

February 3, 2022

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

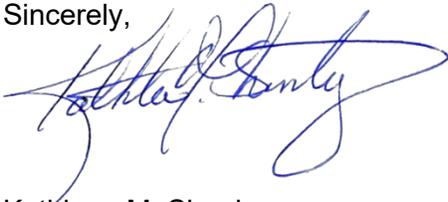
Re: Petition No. 1475 – Montville Junction to Ledyard Junction Project

Dear Ms. Bachman,

This letter provides an original and 15 copies of the response to the requests for information listed below:

Responses to CSC-01 Interrogatories, dated January 20, 2022  
CSC-01 through CSC-011.

Sincerely,



Kathleen M. Shanley  
Manager – Transmission Siting

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 1:**

What is the total estimated 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 \$22.0 million. Eversource anticipates that the entire cost will be regionalized pending the final determination of ISO New England's Schedule 12C review.

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

- Eversource Connecticut customers: 18.9%
- Other Connecticut customers: 5.8%
- Other New England customers: 75.3%

The estimated allocations are based on 2020 actual loads.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 2:**

Identify all other permits required to perform the proposed work.

**Response:**

The list of other permits required to perform the proposed work is as follows:

**Connecticut Public Utilities Regulatory Authority**

- Petition for the Approval of Method and Manner of Construction and Permission to Energize the 100, 400, 1410 and 1280 Lines

**Connecticut Department of Transportation**

- Encroachment Permit - Route 12 (Military Highway), Ledyard

**Connecticut Department of Energy and Environmental Protection**

- General Permit for the Discharge of Stormwater and Dewatering Wastewater Associated with Construction Activities
- Natural Diversity Data Base Determination

**Railroad Right of Entry Permit**

- Providence and Worcester Railroad – east side of Thames River in Ledyard for wire pulling over railroad right-of-way

**United States Army Corps of Engineers**

- Section 10 Rivers and Harbors Act and Section 404 Clean Water Act – Self Verification (SVs)

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 3:**

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

**Response:**

The heights of all replacement structures were checked using the Federal Aviation Administration's "Notice Criteria Tool" (<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>) which determined that notice would not be required for any of the proposed replacement structures. Accordingly, marking and/or lighting for the replacement structures would not be required.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 4:**

Referencing page 37 of the Petition, were there any comments from the Towns of Montville and Ledyard or property owners? If so, what were their concerns, and how were these concerns addressed?

**Response:**

There were no comments or concerns from the Towns of Montville or Ledyard. There were no concerns expressed by property owners. One property owner requested advanced notification when accessing the right of way easement on his property. This request was logged on the Project's tracking matrix and advance notification to this property owner will be provided for any planned use of the easement for access. Outreach to the municipalities and property owners will continue throughout the Project to address any concerns that may arise.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 5:**

Referring to Map Sheet 5, would the project prevent access to the parking lot at the Town of Ledyard's Glacial Park? If so, for what duration?

**Response:**

The Project would not prevent access to the parking lot at the Town of Ledyard's Glacial Park.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 6:**

Referring to Petition p. 33, Eversource proposes to use the existing conductors to facilitate installing the new conductors on the transmission structures. How long are outages expected to last to facilitate new conductor installation and splicing? What is Eversource's contingency plan to maintain power to residents and businesses in the area during the outage?

**Response:**

The outages necessary to conduct the work, as currently scheduled, are as follows:

- 1280 Line - June 2022 to July 2022
- 1410 Line - July 2022 to September 2022
- 400 Line - September 2022 to February 2023
- 100 Line - February 2023 to June 2023

The current outages, as planned, will not impact power to residences or businesses. The transmission system currently has redundancy, meaning that when one line is out of service, there would still be one or more transmission lines supplying power to the distribution system allowing power to residences and businesses to be maintained during the outages.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 7:**

Referring to Petition p. 32, what upland gravel work pad mitigation options are available to property owners?

**Response:**

When property owners express concerns about work pads and/or design options, Eversource will work with the individual property owners to discuss mitigation options on a case-by-case basis. Potential mitigation options are partly dictated by field conditions, such as the requirements for access for construction, operation, and maintenance of the transmission facilities; topography; soil conditions; drainage features, and location of the pad, among others and could include adding topsoil and seeding or removing all or part of the gravel work pad.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 8:**

Referring to Petition p. 19 and Map Sheet 4, provide details/specifications of the proposed permanent bridge. Why is a permanent bridge necessary rather than use of temporary crossing methods? What are the existing conditions at this location?

**Response:**

The proposed permanent bridge shown on Map Sheet 4 would consist of a prefabricated concrete span bridge, approximately 25-feet long and 16-feet wide, which would span a narrow section of a larger wetland area (W7). The proposed bridge would replace a former stone roadbed crossing that has been washed out over the years and is no longer functional for dependable access due to frequent flooding, accumulated sediment and wetland vegetation. The permanent bridge would provide Eversource with permanent access for maintenance and emergency activities.

This crossing would also provide a primary access route to the East Avalonia Land Conservancy ("Conservancy") property. The bridge would span the full length of the wetland area and would not interrupt natural water flow through the area, thus alleviating flooding of the access road and providing a dependable hiking trail for the Conservancy, which the Conservancy fully supports.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 9:**

Referring to Map Sheet 4, a "Span Watercourse" callout is shown for Watercourses S2 and S3. What methods would be used to span these watercourses?

**Response:**

Construction matting would be used and placed in accordance with Eversource's "2016 Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts and Connecticut" to span these watercourses and would be arranged and installed to not impede the flow of water within these two locations.

Date Filed: February 03, 2022

**Request from: Connecticut Siting Council**

**Question 10:**

Referring to Map Sheet 5, vernal pool mitigation measures are not identified for work adjacent to Vernal Pool 1, as recommended in Petition Exhibit E. What specific construction measures would be implemented to reduce the impact to Vernal Pool 1? Is it feasible to deploy temporary matting in the work area for Structures 7036 A-2 and 7036B-2 instead of installing permanent gravel pads?

**Response:**

All construction activities would comply with the 2002 Connecticut Guideline for Erosion and Sediment Control, as well as with Eversource's best management practices. Temporary construction matting would be used to the greatest extent practical to minimize impacts to VP1. For areas where matting cannot be used, silt fence (or equivalent) would be installed at the edge of the gravel between the work pad and VP1. Additionally, existing low growing (scrub-shrub) vegetation within 25 feet of the vernal pool would be maintained to the extent practicable. If scrub-shrub vegetation must be removed adjacent to the vernal pool, the cut vegetation (slash) should be left in place to serve as recruitment for leaf litter and coarse woody debris.

It is feasible to deploy temporary construction matting in a portion of the work area for Structures 7036A-2 and 7036B-2, instead of installing a permanent gravel pad. However, it is not feasible to use temporary matting in the area between Structure 7036A-2 and Structure 7036A because that area would require excavation for the installation of the underground cable. Eversource would plan to use temporary matting and appropriate erosion and sedimentation controls in the area that is within the vernal pool protection envelope to protect the vernal pool.

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**Request from: Connecticut Siting Council**

**Question 11:**

In addition to Eversource's Best Management Practices, what other specific environmental mitigation measures and/or monitoring would be conducted for construction within environmentally sensitive areas?

**Response:**

Prior to Project construction, in accordance with its BMPs, Eversource would install erosion and sedimentation (E&S) controls to avoid or minimize the potential for surface water runoff, erosion, and sedimentation to occur outside of work limits. Additional measures may be utilized to comply with environmental permit conditions, such as the Stormwater Pollution Construction Plan, which would also require a qualified stormwater inspector to monitor conformance to these requirements.

Such E&S controls include, but are not limited to, silt fencing, hay bales, and filter socks, and temporary construction matting for access roads and work pads in all but one wetland area. At stream crossings where existing culverts are not in place, temporary crossings (e.g., consisting of temporary construction matting or equivalent) would be placed to maintain water flows and avoid flooding. All temporary crossing materials would be removed following the completion of construction. Temporary matting would also be removed from wetlands, and all areas affected by construction activities would be restored to pre-construction conditions to the extent practical.

Groundwater (if encountered during structure drilling activities) would be handled and disposed of in accordance with regulatory requirements (depending on the type of material) and Eversource's BMPs. If encountered in excavations, groundwater would be pumped from the excavated area and discharged to an upland area in a location that would not result in a discharge to wetlands, waterbodies, vernal pools, or watercourses. If dewatering activities inadvertently cause sedimentation into water resources, Eversource's contractor would stop the dewatering operation until a means of controlling the turbidity is determined and approved by Eversource. If obvious polluted or contaminated groundwater is encountered, it must be reported immediately to Eversource and handled in accordance with the applicable regulatory requirements.

Except for concrete trucks, no construction equipment or vehicle washing would be allowed on the ROW. Concrete truck wash-out would be allowed only in upland areas, on-ROW locations that would avoid or minimize the potential for impacts to water resources. All wash-out areas would include measures to control and contain wash-water and collect the cement wash-off for off-site disposal.

Project construction would occur, in part, during winter months. Winter work would be conducted to further minimize or avoid adverse environmental impacts, including to wetlands and watercourses. At no time would snow removed from work pads or access roads be allowed to be placed in wetlands.

If, after the re-energization of the lines, some ROW clean-up or restoration work is completed too late in the season to initiate or complete permanent stabilization of disturbed areas (e.g., work pads or access road shoulders that require further reseeding), temporary erosion and sedimentation controls would be left in place and augmented if necessary. These measures would be periodically inspected and maintained until permanent site stabilization can be completed, likely during the spring-early summer of 2023.