

March 30, 2022

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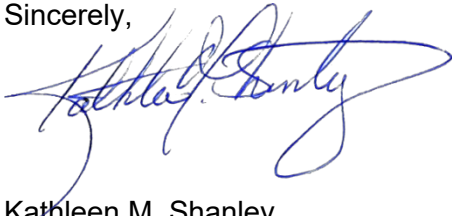
Re: Petition No. 1486 – 400/500 Lines Rebuild Project

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 March 9, 2022
CSC-01 through CSC-018.

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: March 30, 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 \$75.7 million. Of the total, \$25.4 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: 45.0%
- Other Connecticut customers: 5.1%
- Other New England customers: 49.9%

The estimated allocations are based on 2021 actual loads.

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Request from: Connecticut Siting Council

Question 2:

Identify all other permits required to perform the proposed work.

Response:

Connecticut Public Utilities Regulatory Authority

- Petition for the Approval of Method and Manner of Construction and Permission to Energize the 400 and 500 Lines

Connecticut Department of Transportation

- Encroachment Permit – Route 214 (Stoddards Wharf Road), Gales Ferry (Ledyard)
- Encroachment Permit – Route 117 (Colonel Ledyard Highway), Preston
- Encroachment Permit – Route 2 (Norwich Westerly Road), Preston
- Encroachment Permit – Route 165 (Shetucket Turnpike), Preston

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
- Section 401 Clean Water Act - Water Quality Certification

United States Army Corps of Engineers

- Section 10 Rivers and Harbors Act and Section 404 Clean Water Act – Self Verification (SVs) for work within wetlands.

Date Filed: March 30, 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 ("FAA") "Notice Criteria Tool", which determined that notice would not be required for any of the proposed replacement structures. Accordingly, marking and/or lights for the replacement structures is not required. The FAA's screening tool can be found at the following link:

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 4:

Referencing Petition p. 41, were there any comments from the Town of Preston, Town of Ledyard or property owners? If so, what were their concerns, and how were these concerns addressed?

Response:

The Town of Preston expressed concerns about the timing of the work located at the Town of Preston Community Park. The Project team coordinated with the town and scheduled this work to start in September after the softball season is complete. No concerns were expressed from the town of Ledyard.

Ten property owners requested advance notification prior to tree/vegetation removal and the start of construction. These requests were logged on the Project's tracking matrix and advance notification will be provided to these property owners prior to tree/vegetation removal and the start of construction.

One of the ten property owners noted he has two cows and requested that no permanent gravel be used in the cow pasture. No gravel will be used in the cow pasture area. This request was logged on the Project's tracking matrix.

Comments and concerns were received from a property owner on Colonel Ledyard Highway in Ledyard. The property owner expressed concerns about the removal of Atlantic White Cedar trees within the right of way easement and asked Eversource to relocate the right of way and overhead transmission lines. The property owner was provided information about the process to request relocation of the electric transmission lines and to date has declined to further pursue this request. The Atlantic White Cedar trees are considered incompatible trees within the right-of-way. The project did commit to a reduction in the clearance requirement from 35' to 25' along the transmission lines which will reduce the number of trees being removed; however, future pruning work will always be needed as Eversource is not able to clear to the edge of the right of way (power line corridor). The property owner asked what type of environmental monitoring would be used during the project. Eversource explained the Project will have construction monitoring conducted by qualified specialists (biologists, forester, scientists, archaeologists, etc.) to address project-specific resources including but not limited to protected wildlife and plants, selective tree work, wetlands/watercourse protection, and erosion and sediment control measures. The property owner had concerns about the construction matting. Eversource explained that once sections of the 500 overhead line have been removed during the construction process, we anticipate being able to reduce the construction matting by approximately one-third.

The approximate timeframe is fall 2022 and is subject to change due to weather or other unforeseen circumstances. An onsite meeting will be scheduled with the property owner prior to tree/vegetation and construction work on the property.

One property owner commented that she had an issue with dirt bikes on her property and has rocks laid across the entrance to the work pad and asked if a gate could be installed as part of the Project. Eversource will meet with the property owner prior to construction to discuss a gate installation.

Outreach will continue throughout the project to address any concerns that arise.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 5:

Describe the construction plan for the 400 Line. What is Eversource's contingency plan to maintain power to residents and businesses in the area during line outages?

Response:

The construction plan for the 400 Line is to remove it from service in order to execute the work. Prior to taking the 400 Line out of service, a mobile transformer will be installed adjacent to the Gales Ferry Substation to maintain supply to the Gales Ferry Substation by tapping off of the 115-kV 1410 Line. The mobile transformer will serve as the alternate supply for the de-energized 400 Line and will serve to maintain power to residents and businesses in the area served by the Gales Ferry Substation during the outage of the 400 Line. Upon completion of the Gales Ferry Substation modifications and the necessary improvements to the Tunnel Substation, the newly reconducted 400 Line will be energized at 115-kV (and will also then be redesignated as the 1911 Line.) The mobile transformer will be removed along with the tap to the 1410 Line. No customer power interruptions are expected during the construction.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 6:

Referencing Petition pp. 17-18, what is the status of the Phase II Archeological Survey and consultations with the State Historic Preservation Office regarding structure heights?

Response:

Heritage Consultants has completed the Phase II Archeological Survey, as well as a Phase III investigation, to confirm that replacement structure locations will not impact archaeological deposits. The Project team will also employ best management practices to avoid impacts to cultural resources that may be outside of the pole locations, including the use of temporary construction matting, temporary exclusion fencing, and on-site monitoring. The proposed protection measures and final reports have been sent to the State Historic Preservation Office (SHPO) and the tribes for approval.

SHPO indicated the Project may have viewshed impacts to two cultural resources (properties) within Historic Districts along the line. To offset the viewshed impacts at the two properties, Eversource is working with local stakeholders and SHPO on a mitigation plan, which may involve renovation of, or repair to, a historic resource within the district.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 7:

Referencing Petition p. 18, 400 Line - why is it necessary to relocate 4 structures from upland areas to locations within wetlands?

Response:

It is necessary to relocate four structures currently located in upland areas to wetland areas to accommodate the re-alignment of the 400 Line to the western edge of the existing right-of-way ("ROW") and to comply with applicable requirements of the current National Electrical Safety Code. The realignment of the 400 Line to the western edge of the ROW between Ledyard Junction and Hallville Junction and the eastern edge of the ROW from Hallville Junction to Tunnel Substation is proposed to prudently manage the limited space within the existing ROW for the installation of future lines, even though there are no current plans for an additional line within this ROW. However, if an additional line is needed in the future and the 400 Line were located closer to the center of the ROW than currently proposed, the ROW would either need to be expanded or the 400 Line would need to be relocated to provide sufficient space for the new line. Please also note that due to the realignment of the 400 Line, three structures that are currently in wetlands would be relocated to upland areas.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 8:

Can the total amount of tree clearing in uplands and/or wetlands be reduced by aligning the conductors a sufficient distance away from the existing edge of the right-of-way (ROW) managed area?

Response:

Reduction of the total amount of tree clearing in uplands and/or wetlands may be possible within the existing right-of-way ("ROW") by aligning the conductors farther from the edge of the ROW. However, doing so would be inconsistent with the prudent management of the ROW space to allow for the addition of a line in the future, although no additional lines are currently planned. Eversource considered various alignments and structure types, and the proposed alignment will locate structures as close to the ROW edges as current clearance standards allow.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 9:

Referencing the Petition Map sheets;

- a) Structures 7037 through 7053- can expansion of the maintained ROW be avoided by relocating the 400 Line clearance zone to the current maintained area of the ROW?
- b) Structures 7054 through 7070 – is it possible to install the new 400 Line in the location of the abandoned 500 Line, thereby reducing the amount of tree clearing required along the edge of the ROW?
- c) Structures 7071 – 7105 - why is it necessary to expand the maintained portion of the ROW to the east when there appears to be space within current maintained area of the ROW to accommodate the rebuilt 400 and 500 Lines?

Response:

Please see responses below:

- a) The proposed alignment maximizes the remaining right-of-way (“ROW”) width to accommodate installation of a future transmission line, though no such project is currently planned.
- b) Similar to the segment involving Structures 7037 through 7053, the proposed alignment maximizes remaining ROW width to accommodate installation of a future transmission line, though no such project is currently planned.
- c) The proposed alignment allows for the 400 Line (to be redesignated as the 1911 Line upon completion of construction and energization at 115-kV) to be constructed to the side of the existing 400 Line with minimal outage time, which was a significant consideration in the planning of the Project. Similarly, the location of the rebuilt 500 Line is proposed to be located well to the side of the existing 500 Line, with minimized outage time. The 500 Line connects the Southeastern Connecticut Regional Resource Recovery Authority generation facility (“SCRRA”) to the electric grid at Tunnel Substation. Minimizing required outage time is a significant consideration for the 500 Line construction, as the length of the outage directly impacts the ability of the SCRRA power plant to supply power.

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Request from: Connecticut Siting Council

Question 10:

Referencing Petition p. 22, what is the status of the CT DEEP and the US Army Corps of Engineers permits for working within wetlands and vernal pools

Response:

The project activities are eligible for approval by the US Army Corps of Engineers (“ACOE”) Self-Verification (“SVN”) Process and necessary SVN forms will be filed with the ACOE no later than two weeks prior to the initiation of construction, as required. As a condition of the SVN process, impacts to “special wetlands” require a Section 401 Water Quality Certificate (“WQC”) from the CT DEEP. The Project does require the removal of trees within a “special wetland” and the required application for a WQC was filed with the CT DEEP on March 22, 2022.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 11:

Referencing Petition p. 27, what is the status of CT DEEP NDDDB review?

Response:

A NDDDB Review Request was submitted to CT DEEP on November 22, 2021. NDDDB Botanist, William Moorhead provided a “target plant list” and File No. 202112002 for this project on March 2, 2022. Eversource is waiting for a Preliminary Determination letter from NDDDB to learn if any other state-listed species of wildlife need to be surveyed and whether any protective measures or mitigation will be required.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 12:

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, Eversource would install erosion and sedimentation (E&S) controls, as needed, 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.

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. 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). 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.

Eversource shall have an Environmental Inspector onsite, at a minimum of one day per week to address compliance with all environmental permit conditions, including NDDDB requirements. Additionally, a qualified professional shall also inspect all work and associated erosion and sediment control measures at least once a week and within 24 hours of the end of any rain event.

NDDDB compliance and oversight shall also be addressed with onsite inspection with intensity and duration necessary to execute all DEEP coordinated protective and mitigative measures. This shall be daily oversight in some cases/times of construction, to address work in proximity of vernal pools, state-listed plant areas, etc.

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Request from: Connecticut Siting Council

Question 13:

Referencing Petition p. 34, describe site construction inspections that are required for this project under the DEEP General Permit.

Response:

A qualified inspector (as defined by CT DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities) will inspect the site a minimum of weekly and within 24 hours of a storm that generates a discharge in accordance with Section 5(b)(4)(B) (Routine Inspections) of the General Permit.

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Request from: Connecticut Siting Council

Question 14:

Referencing Petition p. 22 and Attachment E, Inland Wetlands and Watercourse Report p. 5-Recommended BMPs, it appears that for Recommendation A, not all of the noted work pads/access roads are utilizing temporary matting. Explain why temporary matting cannot be used at each listed location.

Response:

Based on a detailed field review of all access roads and work pads, the locations for which temporary matting will not be used each have difficult topography that cannot support use of matting. As a result, these locations will need to be graded (cut/fill) to provide a safe and flat workspace for equipment.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question15:

Referring to Map Sheet 6:

- a) can the off-ROW access from Route 117 be eliminated through W15 and S3 by using alternate access from the north and south?
- b) what methods would be used to span watercourses as shown?

Response:

Please see the responses below:

- a) The off-ROW access from Route 117 shown on Map Sheet 6 provides a second point of access to the structures between Structure 7056 on Map Sheet 5 and Structure 7067 on Map Sheet 7. To remove this off-ROW access from the Project would limit the access for construction equipment to a single point of entry to the ROW from Route 117 (Colonel Ledyard Highway) to the north. This would require all construction equipment to travel the entire length of this segment. The proposed matting would not support two-way travel; therefore, vehicle congestion and associated potential hazards with the travel restriction would result. Accordingly, removing this off-ROW access would complicate the construction sequence, significantly prolonging the work period and the duration of impact to resources in this long segment.

The only viable access to this segment of the ROW is from Route 117/Colonel Ledyard Highway to the east of the ROW. Potential alternative access routes from Route 117/Colonel Ledyard Highway to this segment, if the rights could be acquired, would require crossing residential property and would also require impacts to wetlands and flood zones associated with Joe Clark Brook. Eversource does not currently have access rights to alternate access routes for this segment of the ROW.

- b) The contractor would span the watercourse (top of bank to top of bank) using timber construction matting or a rail car frame in accordance with Eversource's best management practices.

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Request from: Connecticut Siting Council

Question 16:

Referring to Map Sheet 9:

- a) can tree removal be reduced or avoided within VP-3 VP-5, VP-6?
- b) can the off-ROW access to Structure 7080 be eliminated by using the off-ROW access that extends to Structure 7081? If not, can temporary matting be used for the portion of the off-ROW access that is adjacent to VP-3?
- c) can temporary matting be used for the work pads at the Structures 7080/7080A and 7080/7081A?
- d) can temporary matting be used for the pull pad south of 7080/7080A? (similar to the pull pad south of 7079/7079A)
- e) why is temporary matting necessary within W21 and W22 if alternate access routes exist?

Response:

Please see responses below:

- a) Non-compatible vegetation (typically woody plants that grow to a mature height greater than 15-feet) need to be removed to maintain safe clearance from overhead wires. Woody vegetation in the form of lower growing shrubs shall remain to support habitat overstory.
- b) This secondary access is needed to support a two-tiered pad configuration to accommodate steep terrain. Due to the topography at this location, grading is required and matting is infeasible. The feasibility of matting was evaluated extensively by construction representatives and Eversource environmental staff at each location to minimize grading to the extent possible and yet establish safe work conditions.
- c) Same answer as b).
- d) Same answer as b).
- e) Temporary matting is required within W21 and W22 to support tree clearing necessary to maintain required safety clearances.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 17:

Referring to Map Sheets 10-11, can temporary matting through W23 and W25 be eliminated if other off-ROW access points can be used that have a reduced wetland impact?

Response:

No, both locations require matting to support tree removal work.

Date Filed: March 30, 2022

Request from: Connecticut Siting Council

Question 18:

Referring to Map Sheets 12-13, can temporary matting through W32 and W33 be eliminated by using existing access to the ROW from the west?

Response:

No, both locations require matting to support tree removal work.