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P.O. Box 270
Hartford, CT 06103

Kathleen M. Shanley
Manager – Transmission Siting
Tel: (860) 728-4527

September 2, 2021

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

Re: Sub-Petition No. 1293-EF-01

Dear Attorney Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No. 1293-EF-01 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Easton and Fairfield, Connecticut. The work includes replacing two existing wood transmission structures with new weathering steel transmission structures.

Eversource notified the officials of the municipality of Easton and Fairfield of Eversource's submission of the Sub-Petition and sent copies of the Sub-Petition to owners of directly abutting properties (see Proof of Notice).

Enclosed please find an original and 3 copies of this filing. A copy of this filing was also sent to the Council electronically.

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Sub-Petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley", written in a cursive style.

Enclosures

Attachments:
Exhibit A: Sub-Petition
Exhibit B: Photographs
Exhibit C: Maps
Exhibit D: Abutter Letter and Proof of Notice

ATTACHMENT A
SUB-PETITION

**THE CONNECTICUT LIGHT AND POWER COMPANY doing business as
EVERSOURCE ENERGY**

Sub-Petition

CONNECTICUT SITING COUNCIL—PETITION NO. 1293
TRANSMISSION FACILITY ASSET CONDITION MAINTENANCE
IMPROVEMENTS TO COMPLY WITH THE UPDATED NATIONAL
ELECTRICAL SAFETY CODE CLEARANCE REQUIREMENTS

Towns: Easton and Fairfield

Sub-Petition: 1293-EF-01

Project: 1720/1714 Transmission Line Structure Replacement Project

Structure Location: Two Transmission Line Structures in Easton and Fairfield, Connecticut

I. Introduction:

In accordance with Condition 1 of the March 30, 2017 ruling by the Connecticut Siting Council (the "Council") (as set forth in the Council's March 31, 2017 letter) regarding Petition No. 1293, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. Description of Transmission Work Activities:

Eversource's 1720/1714 Transmission Line Structure Replacement Project is part of an ongoing maintenance program which evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to ensure the safe and reliable transmission of power to its customers. The 1720 Line, in its entirety, is a 115-kilovolt ("kV") Eversource transmission line that extends from The United Illuminating Company's ("UI's") Hawthorne Substation in the Town of Fairfield to Eversource's Weston Substation in the Town of Weston and Eversource's Norwalk Substation in the City of Norwalk. The 1714 Line, in its entirety, is a 115-kV line that extends between UI's Trumbull Substation in the Town of Trumbull to Weston Substation. Due to asset condition, two wood pole structures require replacement: one along the 1720 Line and one along the 1714 Line. The replacement structures will require an increase in height to comply with current clearance requirements.

Eversource plans to conduct the transmission structure replacement work to remediate damage caused by structure age, weather, and woodpecker activity. The following work ("Work Activities") will be performed:

- Replace two existing wood structures with new weathering steel structures. Each replacement structure will be of the same design as its corresponding existing structure.

III. No Substantial Adverse Environmental Effect:

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

- a) All Work Activities would take place within and directly adjacent to Eversource's existing right-of-way ("ROW") using existing and proposed on-and off-ROW access roads (collectively the "Work Areas"). The existing access roads would be improved as needed. Eversource has existing rights to access both structure replacement locations and to install the work pads. To reach Structure 894, which is located along Eversource's ROW in Centennial Watershed State Forest (in Easton), Eversource applied for and received from the Connecticut Department of Energy and Environmental Protection ("CTDEEP") a Special Use License ("SUL") that allows access to the ROW via an existing off-ROW road in the state forest, as well as for the extension of a portion of the Structure 894 work pad slightly outside the ROW. To reach Structure 884 (in Fairfield), Eversource has obtained rights from the property owner (Aquarion Water Company of Connecticut) that allows access to the ROW via an existing off-ROW road, as well as for the extension of a portion of the Structure 894 work pad slightly outside the ROW.
- b) The Work Activities would not result in any impacts to wetlands or watercourses. However, temporary construction mats would be installed over a culvert and may be placed along permanent access roads near wetlands, as necessary. Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, September 2016 ("BMPs") to avoid impacts to nearby water resources.
- c) No vernal pools or vernal pool envelopes are in proximity to the Work Areas.
- d) Based on a review of the CTDEEP's Natural Diversity Database ("NDDB") mapping, no Work Areas are proposed within a NDDB area. Therefore, the Work Areas are not subject to an NDDB Review Request.
- e) The Work Activities will be performed within known habitat of the New England Cottontail ("NEC"). Consequently, Eversource will implement its NEC BMPs.
- f) The Work Activities will require selective tree cutting and trimming as needed for equipment/vehicle access. In addition, Eversource will undertake tree trimming and/or vegetation removal/mowing within the Work Areas for conductor clearance and/or to improve access to portions of the Work Areas.
- g) A Phase 1A assessment of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") determined that no National or State Register of Historic Places properties/districts are located within 500 feet of the Work Areas. However, based on a review of historic maps, aerial photographs, and available soil profiles, the proposed structure work pad locations and the access road to Structure 884 were identified as having a potential for moderate to high archaeological sensitivity. As a result, a pedestrian survey was conducted. Based on the results of those field observations, Heritage reclassified these areas as having no to low archaeological sensitivity. Heritage thus determined that no further archaeological examination is recommended or warranted.

- h) Both structures require a height increase to comply with current conductor clearance requirements. Structure 884 would increase by approximately 22.5 feet for an overall height of approximately 88.5 feet above ground level. Structure 894 would also increase by approximately 22.5 feet for an overall height of approximately 97.5 feet above ground level.
- i) There are no 100-year flood zones in the Work Areas.
- j) The Work Activities will not impact the public water supply watershed (the Hemlocks Reservoir System Watershed) associated with Hemlock Reservoir (Aquarion Water Company).
- k) No change in noise levels would result from the installation of the new structures and the two transmission lines would continue to comply with the State of Connecticut noise regulations.
- l) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. Mitigation:

Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment controls ("E&S") will be employed and maintained, as needed, for the duration of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and the BMPs.
- Work Activities in the Centennial Watershed State Forest will conform to the conditions of the SUL.
- Potential impacts to nearby water resources will be avoided by the use of temporary construction matting and adherence to the BMPs.
- Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum amount of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at construction entrances to public roads to prevent tracking of soil onto local roads.
- Upon completion of the Work Activities, all disturbed/exposed areas will be stabilized and revegetated as needed. As part of restoration, the portions of work pads that extend outside the ROW will be removed and the affected areas regraded and stabilized. Work Areas within the state forest will be restored per the conditions of the SUL. After establishing permanent ground cover, Eversource's contractor would remove the temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

V. Access:

One new on-ROW permanent access road would be constructed to reach Structure 884. The existing off-ROW access road in Centennial Watershed State Forest will be improved only pursuant to the conditions of the SUL. Existing access roads within the ROW in upland areas may be hardened and widened at turning areas to facilitate the safe passage of construction vehicles. Construction matting would be used as protection over a culvert crossing and may be used near wetlands, if needed. The construction matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

Eversource will access the Work Areas by entering and exiting the ROW from existing access points off public roads, as follows:


Easton:

- Division Street to Structure 894.

Fairfield:

- Hemlock Road to Structure 884.

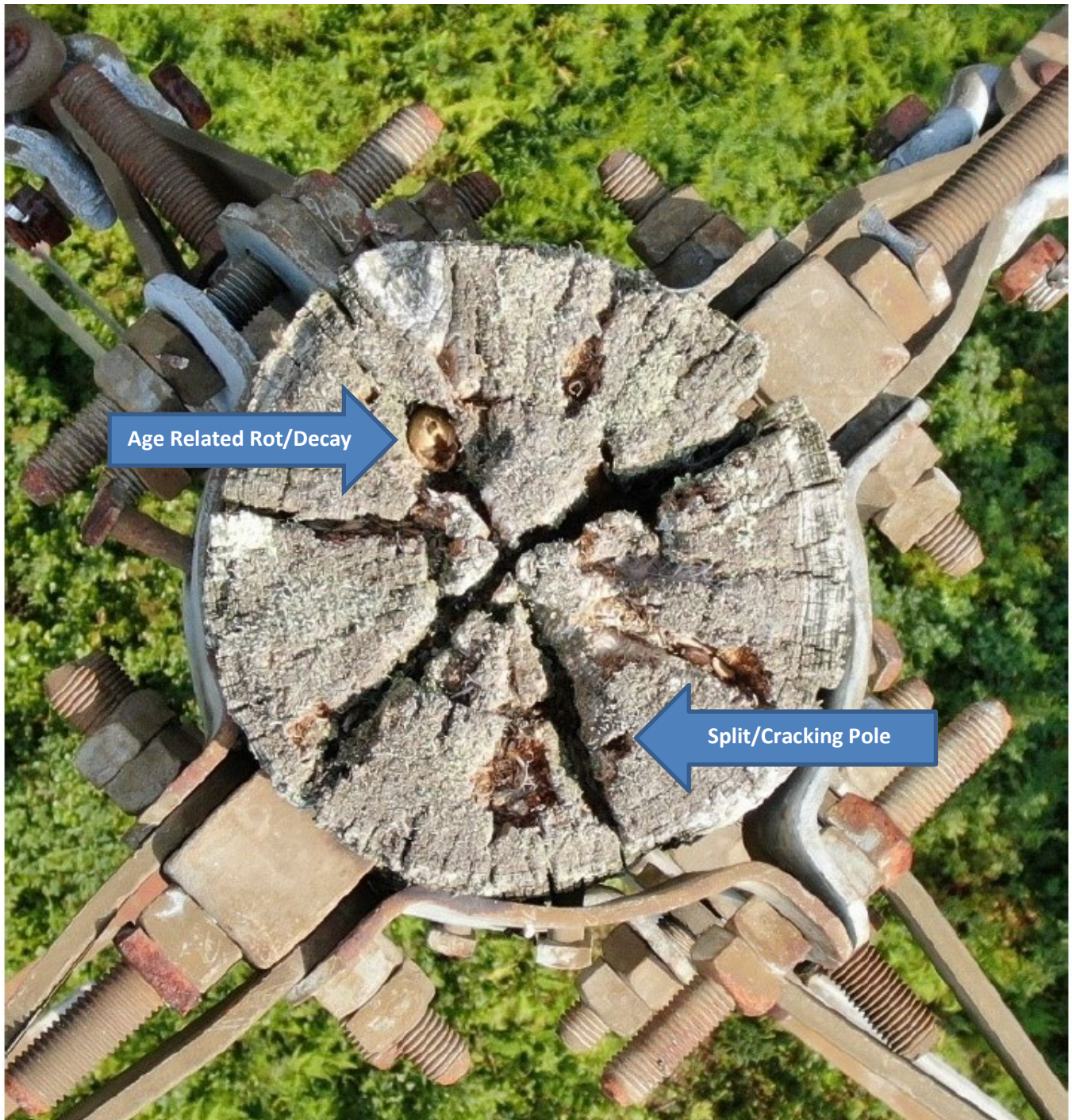
By:



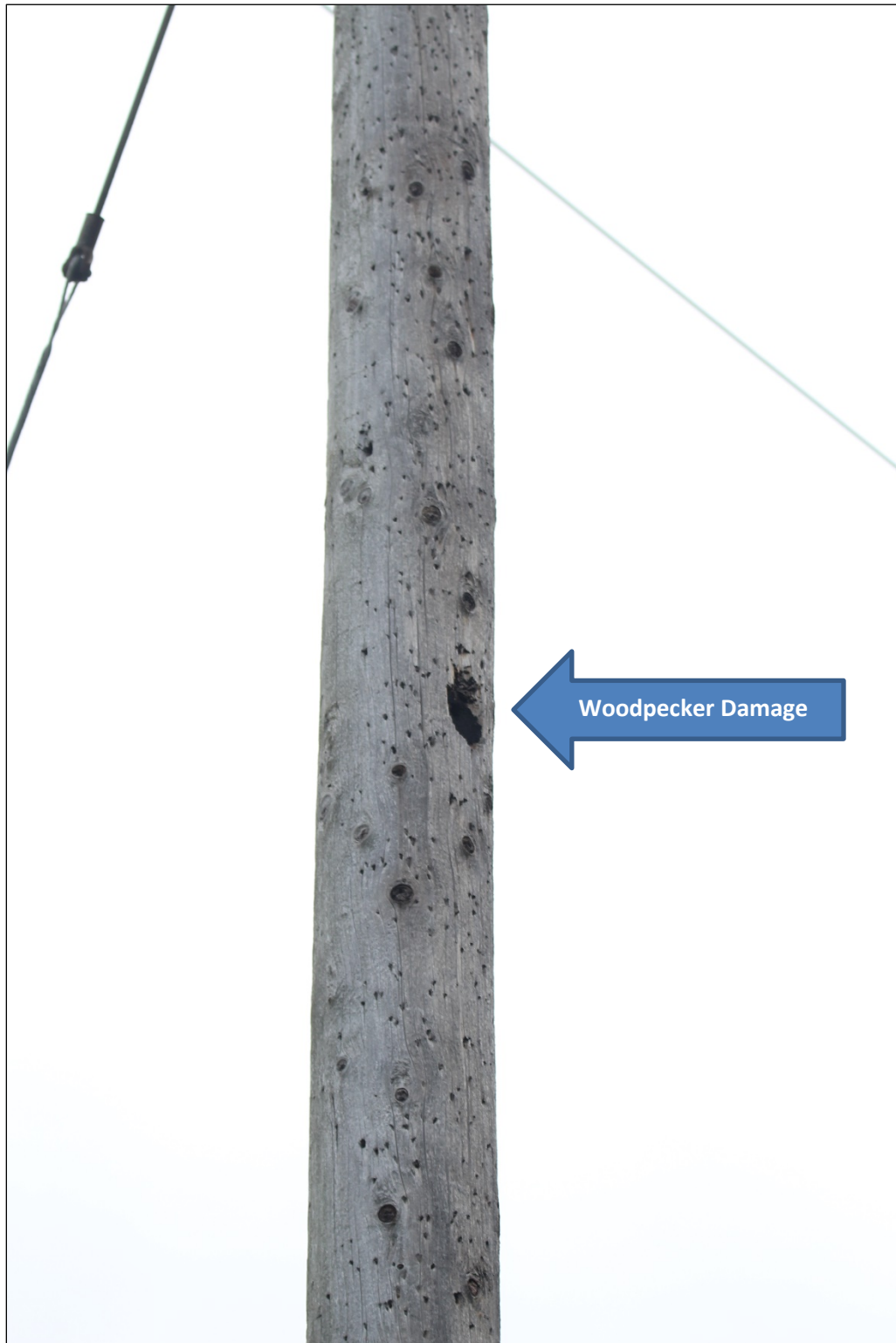
Kathleen M. Shanley
Manager - Transmission Siting

ATTACHMENT B
PHOTOGRAPHS

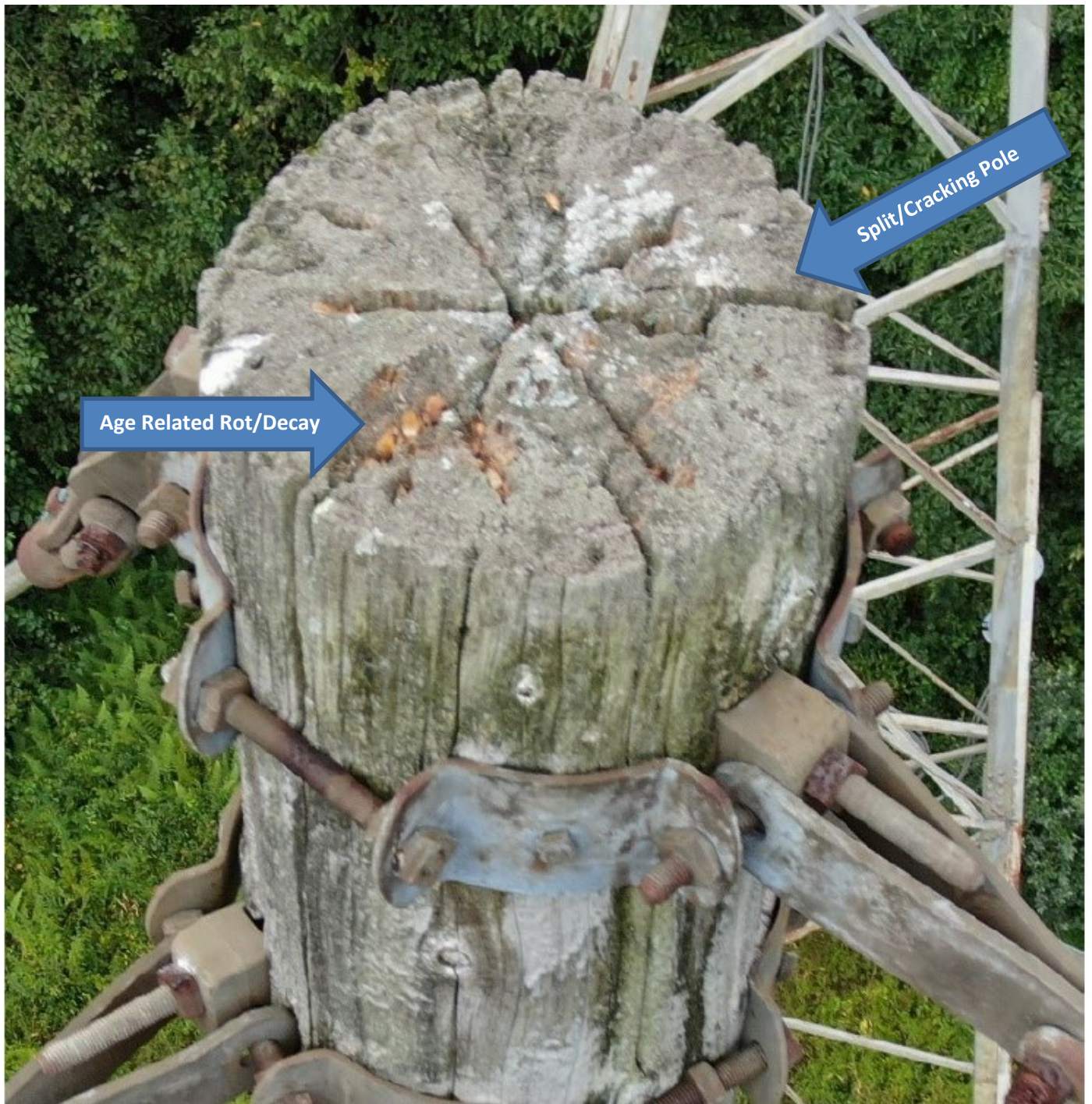
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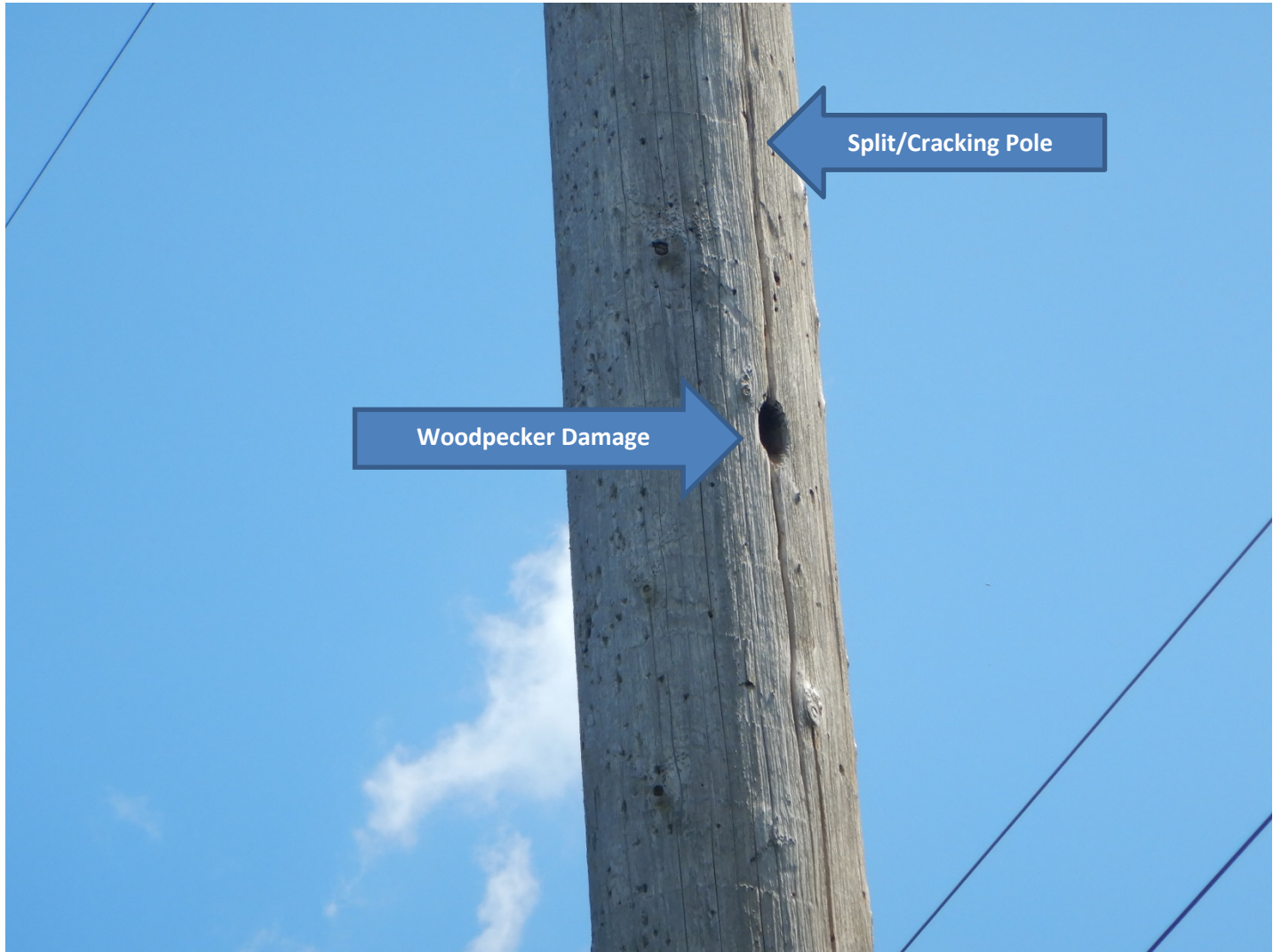
Structure #894



Structure #884



Structure #884



ATTACHMENT C

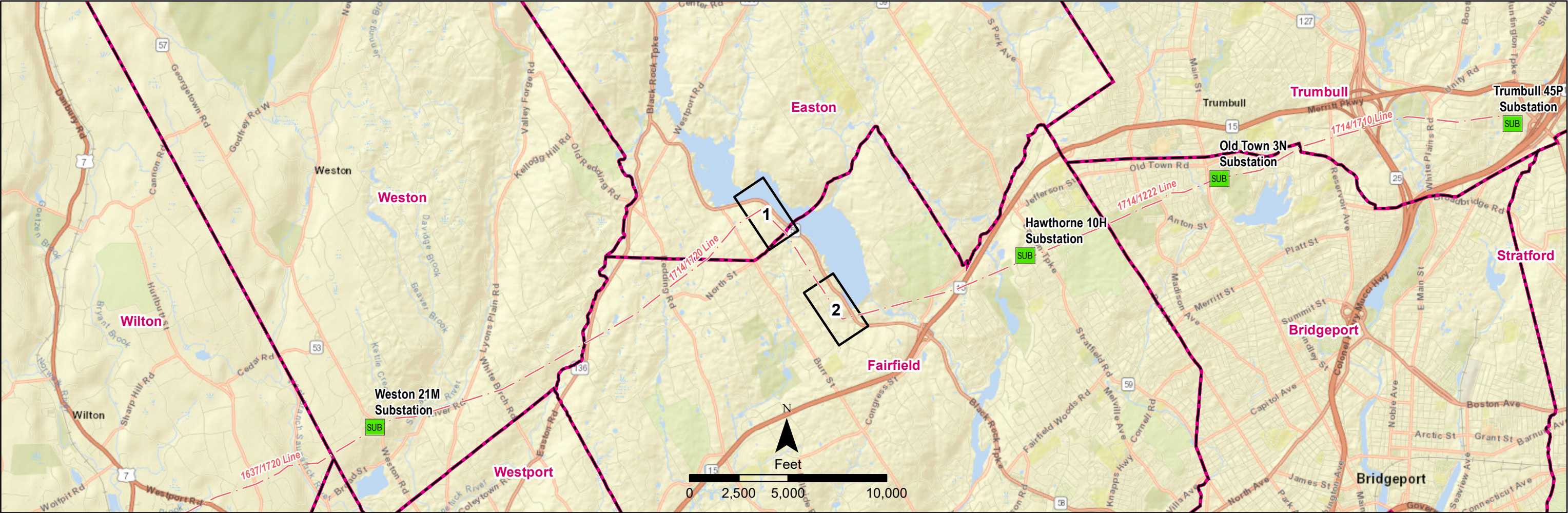
MAPS

1720/1714 Lines Structure Replacement Project





Easton, and Fairfield, CT

Sub-Petition Map Set

August 10, 2021



Legend

 Substation  Overhead Eversource Line  Map Sheet  Municipal Boundary

PREPARED FOR:

EVERSOURCE

107 Selden Street
Berlin, CT 06037

INDEX OF FIGURES

Title Sheet / Index Map
Abutter Tables & Map Sheets 1-2

PREPARED BY:

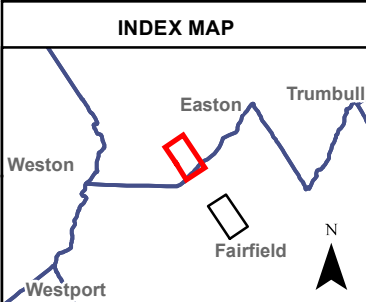
Tighe&Bond

213 Court Street
Middletown, CT 06457

1720/1714 Lines Structure Replacement Project

Map Sheet 1 Abutters List

Line List	Owner Name	Parcel Address	Town	State
297	STATE OF CONNECTICUT	BLACK ROCK ROAD	EASTON	CT



Legend			
● Proposed Structure	— Existing Access	— Delineated Wetland Boundary Outline	Public Water Supply Watershed
● Existing Structure	— Proposed Access	Field Delineated Wetland	Eversource Owned Property
● Existing Structure to be Removed	— Off-ROW Access Pending Rights	Temporary Construction Matting	Parcel Boundary
Gate	— Existing Right-of-Way	CT NE Cottontail Focus	State-Owned Property (CTDEEP)
● Culvert	— Stone Work Pad	FEMA 100-Year Flood Zone*	Municipal Boundary*
— Overhead Eversource Line	— Delineated Watercourse	FEMA Floodway*	
— 5' Contour			
— Railroad*			

Map Notes:

Base Map: CT ECO Map Service, Ortho Imagery (2019).
Data: *Data acquired by CTDEEP GIS Eversource Property and Parcel data provided by Eversource, August 17, 2020.

This mapping product has been created to comply with submittal requirements to obtain certain regulatory approvals and, as such, there is no reliance on the information contained herein for any other purpose.

0 50 100 200 Feet

1:2,400

1720 /1714 Lines

Structure Replacement Project

Easton, Fairfield, Connecticut

Mapsheet 1 of 2

EVERSOURCE

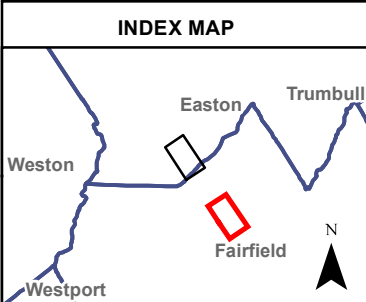
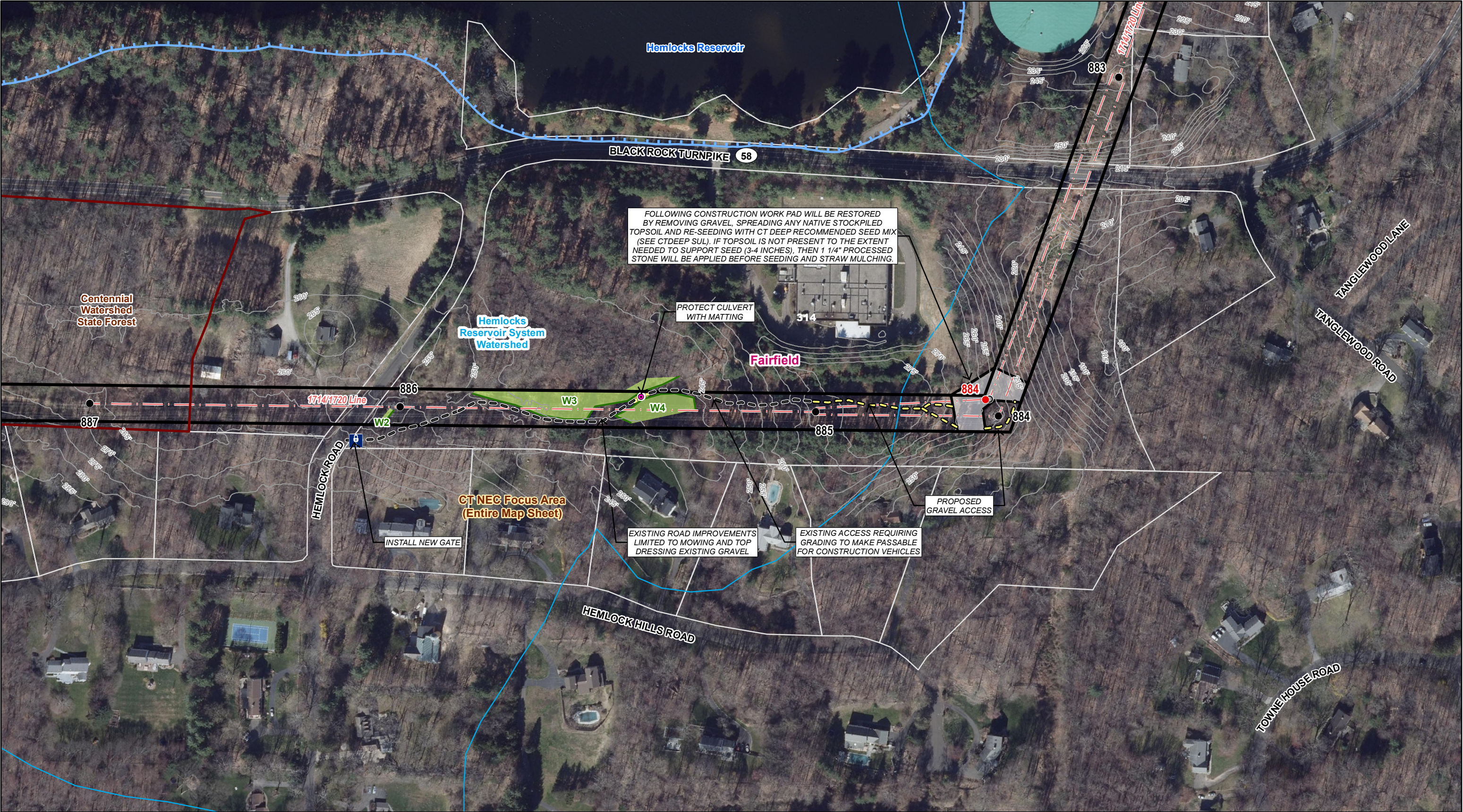
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August 2021

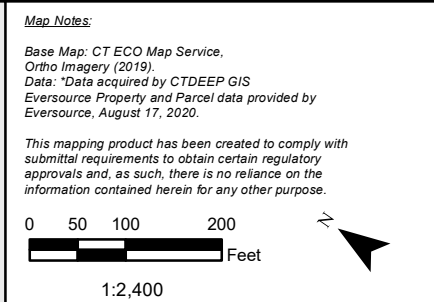
1720/1714 Lines Structure Replacement Project

Map Sheet 2 Abutters List

Line List	Owner Name	Parcel Address	Town	State
314	AQUARION WATER COMPANY OF CONNECTICUT	4975 BLACK ROCK TURNPIKE	FAIRFIELD	CT



Legend			
● Proposed Structure	— Existing Access	— Delineated Wetland Boundary Outline	— Public Water Supply Watershed
● Existing Structure	— Proposed Access	— Field Delineated Wetland	— Eversource Owned Property
● Existing Structure to be Removed	— Off-ROW Access Pending Rights	— Temporary Construction Matting	— Parcel Boundary
Ⓜ Gate	— Existing Right-of-Way	— CT NE Cottontail Focus	— State-Owned Property (CTDEEP)
● Culvert	— Stone Work Pad	— FEMA 100-Year Flood Zone*	— Municipal Boundary*
— Overhead Eversource Line	— Delineated Watercourse	— FEMA Floodway*	
— 5' Contour			
— Railroad*			



1720 /1714 Lines
Structure Replacement Project
Fairfield, Connecticut
Mapsheet 2 of 2

EVERSOURCE

Tighe&Bond

August 2021

ATTACHMENT D
ABUTTER LETTER AND
PROOF OF NOTICE

September 2, 2021

Dear Neighbor,

As part of our everyday effort to deliver reliable energy to our customers and communities, we're planning work in your area to replace electric transmission structures. Maintaining the infrastructure that supports the electric lines is one of the ways Eversource ensures the safe, secure transmission of electricity throughout the region.

You're receiving this letter and a copy of the Sub-Petition because the proposed work would be taking place within the Eversource right of way on or near your property in Easton and Fairfield. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-EF-01 this week to the Connecticut Siting Council (CSC) for its review and approval.

Please know that Eversource remains committed to prioritizing public health as well as the health of employees and contractors. All Eversource personnel follow applicable health and safety guidelines to help prevent the spread of COVID-19.

About This Electric System Improvement: What You Can Expect

First, we want you to know that this work will not interrupt electric service to your property.

As part of this project, we are proposing to replace two wood structures due to structure age, weather, and/or woodpecker activity. The new structures will comply with current clearance requirements and provide continued reliability of the transmission system.

Connecticut Siting Council Process and Timing

With this letter, Eversource is providing notice to you of its proposed work activity, as described in the enclosed Sub-Petition. If you have any comments or concerns about the project, please send them to the CSC at the following address within 30 days of the date of this letter: Melanie Bachman, Acting Executive Director; Connecticut Siting Council; Ten Franklin Square; New Britain, CT 06051. You may also email them to the siting.council@ct.gov. If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-EF-01 in your correspondence.

Our Commitment to You

We are committed to be a good neighbor and doing our work with respect for you and your property. If you would like more information about this work, please call 1-800-793-2202 or send an email to ProjectInfo@eversource.com. Thank you.

Sincerely,

Franco Saporoso

Franco Saporoso
Eversource Project Manager

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

In accordance with Condition 2 of the Connecticut Siting Council's ("Council") March 31, 2017 declaratory ruling on Petition No. 1293, I hereby certify that on September 2, 2021, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-EF-01 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipalities listed below and 2 abutters. The notice of the proposed maintenance activities states that comments or concerns regarding the maintenance activities described in the Sub-Petition should be submitted to the Council within 30 days of the date of such notice.

Municipal Officials:

Town of Easton
David Bindelglass, First Selectman
225 Center Road
Easton, CT 06612

Town of Fairfield
Brenda Kupchick, First Selectwoman
Sullivan Independence Hall, 2nd Fl
725 Old Post Road
Fairfield, CT 06824

James Smith

James L. Smith
Project Siting Specialist

On this the 2nd day of September 2021, before me, the undersigned representative, personally appeared, James L. Smith, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Andrew W. Lo

Signature

Officer of the Superior Court /Juris No. 413393