

Date Filed: December 03, 2021

Request from: Connecticut Siting Council

Question 1:

Referencing page 23 of the Petition, were there any comments from the Town of Montville or property abutters? If so, what were their concerns, and how were there concerns addressed?

Response:

Representatives of the Town of Montville expressed no concerns about the proposed Project.

Eversource's outreach to abutters revealed a concern from one landowner (property at 54 Lathrop Road), who has a fenced area for dogs located within the right of way (ROW) easement on his property. A fence surrounds the entire area, and the dogs occupy this area at all times. The property owner is concerned about both the safety of the Eversource construction personnel and the potential for the dogs to escape during the Project work. The property owner believes that a 4-foot-tall orange snow fence, installed prior to and maintained during construction, will keep his dogs from getting into the ROW work area. Alternatively, a temporary chain-link fence could be installed instead of the orange snow fence.

The property owner's existing fence gate will have to be removed during construction, as well as other sections of fencing. After the work on the ROW is complete, Eversource will reinstall the removed sections of the fence, as well as the gate, and the temporary fencing will be removed.

Additionally, the property owner requested one-week advanced notice of the start of construction at the subject property and 24-hours advance notice of any walkdowns requiring access to the fenced area where the dogs are kept. Eversource will notify the property owner prior to the start of construction.

Finally, the property owner requested the Project Team clear stumps and hay or seed the areas impacted by construction. The Project Team agreed to restore the impacted areas during Project restoration activities.

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Question 2:

What is the total cost of the project? Of this total, what costs would be regionalized, and what costs would be localized? Estimate the percentages of the total cost that would be borne by Eversource ratepayers, Connecticut ratepayers, and the remainder of New England (excluding Connecticut) ratepayers, as applicable.

Response:

The total estimated cost of the project is approximately \$26.6 million. Of the total, \$10.3 million is associated with non-Pool Transmission Facilities (non-PTF). Eversource anticipates that the remaining costs will be regionalized pending the final determination of ISO-New England's Schedule 12 C review.

The Company anticipates the following overall allocations for the total cost:

- Customers of Eversource: 34.6%
- Other Connecticut customers: 4.4%
- Other New England customers: 61.0%

The estimated allocations are based on 2020 actual loads.

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Question 3:

Referencing page 3 of the Petition, explain the cause of the thermal overloads and voltage violations. Are they associated with the line operating at 69 kV, the conductor ratings or both?

Response:

The thermal overloads and voltage violations are caused by the loss of multiple transmission facilities in eastern Connecticut (ECT) during “N-1-1” conditions and are not solely attributable to either the operation the 100 line or the conductor rating or both.

By way of background, for Transmission System Planning purposes, the “N-1-1” designation means that there is a presumption of normal operation (the “N”) with all transmission facilities being in-service. Impacts to the system are then assessed with a single transmission facility out-of-service (referred to as an “N minus 1” or “N-1” condition which could be due to a planned or unplanned outage.) An N-1-1 situation occurs when a second facility is presumed to be out-of-service at the same time.

The evaluation of the ECT system included an analysis of a N-1-1 condition in which a transformer was out-of-service followed by the loss of a transmission circuit. The analysis concluded that this N-1-1 condition would result in thermal overloads and voltage violations on two important transmission supplies for ECT, thus removing those supplies from service. To prevent the loss of those transmission sources, part of the identified solution was to increase the capacity of the 100 Line from 69-kV to 115-kV operation, thus increasing the transmission supply capacity into the ECT load pocket. This increased capacity, along with the other ECT project components, alleviate the thermal and voltage violations.

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Question 4:

When would the remaining section of the #100 Line to Gales Ferry Substation be upgraded? What are the remaining components that need to be completed before the #100 Line can operate at 115-kV?

Response:

Eversource will replace the remaining 1.6-mile section of the 100 Line from the north end of the Horton Cove to Gales Ferry Substation in coordination with other work in the same right-of-way, which would be and initiated upon receipt of all necessary permits and approvals. Eversource expects to file the petition for a declaratory ruling that a Certificate of Environmental Compatibility and Public Need is not required for that section of the 100 Line work with the Connecticut Siting Council in Q1 2022.

In order to operate the 100 Line at 115 kV, Gales Ferry Substation also will need to be converted from 69 kV to 115 kV. The modifications to Gales Ferry Substation will also be the subject of a separate petition to be filed with the Council in Q1 2022.

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Question 5:

Referencing page 21 of the Petition, explain why the #100 Line is going to operate at 69-kV until June 2023 and not sooner?

Response:

As described in the Response to Question 4, the 100 Line cannot be energized at 115 kV until Gales Ferry Substation is converted to 115-kV operation. The construction of the modifications to Gales Ferry Substation that will enable 115-kV-operation, once all necessary permits and authorizations are obtained, will occur in parallel with the 100 Line work, but will have a longer construction duration.

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Question 6:

Explain why the #1410 Line conductor is being upgraded when it is currently operating at 115 kV.

Response:

The 1410 line is being upgraded because the 1410 line and the 100 line are supported on double-circuit lattice structures that would be replaced with double-circuit steel pole structures designed to support the new 115-kV 100 line. As a result, the 1410 line and the associated shield wire will also need to be removed from the existing structures and relocated or rebuilt on the replacement structures. The existing 1410 conductor, which consists of 556 kcmil aluminum conductor steel reinforced, and the Copperweld shield wire need to be upgraded for two reasons. First, the reuse and relocation of the old conductor and shield wire is not cost effective. Second, the existing 1410 line conductor and the Copperweld shield wire are old and obsolete wires. The conductor is no longer carried in stock by Eversource or its suppliers and would need to be custom ordered and manufactured if repairs or replacements were needed as the result of wear or damage in an emergency condition. Additionally, the availability of the hardware for these wires is also limited.

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Question 7:

Explain why the upgrades end at Horton Cove and are not being completed to their respective substations.

Response:

The proposed upgrades that are the subject of Petition No.1468 end at Horton Cove and not at the respective substations because the supporting structures and the conductors crossing Horton Cove have already been replaced, as approved by the Siting Council in Petition No. 1405. The purpose of that project was to reconfigure the four transmission lines supported on the Horton Cove lattice structures to improve system reliability. The Horton Cove project included the partial rebuild and separation of approximately 1 mile of Eversource's existing 69-kilovolt (kV) 100 Line and the 1410, 1280, and 1080 115-kV electric transmission line structures between a location east of Depot Road to a point east of Point Breeze Road. As Eversource reported to the Siting Council on November 23, 2021, the Horton Cove project construction was completed on November 8, 2021.

The modified proposed transmission lines from Montville Substation will connect to the southern extent of the completed Horton Cove crossing. The segment of the 100 Line from the north end of the Horton Cove crossing improvements to Gales Ferry Substation will be completed as a separate project and will be the subject of a separate petition to be filed with the Siting Council in Q1 2022.

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Question 8:

What is the status of the NRG Montville Generation facility? How much of the project cost is associated with interconnecting the generator?

Response:

Aside from news articles regarding the potential change of ownership of the NRG Montville Generation Station, Eversource does not have any detailed information regarding the status of the NRG Montville Generation facility.

By way of clarification, the proposed work does not include a new interconnection. Rather, the purpose of the proposed modifications to the Montville Substation, specifically the addition of the 17X 115-kV/69-kV transformer is to maintain a second supply to the Montville Generation Station, as required by the Interconnection Agreement between Eversource and NRG. Currently, the Montville Generation Station is served by the connection of the 100 Line at the 69-kV Yard adjacent to the Montville Generation Station and the 16X autotransformer, which is located within the Montville Substation. As part of the conversion of the 100 Line to 115-kV operation (which is a required component of the Eastern Connecticut Reliability solution), the termination point will be relocated from the 69-kV yard to the Montville Substation 115-kV bus. Thus, the direct connection between the existing 69-kV 100 Line and the 69-kV Yard will be eliminated. Unless this second 69-kV connection is maintained, only one connection (*i.e.*, the 16x autotransformer) would remain between the Montville Substation 69-kV and 115-kV yards. With only one 69-kV connection to the generating station, the loss of the 16x autotransformer would result in the loss of the Montville Generation Station service with no backup. Further, the Montville Substation service would be lost with the direct current ("DC") system load being supplied by the station batteries, which would support DC system load for approximately 8 hours during contingency scenarios.

The costs associated with maintaining a second source of 69-kV supply to the Montville Generation Station by installing a 115-kV/69-kV transformer and associated overhead and underground lines is approximately \$10 million (order of magnitude estimate only).

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Question 9:

Is the NRG Montville Generation facility a source of the reliability issues resulting in the proposed project? If so, is NRG responsible for any of the costs with the 115-/69-kV power transformer and associated terminal equipment to interconnect the generators?

Response:

The Montville Generation Station is not the source of the reliability issues that prompted the proposed Project. The reliability issues addressed by the proposed Project are the thermal overloads and voltage violations identified in the ISO-NE 2029 Needs Assessment, as referenced in the petition. NRG is not responsible for any of the costs associated with the proposed 115-kV/69-kV power transformer and associated terminal equipment. The proposed Project is not providing a new interconnection to the Montville Generation Station. As explained in the response to Question 8, the Project will simply maintain a second 69-kV supply to the Montville Generation Station, as required by the Interconnection Agreement between NRG and Eversource.

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Question 10:

Referencing page 11 of the Petition, identify the nearest publicly-accessible recreational resource by distance and direction from the proposed project. How would the proposed project impact such resource?

Response:

The closest publicly accessible recreational area to the proposed project is a boat launch at the eastern end of Dock Road in Montville, which is approximately 0.23 mile east of the project right-of-way. It is not expected that the proposed project will have any direct impacts on the resource.

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Question 11:

Referencing page 11 of the Petition, describe any visual impacts to the Decatur Trail as a result of the proposed project.

Response:

The Decatur Trail is located across the Thames River, 0.75 mile to the east of the eastern portion of the Project area (i.e., Structure 7007). The trail is located on a parcel of land, identified as 10 Decatur Trail (<https://www.ledyardct.org/DocumentCenter/View/63/Open-Space-Index?bidId=>), and is owned and maintained by the Town of Ledyard. This parcel and associated trail provide public access to Clark Cove. No visual impacts are anticipated due to the distance, topography, and mature vegetation that separate the Decatur Trail and the Project location.

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Question 12:

Which is the tallest piece of existing equipment within the fenced Montville Substation?
Compare its height in feet with the tallest proposed equipment within the fenced substation.

Response:

The tallest piece of equipment within the fenced Montville Substation is the monopole in the northeast corner of the substation. The height of this existing monopole is approximately 95 feet. The height of the proposed replacement monopole would be approximately 110 feet.

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Question 13:

Referencing page 13 of the Petition, it states, Eversources review of the CT DEEP Natural Diversity Data Base (NDDB) indicates that portions of the Project are located within a NDDB polygon. However, there are no regulatory triggers that necessitate submission of an NDDB Review Request. Explain why submission of an NDDB review request was not necessary.

Response:

The proposed Project does not include any regulatory triggers for an NDDB review request due to the avoidance of wetland impacts and minimal ground disturbance. The Project will not affect any water resources, will not require a Connecticut Department of Energy and Environmental Protection (CT DEEP) General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, and will involve construction activities only at Eversource's existing Montville Substation and within the 1410/100 lines right-of-way – properties that have long been devoted to utility use. Eversource reviewed the CT DEEP NDDB mapping for the Town of Montville (June 2021). There are two polygons overlapping the Project area. One polygon overlaps the work area at structures 7003 & 7003A, where access and work areas will be comprised entirely of temporary construction matting. The second polygon overlaps work areas to the east of Depot Road; these areas were included as part of the work areas for Eversource's recently completed Horton Cove Circuit Separation Project. Eversource submitted an application to NDDB for that project in connection with required water resource permits and received an NDDB Determination (#202004723) indicating that impacts to State-listed species were not anticipated. The construction activities for the Horton Cove project were very similar to the work proposed for subject Project (work pad at structure 7007).

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Question 14:

Would the proposed project comply with DEEP Noise Control Regulations?

Response:

Yes, it is expected that the proposed project will comply with DEEP Noise Control Regulations. As noted in the Petition, the Project construction will result in short-term and highly localized increases in noise associated with the operation of equipment. Typical construction activities will primarily occur during daylight hours, when human sensitivity to noise is less than during the nighttime. Noise from construction activities is exempt from State noise control regulations.

The operation of the proposed new 17X 115-/69-kV transformer, which will be located in the center of the existing substation, east of the two existing 345-kV transformers, will result in a minor increase in sound levels. Tested noise levels at maximum cooling on the proposed new 17X transformer is 61.4 average decibels (dBA). Using a rounded-up value of 62 dBA, and a distance of 230 feet to the nearest fence line, and with the 17X transformer's largest tank area facing that fence line; the extrapolated sound level pressure at the fence line due solely to the new transformer is estimated at 34.5 dBA. This will not have a significant impact on the property line sound levels at Montville Substation.

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Question 15:

Would notice to the Federal Aviation Administration be required for any of the proposed structures? If yes, would marking and/or lighting be required for any of the proposed structures?

Response:

The Project would not require notice to the Federal Aviation Administration for any of the proposed structures.

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Question 16:

Referencing page 16 of the Petition, would appropriate erosion and sedimentation (E&S) controls be installed and maintained at the proposed staging/laydown area until completion of construction in accordance with project permitting and Eversource Best Management Practices (BMPs)?

Response:

Yes, as stated on page 17 of the Petition, appropriate erosion and sedimentation controls would be installed along the boundaries of the staging/laydown yard. These controls, which would be installed in accordance with procedures specified in Eversource's Best Management Practices Manual for Massachusetts and Connecticut (2016), would be inspected, and maintained until the completion of the Project.