



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 9, 2022

Kathleen M. Shanley  
Manager – Transmission Siting  
Eversource Energy  
P.O. Box 270  
Hartford, CT 06141-0270  
[Kathleen.shanley@eversource.com](mailto:Kathleen.shanley@eversource.com)

RE: **PETITION NO. 1535** – The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Ledyard Junction to Mystic Substation Upgrade Project consisting of the replacement and reconductoring of approximately 12.8 miles of its existing No. 1280 115-kilovolt (kV) electric transmission line within existing Eversource electric transmission right-of-way between Eversource’s Ledyard Junction in Ledyard and Mystic Substation in Stonington, Connecticut and related electric transmission line and substation improvements.

Dear Kathleen Shanley:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than November 28, 2022. Please submit an original and 15 copies to the Council’s office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council’s office on or before the November 28, 2022 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council’s website under the “Pending Matters” link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

MB/MP

**Petition No. 1535 - Eversource  
Ledyard Junction to Mystic Substation Upgrade Project  
Ledyard, Groton and Stonington, Connecticut**

**Interrogatories**

**Notice**

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?
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?

**Existing Facility Site**

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?
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?
5. What is the age of the structures and conductors on each line?
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?
7. If the existing conductors were to be replaced or upgraded, what would be the approximate additional cost to the project?

**Project Development**

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?
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.
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.
11. Identify all other permits required to perform the proposed work.
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?

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?
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?
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?
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?
17. Provide sample photos of the asset conditions associated with the structures to be replaced.
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.
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?
20. What is the current status of project coordination with the new distribution line referenced on page 5, footnote 3 of the Petition?

### **Environmental**

21. Describe the clearing that will be required within the ROW to facilitate the project. To what height will vegetation be cut?
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?
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?
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?
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?
26. Describe site construction inspections that are required for this project under the DEEP General Permit.

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?
28. Could restoration of disturbed areas incorporate habitat for the benefit of pollinator species, such as bees, moths and butterflies?
29. How will ATVs be discouraged from accessing the ROW from public roads/access points?