

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing pages E-1 through E-3 of the Petition, were there any comments from abutting property owners? If so, what were their concerns, and how were these concerns addressed?

Response:

The largest abutter for this proposed Project is the City of Norwalk (City). The Company began working with municipal officials in 2016 to find a route that meets the Connecticut Department of Transportation's (CDOT's) need for the transmission lines to be relocated, the Company's need of providing reliable electric service, and the City's concern of minimizing community impacts. The City's number one request was that we place the relocated transmission lines underground and beneath the Norwalk River with no new overhead transmission structures in South Norwalk. The City also asked the Company to minimize its footprint on any parcels that might be developed in the future.

Moving from west to east, the first City-owned parcel where the Company proposes to install new transition transmission structures, as well as underground conduit and cables, is the Norwalk Police Department. In order to minimize impacts to the operation of the Police Department, we focused on limiting the footprint within the Visitor Parking lot. This includes placing the two new transition structures as close to the railroad tracks as possible. It also includes designing the underground conduit portion of the Project to minimize the construction footprint. This will allow for a number of existing parking spaces to be available for police station visitors during construction.

As part of the river crossing, the Company proposes installing the conduit and cables under a portion of the north Visitor's Dock in Veteran's Park. The Company accommodated the City's request to place the conduit and cables beneath the riverbed as deep as possible, as well as maximizing the distance between the conduits and the existing dock pilings.

As the conduits and cables come ashore, they will be beneath the parking lot traversing into vaults located within Fort Point Street. The proposed Horizontal Directional Drill (HDD) design accommodates the City's request to not impact the existing pump station in the Park. The City agreed to allow the Company to use portions of Veteran's Park as a construction staging area. The Company will restore any disturbed areas.

Conversations concerning traffic mitigation along City streets and the City's preferred work hours in certain areas are ongoing.

There are two privately owned parcels where the Company proposes to install new infrastructure. On the western side of the Project is the SoNo Gardens parcel, which is between Monroe Street (to the south) and Madison Street (to the north). Representatives of the SoNo Gardens condominium association asked the Company to minimize the overall impact to its property. The Company was able to locate the new transmission structure (524WN) to the eastern edge of the SoNo Garden property to minimize taking up any of its green space or decreasing the amount of parking spaces in the east lot.

On the eastern side of the Project, the proposed route comes off Fort Point Street and a very short portion of underground route cuts across a large parking lot at 25 Van Zant to reach the railroad corridor where the Company will transition back to being on CDOT property. The Company has agreed with the property owner to restore any disturbed areas.

The Project Team will continue to perform door-to-door outreach to abutters during construction.

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Request from: Connecticut Siting Council

Question: 2

Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?

Response:

As explained in the Petition, once the transmission relocation project construction has been completed (and the relocation transmission facilities energized), the Connecticut Department of Transportation will undertake the removal of the de-energized section of transmission facilities within the railroad corridor and at the existing Bridge crossing.

The Amended and Restated Transmission Line Agreement between the State of Connecticut, Department of Transportation (“CTDOT”) and The Connecticut Light and Power Company (“Eversource”), dated as of May 5, 2000 (the “License”) provides that Eversource and CTDOT “will share on an equal basis the costs for one relocation of the Transmission System at each of the two bridge crossings of the Saugatuck River and the Norwalk River.” In addition, Eversource and CTDOT entered into a Cost Sharing Agreement, dated July 22, 2021, to implement the sharing of the transmission relocation project costs in accordance with the License.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 3

When were the #1028 and #1146 Lines first installed along the railroad right-of-way (ROW)?
Where does each line originate and terminate?

Response:

The 1146 Line originates at SONO Substation located at 229 Dr. Martin Luther King Drive in South Norwalk and terminates at Sherwood Substation located at 7 New Creek Road in Westport. The 1028 Line originates at Darien Substation located at 123 West Ave in Darien and terminates at Fitch Substation at 6 Fitch Street in Norwalk. The original catenary support structures for the railroad were originally constructed in 1912. The bonnet attachments supporting the overhead transmission lines were originally constructed in 1967-68.

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Request from: Connecticut Siting Council

Question: 4

What is the width (or an approximate range of widths) of the railroad ROW in the Project area?

Response:

Within the Project area, the railroad ROW varies in width between 100 feet and 140 feet.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 5

What is the age of the existing structures and conductors on the #1028 and #1146 Lines at the existing facility site?

Response:

Installation of the 1590-kcmil "Lapwing" conductor on the 1028 Line was completed in 1992 and the installation of the 1272-kcmil "Bittern" conductor on the 1146 Line was completed in the late 1960's. The catenary structures with high towers crossing the Norwalk River were originally constructed in 1912 and the 1028 was converted to single-circuit monopoles along the railroad ROW in 1992.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 6

What are the size and type of existing conductors on the #1028 and #1146 Lines?

Response:

The existing conductor on the 1146 Line is 1272 kcmil Aluminum Conductor Steel Reinforced 45/7 "Bittern" and the existing conductor on the 1028 Line is 1590 kcmil Aluminum Conductor Steel Supported 45/7 "Lapwing".

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Question: 7

Referencing page 1 of the Petition, Footnote 3, Eversource notes that it “has existing rights to be located in the railroad corridor.” What public utility uses/rights are identified under the easements along the existing railroad corridor?

Response:

Eversource has a Transmission Line Agreement (“License Agreement”) with CDOT to use railroad property/right-of-way allowing Eversource to install, maintain and operate electric facilities and communications facilities (for its operations). The License Agreement is silent on the rights of other public utilities and Eversource is unaware of any other public utility uses or rights along the railroad corridor within the Project area.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 8

Referencing page 2 of the Petition, provide the license agreement language that requires Eversource to relocate the two transmission lines. Provide the reasons why the Connecticut Department of Transportation (CDOT) cannot accommodate the lines on the new bridge.

Response:

The Amended and Restated Transmission Line Agreement Between the State of Connecticut Department of Transportation and The Connecticut Light and Power Company (the License Agreement”), ARTICLE X, FUTURE CHANGES, Section (a) states, in part:

The Power Company agrees to make, or cause to be made, such changes in its Transmission System, including without limitation the addition of the State’s Structures, and the independent structures erected by the Power Company, as may be required from time to time to conform to changes in railroad facilities with which the location of the Transmission System may interfere, provided that (i) such changes are in compliance with the applicable provisions of the National Electric Safety Code...

The reasons why CDOT cannot accommodate Eversource's lines on the new bridge (and why relocation of Eversource’s transmission lines is required) are explained in the attached March 12, 2020, letter from CDOT to Eversource. In addition to the reasons stated in that letter, the new bridge will be a vertical lift bridge that opens to allow the passage of vessels. Accordingly, it is not feasible to attach the cables to a bridge of that design.

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Request from: Connecticut Siting Council

Question: 9

What is the distance between the Norwalk Bridge and the Stroffolino Bridge? Was the Stroffolino Bridge considered as a potential location for the relocated transmission facilities? If yes, why was this option rejected?

Response:

The Stroffolino Bridge is located approximately 600 feet south of the Norwalk Bridge. The Stroffolino Bridge is a vertical-lift bridge that allows for passage of larger vessels on the Norwalk River. Accordingly, it would not be possible to attach transmission cables to the bridge as part of a relocation option.

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Request from: Connecticut Siting Council

Question: 10

Pages A-14, B-8 and C-3 of the Petition reference as part of its Norwalk Bridge replacement project, CDOT would remove the de-energized section of transmission facilities (structures and extensions, including, but not limited to, the high bridge crossing catenaries) from within the railroad corridor.

- a. Who would dispose of the de-energized section of transmission facilities?
- b. Are any or all of the transmission facilities recyclable? If not, how would they be disposed?

Do any or all of the transmission facilities have a salvage value? Explain

Response:

Please see response below:

- a. CDOT would perform the removal activities for the deenergized transmission lines in coordination with the demolition plan for the Walk Bridge replacement.
- b. The existing transmission facilities are recyclable and would be recycled by CDOT along with the rest of the structural steel from the bridge replacement.

Yes, the existing facilities that would be removed do have a salvage value and the estimated salvage value has been incorporated into CDOT's removal cost estimate. The removal cost as reduced by the salvage value would be shared by Eversource in accordance with the terms of the Amended and Restated Transmission Line Agreement between CDOT and Eversource, dated as of May 5, 2000.

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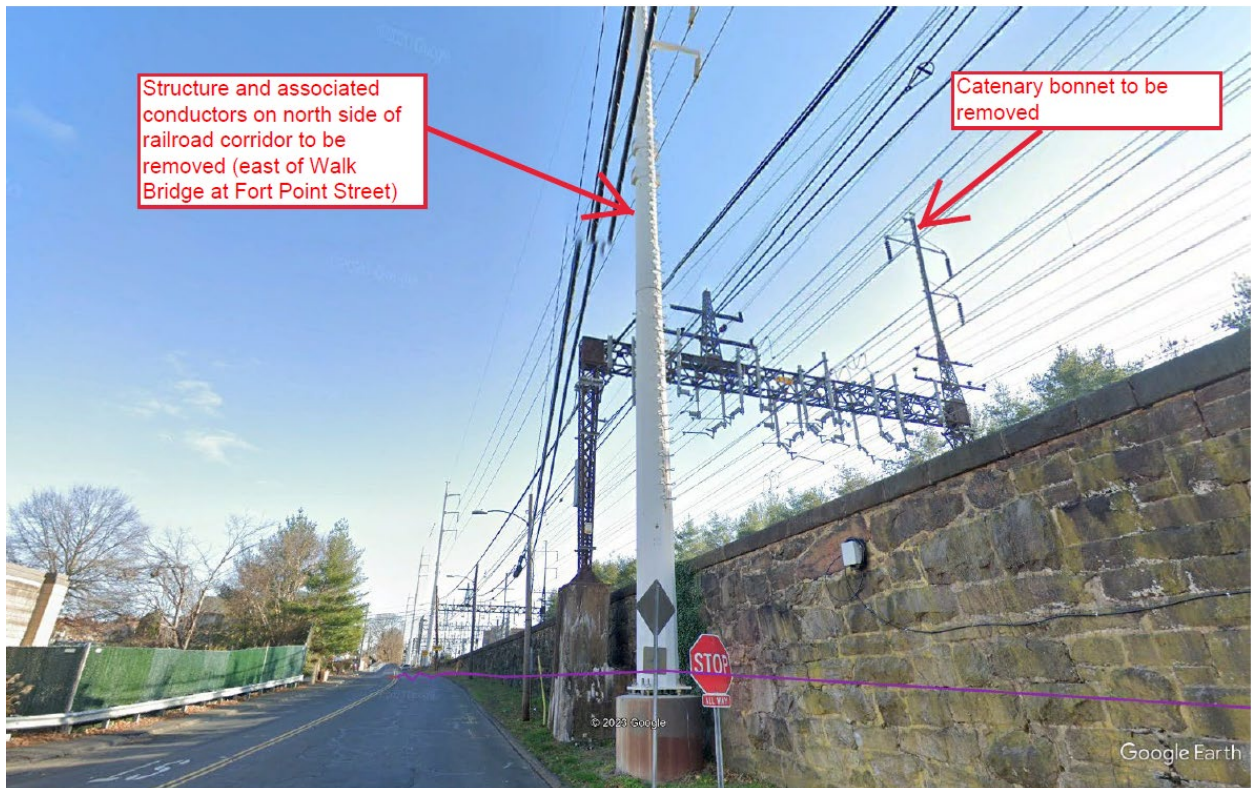
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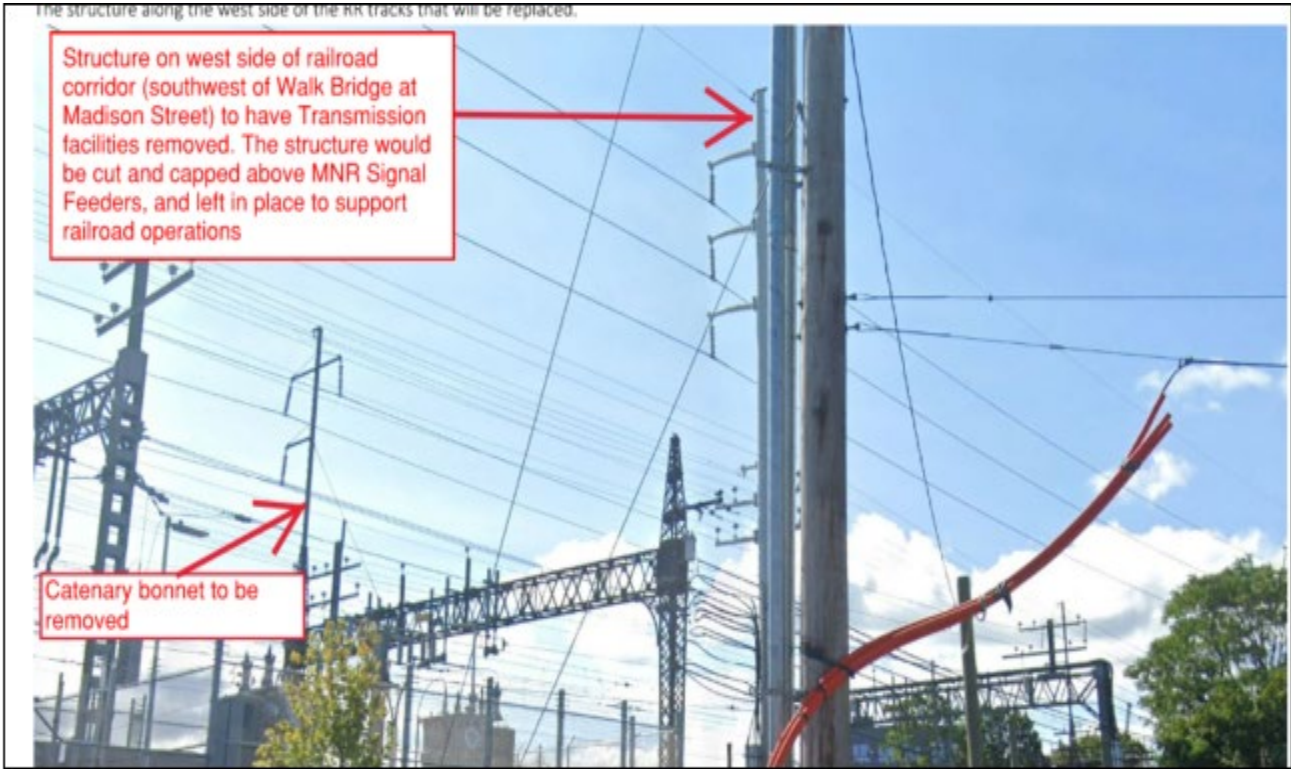
Question: 11

Provide photographs of:

- a. the existing transmission facilities to be removed; and
- b. the existing bridge with transmission facilities currently attached

Response:





Existing bridge with transmission facilities currently attached.



Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 12

Is the proposed project on the ISO-NE Regional System Plan (RSP), Project List and/or Asset Condition List? If yes, identify.

Response:

The project is not included in the ISO-NE Regional System Plan project list or the Asset Condition List. The project is included on Eversource's Local System Plan as "Norwalk-CDOT replace structures at Norwalk River crossing (Norwalk)".

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Request from: Connecticut Siting Council

Question: 13

Is Eversource required to seek any ISO-NE reviews and/or approvals for the relocation of the transmission facilities? Provide the status or copy of any such ISO-NE approvals if applicable.

Response:

There are no approvals required by ISO-NE. Although there are no approvals required, the project is reported by Eversource on its Local System Plan. The Local System Plan is presented annually at a public ISO-NE Transmission Owner Planning Advisory Committee meeting, each October. Included in that presentation is an update on the status of the project.

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Request from: Connecticut Siting Council

Question: 14

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 cost of the project is estimated at approximately \$46,300,000. As mentioned in response to interrogatory CSC-001-002, there is a standing Cost Sharing Agreement between Eversource and CDOT. Under this agreement, approximately 50% of the total Project costs will be reimbursed by CDOT. Eversource anticipates the remainder of the Project cost will be allocated to customers of The Connecticut Light and Power Company d/b/a Eversource Energy.

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Request from: Connecticut Siting Council

Question: 15

Provide a matrix of all relocation project alternatives reviewed utilizing a similar matrix format to Docket 508, Findings of Fact, Figure 15 (page 54): https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/1_MEDIA_DO500_600/DO508/Decision/D508-FOF-Final.pdf that includes, but is not limited to:

- (A) Overhead Transmission Line Costs
- (B) Underground Transmission Line Costs
- (C) HDD for River Crossing Costs
- (D) Micro-tunnel for River Crossing Costs
- (E) Real Property Acquisition Costs
- (F) Bonnet and other Transmission Decommissioning/Removal Costs
- (G) Restoration of Disturbed Areas Costs
- (H) Total Cost Estimate ($H = A+B+C+D+E+F+G$)
- (I) Proposed Project Cost for this Section or Alternative
- (J) Cost Delta ($J = H-I$)

Include the length of each alternative in linear miles. Also, indicate the reason(s) why alternatives were rejected.

Response:

Eversource spent several years working with CDOT and the City of Norwalk to develop the proposed route. Initially, CDOT submitted a number of routing options for Eversource's review and consideration. These various options were located both north and south of the Walk Bridge. All but one of these options were eliminated from further consideration at an early stage due to constructability issues (e.g., inadequate clearances to existing infrastructure or buildings), significantly longer relocated line lengths, and other issues. As a result, no cost estimates were developed for these early-stage route options.

From the routes originally proposed to Eversource by CDOT, the single remaining option that Eversource deemed feasible was an alignment substantially similar to the route proposed in the Petition. This route was further refined based on a series of consultations and iterative input from CDOT and the City, resulting in the configuration proposed in the Petition.

As part of its refinement of the proposed route, Eversource considered three different variations on the proposed route, specifically, an overhead hybrid (alternative) route and two different

alternatives involving collocations with CDOT for the harbor crossing. Cost estimates were developed for the proposed route and these three other route alternatives. As noted in the table below, the cost estimates for the route alternatives involve greater uncertainty and variability than the estimate for the proposed route because the level of engineering for the alternatives is at a conceptual stage.

Eversource rejected the three alternatives for the following reasons:

- **Overhead Hybrid Route:** An overhead crossing of the Norwalk River would require the installation of four (4) approximately 160-foot-tall transition structures to meet federal clearance requirements over the navigation channel and Stroffolino Bridge. The visual impact of such prominent structures on the South Norwalk/Norwalk Harbor area – an area that is of critical importance to City officials – would be substantial. For this reason, the City made it clear to Eversource at an early point that the City firmly opposed the overhead hybrid route. If Eversource had selected the OH Hybrid Route, and the City had opposed the Project, Eversource anticipates that real estate rights that Eversource would need from the City and other nearby property owners concerned about 160-foot structures would likely have been substantially more difficult and costly to obtain, and would have posed the risk of eminent domain litigation against the City and other property owners, with associated litigation delays. In addition, while conceptual-stage cost estimates for the overhead hybrid route suggest it would cost less than the proposed route, which cost differential is mitigated by the fact that CDOT will be sharing approximately 50% of the total Project cost. Moreover, the cost estimates for the overhead hybrid route are subject to substantially greater variability than projected costs for the proposed route, resulting in a higher risk that actual costs may substantially exceed the estimated costs.
- **Collocation Alternative 1:** This alternative was not selected due primarily to construction schedule and workspace conflicts with CDOT’s project work, but also due to the substantial subsurface utility congestion within North Water Street that would shift the location of the cables and duct bank into the sidewalk or even onto private property. Additionally, there would be substantial traffic interruptions to highly traveled City streets such as the intersection of Water Street, Washington Street and Fort Point Street. River navigation would also be disrupted by the use of coffer dams, barges and excavation equipment if cut and cover trenching were utilized for the installation. This method is also limited in that its maximum installation depth is relatively shallow at the shorelines, restricting potential future development near and around the boat docks at 1 Goldstein Place. In addition, this alternative involved added cost for the equipment and coffer dams required and was therefore more costly than the proposed route.
- **Collocation Alternative 2:** Compared to Collocation Alternative 1, the use of a separate trench to cross the Norwalk River under this Alternative would allow Eversource more schedule flexibility and reduce potential conflicts with CDOT construction activities. However, this Alternative would introduce similar challenges coordinating with the railroad operations, and it would have similar substantial constructability issues along North Water Street and require expanded additional property rights. Based on these factors, Eversource determined that this

alternative was less feasible than the Proposed Route. In addition, this alternative was more costly than the proposed route.

Route Options (\$ x 1,000)	LENGTH	OVERHEAD CONSTRUCTION		UNDERGROUND CONSTRUCTION		HYD RIVER CROSSING		CUT & COVER RIVER CROSSING		REAL PROPERTY ACQUISITION COSTS		REMOVALS	RESTORATION	TOTAL COST ESTIMATE	PROPOSED ROUTE PROJECT COST	COST DELTA	Reasons for Rejection
	(mi)	A	B	C	D	E	F	G	H	I	J						
Proposed Route (Est. -25% / +25%) (70% Engineering Design)	0.6	\$9,828	\$18,258	\$13,488	-	\$2,494	\$1,820	\$432	\$46,319	\$46,319	-						-
OH Hybrid Route (Est. -25% / +50%) (10% Engineering Design)	0.6	\$20,690	\$14,672	-	-	\$5,569	\$1,820	\$761	\$43,511	\$46,319	(\$2,808)						- Substantial Visual Impacts - City Opposition - Real Estate Acquisition Challenges
Collocation Alt. 1 (Est. -25% / +50%) (10% Engineering Design)	0.8	\$9,316	\$29,272	-	\$12,852	\$2,607	\$1,820	\$930	\$56,797	\$46,319	\$10,478						- Additional UG construction for longer route through heavily congested City streets requiring additional private property easements - Increased coordination with CDOT / impacts to CDOT Bridge construction schedule
Collocation Alt. 2 (Est. -25% / +50%) (10% Engineering Design)	0.7	\$9,362	\$26,179	-	\$13,220	\$2,622	\$1,820	\$935	\$54,137	\$46,319	\$7,818						- Additional UG construction for longer route through heavily congested City streets requiring additional private property easements - Still requires coordination with CDOT / impacts to CDOT Bridge construction schedule - Additional coordination with railroad operations & CDOT / Metro-North for track outages to support adjacent UG construction (East of River)

The above table at a larger scale is attached.

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Question: 16

How would Eversource avoid and/or manage project cost overruns? Who would bear the burden of any cost overruns? Explain.

Response:

To mitigate project overruns Eversource spent significant time developing and refining the project cost estimate in order to reduce the risk of overruns. If cost overruns were to occur, approximately 50% of the overage would be the responsibility of CDOT in accordance with the cost sharing agreement (Refer to response to question 2 above).

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Request from: Connecticut Siting Council

Question: 17

Referencing pages B-9 and B-10 of the Petition, would an encroachment permit be required by CDOT for work on Route 136?

Response:

Yes, an encroachment permit from CDOT would be required for work on Route 136.

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Request from: Connecticut Siting Council

Question: 18

Referencing page C-3 of the Petition, provide the heights of all existing and proposed/modified structures identified on this page.

Response:

1028 Circuit:

522WN Existing: 95 feet above grade (to remain in place with modifications)

523WN Existing: 95 feet above grade

524WN Proposed: 128 feet above grade

524ES Proposed: 123 feet above grade

534ES Proposed: 113 feet above grade

535WN Existing: 100 feet above grade

535WN Proposed: 124 feet above grade

536WN Existing: 95 feet above grade (to remain in place with modifications)

1146 Circuit:

522 Existing: 75 feet above grade (to remain in place with modifications)

523 Existing: 72 feet above grade

523EN Proposed: 123 feet above grade

535 Existing: 72 feet above grade

535WS Proposed: 118 feet above grade

536 Existing: 72 feet above grade (to remain in place with modifications)

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 19

Would the Project comply with the 2023 National Electrical Safety Code, effective February 1, 2023?

Response:

Yes, the Project would comply with the 2023 National Electrical Safety Code, effective February 1, 2023.

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Request from: Connecticut Siting Council

Question: 20

Referencing page A-3 of the Petition, regarding the 100-year flood zone contingency plan, what time of year is the HDD expected to take place?

Response:

Eversource plans to conduct the HDD during winter months.

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Request from: Connecticut Siting Council

Question: 21

Have CDOT and Eversource considered the possibility of cumulative noise impacts for any night construction associated with the respective projects? How could impacts be avoided?

Response:

Eversource plans to conduct its construction activities during daylight hours to the extent feasible. In some cases, night work will be dictated by the City or Metro North based on traffic and track outage availability. In addition, Eversource is committed to working with residents in areas where cumulative night construction work impacts may occur.

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Request from: Connecticut Siting Council

Question: 22

Referencing page C-2 of the Petition, what are the vertical clearance requirements from railroad catenaries and horizontal clearance requirements from railroad power/signal feeders? Are these based on NESC, CDOT and/or Metro-North Railroad requirements? Explain.

Response:

Vertical clearance requirements from 115-kV conductors at maximum sag condition to railroad catenaries are based on Metro-North Railroad (MNRR) requirements, which is 15 feet and more stringent than the NESC vertical clearance requirements.

The horizontal clearance from Eversource structures (524ES, 534ES, 523EN, and 535WS) was also driven by the MNRR request for 15 feet clearance, which satisfies working clearance requirements established by the Occupational, Safety and Health Administration for construction of these overhead to underground transition structures and the NESC applicable clearance criteria.

The location of the proposed dead-end structures (524WN and 535WN) was determined in consideration of numerous constraints including the existing roadway (Fort Point Street), fencing, and the presence of underground utilities. Horizontal clearances from these proposed structures to the overhead railroad electric/signal feeders meet the 2023 NESC horizontal requirements .

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Request from: Connecticut Siting Council

Question: 23

Referencing page E-3 of the Petition, are there any applicable clearance requirements for installation of the cables under the dock at Veteran's Memorial Park? Explain.

Response:

Per Rule 353.A.1 of the National Electrical Safety Code, underground structures should be separated from other underground structures (including dock pilings) by a minimum of 12 inches. Eversource standards provide for 24 inches to allow for construction tolerances. However, the clearances to the corresponding dock pilings are maximized to the greatest distance that could be feasibly designed based on the constraints with the crossing; this design minimizes potential conflict with future maintenance and installation of dock pilings. Best practices further dictate designing to the maximum clearance feasible.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 24

Would HDD construction have any impact on river navigation? How would safe river navigation be maintained during the HDD construction?

Response:

In accordance with the anticipated permit conditions, Eversource will utilize a vessel on the river during HDD activities to monitor conditions and respond to an inadvertent return. There are no safety concerns with maintaining safe river navigation while the HDD is progress. The vessel will communicate with other vessels utilizing the navigable waterway to avoid any impacts to river traffic.

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Request from: Connecticut Siting Council

Question: 25

Referencing page C-6 of the Petition, what are the required clearance dimensions for submarine cable depth to avoid buried utilities? What authority determines the cable depth?

Response:

Eversource is not aware of any regulator or authority that determines the required depth of cables to avoid buried utilities or the required depth of HDD cable installations beneath a Federal Navigational Channel. The United States Army Corps of Engineers (“ACOE”) has designated the channel bottom elevation for the Norwalk River; however, the ACOE does not have internal standards specific to the installation of cable via HDD.

Eversource's best practices for HDD installations dictate that the HDD be designed to maximize the clearances to the extent feasible, given the site conditions. The proposed HDD design has been analyzed for its risk of inadvertent return from the cable installation, with a minimum factor of safety (1.5 times the design criteria) in order to be considered as a safe and feasible option. The current proposed route has been designed around the specific site conditions of the Norwalk River crossing (soil strata, crossing length, size of bore, etc.) and maintains a 1.5 factor of safety. Based on the foregoing, Eversource’s proposed river crossing would maintain a minimum clearance of approximately 26 feet below the existing river bottom.

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Request from: Connecticut Siting Council

Question: 26

Could the construction or operation of the relocated terrestrial transmission facilities impact or interfere with any existing utilities or infrastructure within the relocation project area? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

Response:

During the design of the underground line, significant effort is placed on identifying subsurface utilities. The first step is to request as-built information from all utilities in the area and incorporate the locations of those subsurface facilities into the design of the relocated underground lines. Once the preliminary design was complete, subsurface field surveys are performed to confirm the actual location of the existing subsurface facilities. This information is used to further the design to avoid the existing utilities as much as possible. If there are unavoidable subsurface conflicts, Eversource will work with the impacted utility to relocate existing facilities in support of the project. For example, Eversource is actively working on the relocation of a watermain that is owned and operated by South Norwalk Electric and Water.

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Request from: Connecticut Siting Council

Question: 27

Referencing page A-10 of the Petition, what are the applicable clearance requirements over the Federal Navigational Channel (FNC)? What authority determines the clearance requirements? What is the depth of the FNC?

Response:

The Army Corps of Engineers designates a minimum vertical clearance above mean high water for any waterway designated as a Federal Navigation Channel (FNC), which includes the Norwalk River at the Project Location. We anticipated a crossing vertical clearance above mean high water of 80 feet, which satisfies 2023 NESC clearance requirements and vertical clearances to the maximum vessel height that is able to navigate under the proposed Norwalk Walk Bridge.

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Request from: Connecticut Siting Council

Question: 28

What is the minimum required depth for the cables within the FNC per the US Army Corps of Engineers (USACE)? How often is the FNC dredged? To what depth?

Response:

The USACE New England District requires a minimum separation of 48 inches from the top of the cables to the bottom of the authorized dredge channel depth (for over-dredge). Eversource is not aware of the frequency at which the USACE dredges this channel. The Congressionally authorized channel depth is 12 feet at Mean Lower Low Water (MLLW). Eversource proposes to install the transmission lines at depths of 30 to 50 feet beneath the riverbed.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 29

If the FNC was required to be realigned, widened or deepened by USACE, how could the cables be temporarily staged or permanently moved to facilitate the realignment, widening or deepening of the FNC?

Response:

Realignment, widening or deepening of the Federal Navigational Channel ("FNC"), which was originally established by the United States Army Corps of Engineers ("ACOE") in 1872 and modified in 1950, would require ultimate approval by the United States Congress, upon recommendation by the ACOE. Given the history of the FNC and the fact that the proposed cables would be at a minimum depth of approximately 26 feet below the depth of the existing river bottom, Eversource is confident that it is unlikely there will ever be conflicts between the proposed cables and any potential changes to the dimensions of the FNC.

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Request from: Connecticut Siting Council

Question: 30

Referencing Figure A-2, Proposed Route Map, on page A-8 of the Petition and the maps for the CDOT Norwalk Bridge Replacement project in the Finding of No Significant Environmental Impact, dated April 28, 2022, available at:

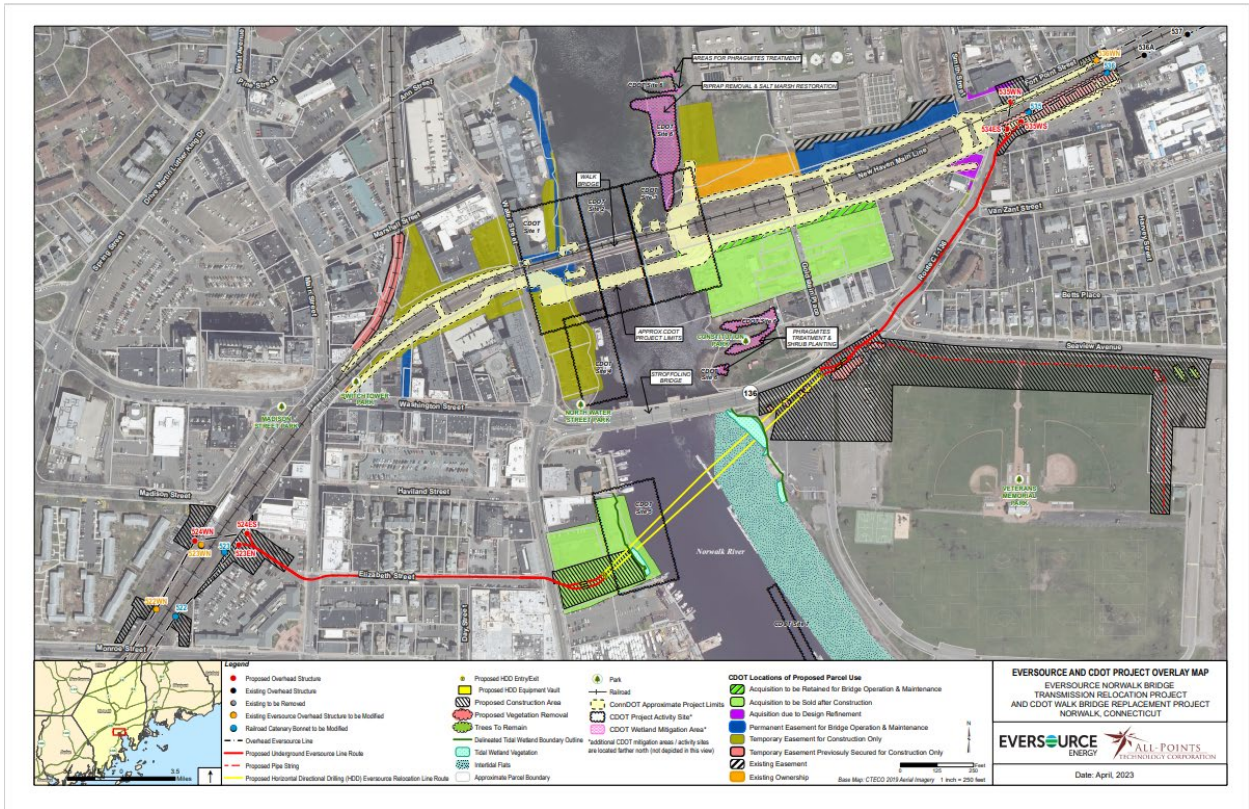
<https://www.walkbridgect.com/pdf/walk%20bridge%20fra%20signed%20fonsi.pdf>, and attached, provide an aerial map that overlays the CDOT maps and depicts the following **for both projects**:

- a. Project limits (CDOT Figures 1 and 2);
 - b. Mitigation areas (CDOT Figure 3);
 - c. Parcel use locations (CDOT Figure 4);
- Project activity locations (CDOT Figure 7)

Response:

Please see the aerial map (below and attached) that overlays the CDOT maps and depicts the following for the CDOT's Norwalk Bridge Replacement Project and Eversource's transmission line relocation project:

- a. Project limits;
- b. Mitigation areas;
- c. Parcel use locations;
- d. Project activity locations



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Request from: Connecticut Siting Council

Question: 31

Could any concurrent upriver or downriver CDOT, or other concurrent construction activities create additional environmental impacts and/or impediments to the Norwalk River and Eversource transmission facilities replacement project? Explain

Response:

Other than CDOT's bridge replacement project, Eversource is unaware of any construction related activities by CDOT or others that may potentially create environmental impacts or impediments to the Norwalk River and/or Eversource's transmission facilities replacement project.

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Request from: Connecticut Siting Council

Question: 32

Referencing Attachment 9 to the Petition, the Biological Assessment at page 8 describes the project as an overhead transmission line project. Clarify.

Response:

The project includes both overhead and underground components. The listed species identified by the USFWS all rely on above-ground habitat. Underground construction associated with the project will occur within developed roadways and parking areas and, in the case of the HDD crossing, beneath the riverbed. For purposes of the biological assessment, above ground facilities would represent the highest potential for conflicts with these species. Thus, the description of the project as “overhead” vs “underground” does not have any influence on the effect determination findings as summarized in the table in Section 4.1 of the Biological Assessment (page 60).

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Request from: Connecticut Siting Council

Question: 33

Referencing Attachment 9 to the Petition, the Biological Assessment at page 13 anticipates perching by raptors. Explain what type of raptors, where they would perch and how this would be managed?

Response:

The two raptor species that could potentially occur in proximity to the project area are peregrine falcon and osprey. Peregrines often nest in large urban and industrial areas because of abundant prey, a lack of natural predators, and the presence of tall buildings which mimic cliff faces and offer relative solitude far above city streets. Osprey commonly build nests in developed areas near the coast, where an ample food supply is present, taking advantage of tall structures (e.g., monopoles, catenaries, etc.).

No project activities involve the use of existing buildings and as such, no conflicts with peregrines are anticipated. To ensure no adverse effects to osprey from Eversource's project activities during the nesting season, pre-construction inspections would be completed on those above-ground structures being removed or modified. In the event an active nest were identified on a structure to be removed or modified by Eversource, work on the structure would be delayed until the young birds have fledged.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 34

Referencing pages A-7 and A-14 of the Petition, and Attachment 10 to the Petition, would Eversource modifications to the existing bonnets on the CDOT catenary structures have any impact on “uniqueness” as required to be documented by CDOT for the State Historic Preservation Office (SHPO)?

Response:

SHPO has no objections to removing or modifying the bonnets along the railroad provided the catenary structures are unaffected.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 35

Referencing Attachment 10 of the Petition, SHPO identified the following above-ground features listed on the National Register of Historic Places (NRHP): Haviland and Elizabeth Streets-Hanford Place Historic District; South Main & Washington Street Historic District; former Norwalk City Hall; and the Norwalk River Bridge:

- a. Is the railroad listed on the NRHP?

Provide an aerial map that overlays the below CDOT Area of Potential Effect Map for the Norwalk Bridge Replacement project and depicts all above-ground NRHP-listed sites proximate to Eversource's transmission facility replacement project area. Provide the addresses or approximate street boundaries of each.

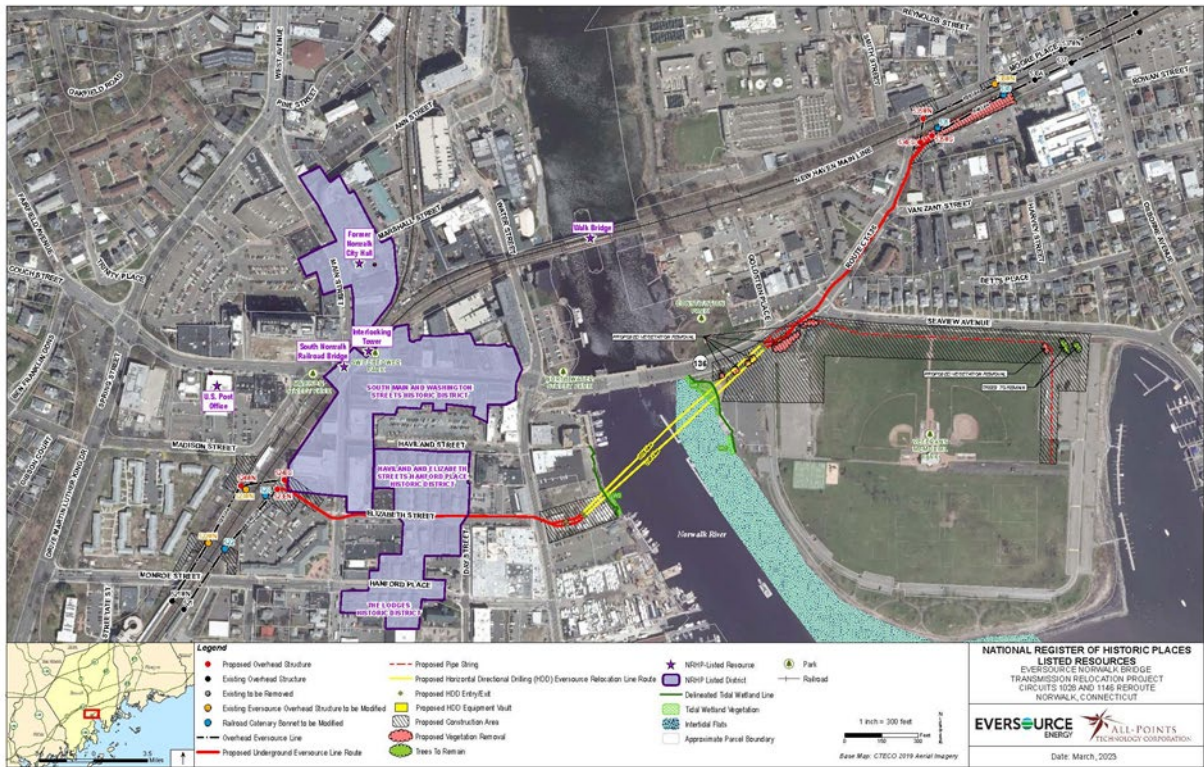
Response:

No, the railroad has as Determination of Eligibility (DOE) status, but it is not currently listed on the NRHP.

A map depicting above-ground NRHP-listed sites proximate to Eversource's project area is provided below. Two abutting NRHP-listed historic districts are in proximity to the project, including: the South Main and Washington Streets Historic District and the Haviland and Elizabeth Streets Historic District.

The South Main and Washington Streets Historic District is bounded by the railroad corridor on the west, Monroe Street and Elizabeth Street to the south, South Main Street, and extending east south and north of Washington Street (incorporating portions of properties/buildings on either side).

The Haviland and Elizabeth Streets Historic District is bounded on the north by Haviland Street, on the east by Day Street, on the west by South Main Street, and on the south by properties facing Hanford Place.



Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 36

Referencing Attachment 10, what is the status of the Historic Building Protection Plan requested by SHPO? Estimate the cost of its development and implementation. Do any Areas of Potential Effect overlap with CDOT's Historic Building Protection Plan?

Response:

Eversource has not initiated the Historic Building Protection Plan to date and a precise estimate of the cost of preparing such a plan is not available at this time. Additional site reconnaissance and coordination with CDOT is required to develop an accurate estimate for Eversource's portion of the plan, which will overlap with CDOT's. In the SHPO's determination letter, the recommendation was targeted to the Haviland and Elizabeth Streets-Hanford Place Historic Districts, which Eversource would need to address in its Historic Building Protection Plan as this area is included in CDOT's Historic Building Protection Plan, which has already been prepared and would need to be implemented during construction. Based on prior projects, if Eversource were to prepare the entire plan and implementation program, it is expected the plan would cost approximately \$100,000 and the implementation would be approximately \$125,000.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 37

Referencing Attachment 10 to the Petition, SHPO recommended that an archaeological monitor be present during construction unless it could be demonstrated via soil probes or cores that no further archaeological work is warranted because the soil has been compromised. Referencing Attachment 6 to the Petition, the Benthic Study collected 15 data samples within a 100-foot buffer on either side of the HDD path indicating the river in the vicinity of the HDD path is in a degraded condition. Does the soil data from the Benthic Study satisfy the SHPO requirement to demonstrate the soil has been compromised and no further archaeological work is warranted? Explain.

Response:

The SHPO recommendation for an archaeological monitor to be present during construction was directly related to terrestrial areas, including the eastern backline of the Fort Point Island Native American fort and within the streets on the western bank line due to the presence of the Haviland and Elizabeth Streets-Hanford Place Historic District and possible archaeological features in these areas. SHPO understands that the river has been dredged repeatedly and is unlikely to hold any resources. As a result, no additional borings are required to address cultural or archaeological concerns within the river where the HDD is planned.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

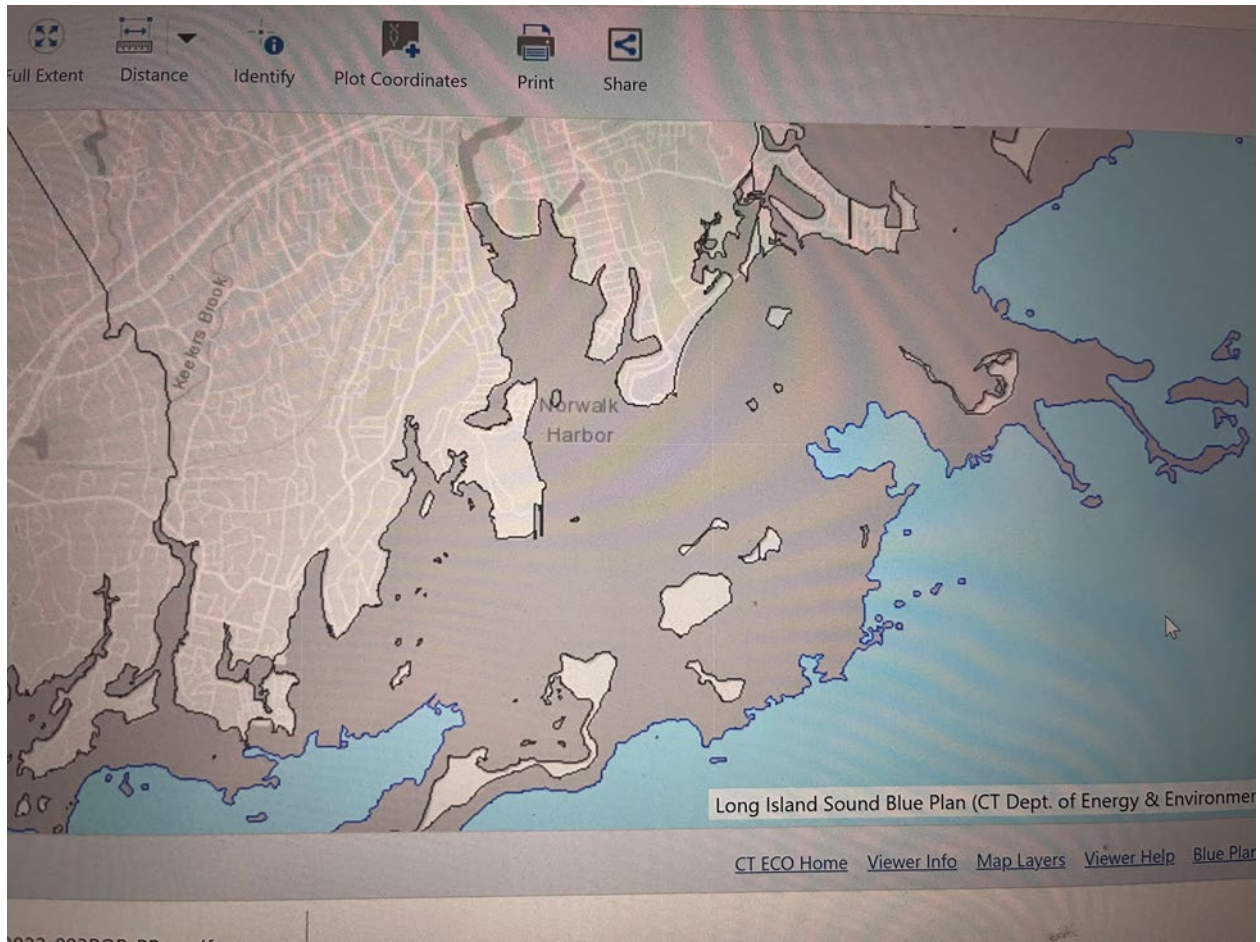
Question: 38

Is the project located within the policy area of the Long Island Sound Blue Plan? If so, how would the project comply with its policy objectives? Are any Ecologically Sensitive Areas or resources identified by the Blue Plan within the project area?

Response:

Based on a review of the Connecticut Environmental Conditions Online Blue Plan viewer, Eversource's project area is not located within the policy area of the Long Island Sound Blue Plan (see screen shot below). The blue shading represents the Blue Plan policy boundary area, which is well offshore from Eversource's project location.

No Ecologically Significant Areas identified by the Blue Plan are located within the Project area. Potential Significant Human Use Areas are proximate to the Project area, as this category includes, among others, waterfront historic districts, anchorage areas, marinas, designated navigational channels, and transmission facilities within the Blue Plan Area of Interest.



Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 39

Would a geotechnical analysis and/or ship simulation be conducted? Is there a minimum recommended depth of HDD bores below the river bed to protect against potential damage by ship anchors?

Response:

Eversource does not plan to conduct additional geotechnical analysis or ship simulations for this Project. The proposed HDD crossing and transmission line installation will not create any navigational conflicts. Further, the cables will be installed inside conduit, which will be installed via HDD approximately 20 feet below the proposed over dredging limits. There will not be any risk from ship anchors.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 40

Referencing page A-1 of the Petition, paragraph 3, identify the drilling fluid to be used for HDD. How is the fluid contained during use?

Response:

The drilling fluid is primarily a mix of bentonite (clay) and water is an important component to the success of any directionally drilled bore. The drilling fluid has physical characteristics designed to preserve the integrity of the drilled hole, remove cuttings and lubricate the bit and down-hole components. The contractor will receive fresh water from nearby fire hydrants or from a water truck and mix it with bentonite for the drilling fluid. The contractor will select the additives to mix with the fluid based on the expected soil types and to ensure the stability of the bore hole. The drilling fluid that is returned to the entry or exit location from drilling activities is contained within drilling pits that will be adequately sized based on expected drilling fluid and cuttings that will be returned. The returns would be continuously pumped away from the drill pits into reclaimers (specialized containers utilizing mechanical silt and soil separators) where the soil cuttings are separated from the drilling fluid. The reclaimed drilling fluid would then be reused for the drilling operations by the contractor. The cuttings will be properly disposed of by the contractor in accordance with applicable requirements.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 41

Could restoration of disturbed terrestrial areas incorporate habitat for the benefit of pollinator species, such as bees, moths and butterflies? If yes, identify areas where pollinator habitat can be established.

Response:

No, the disturbed areas are limited in size and are located in a densely urbanized environment and Eversource has committed to restoring those disturbed areas of the project to pre-existing conditions. Also, where applicable, disturbed areas will be restored in accordance with the municipal tree ordinance.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 42

The HDD construction would be conducted below wetlands and intertidal flats. What cable installation depth is necessary to ensure there would be no impact to these resources?

Response:

The proposed cables would be located more than 40 feet below tidal wetlands and intertidal flats. Since this depth is well below any habitat for plant or animal species, the only remaining potential for impact would be the result of an inadvertent release of drilling fluid during HDD construction. The depth of the proposed conduit and cables has been maximized to the extent possible to minimize this risk. Based on modeling performed by GEI Consultants, Inc.(Inadvertent Release Analysis, March 9, 2023) the HDD profile is feasible as demonstrated by meeting the U.S. Army Corps of Engineers minimum factor of safety for inadvertent releases.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 43

How would Eversource manage obstructions within the Norwalk River, such as the weathered rock shown on the plans?

Response:

HDD technology can drill through materials such as weathered rock. Eversource does not anticipate encountering obstacles that would significantly deter the completion of the HDD installation. Eversource contractors performed numerous borings within the river to characterize subsurface conditions, including five borings along the route of the proposed cable locations. The subsurface conditions that would be encountered by the HDD consist of native, undisturbed materials, primarily sand and gravel. Weathered rock, as shown on the plans is located beneath the proposed path of the HDD and would not impede the HDD.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 44

Referencing Attachment 8 of the Petition, if construction were to commence after June 24, 2023, would Eversource's Stormwater Permit include an updated DEEP Natural Diversity Database determination?

Response:

Yes, this is a requirement of the General Permit application process.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 45

Referencing page A-16 of the Petition, do any of the tree clearing areas coincide with CDOT project activities? Would grubbing be performed?

Response:

Eversource and CDOT's tree removal activities coincide at (2) locations:

1. The proposed shared staging area at 90 Water Street will require limited tree removal and site preparation, including grubbing (tree stump removal) prior to equipment and materials being brought to site.
2. Removal of trees located on CDOT's ROW adjacent to 25 Van Zant Street will be required (including grubbing for stump removal), both to support the installation of riser structures along Eversource's Proposed Route, as well as for CDOT's repairs of the Fort Point Street Bridge.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 46

Referencing Attachment 1 of the Petition, Map Sheet 3, please define “pipe string” and identify any potential impacts to Veteran’s Memorial Park associated with the proposed pipe string.

Response:

“Pipe string”, as shown on Attachment 1, Map Sheet 3 of the Petition defines the process of preparing high density polyethylene (“HDPE”) sections of pipe for installation in the HDD bore holes. HDPE will be delivered to the Project site in sections, which will need to be joined into two continuous lengths (one per line) of HDPE to be pulled back through the HDD bore hole. In order to reduce the overall duration of pull back activities, HDPE will be fused as a whole, rather than in sections. This allows for the HDD contractor to maintain continuous pulling operations, rather than having to periodically pause to fuse additional sections of HDPE to reach the full length required.

In order to maintain the maximum bending radius of the HDPE shown on Attachment 4 of the Petition, select tree trimming / removal may be needed to accommodate the pipe string out. Additionally, temporary reconfiguration of the overhead electric distribution facilities that are owned and operated by the Norwalk Third Taxing District will be needed to allow the HDPE to enter the bore hole while maintaining the maximum bending radius.

Eversource intends to utilize Veteran's Memorial Park as the staging area for the pipe string out. Eversource also intends to limit any impacts to the Park to the extent possible via use of temporary construction matting and by restoring the area in accordance with the Project’s commitments to the City.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 47

Referencing page 5 of the Petition, Eversource notes that construction activities would commence in the fourth quarter of 2023. On page C-10 of the Petition, Eversource notes that construction activities would commence in the third quarter of 2023. Please clarify.

Response:

Eversource is targeting start of construction activities in November 2023, assuming that the required permits and approvals to begin work are received by that time.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 48

Referencing page A-17 of the Petition, is the latest Eversource Best Management Practices Manual for Massachusetts and Connecticut (Eversource BMPs) dated April 2022? Please clarify

Response:

Yes, the latest Eversource Best Management Practices Manual for Massachusetts and Connecticut (Eversource BMPs) is dated April 2022.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 49

Refencing page C-7 of the Petition, approximately what would the HDD pilot hole diameters be?

Response:

The HDD Pilot Hole diameters will be between 8 inches and 12 inches. The final size of the pilot holes is subject to the contractor's means and methods for installation, and choice of preferred drilling head for the operation.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 50

How long would the HDD portion of the project take to complete?

Response:

Eversource is planning the HDD portion of the Project to have an approximately 5-month duration, or about 10 weeks per line.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 51

Describe site construction monitoring and 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, 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 weekly and within 24 hours after the end of a storm that generates a discharge that equals or exceeds 0.5 inches. For storms of less than 0.5 inches, an inspection would be done immediately upon the start of the subsequent normal working hours. In addition to CT DEEP's requirement, Eversource requires weekly environmental inspections to document compliance with all project permits and authorizations.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 52

How would CDOT and Eversource coordinate construction traffic routes for the respective projects?

Response:

Eversource is working closely with CDOT and the City of Norwalk to develop a detailed traffic management plan.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 53

The CDOT bridge replacement project includes construction of a bulkhead at 68 and 90 Water Street for barge deliveries during construction that would remain in place for the property owner's use. The bulkhead construction requires dredging. How would this impact Eversource's HDD and other construction activities within that area?

Response:

Eversource is aware of CDOT's project plans to include dredging and bulkhead activities planned for the shore at 68 and 90 Water Street. These activities were reviewed and coordinated with Eversource construction and engineering teams. Eversource reviewed the bulkhead design in the location where the bulkhead would cross over Eversource's HDD route and provided comments to CDOT. CDOT revised its design based on Eversource's comments. The revised bulkhead design, dredging parameters and related construction activities were evaluated to determine whether these features would interfere with Eversource's HDD and construction activities. Eversource's analysis concluded that based on the depth of the HDD route at that location, the bulkhead and dredging would have no impact on the HDD or other construction activities.

CDOT recently informed Eversource that it has removed the construction of the bulkhead from its construction plans.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 54

After construction of the cables within the Norwalk River, how would future replacement of pilings and performance of dock work be coordinated?

Response:

Eversource has identified two separate zones of influence where certain limitations would apply. These include: 1) a restricted zone where no future facilities should be placed; and 2) a corridor where any future activities should be coordinated with Eversource to ensure the continued safe operation of the transmission cables, as well as the safety of the workers performing the dock/pilings work.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 55

Referencing page A-3 of the Petition, footnote 3 and page E-3 of the Petition, CDOT Bridge Replacement project mapping identifies 90 Water Street as to be sold after construction. How could this property transfer impact Eversource's relocation project?

Response:

Eversource has requested, and CDOT has agreed that it will grant, a permanent easement on the 90 Water Street property for the installation, future access, and maintenance of the Eversource facilities. Eversource's easement would remain in effect after sale of the 90 Water Street property, consistent with other properties over which Eversource has recorded easement rights for its facilities.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 56

Are there any opportunities for additional shared staging areas between Eversource and CDOT for the respective projects?

Response:

Other than the coordinated use of the 90 Water Street property between Eversource and CDOT, Eversource's additional laydown areas are outside of the bounds of the CDOT Project. If Eversource's contractor requires additional laydown area, it will assume the responsibility of securing additional property rights for such area. Eversource would encourage continued coordination with CDOT if the need for additional staging area arises.

Date Filed: April 14, 2023

Request from: Connecticut Siting Council

Question: 57

Referencing page A-1 of the Petition, Eversource would construct the project in advance of CDOT's project. What is the status and timeline of construction coordination among Eversource and CDOT for the respective projects (Eversource's proposed project and CDOT's Norwalk Bridge Replacement and Fort Point Street Bridge construction)? How would conflicts among CDOT and Eversource project construction routes (ex. land and marine traffic) and construction activities be avoided?

Response:

Eversource has been closely coordinating, and would continue to coordinate, with CDOT as the projects start concurrent construction activities. At this time, Eversource does not anticipate any conflicts. CDOT has explained that the first phase of construction on the Walk Bridge Replacement Project began on April 1, 2023; therefore, Eversource's and CDOT's project construction timelines will overlap. Eversource is aware of two locations where the projects will have overlap.

CDOT is scheduled to replace the Fort Point Street Bridge in the Spring of 2024, as well as modifying catenary structures in this location. Eversource and CDOT coordinated design efforts to make sure both projects were considered in the design of each project. Portions of Eversource work will take place before CDOT's replacement of the Fort Point Street Bridge replacement and other Eversource activities will take place after the Fort Point Street Bridge is scheduled to be replaced. Eversource intends to work with CDOT to minimize interruptions to traffic, property owners and track operations, to the extent practicable.

The second location at which the projects overlap is off of Water Street where CDOT is installing a vessel docking facility on the west shore of the Norwalk River. The design of CDOT's dock and Eversource's HDD were closely coordinated to avoid conflicts. Specifically, this coordination led to CDOT modifying the design of the dock to facilitate Eversource's HDD work. It is anticipated that CDOT's dock would be installed in the Fall of 2023. Eversource's HDD work would occur after the completion of the dock. CDOT recently informed Eversource that the bulkhead is no longer included in its construction plans.