



56 Prospect Street
P.O. Box 270
Hartford, CT 06103

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

August 5, 2022

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

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

Dear Attorney Bachman:

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

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

Enclosed please find an original and three (3) copies of this filing.

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".

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

Town: Killingly

Sub-Petition: 1293-KL-01

Project: 3448 Transmission Line Structure Replacement Project

Structure Locations: Two Transmission Line Structures located in Killingly, 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 3448 Transmission Line Structure Replacement Project ("Project") is part of an ongoing maintenance program which evaluates the integrity of its utility structures and implements repair, upgrade, or replacement to ensure the safe and reliable transmission of power to its customers.

The 3348 Line in its entirety, is a 345-kilovolt ("kV") line that extends from Lake Road Substation in Killingly, to Killingly Substation, also located in Killingly. Due to asset condition, two structures, 9265 and 9266, require replacement on a portion of the 3348 Line. Structures 9265 and 9266 are wood H-frame structures, the only two remaining wood structures on the 3348 Line. Both structures have one or more of the following defects: split pole top, insect damage, woodpecker damage and/or cracks. To comply with current clearance requirements, each replacement structure will need to be taller than the associated existing structure.

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

- Replace two existing wood structures with new weathering steel structures (H-frame). Each replacement structure will be of the same design as its corresponding existing structure.
- Transfer the conductor from the existing structures to the new taller structures, after the new structures have been erected, using cranes, bucket trucks and tensioning rigs.

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:

All Work Activities would take place within Eversource's property or existing right-of-way ("ROW") utilizing existing access roads as well as some temporary access roads and stone work pads (collectively the "Work Areas"). Eversource can access each of the structure replacement locations utilizing its existing rights, and in coordination with Providence & Worcester Railroad Co (RR) for a temporary track crossing.

- a) The Work Activities would not result in any impacts to wetlands or watercourses. 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") to avoid impacts to nearby wetland and watercourse resources.
- b) There are no 100-year flood zones in the Work Areas.
- c) No vernal pools or vernal pool envelopes are located in proximity to the Work Areas.
- d) Based on review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDB"), the project is located within an NDDB buffered area. However, due to the limited Work Areas required there are no jurisdictional triggers for an NDDB Review Request (CTDEEP Stormwater Permit, wetland impacts, or work on CTDEEP-owned land). Therefore, the Work Areas would not be subject to an NDDB Review Request. Work will be conducted in accordance with Eversource's Best Management Practices Manual. With these protective measures, no adverse impacts to state-listed rare species are anticipated.
- e) The Work Activities will not require any tree clearing. However, Eversource will need to undertake tree trimming and/or vegetation removal/mowing to establish required conductor clearance, to improve access roads, to install work pads and/or to install guy wires within the Work Areas.
- f) 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 located within 500 feet of the Work Areas.
- g) To comply with current conductor clearance requirements the height of the replacement structures will be increased. Structure 9265 is 90 feet in height, with the replacement structure at 120 feet. Structure 9266 is 85 feet in height, with the replacement structure at 100 feet. Both structures will be constructed of light duty steel.
- h) No change in noise levels would result from the installation of the new structures and the applicable line would continue to comply with the State of Connecticut noise regulations.
- i) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. Mitigation:

Temporary environmental effects from implementing the Work Activities will be mitigated as follows:

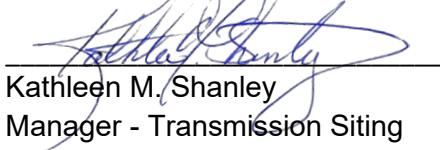
- Erosion and sediment ("E&S") controls will be employed and maintained, as needed, for the duration of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and Eversource's BMPs.
- Eversource's contractor will perform construction sequencing such 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. 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:

Eversource will access the Work Areas by entering the Killingly Substation from an existing access point on a public road, Park Road in Putnam, Connecticut. The substation access road runs southwest, crossing the Providence & Worcester Railroad ROW, continuing to the Eversource ROW where the two structures are located. Short segments of temporary access road will be established from the existing access road to each of the two structures for the construction work.

Portions of the existing access roads may be hardened and widened at turning areas to facilitate the safe passage of construction vehicles. Construction matting will be used for a temporary spur access road to Structure 9265 and the Work Area pad within the sensitive NDDB buffered area. A short segment of access road and stone work pad will be constructed within the Work Area for the Structure 9266 replacement. The temporary matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

By:



Kathleen M. Shanley
Manager - Transmission Siting

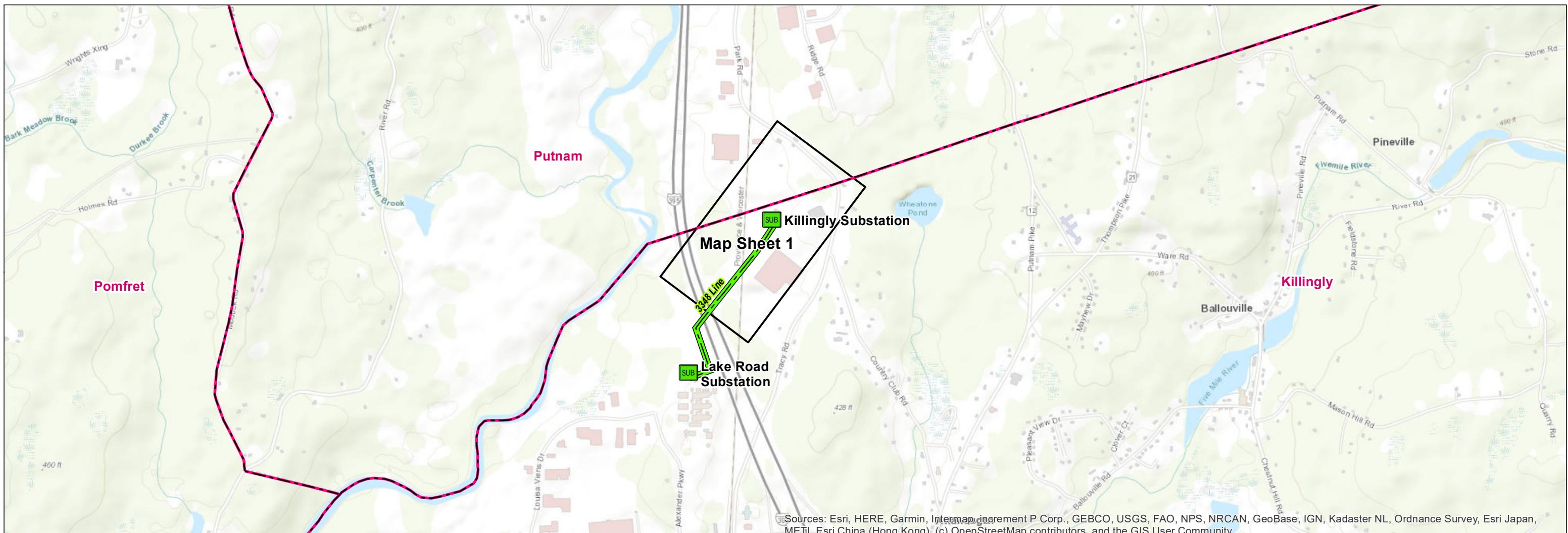
ATTACHMENT B

SUB-PETITION MAPS

3348 Line Structure Replacement Project

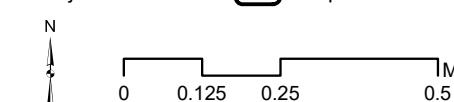
Killingly and Putnam, CT
Sub-Petition Map Set

Date: August 04, 2022



Legend

Substation Project Corridor Map Sheet Municipal Boundary



PREPARED FOR:

EVERSOURCE
ENERGY

107 Selden Street
Berlin, CT 06037

INDEX OF FIGURES

Title Sheet / Index Map
Abutter Table & Map Sheet 1

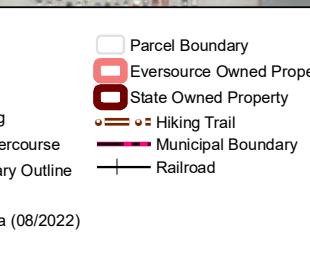
PREPARED BY:

ALL-POINTS
TECHNOLOGY CORPORATION

567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385



INDEX MAP	
 <p>C:\Users\erik\Downloads\APT_GIS\WAT\GIS Team Folder\Project\3348_ACRs_2022\mxd\Line3348_ACRs_2022.mxd\Line3348_ACRs_2022.mxd</p>	Legend <ul style="list-style-type: none"> Proposed Structure Existing Structure to be Removed Existing Structure Distribution Structure Overhead Eversource Line Distribution Line Existing Right-of-Way (ROW) 5' Contour Line Gate Existing Access Proposed Access Stone Work Pad Temporary Construction Matting Delineated Intermittent Watercourse Delineated Wetland Boundary Outline Field Delineated Wetland Natural Diversity Database Area (08/2022) Parcel Boundary Eversource Owned Property State Owned Property Hiking Trail Municipal Boundary Railroad



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Map Notes:
 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.
 ROW Boundary provided by Eversource Survey.
 Wetland Delineation by IRP/Davison Environmental 2017.
 Base Map Source: 2019 CTECO Aerial Imagery

1 inch = 200 feet

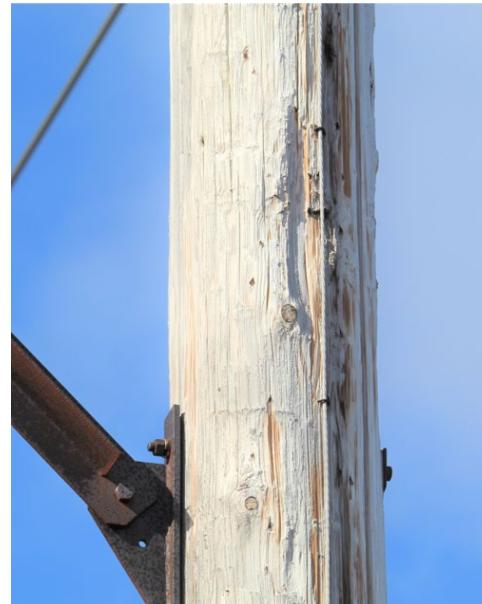
EVERSOURCE ENERGY			
3348 Line Structure Replacement Project			
Killingly and Putnam, CT			
Map Sheet 1 of 1		REVISIONS	Date: August, 2022
NO.	DATE	REVISIONS	Date: August, 2022

ATTACHMENT C

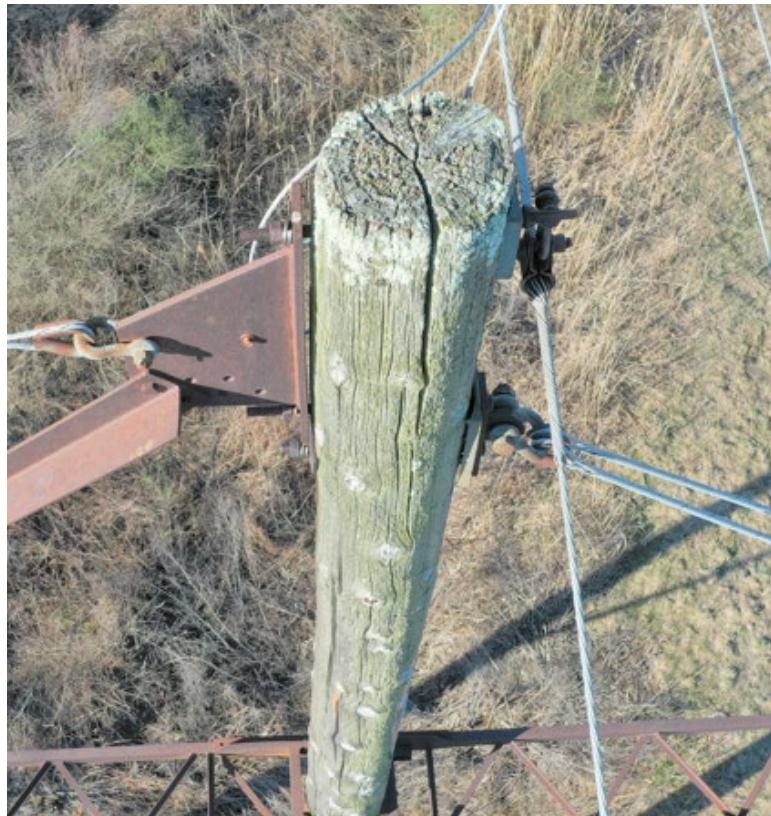
PHOTOS

Figure 2: Structure Photos

Structure 9265



Structure 9266



Structure 9266 (Cont.)



ATTACHMENT D

ABUTTER LETTER AND

PROOF OF NOTICE

AFFIDAVIT OF SERVICE OF NOTICE

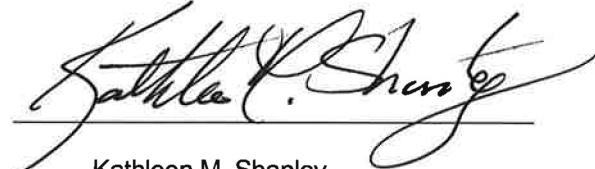
STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

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 August 4, 2022, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-KL-01 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 7 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 Killingly
Mary Calorio, Town Manager
172 Main Street
Killingly, CT 06239

Town of Putnam
Barney Seney, Mayor
200 School Street
Putnam, CT 06260



Kathleen M. Shanley
Manager – Transmission Siting

On this the 4th day of August 2022, before me, the undersigned representative, personally appeared, Kathleen M. Shanley 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.



Susan Napolitano

Signature

Officer of the Superior Court / Juris No. _____



**3348 Line
Structure Replacement
Project Abutter Table**

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
288C-043	145 ALEXANDER PKWY	KILLINGLY	CT	145 ALEXANDER PARKWAY LLC
288C-044	125 ALEXANDER PKWY	KILLINGLY	CT	TOWN OF KILLINGLY
288C-049	40 OLD PERRY RD	KILLINGLY	CT	STATE OF CONNECTICUT
288C-050	4 RAILROAD AVE	KILLINGLY	CT	PROVIDENCE & WORCESTER RR CO
288C-051	155 TRACY RD	KILLINGLY	CT	LCN STP HAGERTOWN
288C-053	207 TRACY RD	KILLINGLY	CT	207 TRACY ROAD ASSOCIATION LLC
288D-002	239 TRACY RD	KILLINGLY	CT	ESTATE OF ARTHUR TRACY

August 4, 2022

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 in Killingly. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-KL-01 this week to the Connecticut Siting Council (CSC) for its review.

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 area.

As part of this project, we are proposing to replace two structures due to structure age, weather, woodpecker activity and/or clearance requirements. The new structures will be weathering steel, with a finish that "weathers" or darkens over time. 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, 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-KL-01 in your correspondence.

Our Commitment to You

We are committed to being 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,

Everton Robinson

Everton Robinson
Eversource Project Manager – Transmission Projects

Enclosure – Sub-Petition No. 1293-KL-01

