

April 5, 2022

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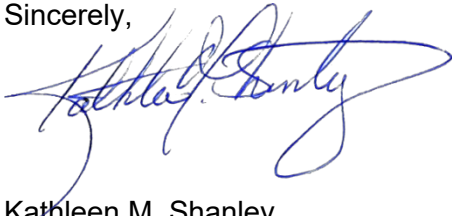
Re: Petition No. 1484 – Modifications to Gales Ferry Substation

Dear Ms. Bachman,

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

Responses to CSC-02 Interrogatories, dated February 22, 2022
CSC-14 through CSC-021.

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question14:

Referring to the response to Council Interrogatory 9, what is the distance from the proposed switch gear to the southern property line? What alternative designs were reviewed to increase the buffer to the southern property line? Please provide alternative designs that would increase the distance to the southern property line.

Response:

The distance from the proposed switchgear location to the southern property line is approximately 20 feet. The distance from the existing switchgear to the southern property line is approximately 35 feet. Due to the change in operating voltage from 69 kV to 115 kV, the 115-kV switchgear equipment is larger and requires greater clearance distance from other substation equipment. The distance between the location of the proposed 115-kV switchgear and the southern property line cannot be reduced, given the spatial limitations within the existing substation and the design criteria for the replacement equipment and the requirement that the existing 69-kV switchgear must remain in service until the new 115-kV switchgear is placed in service.

The existing substation is located on Eversource-owned property and for safety considerations, the proposed substation equipment, which also includes two new terminal structures, bus work and transformers, must be located to the south of the overhead transmission lines. There is not sufficient space within the Eversource-owned property to increase the distance between the proposed switchgear and the southern property line. Expanding the substation to the eastern boundary of the Eversource-owned property would result in additional wetland impacts and encroachment on the 100-year flood zone.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question15:

Has Eversource conducted additional outreach to the abutter at 28 Ferry View Drive regarding expansion of the substation to a distance of five feet from the property line? What were the abutters concerns, if any, and how were these concerns resolved? When was outreach conducted?

Response:

The Project Services representative briefed the abutting property owner about the project scope of work, including the expansion of the fenced area on Eversource's property, in October 2021. The property owner did not express concerns. A Project introduction letter that provided the scope of work and included the fence extension was sent in November 2021. The petition notification letter was sent February 3, 2022. A Project introduction letter for another project called "Horton Cove to Ledyard Junction Project" provided information about other Eversource work including the proposed upgrade and expansion at the Gales Ferry Substation in September 2021. Eversource Project Services Contact information was provided in all communications. No concerns or comments were received from the abutting property owner.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question16:

Petition Attachment A and Attachment B show different locations for the mobile transformer, which location is proposed? If the location in Attachment A is proposed, why was this location chosen?

Response:

The location of the mobile transformer shown on Attachment A is intended to show the approximate location. Attachment B is the more detailed drawing and the location shown in this drawing is the same location that is proposed on Attachment A.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question17:

Referring to the response to Council Interrogatory 10, why is installing a temporary mobile transformer on construction mats within a wetland considered a construction related activity under the Programmatic General Permit (PGP)? Has there been any discussion with the Army Corps of Engineers (USACE) to determine if this is acceptable considering the duration of the installation?

Response:

The temporary mobile transformer would be required to maintain electric supply reliability during construction. Temporary and permanent wetland impacts, as a result of the Project, including the temporary placement of the mobile transformer, are authorized under General Permit 6 of the Department of the Army Regional General Permits for the State of Connecticut (Effective December 21, 2021). There are no time durations or limitations associated with the use of temporary construction mats. General Permit 6 notes that "Construction mats of any area necessary to conduct activities do not count towards the impact thresholds and should be removed as soon as work is completed."

There have not been any discussions with USACE because the General Permit does not include any time duration limits for the use of temporary construction mats during the Project construction. Further, the temporary mobile transformer is needed to reduce the risk of customers losing electric service during the Project construction as explained in the response above.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question18:

Is there another location where the mobile transformer can be installed to avoid wetland impact?

Explain

Response:

There is no other location on Eversource-owned property where the mobile transformer can be installed to avoid wetland impacts. The mobile transformer must be located to allow connection to the 1410 Line. The mobile transformer location is restricted to the west by proximity to Whalehead Road, to the north by the limit of Eversource-owned property, to the south by the overhead, 100, 400 and 1280 lines and by the existing substation. To the east of the proposed location of the mobile transformer, the wetlands extend beyond Eversource-owned property. A shift of the location to the east, within Eversource's property, would not avoid wetland impact and would require additional impacts to the wetlands due to the increased length of the underground cable needed to connect the mobile transformer to the substation.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question19:

Referring to the response to Council Interrogatory 11, why is the project eligible for the USACE self-verification process if the total temporary and permanent wetland impacts associated with the project exceeds 5,000 square feet? What portion of temporary impact and/or permanent impact for this project is exempt from the Pre-Construction Notification (PCN) threshold?

Response:

The project is eligible for the USACE self-verification process because the permanent impacts to wetlands are less than 5,000 square feet. As explained in the response to Question 17, General Permit 6 states that "Construction mats of any area necessary to conduct activities do not count towards the impact thresholds and should be removed as soon as work is completed." Accordingly, the temporary impacts associated with the placement of construction mats are not considered permanent impacts and are not included in the calculation of permanent impacts. Because the permanent impacts of the Project are less than 5,000 square feet, the entire Project is exempt from the Pre-Construction Notification (PCN) threshold and is eligible for approval through the Self-Verification Process.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question20:

Under what conditions/disturbance thresholds would PGP Condition 27b (Invasive Species Control Plan) apply?

Response:

PGP Condition 27b (Invasive Species Control Plan) only applies to projects that require a Pre-Construction Notification. This project is eligible for Self-Verification and is subject to compliance with General Condition 27a, which states:

The introduction, spread, or the increased risk of invasion of invasive plant or animal species on the project site, into new or disturbed areas, or areas adjacent to the project site caused by the site work shall be avoided. Hence, swamp and timber mats shall be thoroughly cleaned before reuse.

Date Filed: April 05, 2022

Request from: Connecticut Siting Council

Question21:

Provide photographs of the location of the temporary mobile transformer and the location of the southern substation expansion area.

Response:

The following photograph shows the approximate location of the proposed mobile transformer, under the 1410 line, which is the northernmost line in this section of Eversource's property.



The following photograph shows the area of the southern expansion of the substation (looking eastward from Whalehead Road). The southern property line is located approximately 20 feet

south of the existing fence line. Starting approximately 120 feet from the southwest corner of the substation, the fence line will be extended southward by approximately 15 feet.

