



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 17, 2023

Deborah Denfeld
Team Lead – Transmission Siting
Eversource Energy
P.O. Box 270
Hartford, CT 06141
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RE: **PETITION NO. 1560** - The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Norwalk Bridge Transmission Relocation Project that consists of the relocation and rebuild of two existing overhead 115-kilovolt (kV) electric transmission lines from railroad catenaries and existing structures within the Connecticut Department of Transportation corridor to an underground configuration within roads and across the Norwalk River for approximately .66 miles between existing Structure No. 522WN north of Monroe Street and Structure No. 536WN north of Van Zant Street in Norwalk, Connecticut, and related electric transmission line improvements.

Dear Deborah Denfeld:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 14, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the April 14, 2023 deadline.

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

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

Sincerely,

Melanie Bachman
Executive Director

c: Service List dated February 17, 2023

**Petition No. 1560 - Eversource
Norwalk Bridge Transmission Relocation Project
Norwalk, Connecticut**

**Interrogatories
March 17, 2023**

Notice

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?
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?

Existing Facility Site

3. When were the #1028 and #1146 Lines first installed along the railroad right-of-way (ROW)? Where does each line originate and terminate?
4. What is the width (or an approximate range of widths) of the railroad ROW in the Project area?
5. What is the age of the existing structures and conductors on the #1028 and #1146 Lines at the existing facility site?
6. What are the size and type of existing conductors on the #1028 and #1146 Lines?
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?
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.
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?
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?
 - c. Do any or all of the transmission facilities have a salvage value? Explain.
11. Provide photographs of:
 - a. the existing transmission facilities to be removed; and
 - b. the existing bridge with transmission facilities currently attached.

Project Development

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

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

Proposed Project

17. Referencing pages B-9 and B-10 of the Petition, would an encroachment permit be required by CDOT for work on Route 136?
18. Referencing page C-3 of the Petition, provide the heights of all existing and proposed/modified structures identified on this page.

Public Safety

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

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?
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.
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.

River Navigation

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

Environmental

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);
 - d. Project activity locations (CDOT Figure 7).
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.
32. Referencing Attachment 9 to the Petition, the Biological Assessment at page 8 describes the project as an overhead transmission line project. Clarify.

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?

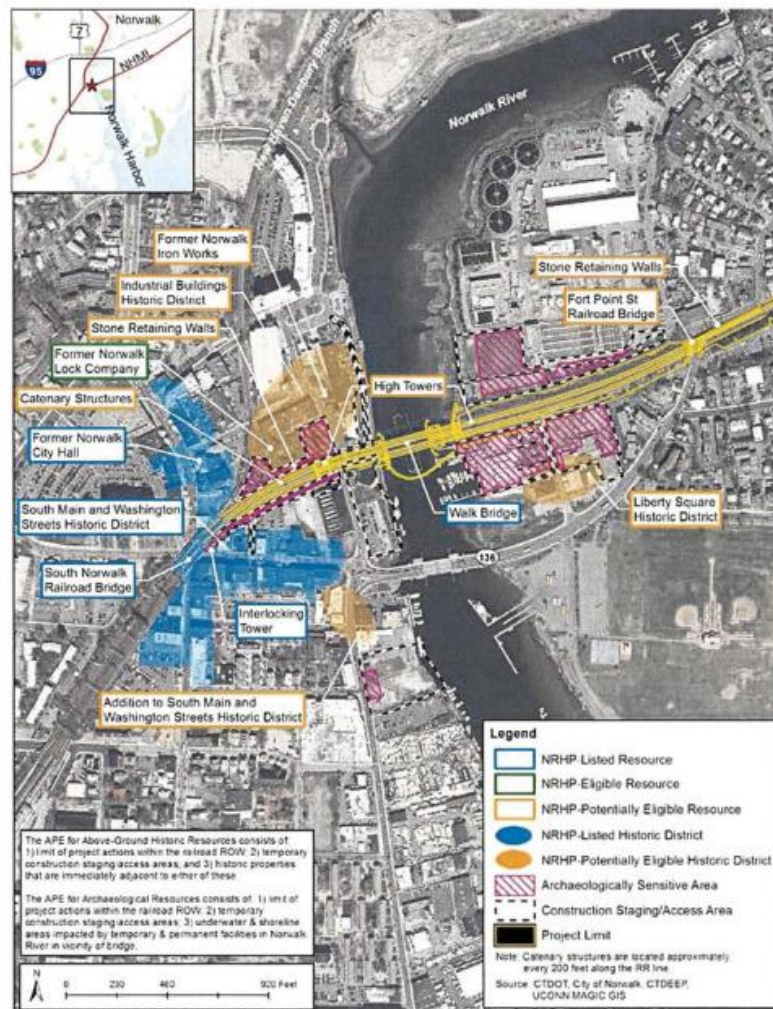
Scenic, Historic and Recreation Areas

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)?
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?
 - b. 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.

MEMORANDUM OF AGREEMENT
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

APPENDIX B:

Area of Potential Effect Map



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?
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.

Coastal Resources

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?
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?
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?

Benthic Habitat and Wildlife

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.
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?
43. How would Eversource manage obstructions within the Norwalk River, such as the weathered rock shown on the plans?
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?
45. Referencing page A-16 of the Petition, do any of the tree clearing areas coincide with CDOT project activities? Would grubbing be performed?

Project Construction

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.
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.
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.
49. Referencing page C-7 of the Petition, approximately what would the HDD pilot hole diameters be?
50. How long would the HDD portion of the project take to complete?
51. Describe site construction monitoring and inspections that are required for this project under the DEEP General Permit.

52. How would CDOT and Eversource coordinate construction traffic routes for the respective projects?
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?
54. After construction of the cables within the Norwalk River, how would future replacement of pilings and performance of dock work be coordinated?
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?
56. Are there any opportunities for additional shared staging areas between Eversource and CDOT for the respective projects?
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?

CDOT Norwalk Bridge Replacement Project Finding of No Significant Impact Maps

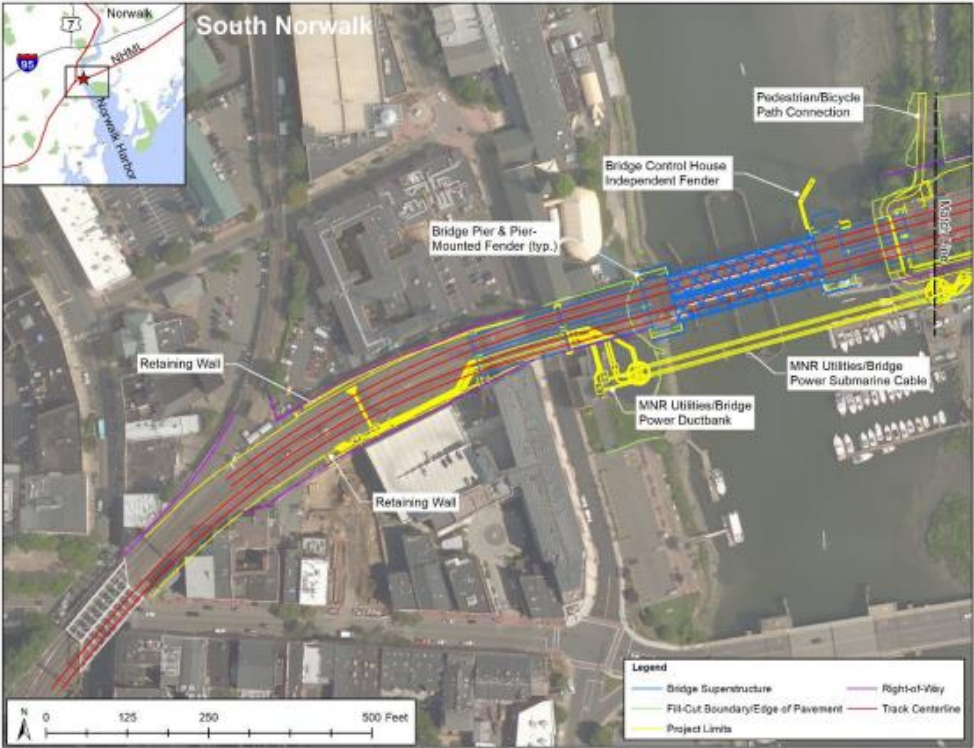


Figure 1 – Illustration of Project Limits, South Norwalk

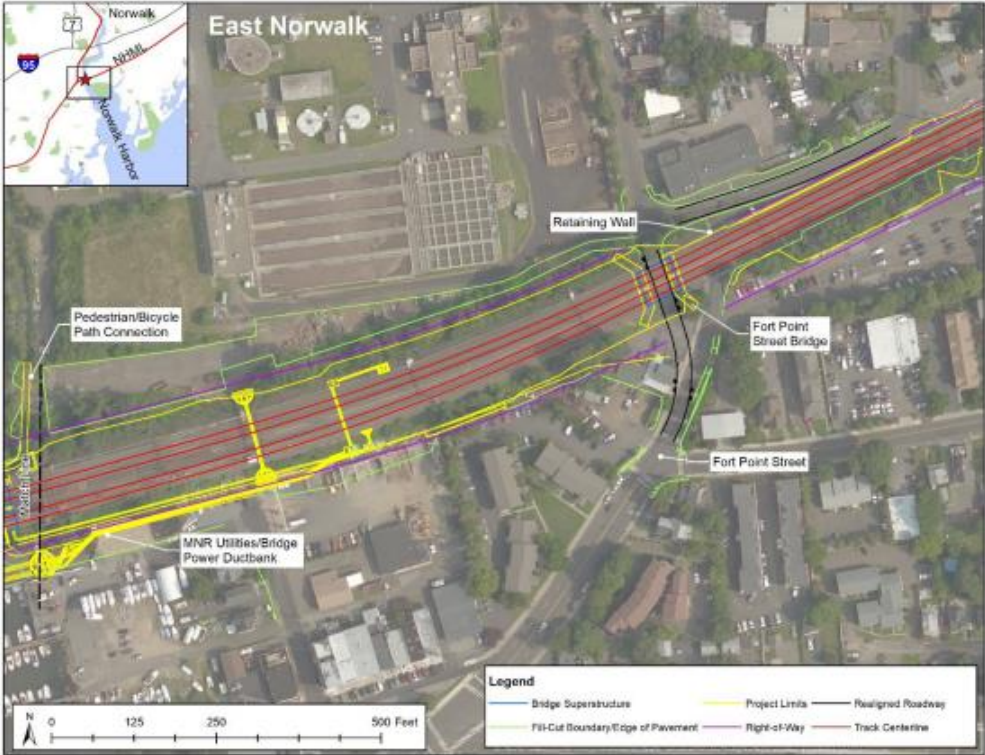


Figure 2 – Illustration of Project Limits, East Norwalk

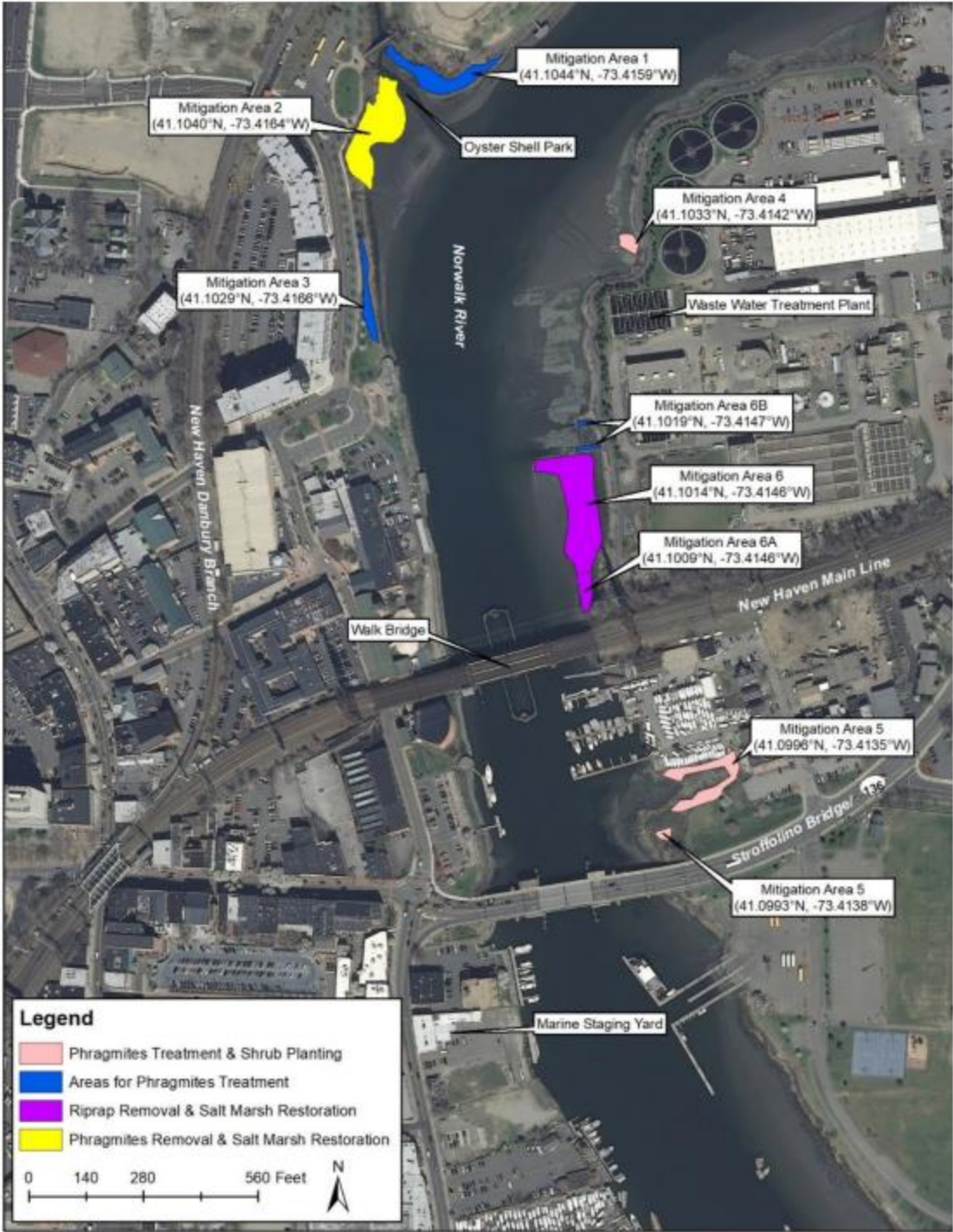


Figure 3 – Project Wetland Mitigation

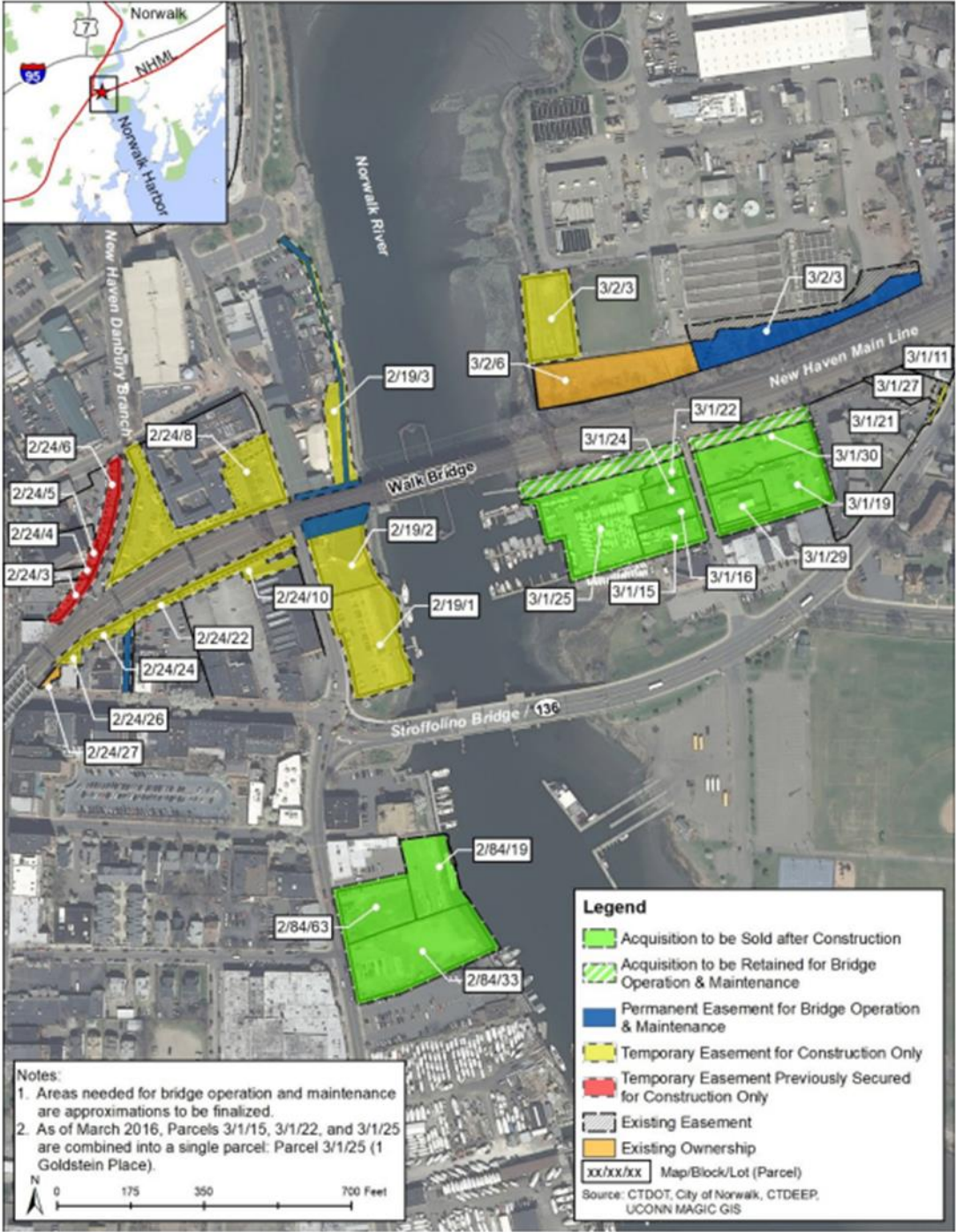


Figure 4 – Locations of Proposed Parcel Use, 1 of 3

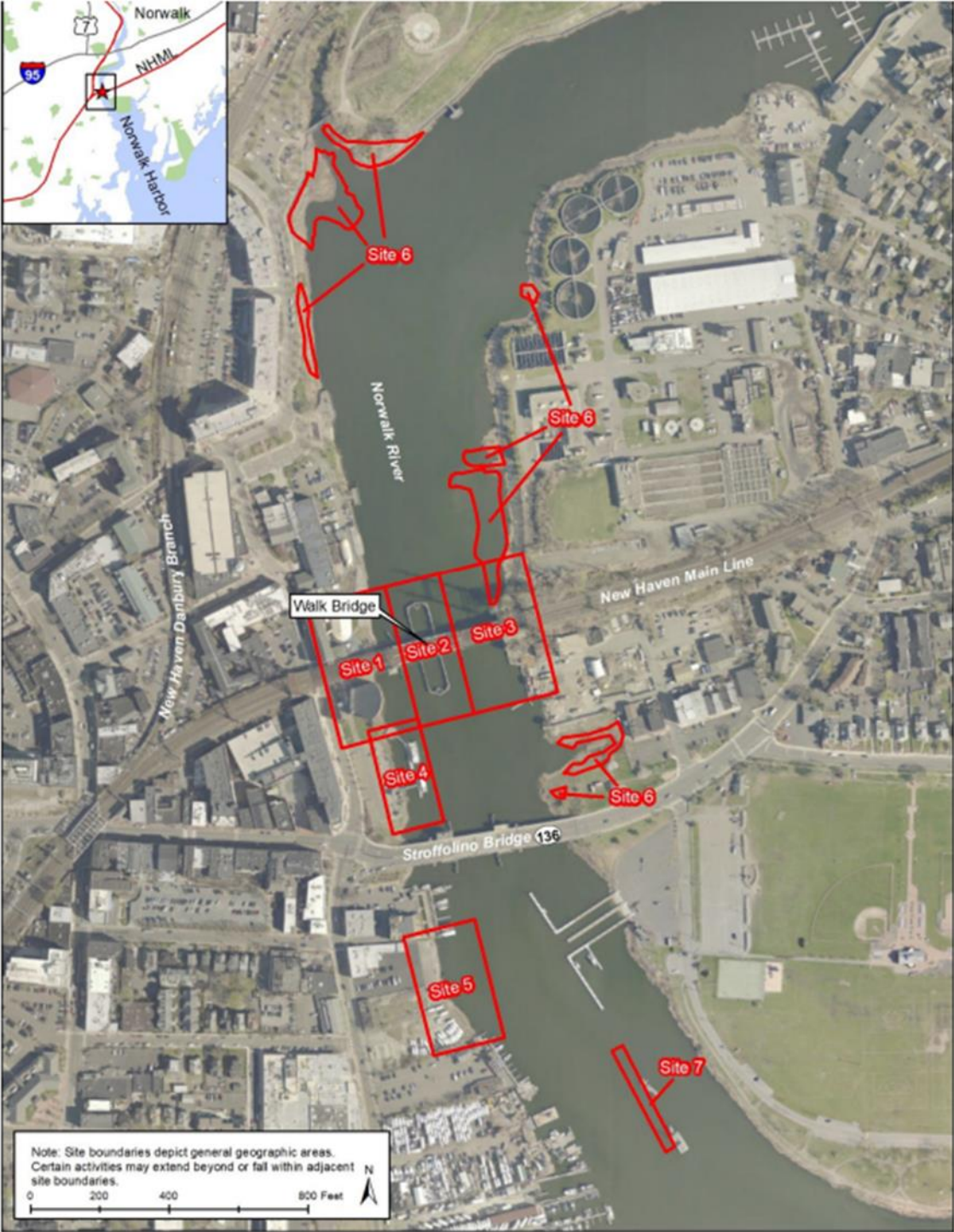


Figure 7 – Project Activity Locations - Sites 1 – 7