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Manager - Transmission Siting

August 5, 2021

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

Re: Sub-Petition No. 1293-MGHACL-02: 310/368 Line Transmission Line Structure Replacement Project, Amendment to Sub-Petition pursuant to Condition 2 of the Connecticut Siting Council Sub-Petition Approval

Dear Attorney Bachman:

On June 25, 2021, 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 maintenance work within its transmission right-of-way ("ROW") in Manchester, Glastonbury, Hebron, Andover, Columbia, and Lebanon, Connecticut. As detailed in the Sub-Petition, the work includes replacing 33 existing wood transmission structures with new weathering steel transmission structures.

On July 27, 2021, the Council issued a letter acknowledging that the above-reference project would not have an adverse environmental effect and would not require a Certificate of Environmental Compatibility and Public Need. Accordingly, Eversource commenced work on the asset condition improvements specified in the Sub-Petition, as well as on the replacement of structures not subject to Council jurisdiction (i.e., structures to be replaced due to asset condition issues, but that will require no increase in height compared to the structure to be replaced).

However, after the completion of civil work at one of the structures at which no height increase was anticipated (3-pole dead-end Structure 18140 in Columbia), Eversource determined that the height of the replacement 3-pole structure must increase by 5 feet (85 feet compared to the existing 80 feet). This structure is in a wetland, which is located at the base of a slope leading from Structure 18139.

After the project civil work revealed the actual condition of the wetland substrate and taking into consideration the change in topography, Eversource determined that replacement Structure 18140 must be slightly taller than the existing structure in order to maintain appropriate conductor elevations. The attached map, excerpted from the Sub-Petition filing, has been revised to reflect the location of Structure 18140 (revised Sub-Petition Map 14).

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Eversource respectfully submits that the Structure 18140 replacement activities will not result in any substantial adverse environmental impacts, based on the following factors:

The replacement structure work ("Work Activities") will be within Eversource's existing ROW, which will be reached via an approved on and off-ROW access road.

- The project Work Activities associated with the replacement of Structure 18140 will result in approximately 13,518 square feet of temporary wetland impacts from the use of timber mats for the work pad and the access road leading to the work pad. 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 wetland and watercourse resources.
- No vernal pools or vernal pool envelopes are located near Structure 18140.
- Eversource consulted with the Connecticut Department of Energy and Environmental Protection, Natural Diversity Data Base ("NDDB"), and has received NDDB approval for the Structure 18140 work.
- Eversource conducted a Phase 1A cultural resource assessment (conducted by Heritage Consultants, LLC), which did not identify any known historic or archaeological sites in or near the Structure 18140 work pad or access road.
- Temporary environmental effects from construction will be mitigated as referenced in Sub-Petition 1293-MGHACL-02
- Eversource will access the Structure 18140 work area via an approved off-ROW access road from Jonathan Trumbull Highway (State Route 87),

Eversource respectfully seeks Council approval of this proposed amendment to Sub-Petition 1293-MGHACL-02.

Please contact me at 860-728-4527 if you have any guestions regarding this request.

Sincerely,

Enclosures

