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November 22, 2022

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

Re: Petition 1535 – Ledyard Junction to Mystic Substation

Dear Ms. Bachman:

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

Response to CSC-01 Interrogatories dated November 9, 2022  
Set 01 – Questions 1-29

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley".

Kathleen M. Shanley

Enclosure

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 1**

Referencing page 38 of the Petition, were there any comments from the Towns of Ledyard, Groton and Stonington or abutting property owners? If so, what were their concerns, and how were these concerns addressed?

**Response:**

There have been no comments or concerns from the Towns of Ledyard, Groton or Stonington.

Three abutting property owners had concerns:

- 1) The property owner located on Quaker Farm Road in Mystic (LL 282-197) has a horse sanctuary and indicated she prefers that a helicopter be used for the work on her property and the use of matting in the ROW be limited on her property, as matting in the ROW would make the entire area unusable for the horses. Eversource explained to the property owner that Eversource's contractor would determine if a helicopter would be used for this work.

The property owner also indicated that she would prefer the Project use the off-ROW access from her driveway to access Structure 8410 and that access to Structure 8411 be from Colonel Ledyard Highway, as this would reduce the amount of matting on her property. Eversource agreed to use these two access options. Eversource offered to install temporary horse paneling near the existing gate and fence line to block off the horses from the work zone around Structure 8410. The property owner agreed. Eversource and the property owner also agreed that a "washed sandstone" gravel would be used for the work pad for Structure 8410.

In addition, the property owner also requested 24-hour advance notice for all Project work on her property due to safety concerns related to the horses and dogs on the owner's property and Eversource agreed to such notification. Once the temporary horse panel fencing is installed, the 24-hour notice will not be needed for the duration of the work until restoration occurs and the property owner can remove the temporary horse paneling.

The property owner had some concerns about the extent of vegetation and select tree removal on her property because the trees and vegetation provide shade for the horses.

Eversource agreed to work with the property owner on restoration options for her property at the conclusion of the Project.

And, finally, the property owner had concerns about the flags the Eversource survey contractor used at the edge of the ROW. The concern is for the safety of the horses. The flags have been removed from the property and replaced with painted stakes. Eversource survey will not use flags on this property for the Project work.

- 2) The property owner located on Colonel Ledyard Highway (LL282-189) does not want Eversource to use the historical off-ROW access road, which utilizes his driveway, because he recently had it paved. The Project instead plans to access the ROW directly from Colonel Ledyard Highway by building a new gravel access road within the ROW. This new ROW access road would provide access to Structure 8414, which is located on this property owner's property and would continue to Structure 8411, which is located on LL 282-197 (referenced above). The property owner expressed concern that this new access road would allow trespassers access to his property so Eversource offered to install a new gate at the entrance from the public road and the property owner agreed to this solution.

The property owner also does not want incompatible cedar trees located within the ROW removed. Eversource explained that the incompatible trees need to be removed from the ROW to maintain vegetation clearance requirements along the transmission lines and align with industry best practices to ensure the safe and reliable delivery of electricity. The property owner requested the removal of one other tree that is located on the edge of the ROW. Eversource will have the location of this tree surveyed and will remove it if it's located within the ROW. At the conclusion of the Project, Eversource will work with the property owner on restoration options in the area from which the cedar trees will be removed.

And lastly, Eversource agreed to the property owner's request for 24-hour advance notification prior to the start of construction work on his property.

- 3) The property owner located on Colonel Ledyard Highway (LL282-186) also requested 24-hour advance notification prior to the start of construction work on this property. Eversource agreed to this advance notification and to have Project vehicles stay within the ROW and not park on his lawn.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 2**

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:**

Yes, notice to the Federal Aviation Administration (FAA) is required, and determinations have been received, for twenty-four (24) of the proposed structures. The FAA determined that marking and/or lighting is not required for any of these 24 proposed structures.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 3**

When were the right-of-ways (ROW) for the 1280 Line and the 1465/1280 Lines established?  
What public utility uses/rights are identified under the easements along the existing ROW?

**Response:**

The ROW from Mystic S/SS to Whipple Junction was established in 1963. The ROW from the Groton Town Line to Ledyard Junction was established in 1950 and expanded from 125 to 200 feet in 1965. Although some of the easements have minor wording differences, the easements grant Eversource the following public utility uses/rights:

a perpetual easement, privilege, and right of way for electric lines for the transmission of electric currents of any character necessary or convenient from time to time in the conduct of the grantee's business and the right at any and all times and from time to time to erect, inspect, operate, use, patrol and permanently maintain the said electric lines ... Said electric lines may consist of poles, towers, other supporting structures (which may be substituted one for the other at any time) circuits, cables, wires crossarms, guy wires, anchors, guy stubs and other overhead and underground appurtenances and fixtures, any or all of which constituent parts of said electric lines may be erected, relocated, replaced, repaired or changed in number, size or type from time to time.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 4**

What is the total number of existing structures over the 12.8 mile project area? How many structures within the project area will not be replaced or reinforced?

**Response:**

There are 145 existing structures over the 12.8-mile Project area. Ninety-one structures within the Project area will not be replaced or reinforced.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 5**

What is the age of the structures and conductors on each line?

**Response:**

The oldest structures existing on the 1280 Line today are from the original construction occurring between 1966-1973. Numerous structures along the line have been replaced over the years with the most recent replacements completed between 2018-2021 due to asset condition.

See the response to Question #6 for conductor type and age.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 6**

What are the size and type of the existing conductors? What is the remaining useful life of the conductors? Explain why the conductors are not being replaced or upgraded?

**Response:**

Montville Substation to Whipple Junction segment conductor is 1272kcmil 45/7 Aluminum Conductor Steel Reinforced (ACSR) – Installed in 1991 with approximately 30 to 50 years of useful life remaining\*.

Whipple Junction to Mystic Substation segment conductor is 795 45/7 ACSR – Installed in 1963 with approximately 10 years of useful life remaining\*.

Whipple Junction to Groton Town Line segment conductor is 556 26/7 ACSR – Installed in 1973 with approximately 20 years of useful life remaining\*.

*\*Useful life of ACSR conductor can vary depending on a variety of environmental factors. The conductor is routinely inspected for any wear or damage. The conductor may last shorter or longer than the approximations given due to these environmental factors.*

The conductors are not being replaced or upgraded at this time as there is no system need currently identified.



**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 7**

If the existing conductors were to be replaced or upgraded, what would be the approximate additional cost to the project

**Response:**

If the existing conductors were to be replaced or upgraded, the approximate additional cost to the project would be \$9.6 million.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 8**

Is the proposed project identified in any ISO-New England, Inc. (ISO-NE) needs and solutions analyses? Is the proposed project on the ISO-NE Regional System Plan (RSP), Project List and/or Asset Condition List?

**Response:**

The Ledyard Junction to Mystic Substation Upgrade Project (the Project) was not identified by an ISO-New England Inc. (ISO-NE) needs and solutions analysis. The Project is associated with the Asset Condition List project number 220.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 9**

Are any generation facilities listed on the ISO-NE interconnection queue associated with the proposed project? If so, please identify the generation facilities and the queue position.

**Response:**

No, there are no generation facilities listed on the ISO-NE interconnection queue associated with the proposed Project.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 10**

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 \$19.73 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:

- Customers of Eversource: 19.1%
- Other Connecticut customers: 5.9%
- Other New England customers: 75.0%

The estimated allocations are based on 2021 actual loads.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 11**

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 1280 Line

Connecticut Department of Transportation

- Encroachment Permit – Route 117 (Center Groton Road), Ledyard
- Encroachment Permit – Route 184 (New London Turnpike), Mystic
- Encroachment Permit – Route 234 (Pequot Trail), Stonington

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 (permit requirement)
  - State Historic Preservation Office Notification (permit requirement)

United States Army Corps of Engineers

- Section 404/401 Clean Water Act - Self Verification under the Connecticut General Permit

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 12**

Referencing page 6 of the Petition, 11 structures would be reinforced. What would the remaining useful life of the structures be after the reinforcements?

**Response:**

Adding reinforcements to a structure increases the remaining useful life by allowing the structure to have adequate strength to support the new shield wire. The structures were originally installed between 1966 and 1970. Based on the typical lifespan of wood poles, we would expect these structures to remain useful for approximately five to ten years after reinforcement.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 13**

How does this project relate to Eversource's project that was approved by the Council on November 20, 2020 in Sub-Petition 1293-LG-01 and Groton Utilities' (GU) 1410/400/1280 Line Structure Replacement Project in the Towns of Groton and Ledyard that was approved by the Council on February 26, 2021 in Petition 1436?

**Response:**

Sub-Petition 1293-LG-01 replaced structures (due to their asset condition) on the 400 and 1410 Lines in a small portion of the ROW subject of this Petition (between Ledyard Junction and the Groton town line). All such replacement structures were completed in April 2021, except for Structure 7406 (at Ledyard Junction) which was just completed in October 2022.

Petition 1535 relates to Petition 1436 in that both utilities are coordinating the installation of new OPGW on their respective portions of the 1280 Line.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 14**

Is the design of the project dependent upon the design of the GU project? Could any modifications to the proposed project impact the design of the Eversource and/or GU transmission lines beyond Ledyard Junction?

**Response:**

Yes, the design of the project is dependent upon the design of the GU project.

Yes, a significant modification to the proposed project could impact the design of the Eversource and/or GU transmission lines beyond Ledyard Junction. Eversource has been in coordination with GU on the design of the interconnecting structures (#126, #127) to make sure that no design related issues arise during or after construction.



**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 15**

Would any modifications be required, or have any modifications been completed, at Ledyard Junction, Whipple Junction, Mystic Junction or Mystic Substation to facilitate this project?

**Response:**

Ledyard Junction: No modifications would be required or have been completed to facilitate this Project.

Whipple Junction: The 3-way tap structure #8387 on Line 1280 is being replaced as part of this Project.

Mystic Junction: This Project will install two (2) new steel poles to facilitate the fiber optic path through the Junction using all-dielectric self-supporting aerial optical cable (ADSS). No other modifications will be required as part of this Project.

Mystic Substation: No modifications are required or have been completed to facilitate this Project.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 16**

Is the temporary construction matting for pull pads and access to the structures for the installation of the OPGW? Have other OPGW installation measures been explored?

**Response:**

Yes, the temporary construction matting is for pull pads and access to the structures for the installation of OPGW.

Yes, other OPGW installation measures have been explored. As stated on page 34 of the Petition, "helicopters may be used to install the pulling lines for the conductors and the OPGW". Eversource does not dictate the means and methods or technical execution plan for Project construction. The construction contracting is responsible for determining if and where a helicopter would be used. Typical considerations include accessibility, large river crossings, damaged static wire, schedule, manpower/equipment availability and cost.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 17**

Provide sample photos of the asset conditions associated with the structures to be replaced.

**Response:**

Please see a sampling of photographs taken of the structures proposed to be replaced due to asset condition:



Structure 8370: Woodpecker Damage



Structure 8374: Hollow Pole and severe woodpecker damage



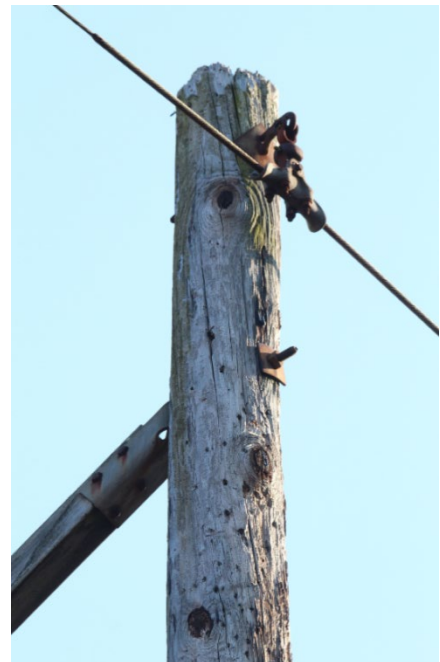
Structure 8387: Woodpecker Damage and rotted pole



Structure 8388: Woodpecker Damage and rotted pole



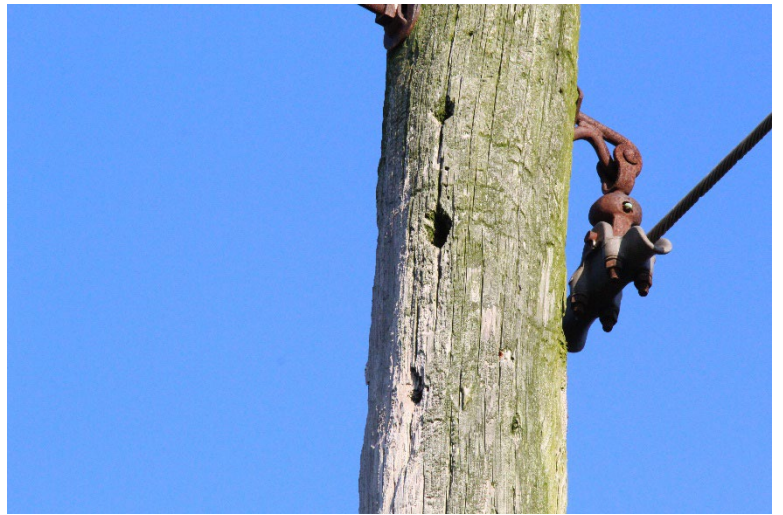
Structure 8389: Cracks and rot



Structure 8393: Woodpecker Damage and rotted pole



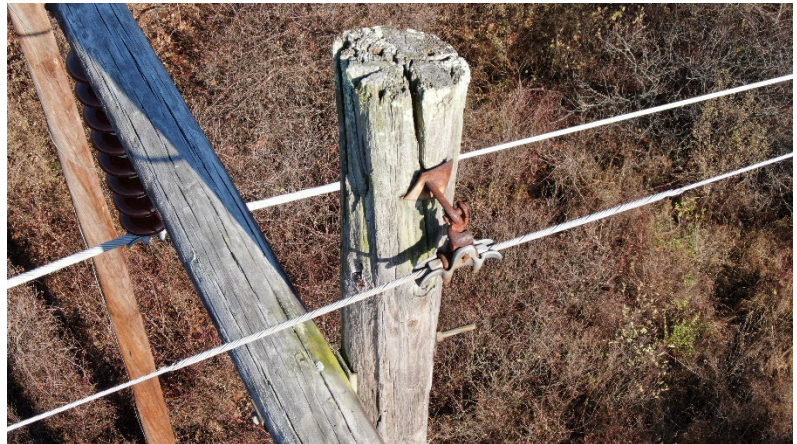
Structure 8395: Woodpecker Damage and rotted pole



Structure 8400: Woodpecker Damage and rotted pole



Structure 8420: Woodpecker damage



Structure 8426: Split pole top



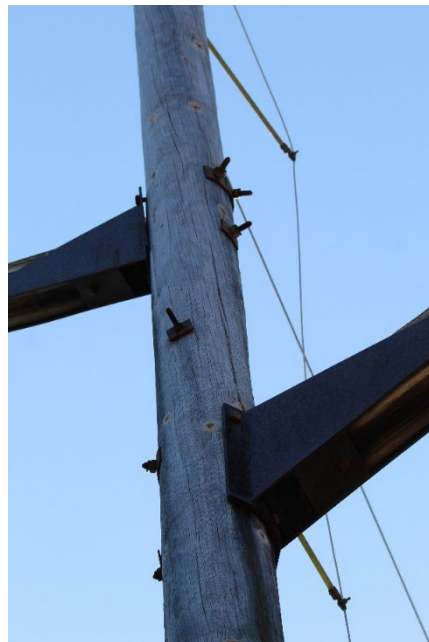
Structure 8431: Rotted pole tops and Woodpecker damage



Structure 8430: Rotted arms and cracks



Structure 115: Severe Cracks



Structure 121: pole cracks



Structure 122: Pole cracks



Structure 125: Pole top rot

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 18**

Referencing page 7 of the Petition, explain in detail the NESC clearance requirements for conductor uplift and why the existing delta configuration must be changed to a vertical configuration.

**Response:**

The change in structure configuration from delta to vertical is a design change that was made to meet edge of right-of-way (ROW) clearance and constructability concerns along the ROW. The constructability concerns were one of the larger factors and involve sequencing of how the contractor would move the conductor over to the new structures without negatively affecting the ahead and back structures. One of the negative impacts to the ahead and back structures that is reviewed is "Uplift". The term "Uplift" is a condition of wires considered in transmission design to prevent insulator tension hardware from being put into a compression load during periods of extreme cold. The insulators and hardware commonly used for typical tangent suspension structures include ball and socket connections. During periods of extreme cold, typically analyzed at -20F, the design engineers review the anticipated vertical load on the conductor attachment points to ensure that the suspension insulators will stay in tension so that the ball and socket hardware remain firmly connected and without risk of coming apart. When structures ahead or back of existing structures are replaced, often with taller structures, the new structures always are designed to current design codes and clearances. On occasion when doing this on older lines, there is a negative effect of putting the nearby structures into an uplift scenario that warrants replacing the structure.



**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 19**

Referencing pages 8 and 9 of the Petition, the average height increase of the replacement structures is approximately 9 feet. Why are structure height increases proposed, e.g. National Electric Safety Code (NESC) clearance requirements? Are the proposed structure height increases at the absolute minimum to meet these requirements?

**Response:**

No, the proposed structure heights are not at the absolute minimum to meet clearance requirements. As with any Eversource design, there is an additional safety buffer included to ensure that the clearances are maintained at all times under a variety of conditions. When determining design structure heights, the conductor clearances in both the ahead span and back span need to be considered. It is not uncommon to have clearances in one span drive the structure height in the ahead and/or back spans, especially in hilly terrain. Eversource evaluated the design to minimize structure height increases and meet clearance requirements and added a safety buffer in accordance with Eversource standards. Even though the primary driver for structure heights is to meet minimum clearance criteria, the need to mitigate insulator swing and conductor uplift contributed to structure height increases in certain locations. Conductor clearance to the supporting structure must be maintained in certain wind conditions. Lightly loaded spans tend to experience greater insulator swing in wind events. Depending on the elevation and terrain, an increase in structure height provides for more heavily loaded insulator strings, thereby reducing insulator swing. In addition to insulator swing, conductor uplift is a related and similarly undesirable phenomenon. To maintain tension on suspension insulators and other hardware, a minimal amount of "weight" should be maintained on each insulator string. Eversource analyzes uplift at the coldest reasonably anticipated temperature in its service area (-20 degrees F) when the conductor has minimal sag and maximum uplift would occur. An increase in structure height typically provides a cost-efficient solution to mitigate uplift.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 20**

What is the current status of project coordination with the new distribution line referenced on page 5, footnote 3 of the Petition?

**Response:**

The new distribution line project will be built in conjunction with the proposed 1280 Line Project construction.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 21**

Describe the clearing that will be required within the ROW to facilitate the project. To what height will vegetation be cut?

**Response:**

As stated in the Petition under Section 4, *Tree Removal and Vegetation Management*, the majority of the ROW is fully maintained and requires some focused areas of vegetation management and tree removal work. The Project will mow work pad areas and access roads, remove small amounts of non-compatible vegetation from within the maintained ROW, remove danger trees and hazard trees and prune side trees as necessary to maintain required electrical clearances. A total of 2.2 acres of upland forest habitat will be cleared and converted to scrub/shrub habitat to support the Project. The vegetation will be cut to an above ground height of 6-8 inches to limit soil disturbance.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 22**

Are CT DEEP and/or the US Army Corps of Engineers permits required for working within wetlands and vernal pools? If yes, what is the status of such permits?

**Response:**

There are no proposed activities within vernal pools.

Proposed activities within wetlands will result in minimal impacts, meet all applicable terms and conditions of the Connecticut General Permit ("GP") and are eligible for Self-Verification under General Permits 6 and 21 of the Department of the Army Regional General Permits for the State of Connecticut.

Self-Verification Notification Forms and the required accompanying materials were submitted to the U.S. Army Corps of Engineers - New England District and the Connecticut Department of Energy and Environmental Protection and an authorization letter was received on September 20, 2022.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 23**

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:**

In addition to Eversource's Best Management Practices ("BMPs"), the following mitigation measures and monitoring will be conducted within environmentally sensitive areas:

- Measures will be implemented for the protection of state-listed species documented within the Project corridor. Eversource will comply with recommendations detailed within the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Natural Diversity Database ("NDDB") Determination Letter that was received for this Project (NDDB Determination Number: 202202877, dated April 5, 2022). Protection measures include, but are not limited to, contractor training, time of year best management practices, monitoring, and installation of exclusionary features (e.g., silt or snow fencing) as directed by qualified individuals.
- Work pad restoration measures will be implemented to mitigate impacts within environmentally sensitive areas, which will include amendment of the work pad surface with stockpiled topsoil or fine process gravel, application of a native warm season grass mix, and installation of temporary erosion and sediment controls (e.g., straw mulch, compost filters, biodegradable erosion control blankets, etc.), which will be regularly inspected and maintained until final stabilization has been achieved.
- The Project Vernal Pool Report, submitted with the Petition, includes additional habitat and species protection measures that will be implemented during construction. This includes but is not limited to: avoid clearing to maximum extent practicable during the breeding period (March – end of April), protection of compatible vegetation within the vernal pool envelope, and use of elevated matting during the breeding season for work within the vernal pool envelope.
- No archeological resources eligible for listing on the National Register of Historic Places or historic properties will be affected by the proposed Project. Therefore, no BMPs are required for protection of cultural resources.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 24**

Referencing Map sheet 16 of 22, what measures would be implemented to protect and enhance the New England Cottontail habitat within the project area?

**Response:**

All work areas depicted are within a New England Cottontail (“NEC”) Focus Area. In accordance with the 2021 NEC BMPs, we have maximized the use of temporary matting to protect and preserve NEC habitat.

NEC BMP No. 10 recommends that “stonework pad sizes shall be minimized to the extent practicable.” Where topography, construction and safety dictate, typical work pads shall consist of a 50 foot x 50 foot+ stone pad surrounded by temporary construction matting, as necessary, if a larger work pad is required. This approach was implemented for Structure 8432. At this location and for others with similar constraints, the gravel portion of the pad will be enhanced by an application of processed stone, native warm season grasses and chopped straw mulch.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 25**

Has Eversource developed a Protection Plan for Wetlands and Vernal Pools in its construction plans for the project? If so, please submit the plans. If not, when would the plans be developed?

**Response:**

The Project SWPCP (approved by CT DEEP on November 10, 2022) details work areas, erosion and sedimentation control measures, and matting configurations, which are intended to protect sensitive resource areas during construction. Project work will comply with the SWPCP, Eversource's BMP Manual, which focuses on the protection of wetlands and vernal pools, Vernal Pool Report - Recommended Protection Measures (Section 9.0), and U.S. Army Corps of Engineers ("ACOE") Self-Verification Authorizations for work in wetlands (approved by ACOE on September 20, 2022). Eversource will conduct weekly inspections to ensure compliance with the BMPs, authorizations, and permit conditions.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 26**

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.



**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 27**

Has Eversource evaluated the project area for existing invasive species consistent with Section 3.10.4.1 of the Eversource April 2022 BMPs that are posted on its website? If invasive species exist, how would Eversource control the spread of invasive species for this project?

**Response:**

Yes, Eversource has evaluated the Project area for existing invasive species consistent with Section of the Eversource April 2022 BMP Manual (“BMP Manual”) and has identified invasive species within both upland and wetland work areas. Eversource will follow the practices outlined in Section 3.10, Decontamination Procedures and Methods of Cleaning, of the BMP Manual, including the following additional actions to control the potential spread of invasive species:

- Clean vehicles, equipment, materials (including matting), gear, footwear or clothing of all visible soil and plant material on site in the infested area, or as near as practical to the infested area, prior to leaving the Project site.
- Cleaning may be accomplished using a brush, broom, or hand tools, by shaking or dropping mats in a controlled manner to dislodge attached soil and debris, or compressed air.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 28**

Could restoration of disturbed areas incorporate habitat for the benefit of pollinator species, such as bees, moths and butterflies?

**Response:**

The Project will include restoration and long-term management practices that promote habitat for pollinator species. Where practical, Eversource's transmission line corridors are regularly maintained as early successional habitat that provides vital conservation benefits for wild pollinators

This Project corridor has historically been, and will continue to be, maintained as early successional habitat. Further, restoration within sensitive areas (such as Connecticut Department of Energy and Environmental Protection Natural Diversity Database areas, New England Cottontail areas, and open space areas) will incorporate habitat enhancements for the benefit of pollinator species. These enhancements will include amending gravel work pads with either stockpiled native topsoil or fine process material, and application of a native warm season grass mix.

**Date Filed:** November 22, 2022

**Request from:** Connecticut Siting Council

**Question: 29**

How will ATVs be discouraged from accessing the ROW from public roads/access points?

**Response:**

Existing gates, existing pole barriers and signage are utilized to discourage ATV's from accessing the ROW. It is standard work practice to close and lock all gates at the end of the workday. In addition, for any new access points that currently do not have gates or pole barriers installed, Eversource will install these measures upon request by the property owner during and/or after construction. During construction, Eversource will make every attempt to barricade open access points using natural features such as large rocks and downed trees.