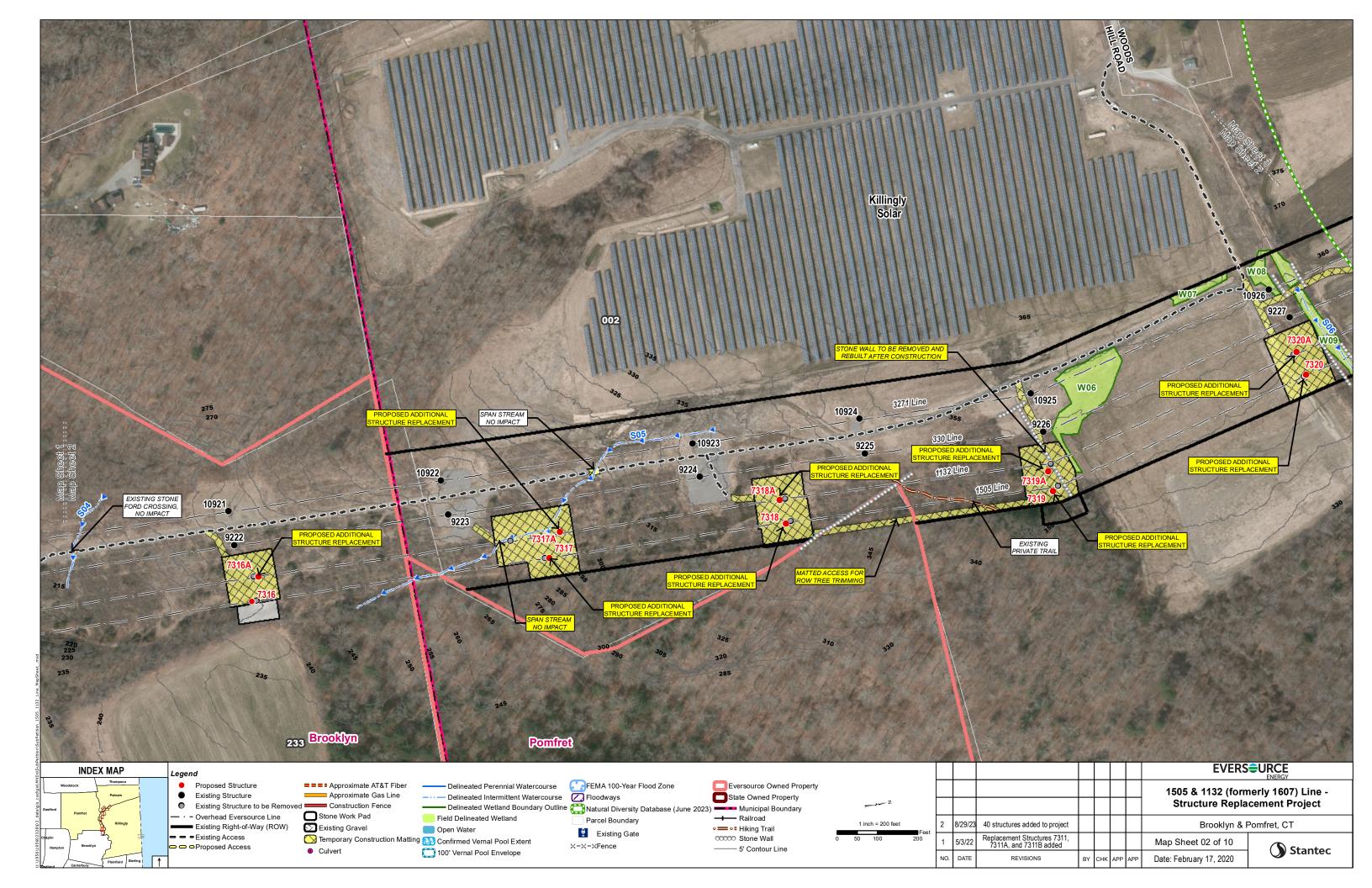
STRUCTURE #
7314
7314A
7315
7315A



1505/1132 Line - Structure Replacement Map Sheet 2 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
233	ROCKY RIVER REALTY CO		DAY ST	BROOKLYN	СТ	06234
002	WOODS HILL SOLAR LLC		101 WOODS HILL RD	POMFRET	СТ	06259

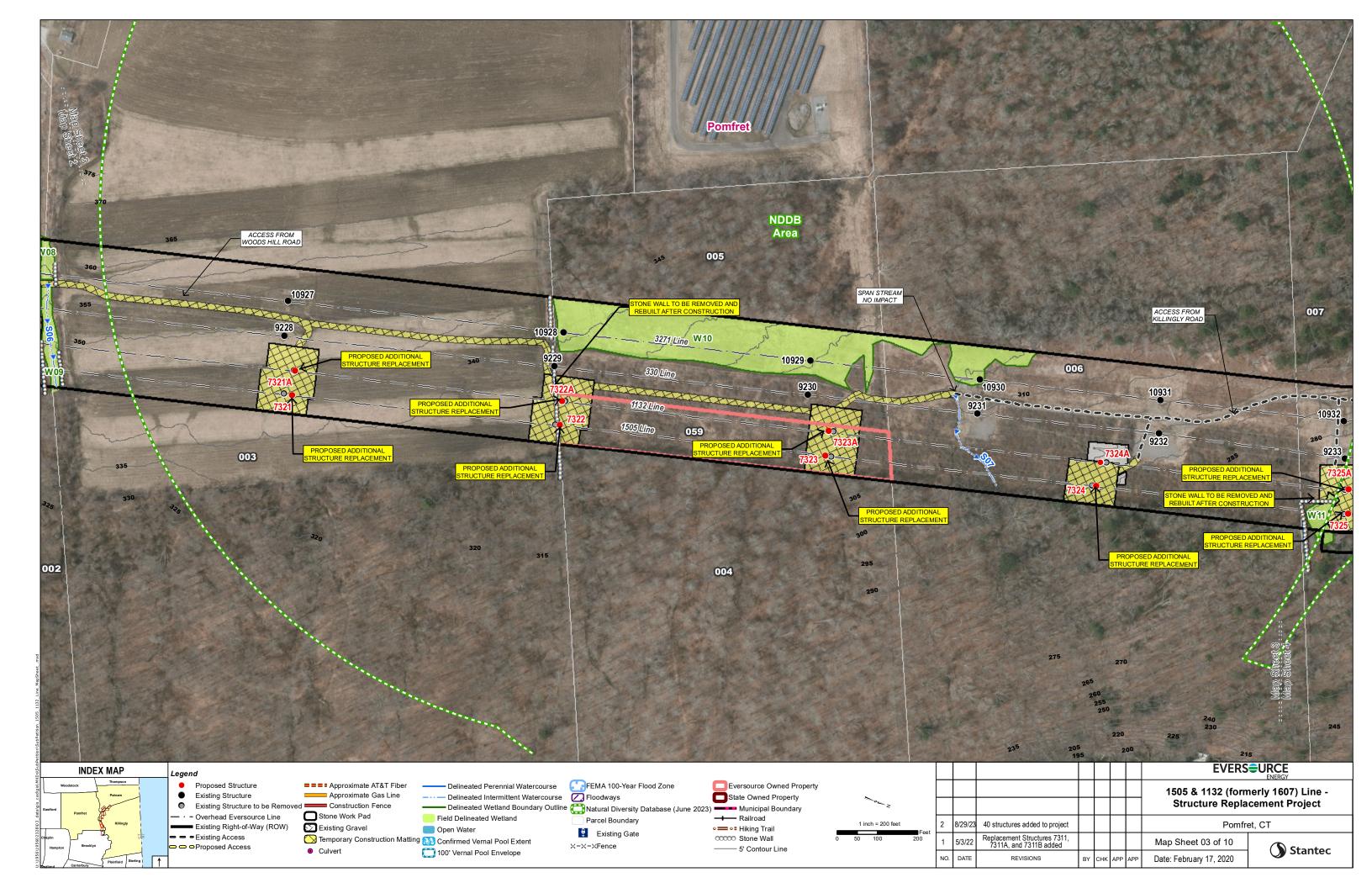
STRUCTURE #
7316A
7317
7317A
7318
7318A
7319
7319A
7320
7320A



1505/1132 Line - Structure Replacement Map Sheet 3 Abutters Table

LINE LIST NUMBER		OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
002	WOODS HILL SOLAR LLC		101 WOODS HILL RD	POMFRET	СТ	06259
003	JOHN F	ENNIS	110 WOODS HILL RD	POMFRET	СТ	06259
004	RIDGEWOOD FARM LLC		468 SEARLESS RD	POMFRET	СТ	06259
005	RIDGEWOOD FARM LLC		155 SEARLESS RD	POMFRET	СТ	06259
006	ROGERS CORPORATION		470 KILLINGLY RD	POMFRET	СТ	06259
007	TOWN OF POMFRET		434 KILLINGLY RD	POMFRET	СТ	06259
059	CONNECTICUT LIGHT AND POWER COMPANY		480 KILLINGLY RD	POMFRET	СТ	06259

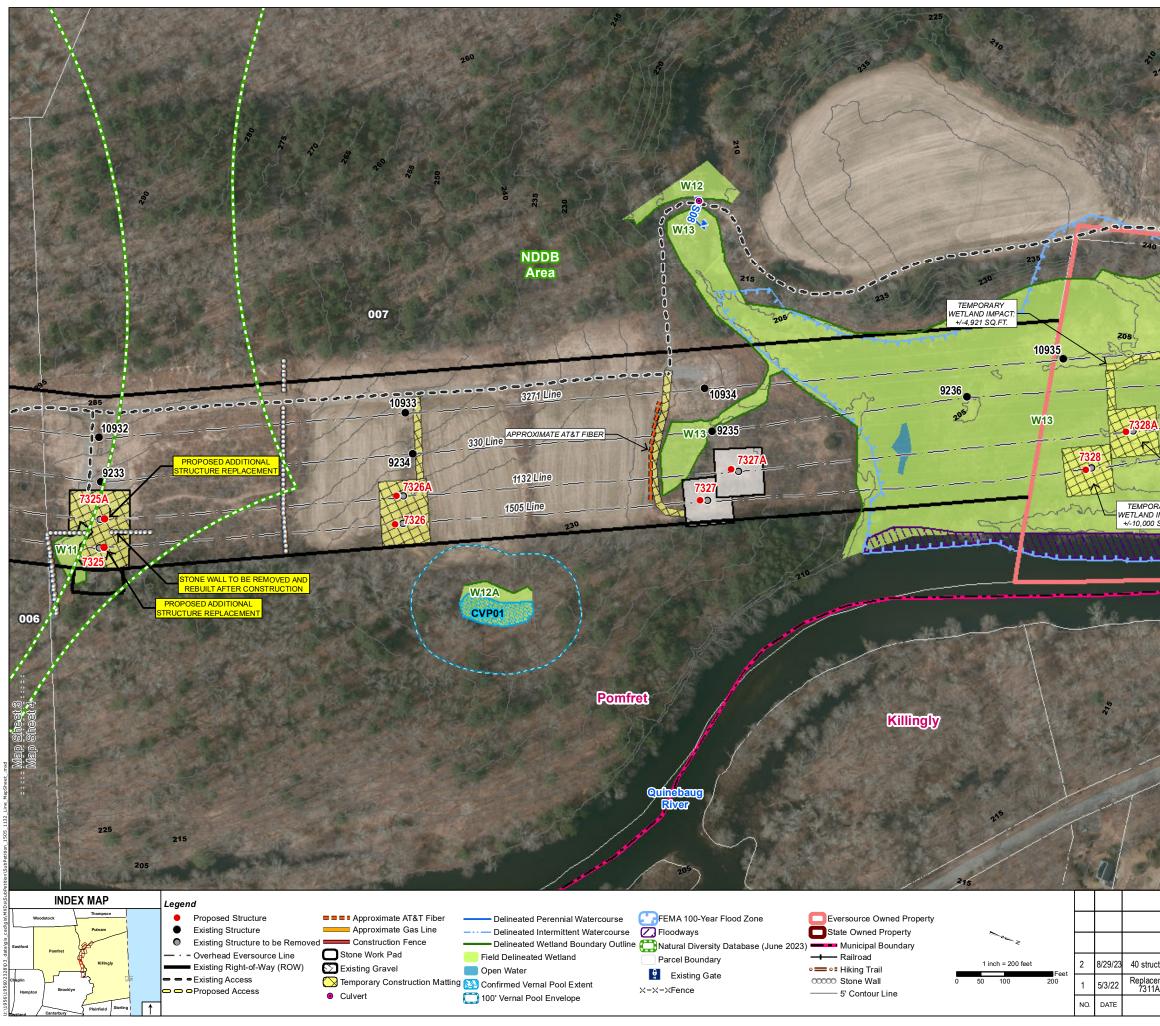
STRUCTURE #
7321
7321A
7322
7322A
7323
7323A
7324
7325
7325A



1505/1132 Line - Structure Replacement Map Sheet 4 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
006	ROGERS CORPORATION		470 KILLINGLY RD	POMFRET	СТ	06259
007	TOWN OF POMFRET		434 KILLINGLY RD	POMFRET	СТ	06259
008	CORY	CHACE	437 KILLINGLY RD	POMFRET	СТ	06259
060	CONNECTICUT LIGHT AND POWER COMPANY		460 KILLINGLY RD	POMFRET	СТ	06259

STRUCTURE #	
7325	
7325A	

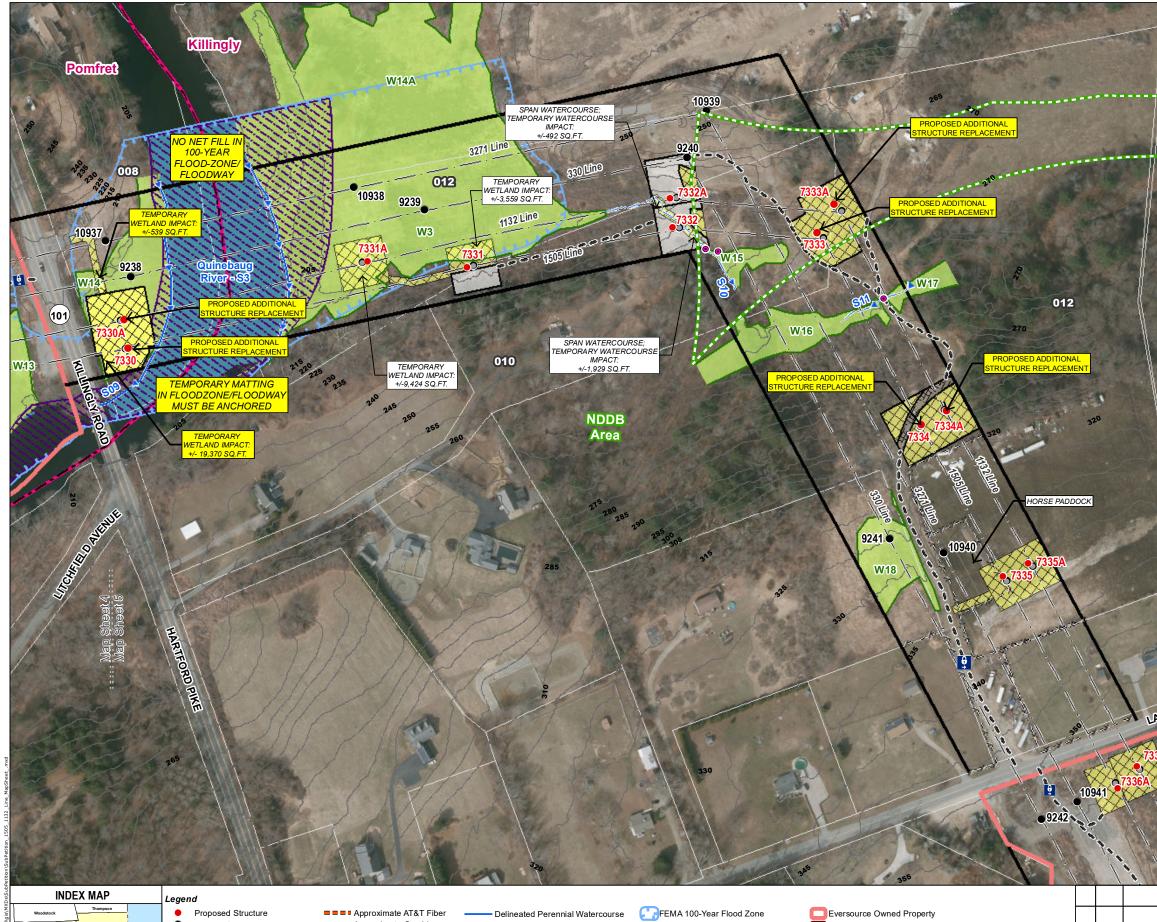


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1505/1132 Line - Structure Replacement Map Sheet 5 Abutters Table

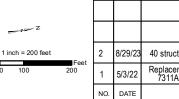
LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
008	CORY	CHACE	437 KILLINGLY RD	POMFRET	СТ	06259
010	TAZ	BROWN	14 HARTFORD PIKE	KILLINGLY	СТ	06241
012	91LAKE RD ENTERPRISES LLC		91 LAKE RD	KILLINGLY	СТ	06241
017	LAWRENCE	BECKER	LAKE RD	KILLINGLY	СТ	06241
068	CONNECTICUT LIGHT AND POWER COMPANY		70 LAKE RD	KILLINGLY	СТ	06241

STRUCTURE #
7330
7330A
7333
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7334A



INDE		
1	Thompson	

- Proposed Structure Existing Structure
 - Overhead Eversource Line Existing Right-of-Way (ROW) Existing Access • • • Proposed Access
 - Approximate Gas Line Existing Structure to be Removed ——— Construction Fence Stone Work Pad Existing Gravel
 - Culvert
 - Field Delineated Wetland Open Water Temporary Construction Matting 🐹 Confirmed Vernal Pool Extent
 - (
 100' Vernal Pool Envelope
- ---- Delineated Intermittent Watercourse — Delineated Wetland Boundary Outline 🛗 Natural Diversity Database (June 2023) ——— Municipal Boundary Parcel Boundary Existing Gate ×=×=×Fence
- Eversource Owned Property State Owned Property
 - ----- Railroad • 💳 • = Hiking Trail 00000 Stone Wall ------- 5' Contour Line



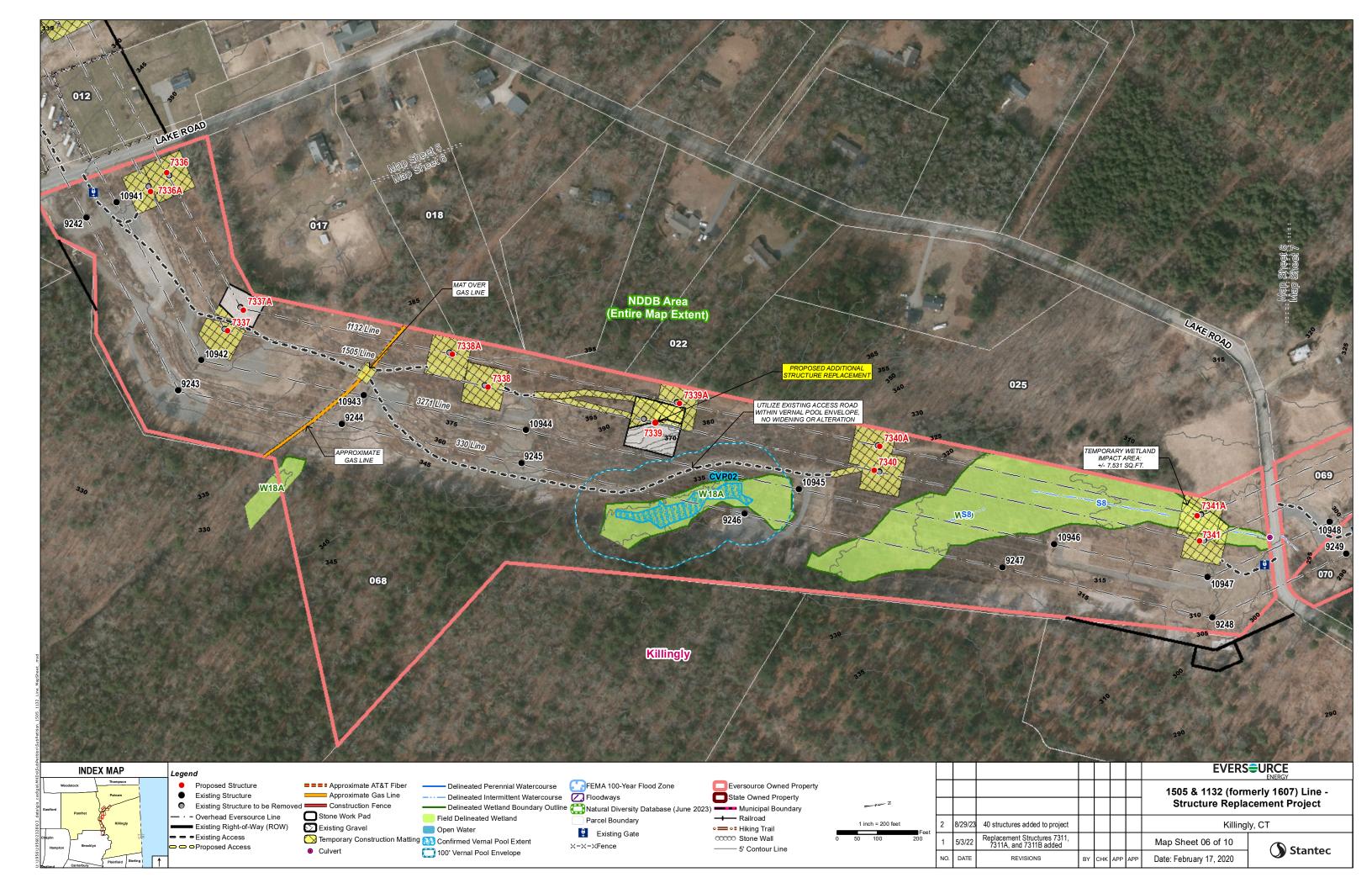
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1505/1132 Line - Structure Replacement Map Sheet 6 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
012	91LAKE RD ENTERPRISES LLC		91 LAKE RD	KILLINGLY	СТ	06241
017	LAWRENCE	BECKER	LAKE RD	KILLINGLY	СТ	06241
018	ASA M	CROSSMAN	92 LAKE RD	KILLINGLY	СТ	06241
022	CARL R	DESAUTELS	144 LAKE RD	KILLINGLY	СТ	06241
025	GEOFFREY A	SORROW	180 LAKE RD	KILLINGLY	СТ	06241
068	CONNECTICUT LIGHT AND POWER COMPANY		70 LAKE RD	KILLINGLY	СТ	06241
069	CONNECTICUT LIGHT AND POWER COMPANY		199 LAKE RD	KILLINGLY	СТ	06241
070	ROCKY RIVER REALTY CO		209 LAKE RD	KILLINGLY	СТ	06241

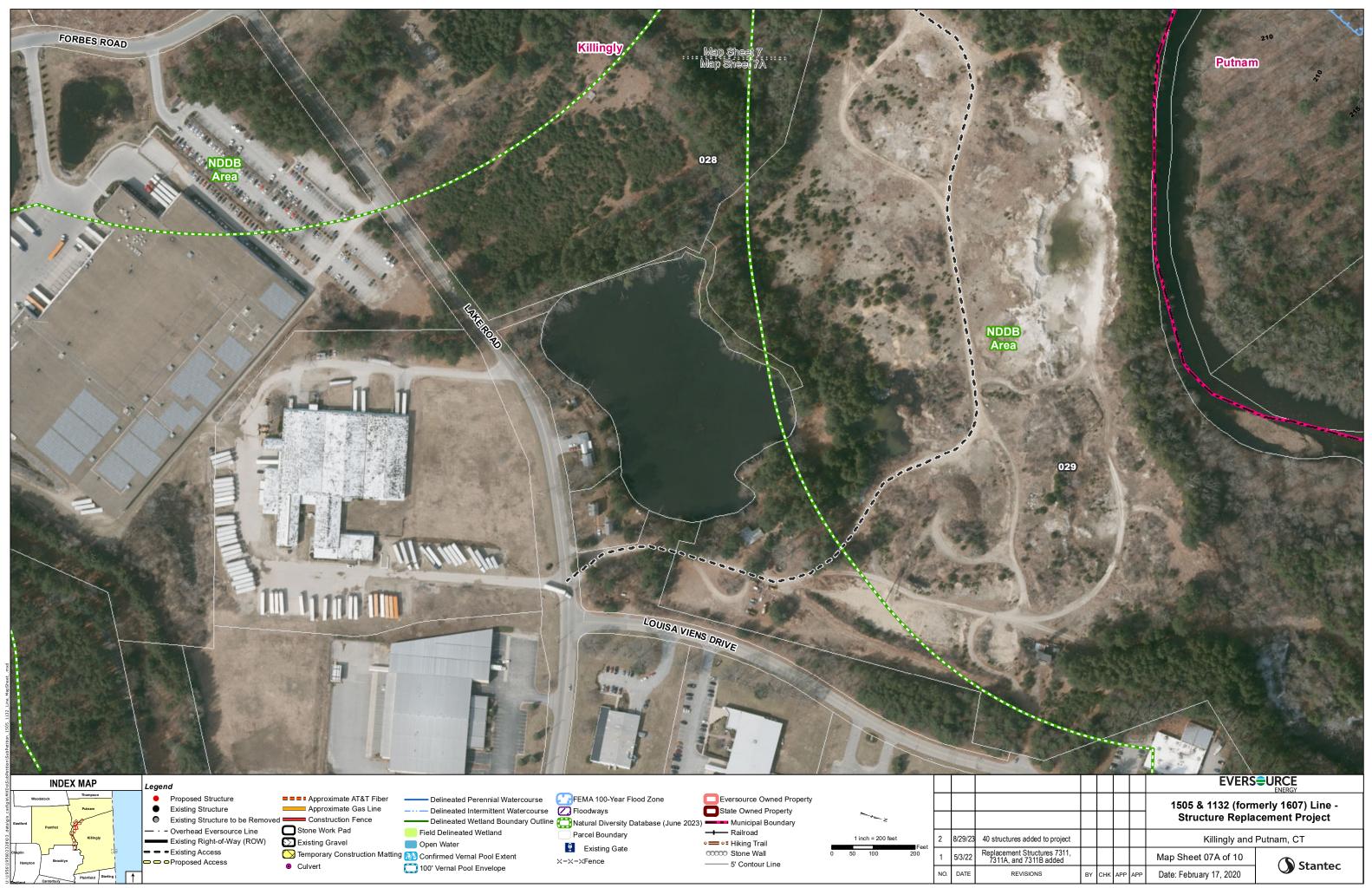
Proposed Additional Structure Replacements

STRUCTURE # 7339



1505/1132 Line - Structure Replacement Map Sheet 7A Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
028	MAUREEN	LANNON	251 LAKE RD	KILLINGLY	СТ	06241
029	EDITH S	GARVEY EST	295 LAKE RD	KILLINGLY	СТ	06241



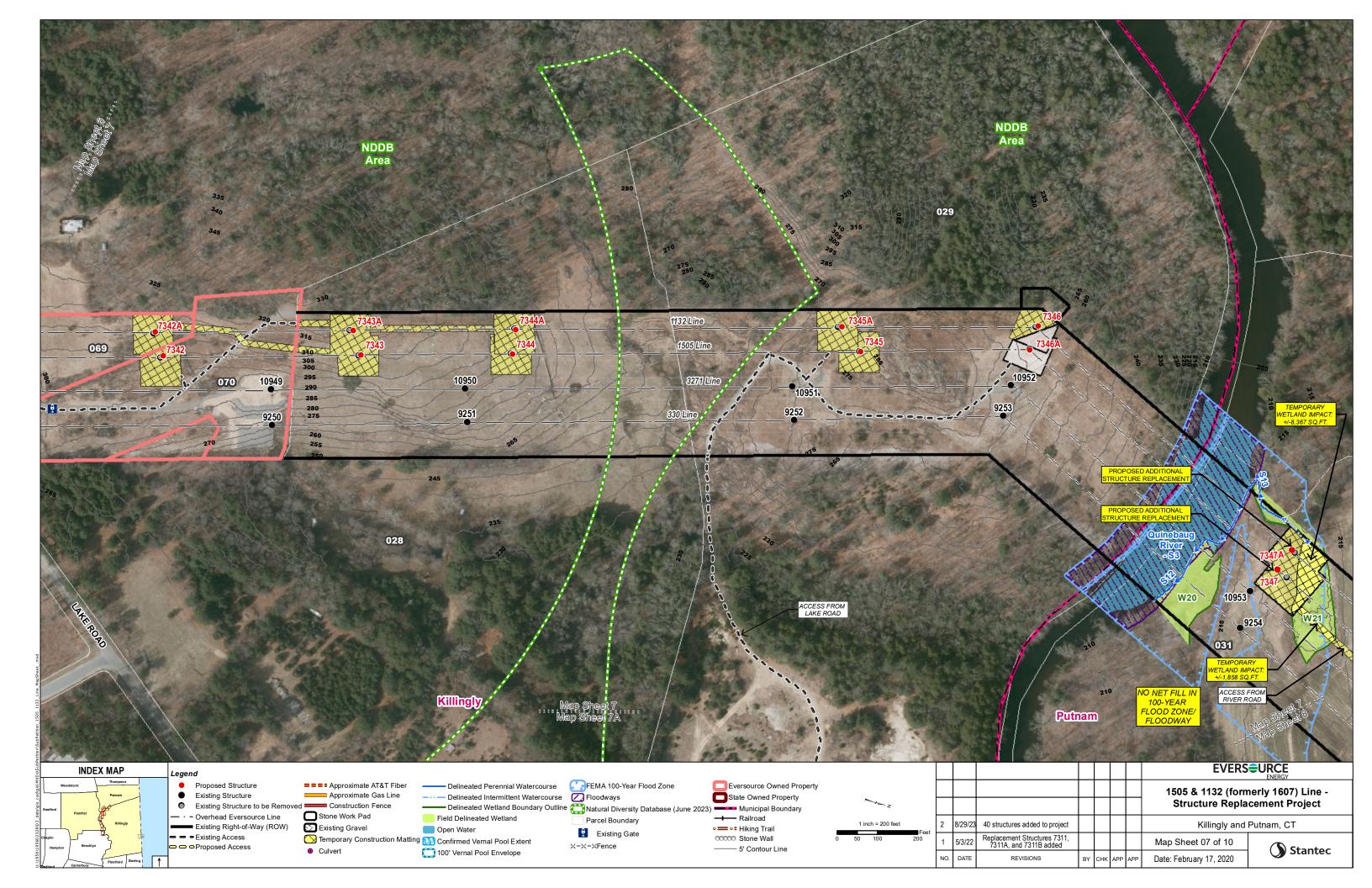
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1505/1132 Line - Structure Replacement Map Sheet 7 Abutters Table

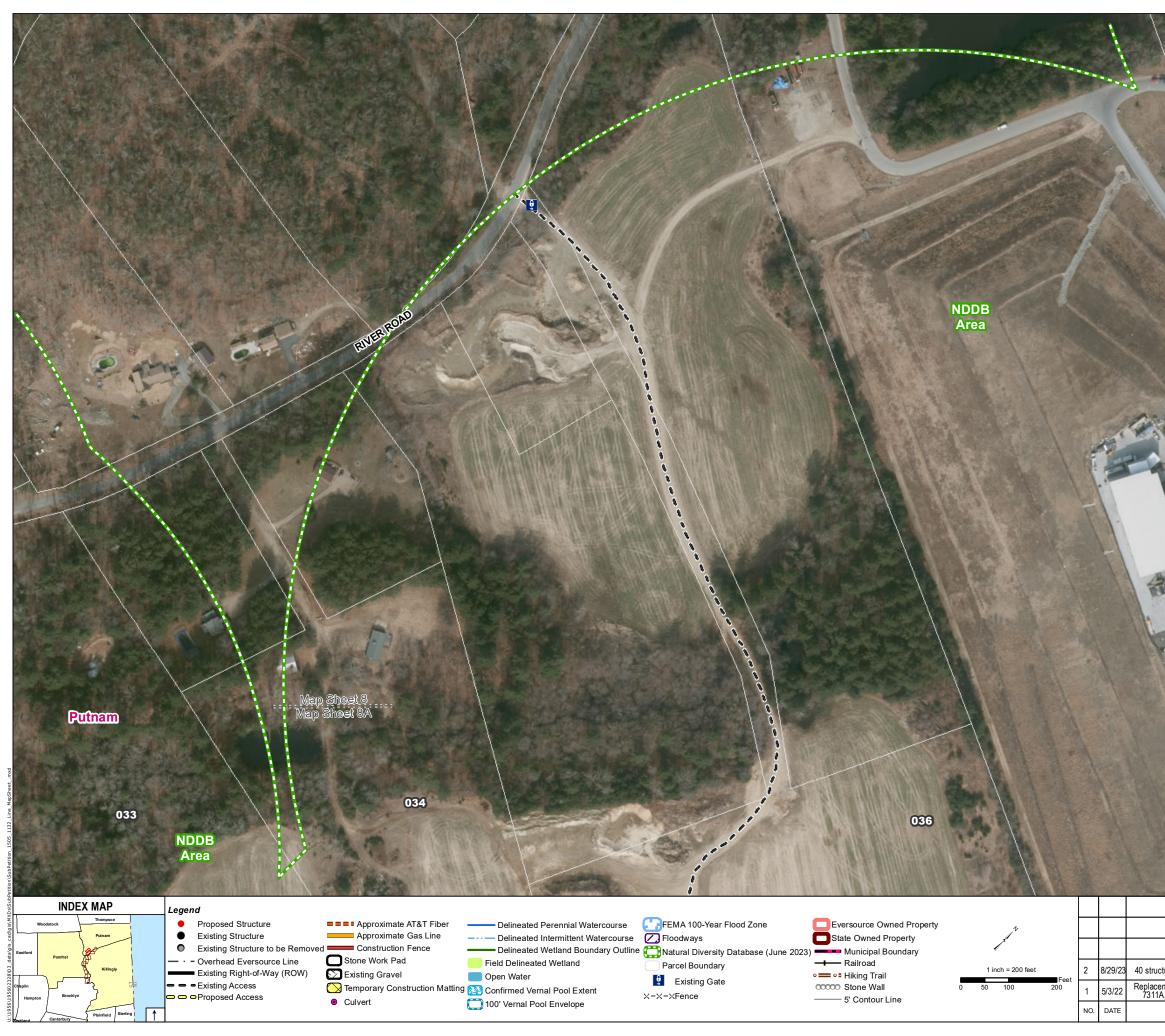
LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
028	MAUREEN	LANNON	251 LAKE RD	KILLINGLY	СТ	06241
029	EDITH S	GARVEY EST	295 LAKE RD	KILLINGLY	СТ	06241
031	LEA M	THERRIEN	470 RIVER RD	PUTNAM	СТ	06260
069	CONNECTICUT LIGHT AND POWER COMPANY		199 LAKE RD	KILLINGLY	СТ	06241
070	ROCKY RIVER REALTY CO		209 LAKE RD	KILLINGLY	СТ	06241

STRUCTURE #	
7347	
7347A	



1505/1132 Line - Structure Replacement Map Sheet 8A Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
033	WHEELABRATOR PUTNAM INC		444 RIVER RD	PUTNAM	СТ	06260
034	WHEELABRATOR PUTNAM INC		422 RIVER RD	PUTNAM	СТ	06260
036	WHEELABRATOR PUTNAM INC		388 RIVER RD	PUTNAM	СТ	06260

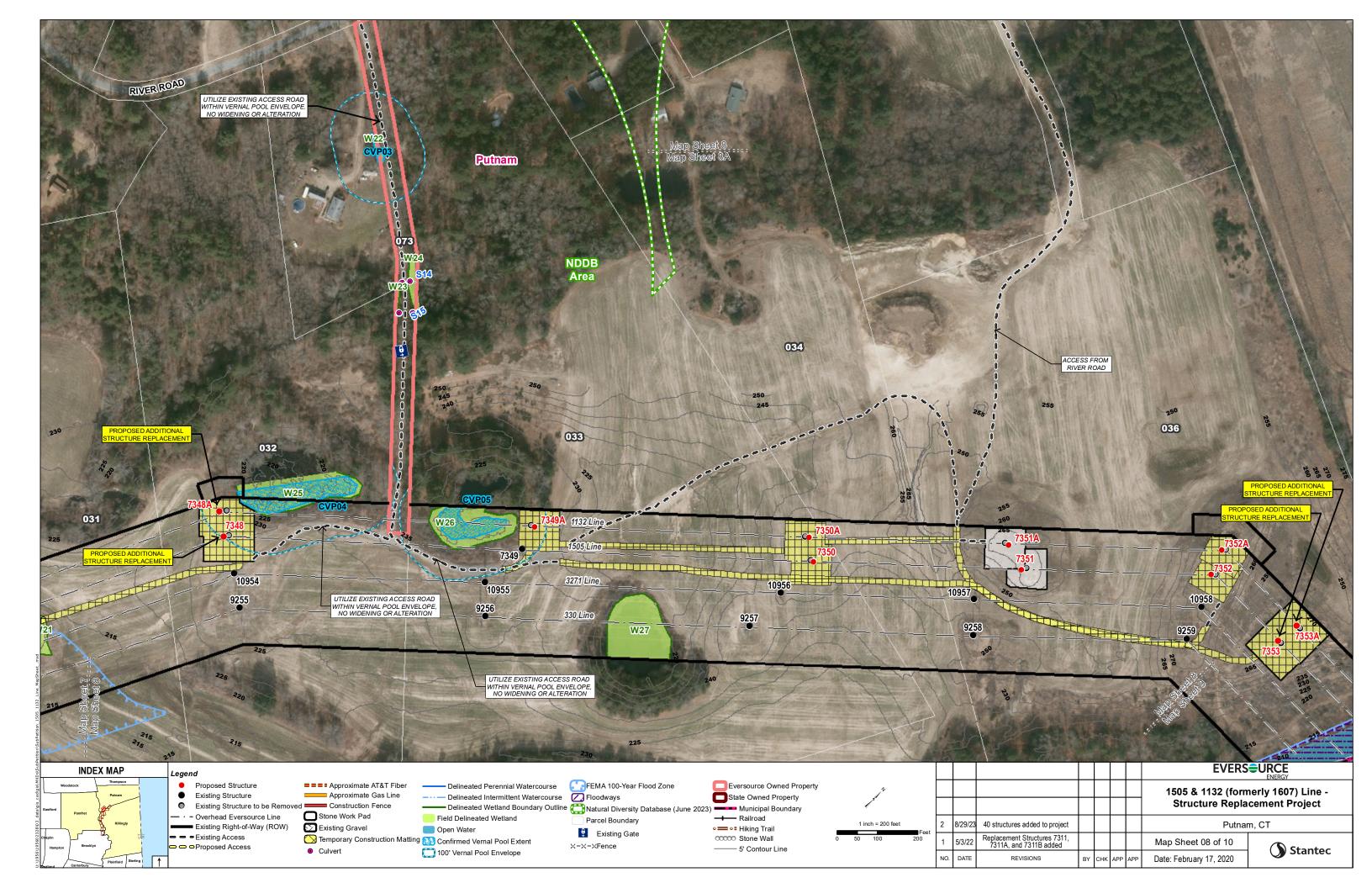


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1505/1132 Line - Structure Replacement Map Sheet 8 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
031	LEA M	THERRIEN	470 RIVER RD	PUTNAM	СТ	06260
032	WHEELABRATOR PUTNAM INC		458 RIVER RD	PUTNAM	СТ	06260
033	WHEELABRATOR PUTNAM INC		444 RIVER RD	PUTNAM	СТ	06260
034	WHEELABRATOR PUTNAM INC		422 RIVER RD	PUTNAM	СТ	06260
036	WHEELABRATOR PUTNAM INC		388 RIVER RD	PUTNAM	СТ	06260
073	CONNECTICUT LIGHT AND POWER COMPANY		444 RIVER RD	PUTNAM	СТ	06260

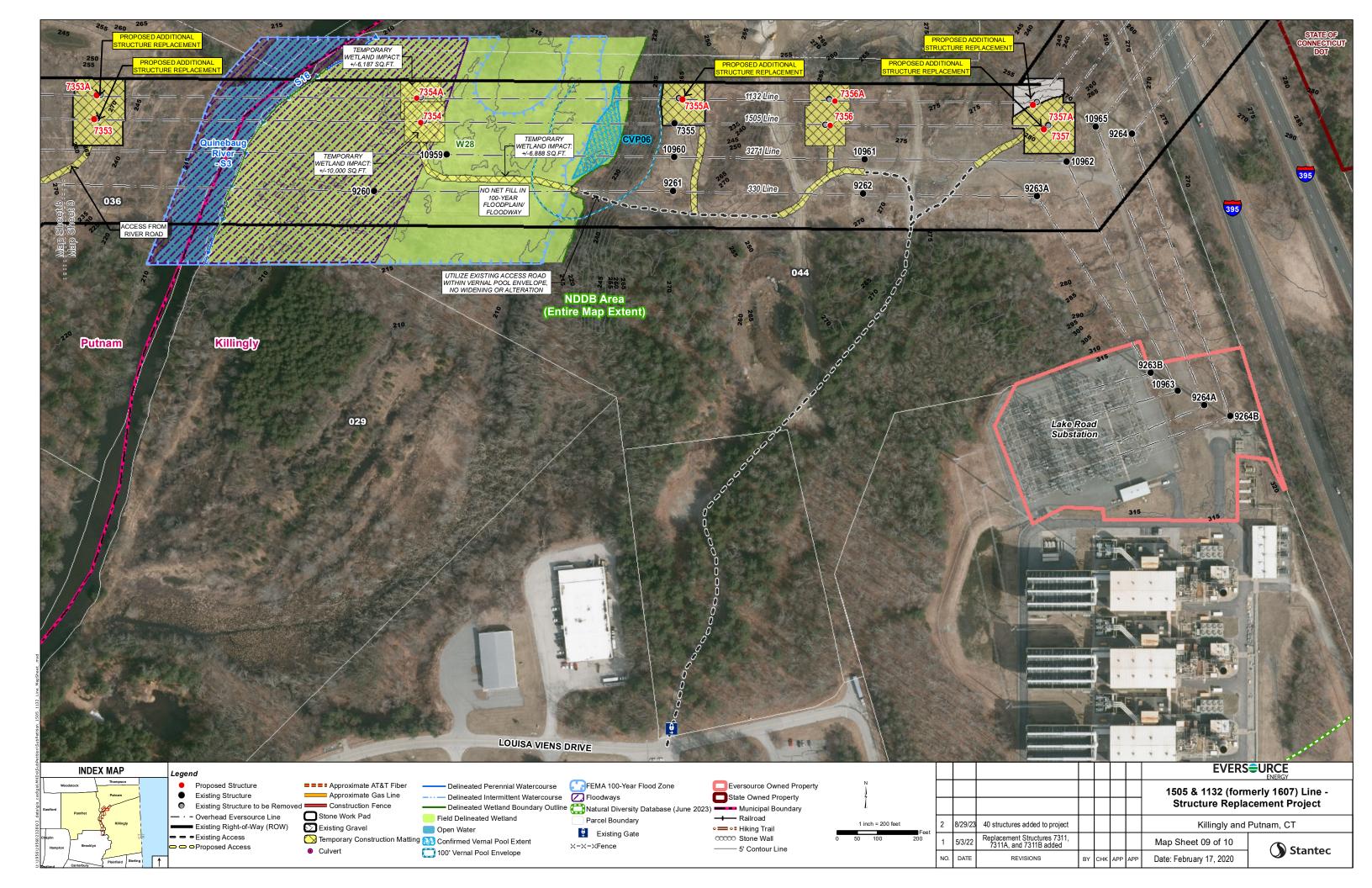
STRUCTURE #
7348
7348A
7353
7353A



1505/1132 Line - Structure Replacement Map Sheet 9 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
029	EDITH S	GARVEY EST	295 LAKE RD	KILLINGLY	СТ	06241
036	WHEELABRATOR PUTNAM INC		388 RIVER RD	PUTNAM	СТ	06260
044	TOWN OF KILLINGLY		125 ALEXANDER PKWY	KILLINGLY	СТ	06241

STRUCTURE #
7353
7353A
7355A
7357
7357A



1505/1132 Line - Structure Replacement Map Sheet 10 Abutters Table

LINE LIST NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
050	PROVIDENCE & WORCESTER RR CO		4 RAILROAD AVE	KILLINGLY	СТ	06241
049	STATE OF CONNECTICUT		40 OLD PERRY RD	KILLINGLY	СТ	06241

STRUCTURE #				
7358				
7358A				

