

September 23, 2022

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



Re: Sub-Petition No. 1293-OX-03

Dear Attorney Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-OX-03 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Oxford, Connecticut. The work includes replacing four existing wood transmission structures with new galvanized steel transmission structures, replace one laminated wood structure with a galvanized steel structure and install one new weathering steel structure.

Eversource notified the officials of the Town of Oxford of Eversource's submission of the Sub-Petition as Attachment A and sent a copy of the Sub-Petition to the owners of the directly abutting properties (see Proof of Notice).

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

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

Sincerely,

Handwritten signature of Kathleen M. Shanley in blue ink.

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: Oxford

Sub-Petition: 1293-OX-03

Project: 1319/1619 Transmission Line Structure Replacement Project

Structure Locations: Transmission Line Structures Located off Commerce Drive in Oxford, 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 1319/1619 Transmission Line Structure Asset Condition Replacement (ACR) 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 1319 Line and the 1619 Line are 115-kilovolt lines located in Connecticut. The 1619 Line extends from Oxford Substation to Towantic Substation in Oxford and Stevenson Substation in Monroe. The 1319 Line extends from Oxford Substation in Oxford to Beacon Falls Substation in Beacon Falls. One replacement structure on the 1319 Line is rated C. A new mid-span structure will also be constructed on the 1319 Line to comply with current North American Electric Reliability Corporation clearance requirements. One structure on the 1619 Line is rated C and needs to be replaced. Three adjacent opportunity structures are also being replaced of the 1619 Line; as these are the last wood structures on this section of the 1619 Line at 3 Commerce Drive, Oxford, Connecticut.

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

- Replace one existing wood monopole structure, Structure 1443A, with a new galvanized steel monopole structure on the 1319 Line.
- Install one new weathering steel H-frame structure, Structure 1444W, on the 1319 Line.
- Replace four existing wood H-frame structures, Structures 11153, 11154, 11155 and 11156

with newgalvanized steel H-frame structures on the 1619 Line.

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 Eversource's property and existing right-of-way ("ROW") utilizing existing access roads (collectively the "Work Areas").
- b) The Work Activities would result in +/- 2,288 square feet of impacts to wetlands at Structure 11154 and +/- 3,295 square feet of impacts to wetlands at Structure 1443A. Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, 2022 ("BMPs") to avoid impacts to nearby wetland and watercourse resources.
- c) No vernal pools or vernal pool envelopes are located in proximity to the proposed Work Areas.
- d) There are no 100-year flood zones in the Work Areas.
- e) Based on review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDB"), no Work Areas are proposed within a NDDB buffered area and/or CTDEEP owned/managed land. Therefore, the Work Areas would not be subject to an NDDB Review Request. Work would be conducted in accordance with Eversource's BMPs to avoid or minimize impact to terrestrial habitats that may support rare species. With these protective measures, no adverse impacts to state-listed rare species are anticipated.
- f) The Work Activities will not require any tree clearing. However, Eversource may need to 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 review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office, conducted by Heritage Consultants, LLC ("Heritage") in June 2022, for the 1619 Line Project did not identify any National or State Register of Historic Places properties/districts or archeological sites within 500 feet of the Work Areas.
- h) 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") in May 2021 and recommended that a Phase 1B Survey be conducted for the 1319 Line. The Phase 1B Survey was conducted in June 2021 and concluded that any archaeological deposits that may be present are not likely to be considered historically significant and no additional archeological examination is recommended on the 1319 Line.
- i) Based on a review of historic maps, aerial photographs, and available soil profiles, Heritage determined that "no/low" physical evidence of archaeological significance; therefore, Heritage advised that no further cultural resource examinations are recommended or warranted for either line.
- j) Existing 1443A on the 1319 Line is 81 feet and the replacement structure will not increase in height. The mid-span Structure 1444W to be added at a height of 39 feet to comply with current clearance requirements. Structure 11155 on the 1619 Line will increase by 9 feet for an overall

height of 43 feet, while Structure 11156 will decrease by 4.5 feet to a height of 43 feet. The heights for replacement Structures 11153 and 11154 will remain the same as for the existing structures at 47.5 feet.

- k) Because of the proximity of the replacement structures to Waterbury-Oxford Airport, a general aviation airport, Eversource consulted with both the Federal Aviation Administration ("FAA") and the Connecticut Airport Authority ("CAA") for approval on structure height clearance requirements. After aeronautical review of the proposed structure height increases, the FAA issued a Determination of No Hazard on the 1319 Line work and the 1619 Line work, finding that the replacement structures and the mid-span structure will not exceed obstruction standards and that marking/lighting the structures is not required.

The CAA manages and operates Waterbury-Oxford Airport. The 1319 Line was approved by the CAA and the 1619 Line is being reviewed. Eversource expects a similar approval.

- l) 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.
- m) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. Mitigation:

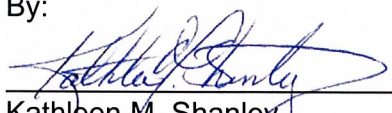
Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment ("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 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 the construction entrance off Commerce Drive to prevent tracking of soil onto the public road.
- 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 its property at Oxford Substation utilizing an existing access road off Commerce Drive within the existing ROW.

By:



Kathleen M. Shanley
Manager - Transmission Siting

ATTACHMENT B

PHOTOGRAPHS

Structure #1443
Rated C on the
1319 Line

Figure 1: Line 1319 – Existing LWS Structure 1443



○



Structure #1445A

C Rated on the
1619 Line

Figure 1: Line 1319 – Existing LWS Structure 1443



○

Sample - Laminated Wood Structure Rot



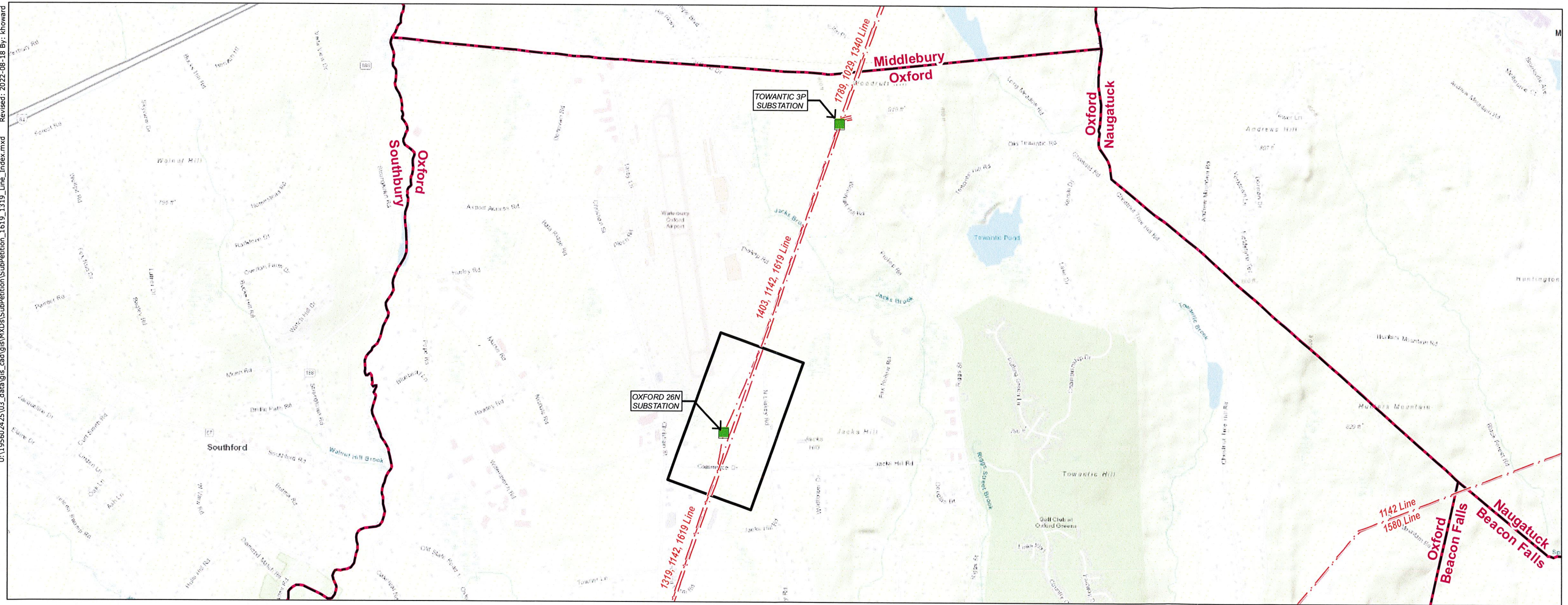
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ATTACHMENT C

MAPS

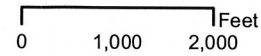
1619/1319 Line - Structure Replacement Project

Oxford, CT
 Sub-Petition Map Set
 Date: August 18, 2022



Legend

- Substation
- - - Overhead Eversource Line
- Map Sheet
- Municipal Boundary



INDEX OF FIGURES

Title Sheet / Index Map
 Abutters Table & Map Sheet 1 of 1

PREPARED FOR:



107 Selden Street
 Berlin, CT 06037

PREPARED BY:



30 Park Drive
 Topsham, ME 04086

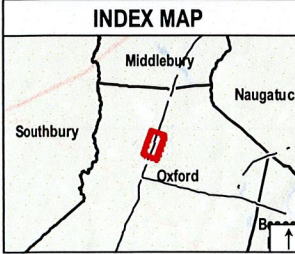
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1619/1319 Line - Structure Replacement Project

Map Sheet 1 Abutters Table

ABUTTER NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
200B-120	THE CONNECTICUT LIGHT & POWER COMPANY		3 COMMERCE DR	OXFORD	CT	06478
200B-123	DAVID	SIPPIN	NORTH LARKEY RD	OXFORD	CT	06478

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Legend	
● Existing Structure	■ Temporary Construction Matting
○ Existing Structure to be Removed	▭ Stone Work Pad
● Proposed Structure	▭ Eversource Owned Property
— Overhead Eversource Line	▭ State Owned Property
— Existing Right-of-Way (ROW)	200B Abutter Number
— Existing Access	▭ Parcel Boundary
▭ Proposed Access	— 2' Contour
▭ Existing Gravel	— 10' Contour
— Delineated Intermittent Watercourse	● Culvert
— Delineated Wetland Boundary Outline	Ⓜ Gate
▭ Field Delineated Wetland	
▭ FEMA 100-Year Flood Zone	

Map Notes:
 Coordinate System: NAD 1983 StatePlane Connecticut FIPS 0600 Feet
 Data source: Eversource easement lines, structures, transmission lines provided by Eversource Energy. Wetlands/watercourses associated with the 1619 Line delineated by Stantec in June 2022. Wetlands/watercourses associated with the 1319 Line (W01, S01) provided by Kleinfelder. Additional sources include: CT DEEP, FEMA.
 Basemap: 2019 Statewide Leaf-off Orthoimagery provided by Connecticut Environmental Conditions Online (CT ECO).

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.

EVERSOURCE ENERGY	
1619/1319 Line - Structure Replacement Sub-Petition Map Set	
Oxford, CT	MAP SHEET: 1 of 1
Date: August 18, 2022	
NO.	DATE
REVISIONS	

ATTACHMENT D
ABUTTER LETTER AND
PROOF OF NOTICE

September 2022

Dear Neighbor,

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

We Are Always Working to Serve You Better

We are submitting a sub-petition to the Connecticut Siting Council (CSC) for proposed structure replacements in your area.

You're receiving this letter because the proposed work would be taking place within the existing Eversource right-of-way (power line corridor) on or near your property in Oxford, Connecticut. The Project, called the 1619/1319 Structure Replacement Project ("Project"), includes replacing select wood structures with new, more durable steel structures, 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.

What You Can Expect

Pending receipt of the necessary approvals for this proposed work, construction is expected to begin in the late-Q3 or early-Q4 of 2022. We anticipate to complete construction, including restoration of affected areas, by the end of 2022.

Contact Information

Eversource is committed to being a good neighbor and doing our work with respect for you and your property. For more information, please call our projects hotline at 1-800-793-2202 or send an email to ProjectInfo@eversource.com.

If you would like to send comments regarding Eversource's sub-petition to the CSC, please send them via email to siting.council@ct.gov or send a letter to the following address: Melanie Bachman, Executive Director, Connecticut Siting Council, Ten Franklin Square, New Britain, CT 06051.

Sincerely,

Ibraheem Kamona and Wayne Vargas

Ibraheem Kamona and Wayne Vargas
Project Managers on Behalf of Eversource - Transmission

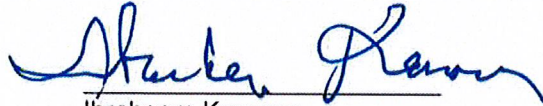
AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF WATERBURY)

Sec. 16-50j-40 of the Regulations of Connecticut State Agencies ("RCSA") provides that proof of notice to the affected municipalities, property owners and abutters shall be submitted with a petition for declaratory ruling to the Connecticut Siting Council ("Council"). In accordance with that RCSA section, I hereby certify that I caused notice of the petition for a declaratory ruling of The Connecticut Light and Power Company doing business as Eversource Energy to be served by mail or courier upon the following municipal official:

- First Selectman George Temple
Town of Oxford
Oxford Town Hall
486 Oxford Road
Oxford, CT 06478

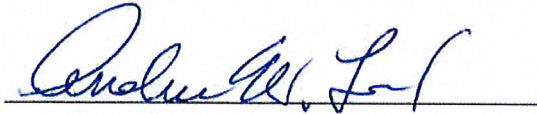
I also certify that I caused notice of the proposed modifications to be served by mail or courier upon owners of abutting properties shown on the List of Abutters included in Attachment D of the Petition.



Ibraheem Kamona
Project Manager

On this the 21st day of September 2022, before me, the undersigned representative, personally appeared, Ibraheem Kamona, 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.



~~Notary Public~~/My Commission expires: _____

Commissioner of the Superior Court/ Juris No.: 413393