

February 1, 2023

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

Re: Petition 1549– 1714 Line Rebuild Project

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 January 11, 2023
Set 01 – Questions 1-42

Sincerely,



Deborah Denfeld
Team Lead – Transmission Siting

Enclosure

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing page 39 of the Petition, were there any comments from the City of Bridgeport, the Towns of Easton, Weston and Fairfield or abutting property owners? If so, what were their concerns, and how were these concerns addressed?

Response:

The City of Bridgeport, the Towns of Easton, and Fairfield did not provide any comments. The Town of Weston representatives explained that they needed to better understand the Connecticut Siting Council process and process for the public and municipalities.

- Eversource provided a brief overview of the role of the Connecticut Siting Council, including the following links for more details:
 - Link to CSC website:
<https://portal.ct.gov/CSC>
 - Link to CSC petition filing guide:
<https://portal.ct.gov/-/media/CSC/Guides/2016Guides/PetitionApplicationGuide912pdf>

Weston also communicated a concern about future power needs and confirmation that the proposed design of the 1714 Line could support additional power needs.

- Eversource explained the capabilities of the proposed modified transmission line and that it would provide an upgrade to transmission system capacity and reliability. Eversource further explained that the project has been designed for current and additional power needs.

There were comments from abutters directly to Eversource as a response to outreach efforts about the project, with a few abutters also contacting the Connecticut Siting Council. In general, the concerns of abutting property owners included the following items and Eversource addressed those concerns as follows:

- Restoration
 - Eversource explained its standard restoration practices and addressed any property specific questions with the respective property owners.
- Post construction visual mitigation for proposed structure heights and locations
 - Eversource reviewed post construction visual mitigation options with the property owners and committed to working with property owners on visual mitigation plans; including, but not limited to, planting plans.
- Impact to property value(s)
 - Eversource explained that following project completion, its transmission line will remain within its existing easements and that Eversource does not offer payment for claimed property devaluations resulting from the exercise of its existing easement

- rights. Eversource committed to working with property owners on post construction visual mitigations plans.
- Vegetation removal and cleanup
 - Eversource explained the required tree and other vegetation removal work and that all cut vegetation generated as part of the Project would be disposed of offsite.
 - Environmental impacts to wetlands
 - Eversource shared applicable Best Management Practices associated with the minimization of disturbance to environmentally sensitive areas (use of temporary matting, environmental monitoring, etc.) and the permitting required with property owners.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 2

Describe outreach efforts to project abutters. Over what time frame were abutters contacted? Which abutters requested further information? Were right-of-way (ROW) restoration measures described during public outreach?

Response:

Outreach efforts to project abutters commenced Q2 2022 with ongoing communication that would continue throughout all phases of the Project through restoration. Project outreach activities to date were comprised of:

- Mailed introduction letters
- Door-to-door communication
- Telephone communication
- Email communication

Project outreach provided abutters and the municipalities an overview of the Project need and scope, including details of existing infrastructure and the proposed replacements and/or upgrades, examples of typical structure cross sections and work areas, typical restoration measures, and the potential visual mitigation options for all abutters who responded to outreach attempts.

The following abutters requested further information and actions beyond the above-noted Project outreach information and Eversource followed up in response to their questions and offered mitigating activities as appropriate:

	Line List #	Address	Town
1	201-412	58 Good Hill Road	Weston
2	201-414	15 Hidden Hill Road	Weston
3	201-397	77 Lyons Plain Road	Weston
4	201-370	12 Hunt Lane	Weston
5	201-368	5 Aspetuck Glenn	Weston
6	201-348	3220 North Street	Fairfield
7	201-334	320 Misty Wood Lane	Fairfield
8	201-338	3808 Redding Road	Fairfield

9	201-331	Burr Street	Easton
10	201-272	225 Morehouse Drive	Fairfield
11	201-269	280 Morehouse Drive	Fairfield
12	201-262	105 Holiday Road	Fairfield

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 3

How many abutting parcels along the ROW that don't currently host an existing structure will host a new structure? Have any of these abutters provided comments?

Response:

Nine abutting parcels along the right-of-way ("ROW") that do not currently host an existing structure will host a new structure as part of the Project. One abutting parcel along the ROW that will host a new structure as part of the Project is owned by Eversource.

The owners of the eight additional abutting parcels that will host new structures on their respective properties were briefed about the Project and Eversource is working with them on visual mitigation plans to address their comments.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 4

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

Response:

Yes, notice to the Federal Aviation Administration (FAA) is required for twenty-two (22) of the proposed structures. The FAA determined that marking and/or lighting is not required for any of these 22 proposed structures.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 5

When was the ROW established for the Nos. 1714/1720 Lines, and the Nos. 1714/1222 Lines?
What public utility uses/rights are identified under the easements along the existing ROW?

Response:

The right of way (ROW) for the 1714/1720 Lines and the ROW for the 1714/1222 Lines were each established in 1923 and 1924.

The public utility uses/rights identified under easements along the existing ROWs typically include the right to enter upon the subject land and erect, install, inspect, operate, replace, repair and patrol, and permanently maintain on the ROW, poles and towers, with necessary conductors, wires, cross arms, guy wires and other usual fixtures and appurtenances used or adapted for the transmission of electric current for light, heat, power or any other purpose, and used and adapted for telephone purposes.

Furthermore, the easements along the existing ROWs also identify clearing rights which typically include the right to trim, cut, and remove at any and all times such trees, parts of tree, limbs, branches, underbrush within or projecting into the ROW which may interfere with or endanger said poles, towers and wires or their operation or with any of their appurtenances when erected.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 6

When was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

Eversource cyclical vegetation management in the right of way ("ROW") was conducted between September 2020 and December 2020. Work performed included the removal of incompatible tree species and side tree trimming along the maintained 80-foot ROW between Weston Substation and Old Town Substation. Also, herbicide application targeting incompatible species and select invasive species was applied within the ROW where permissible.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 7

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? If yes, identify.

Response:

The proposed 1714 Line Rebuild Project was not identified by an ISO-New England Inc. (ISO-NE) needs and solution analysis. The Project was presented to the ISO-NE Planning Advisory Committee (PAC) on November 15, 2022 and will be added to the Asset Condition List in March 2023.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 8

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: February 01, 2023

Request from: Connecticut Siting Council

Question: 9

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 \$124.290 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: February 01, 2023

Request from: Connecticut Siting Council

Question: 10

How does the project relate to other proposed, planned or constructed Connecticut reliability and asset condition projects?

Response:

The proposed 1714 Line Rebuild Project will be coordinated with the proposed 1637/1720 Lines Rebuild Project, which is targeted for submittal to the Siting Council at the end of February. The two projects include work planned for the right of way (ROW) corridor from Norwalk Junction Substation in Wilton, to Weston Substation in Weston to United Illuminating's (UI) Hawthorne Substation in Fairfield to UI's Old Town Substation in Bridgeport. The 1714 Line Rebuild Project includes all work planned in the ROW east of Weston Substation, as well as one replacement structure (existing Structure 926) west of the Weston Substation.

In addition, the Project will be coordinated with UI's Old Town Substation Rebuild Project which was approved by the Siting Council in Docket 490.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 11

Is the design of the project dependent upon the design of any United Illuminating Company (UI) project? Could any modifications to the proposed project impact the design of the Eversource and/or UI transmission lines beyond Hawthorne Substation?

Response:

The Project is not dependent on the design of any United Illuminating Company (UI) projects. The proposed Eversource Project terminates with dead-end structures just to the west of Kaechele Place in Bridgeport. Once Eversource replaces its structures located on UI's Old Town Substation property per Siting Council Docket 490, Eversource plans to reconductor from proposed Structure 19701 and proposed Structure 19701A to its replacement structures on the Old Town Substation property. A change to the proposed conductor size for the portion of the Eversource Project involving the 1222 Line may affect minor aspects of the design of Old Town Substation, such as relay settings.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 12

What modifications, if any, are necessary at Hawthorne Substation to connect the Eversource circuits to UI-owned and operated facilities?

Response:

United Illuminating (UI) may be required to install new tap conductors from UI's existing terminal structure to its existing equipment at Hawthorne Substation. Eversource is working with UI to ensure that no modifications would be required to UI's terminal structure to connect the Eversource circuits.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 13

Referring to Petition Attachment 1 - Map Sheet 14 and Petition No. 1370, to which existing Eversource structure is the UI overhead fiber line connected? Would the fiber line be connected to a replacement Eversource structure? If yes, which structure and at what height?

Response:

The existing UI overhead fiber line is connected to existing Eversource structure 872D at Hawthorne Substation.

The UI overhead fiber line would be relocated, along with the splice can, to proposed Eversource structure 19717. The proposed attachment height would be approximately 40 feet above ground, similar to the existing attachment height.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 14

Identify all other permits required to perform the proposed work.

Response:

Connecticut Department of Energy and Environmental Protection

- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
- Natural Diversity Data Base Determination
- State Historic Preservation Office Notification
- Special Use License

United States Army Corps of Engineers

- Self-Verification Notification under Connecticut General Permits 6 and 21

The Public Utilities Regulatory Authority

- Approval for Method and Manner of Construction

Connecticut Department of Transportation

- Encroachment Permits for Routes 15, 57, 58, 59 and 136.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 15

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

Response:



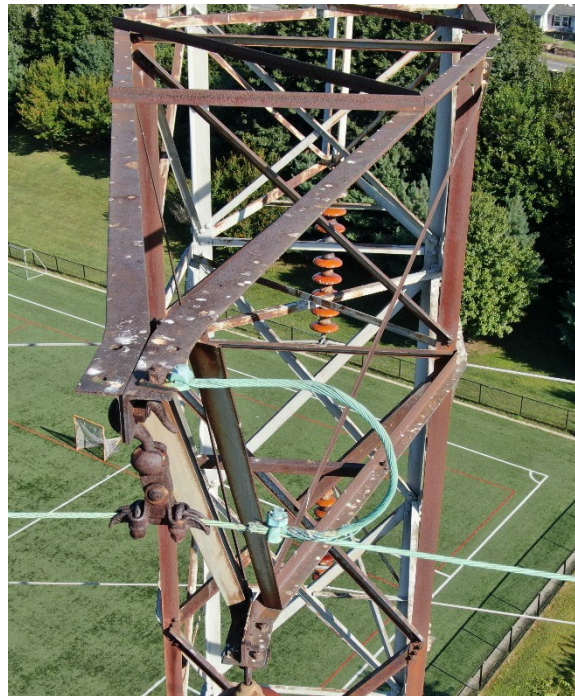
Structure 859 - rust on structure and hardware



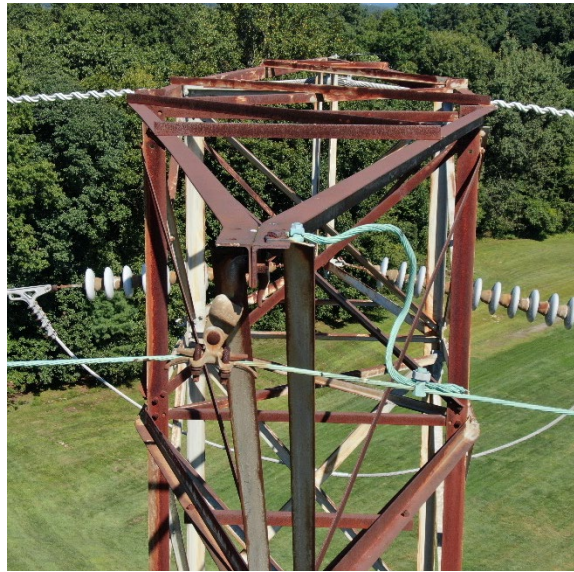
Structure. 860 - rust on structure and hardware



Structure. 861 - foundation damage



Structure. 863 - rust on structure and hardware



Structure. 869 - rust on structure and hardware



Structure. 872 - rust on structure and hardware



Structure. 887 - foundation damage



Structure. 888 - foundation damage



Structure. 889 - foundation damage



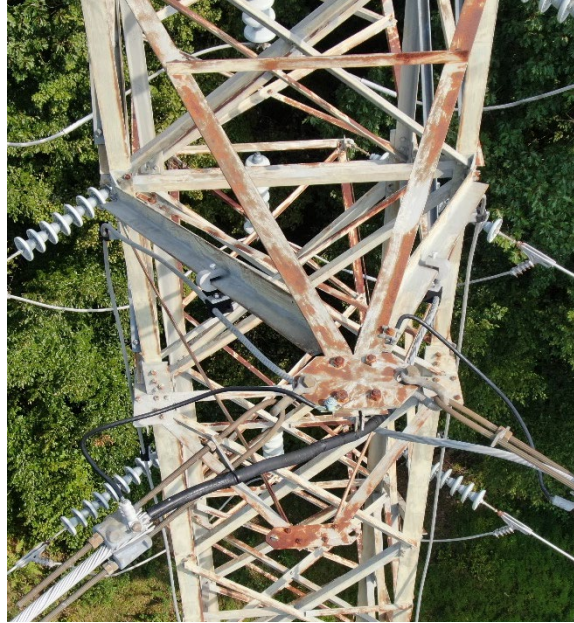
Structure. 890 - foundation damage



Structure. 891 - foundation damage



Structure. 892 - foundation damage



Structure. 894 - rust on structure and hardware



Structure. 897 - rust on structure and hardware and bent arm



Structure 899 - rust on structure and hardware



Structure 901 - rust on structure and hardware

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 16

Referring to Petition p. 22, - Explain in detail the NESC clearance requirements for conductor sway due to wind (blow out)

Response:

Eversource design criteria for conductor sway (blowout) is primarily based on National Electrical Safety Code (NESC), which has horizontal clearance requirements that Eversource applies to the edge of the rights of way (ROWs). NESC Rules 234C and 234G result in a calculated clearance requirement of 9.1 feet of clearance to edge of the ROW for 115-kV conductors displaced by a 6 pounds per square foot (psf) wind. To provide a buffer for construction tolerance, Eversource typically designs transmission corridors so that 115-kV conductors meet or exceed 11 feet of clearance to the edge of ROW during a 6 psf wind event.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 17

Could the number of additional structures proposed within the existing ROW be reduced by utilization of anti-galloping devices or other design options? Explain.

Response:

The number of additional structures cannot be reduced by utilizing anti-galloping devices or other design options within this narrow right-of-way ("ROW").

Due to the terrain, galloping is not expected to occur. Most of the Project area has undulating terrain and significant nearby tree cover and vegetation. Galloping is most commonly observed on transmission lines traversing flat, open areas. Examples include water crossings and fields.

One design option to reduce blowout is to specify higher ("damped") conductor tensions than are typically used. However, conductors placed in damped tension frequently require vibration dampers to mitigate wind-induced conductor motion. This technique was evaluated but concluded that blowout clearance requirements would still not be met for all spans. The purpose of the additional structures is generally to restrain the conductors and fiber optic ground wire (OPGW) in blowout conditions.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 18

Referring to Petition p. 9 and Attachment C, the increase in structure heights listed in the “Vegetation Only” column vary from 12 to 34 feet. What methodology was applied to determine the necessary height increase related to vegetation?

Response:

Eversource used aerial survey information (LiDAR) to determine the approximate heights of existing trees that are adjacent to proposed structures. At each location, Eversource assumed a tree of the determined approximate height would fall from the right of way edge into the right-of-way. The structure framing and type depicted by cross-section 01002-85006p001 was considered for all locations to simplify the analysis. The analysis objective was to maximize the number of locations where a falling tree would not strike the lowest phases of the circuits

Eversource then determined design structure heights resulting from typical National Electrical Safety Code and Eversource design criteria (required vertical clearance to ground or objects, insulator swing and uplift, etc.). In locations where typical design criteria governed structure height (for example, vertical clearance to a roadway), and existing vegetation was not a factor to drive additional structure height, Eversource proposed the structure height determined from typical design criteria. Eversource proposed a maximum structure height increase of 5 to 10 feet above the typical design criteria at structure locations identified in the vegetation criteria check, which is accounted for in the 12 to 34 feet overall proposed structure height increases in the “Vegetation Only” column.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 19

Referring to Petition p. 9, when construction is complete and the transmission lines are in operation, what is the predicted flashover rate of the transmission lines?

Response:

Eversource does not actively predict disturbance rates due to vegetation but seeks to minimize disturbances and damage due to vegetation. The mitigation measures discussed in the Petition are an effort to reduce the disturbance rate of the Project area to a 115-kV typical target rate of 3 disturbances per 100 circuit miles per year. This rate is calculated using a minimum period of seven years of historic data.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 20

Why are larger capacity conductors proposed for each line?

Response:

The primary driver for Eversource to propose larger conductors for each line of this Project is to minimize conductor displacement under wind conditions, also referred to as conductor sway or blowout. For a linear increase in conductor diameter and wind sail area (surface area upon which wind can act), conductor weight increases quadratically, which reduces the propensity for insulator swing and conductor displacement. The application of larger conductors for use in relatively narrow transmission line corridors has been a routine practice on past Eversource projects, such as the 1990 Line Structure Replacement Project, Connecticut Siting Council Petition No. 1058 and the Stevenson to Pootatuck Rebuild Project, Connecticut Siting Council Petition No. 1527.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 21

Provide the total number of proposed structures over the 9.4-mile long project area

Response:

The total number of proposed structures over the 9.4-mile long project area is 114.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 22

Referring to Petition p. 21, has the State Historic Preservation Office commented on the Phase 1B survey?

Response:

The Phase 1B survey report submitted to the State Historic Preservation Office (“SHPO”) in November 2022. On January 30, 2023, SHPO responded and concurred with the findings of the Phase 1B report that “no historic properties will be affected by the proposed Project”.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 23

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:

Yes, the Project requires permits from the Connecticut Department of Energy and Environmental Protection ("CT DEEP") and U.S. Army Corps of Engineers for work activities within wetlands. There are no proposed Project activities directly within vernal pools.

Proposed work activities within wetlands would result in minimal impacts, would meet all applicable terms and conditions of the Connecticut General Permit, and would be 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 would be submitted to the U.S. Army Corps of Engineers – New England District and the CT DEEP in advance of Project construction.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 24

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 which include the use of temporary construction matting and restoration after the removal of matting, Eversource would comply with recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Natural Diversity Database ("NDDB") Determination Letter that was received for this Project (NDDB Determination Number: 202201181, dated February 24, 2022). Protection measures would include, but would not be limited to, providing 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.

Gravel work pad restoration measures would also be implemented to mitigate impacts within environmentally sensitive areas, which would 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 would 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 would be implemented during construction. This includes but is not limited to avoiding civil construction near vernal pools to the maximum extent practicable during high sensitivity periods for the observed vernal pool indicator species, and protection of compatible vegetation within the vernal pool envelopes.

Weekly and monthly inspections would be completed per permit requirements during construction and restoration activities.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 25

Has a Wetland/Watercourse Protection Plan been developed for this Project? If yes, provide. If no, when would the plans be developed?

Response:

The Project Stormwater Pollution Control Plan (“SWPCP”), submitted to the Connecticut Department of Energy and Environmental Protection on January 6, 2023, details work areas, erosion and sedimentation control measures, and matting configuration, which are intended to protect sensitive resource areas during construction. The Project work will comply with the SWPCP and with Eversource’s Best Management Practices (“BMPs”), which focus on the protection of wetlands and vernal pools, the Vernal Pool Report – Recommended Protection Measures (Section 9.0 of the Petition), and the U.S. Army Corps of Engineers Self-Verification Authorizations for work in wetlands. Eversource will conduct weekly Inspections during active construction within these areas and during restoration to ensure compliance with the BMPs. Applicable agency authorizations, and permit conditions.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 26

Describe site construction inspections that are required for this project under the DEEP General Permit.

Response:

In accordance with Section 5(b)(4)(B) (Routine Inspections) of the General Permit (“GP”) inspections will be conducted by a “Qualified Inspector”, as defined in the GP, at least once a week throughout the duration of construction activities and after a storm event. Inspections will occur within 24 hours of the end of a storm that generates a discharge that equals or exceeds 0.5 inches and upon the start of subsequent normal working hours for storms that generate less than 0.5 inches of discharge.

In accordance with the GP, Eversource will also conduct monthly inspections after construction activities are complete to assure the Project has achieved final stabilization for one full growing season in the year following construction completion.

Finally, a qualified soil erosion and sediment control professional or a qualified professional engineer will inspect the Project after construction completion to confirm compliance with the post-construction stormwater management requirements of the GP. A report shall be prepared and certified in order to complete and file a Notice of Termination form for the Project ending inspection activities.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 27

What measures would be undertaken to protect public drinking water resources?

Response:

As stated in the Petition under Section 5 Water Supply, Eversource would require its contractors to employ best management practices for the proper storage, secondary containment, and handling of diesel fuel, motor oil, grease, and other lubricants, to protect water quality within the Project area. Construction activities would conform to Eversource's and Aquarion's best management practices, as well as to the requirements of Project-specific plans (e.g., Stormwater Pollution Control Plan; Spill Prevention and Control Plan), which would be prepared prior to the commencement of construction.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 28

In what areas could temporary construction matting, or other method, such as soil/seeding, be used instead of gravel pads (where topographic conditions allow)? Explain

Response:

There are nine locations within New England Cottontail (“NEC”) areas on the Project that propose gravel work pads that could be constructed with temporary construction matting. These nine locations include work pads associated with structures 19754, 19750 and 19750A, 19749, 19744 and 19744A, 19743, 19741, 19740, 19739, and 19703 and 19703A. A detailed assessment of each proposed work location was conducted with a goal to provide safe construction and future maintenance work surfaces, and, where feasible, to avoid, minimize, and/or mitigate impacts to recreational areas, protected open space, National Diversity Data Base areas, NEC areas and manicured or cultivated portions of residential properties.

Upon construction completion, a 50’ x 50’ gravel work pad would remain at all nine locations within the NEC areas for future maintenance, with the remainder of the proposed gravel work pad to be restored with processed stone and native grass seed.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 29

Referring to Petition Attachment 1 - Map Sheet 14, why is a gravel pad proposed for work adjacent to the Hawthorne Substation for Structures No. 19719, 19718, 19717, 19717A?

Response:

A gravel pad was proposed for work adjacent to Hawthorne Substation due to the existing variable topography within the ROW, making the installation of matting not practical at this location.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 30

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 5, Tree Removal and Vegetation Management, the Project would be constructed within the currently maintained portion of the ROW, requiring select vegetation removals, trimming and mowing, with the exception of Structures 19783 and 19783A. This location would require limited in-ROW tree clearing of approximately 0.6 acres of forested habitat to accommodate the construction of the proposed structures and the associated work pad and access road.

The vegetation would be cut to an above ground height of 6-8 inches to limit soil disturbance.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 31

Describe vegetive removal to facilitate the installation/operation of Structures Nos. 19720A, 19720, 19719, 19718, 19717, 19717A?

Response:

Mowing and the removal of 3-5 trees will be required within the existing 80-foot right-of-way (ROW) to facilitate the construction of work pads necessary for structure installation of Structures 19720A, 19720, 19719, 19718, 19717 and 19717A. During construction, the need for in ROW limb trimming will be evaluated and executed as needed. Vegetation, such as hazard trees, that are located outside of the ROW limits will not be removed unless approved by the property owner.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 32

Has Eversource evaluated the project area for existing invasive species consistent with Section 3.10.4.1 of the Eversource April 2022 BMPs? If invasive species exist, how would Eversource control the spread of invasive species?

Response:

Yes, Eversource has evaluated the Project area for existing invasive species consistent with Section 3.10.4.1 of the Eversource April 2022 BMP Manual (“BMP Manual”) and has identified invasive species within both upland and wetland work areas. Eversource would follow the practices outlined in Section 3.10 of the BMP Manual, Decontamination Procedures and Methods of Cleaning, including the following additional actions to control the potential the 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: February 01, 2023

Request from: Connecticut Siting Council

Question: 33

Referring to Petition Attachment A- Map Sheet 5, can structure No. 19763 be relocated out of the vernal pool envelope of Vernal Pool 1?

Response:

Yes, it is possible to relocate Structure 19763 to the east, outside of the vernal pool envelope. Eversource will make this change.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 34

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

Response:

Yes. The Project would 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 of fine process material and application of native warm season grass mix.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 35

What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?

Response:

Excavated soils from the Project that cannot be used as backfill would be regraded into adjacent uplands and stabilized in accordance with Eversource Best Management Practices (“BMPs”) manual and the Stormwater Pollution Control Plan. Any excavated soils that cannot be reused on the property from which they were excavated would be transported from the Project area and properly managed off-site in accordance with Eversource BMPs.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 36

Referring to Petition p. 20, what is the status of the Town's request that Eversource avoid restoring old roads, now used as hiking trails, for off-ROW access within Brett Woods Conservation Area?

Response:

Eversource has agreed to the Town of Fairfield's request to leave proposed off-ROW gravel access roads within the Brett Woods Conservation Area in place after construction is complete so that they may be used as upgraded walking / hiking trails and for future Eversource access.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 37

Referring to Petition Attachment A - Map Sheet 5, can Structure No. 19763 be accessed using the ROW access from Structure No. 19762, eliminating the need for a second access from North Street?

Response:

Yes, access within the right-of-way ("ROW") to Structure 19763 is physically possible from Structure 19762. Eversource does not consider the in-ROW access route from Structure 19762 to Structure 19763 to be a prudent option based on safety concerns related to grade changes within the ROW, the need for extensive hammering, installation of fill, and regrading, and the greater impact to terrain in the Brett Woods Conservation Area. As requested by the Fairfield Conservation Commission, the proposed permanent gravel off-ROW access roads from North Street would provide a safer and level walking surface for public use as well as provide future Eversource access. Eversource has obtained off-ROW access rights from North Street to complete construction activities associated with proposed Structure 19763.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 38

Referring to Petition Attachment A - Map Sheet 6, if access rights are obtained across Parcel 201-248 (3220 North Street), would the temporary access road through Wetland 17 be necessary? Explain.

Response:

Temporary access through Wetland 17 would not be required if off right-of-way ("off-ROW") access rights are acquired across parcels #201-348 (3220 North Street) and #201-347 (3250 North Street).

Eversource approached the property owners regarding temporary off-ROW access rights and has not been able to secure an agreement.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 39

Describe measures that will be taken to ensure the safe use of public recreational trails that cross the ROW.

Response:

Eversource will follow all applicable BMPs associated with construction on or around existing hiking trails. The Project will coordinate with the Town(s) in advance to inform the public of temporary trail closures during active construction. Signage will be posted at the trail head and near the ROW indicating temporary trail closures, spotters will be used while moving equipment, and temporary construction fencing may be installed as needed to provide additional barriers to the construction zone. Prior to the end of each workday the site will be left in safe condition (no open holes) and equipment and construction materials will be placed off of hiking trails that cross the ROW.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 40

Describe post-construction construction cleanup procedures in the ROW, including the disposition of woody debris. In what areas will woody debris and other natural materials be disposed of? Have abutters been notified of the disposal areas?

Response:

As stated on page 36 of the Petition, "Restoration activities would include the removal of construction debris, signage, flagging, and temporary fencing, as well as the removal of construction mats and work pads that are designated for removal. Areas affected by construction would be re-graded as practical and stabilized using revegetation or other measures before removing temporary E&S controls. Eversource would perform ROW restoration in accordance with the protocols specified in Eversource's BMPs and in consultation with affected property owners."

Woody materials that will be cut as part of the Project will be removed and disposed of offsite in accordance with Eversource BMPs for removal of woody vegetation. Woody debris remaining from previous construction activities that are located on proposed access roads or work pad areas will also be removed and disposed of offsite in accordance with Eversource BMPs. Please refer to Attachment E, section 9.D. of the Petition for woody debris removal procedures in proximity to vernal pools.

Excess soils generated from construction activities will be spread in disturbed upland areas as practical to restore grades as part of restoration or disposed of offsite.

Abutters responsive to outreach attempts have been notified that woody and natural materials will be removed and disposed of at an offsite location.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 41

Describe construction procedures for removal, disposal or restoration of stone walls within the construction areas.

Response:

Sections of stone walls located in property owner-maintained yards that are within proposed locations for access roads and work pads will be temporarily dismantled, placed in ROW outside of active work zones during construction, and restored to original condition following construction, unless otherwise directed by the property owner.

Stone walls located outside of property owner-maintained areas will be dismantled, with the stones relocated in ROW outside of access roads and active work zones.

Date Filed: February 01, 2023

Request from: Connecticut Siting Council

Question: 42

Referring to Petition p. 37, magnetic fields are described from the proposed double circuit structures. Would magnetic field levels change for conductors installed on the proposed single circuit structures?

Response:

The proposed single circuit structures that are located along tangent segments of the corridor generally maintain the same circuit separation and distance to edge of ROW as the double circuit structures. Because the conductor positions are not significantly changing, Eversource does not expect significant magnetic field changes at those locations. However, there are some constraints at various angle structure locations, such as the narrow ROW, the ability to erect new structures and reconductor in proximity to existing towers, and also public roads and private parking areas within the ROW. The location of angle structures varies somewhat at each angle point, and the conductor positions change relative to the ROW edges.

For the Weston Substation-Hawthorne Substation segment of the Project, peak and ROW edge magnetic field levels at single circuit angle structure locations are predicted to further increase by an average of 5 mG, with one peak ROW edge increase of approximately 8 mG above the values depicted at typical proposed double circuit locations.

For the Hawthorne Substation-Old Town Substation segment of the Project, peak and ROW edge magnetic field levels at single circuit structure locations are predicted to further increase by an average of approximately 6 mG, with one peak ROW edge increase of approximately 11 mG above the values depicted at typical proposed double circuit locations.

Looking in the direction of the right-of-way, as one travels from the location of single circuit structures toward adjacent double circuit structures, the increased field effect diminishes. At the half-span point, the magnetic fields would be very similar to the predicted values at double circuit locations.

The magnetic fields in all these locations will still be orders of magnitude below the International Council on Non-Ionizing Radiation Protection ("ICNIRP") guideline of 2,000 mG for the general public as recognized by the World Health Organization.