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

January 7, 2021

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

Re: Petition 1429 - The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed 1768 Line Lattice Tower Replacement Project consisting of the reconductoring and replacement of electric transmission line structures along approximately 7 miles of its existing No. 1768 115-kilovolt (kV) double-circuit electric transmission line within existing Eversource electric transmission line right-of-way between East Granby Junction in East Granby and the Suffield, Connecticut/Agawam, Massachusetts border, and related electric transmission line structure improvements. Request to start construction in areas not subject of the requirements of the Partial Development and Management Plan.

## Dear Ms. Bachman:

On December 17, 2020 the Council ruled that the subject Project would not require a Certificate, providing that Eversource complied with seven Project-specific conditions. Condition 1 of the Council's ruling specifies that Eversource prepare a Partial Development and Management ("Partial D&M Plan" or "Partial Plan") that conforms to Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies (RCSA: Requirements for a D&M Plan, Elements of a D&M Plan, Reporting Requirements), and that the Plan must specifically address:

- a) Detailed site plans that clarify construction within wetlands, watercourses and at culvert crossings, including structure locations and temporary and permanent impacts related to work pads and construction access, and methods to reduce such impacts, including, but not limited to, the potential use of silt sox for erosion and sedimentation control; and
- b) Details of construction-related dewatering.

Eversource is developing the requisite Partial D&M Plan and expects to submit the Partial Plan to the Council in the next few days. In the interim, Eversource respectfully requests that the Council allow Eversource to begin civil construction in upland areas that would not require dewatering (for

example, improvement/development of access roads and work pads). The Project has received approval from all other state and federal regulatory agencies allowing civil work to commence, including a *General Permit Registration for Discharge of Stormwater and Dewatering Wastewater from Construction Activities* (approved by the Department of Energy and Environmental Protection on December 7, 2020; Application No. 202009569). A civil contractor has been selected for the Project.

Allowing this work to proceed in parallel with the Council's review of the Partial D&M Plan will enable the Project to meet certain construction milestones required to accommodate time of year restrictions associated with certain species. Proceeding with the work at this time will also mitigate the risk of shifting the outage window into the summer which, if approved, may require daily standby generation or other measures to, under certain contingencies, avoid outages to customers served from Southwick Substation.

The specific targeted areas requested are depicted on the attached map sheets and are as follows:

- Mapsheet 4: Roads and pads associated with structures 3196 through 3200;
- Mapsheet 5: Roads and pads associated with structures 3201, 3202, 3204 and 3205;
- Mapsheet 6: Roads and pads associated with structures 3206, 3209, 3210, and 3211, but excluding improvements to existing access roads from structures 3207 and 3209 to structure 3208 (access to these areas will be from Phelps Street, as shown on Mapsheet 8);
- Mapsheet 7: Roads and pads associated with structures 3211 through 3216;
- Mapsheet 8: Roads and pads associated with structures 3217 through 3222;
- Mapsheet 9: Roads and pads associated with structures 3223 and 3224; and,
- Mapsheet 12: Roads and pads associated with structures 3239, 3240 and 3241 (access from Ratley Road), but excluding improvements to existing access roads, pads and matting from structures 3241 to 3245. Matting of work pads and/or access roads related to structures 3239, 3240, 3241 are to protect lawns or agricultural areas on private property.

Eversource very much appreciates the Council's consideration of this request. Should you have any questions, please do not hesitate to contact me at via e-mail at <a href="mailto:kathleen.shanley@eversource.com">kathleen.shanley@eversource.com</a> or telephone at (860) 728-4527.

Sincerely,

Kathleen M. Shanley













