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June 5, 2023

Melanie Bachman, Esq
Executive Director
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Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1565: East of Hurd State Park to East Haddam Junction 1772, 362, 376, and
364 Lines Rebuild Project

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy submits the enclosed original and 15 copies of the response to the request for information listed below:

Response to CSC-02 Interrogatories dated May 23, 2023
Set 02 – Questions 24-30

Sincerely,

A handwritten signature in cursive script that reads "Deborah Denfeld".

Deborah Denfeld
Team Lead – Transmission Siting

Encl

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 24

Under Regulations of Connecticut State Agencies (RCSA) 16-50j-2a(29), Site means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. Is the Project area described in the Petition synonymous with the existing facility site? Explain.

Response:

Yes, the "Project area" described in the Petition is synonymous with the existing facility "Site" described in RCSA §16-50j-2a(29). In the Petition, "site" is typically used to refer to a portion of the Project area, such as "work pads at structure and wire pulling sites", "Project work sites" and the yet-to-be identified Project construction staging area.

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 25

Referencing Petition p. 5, after the structure replacements specified in Sub-Petition No. 1293-HEHLELMW-01 and the structure replacements for the project, what number of existing structures would remain and when is replacement of those structures anticipated?

Response:

Sub-Petition No. 1293-HEHLELMW-01 addressed asset condition issues for structures that were primarily located east of the Project area, on both the 364 and 348 lines. Twelve structures on the 364 Line along the 3.4-mile ROW segment from Haddam Neck Switching Station to East Haddam Junction were replaced with weathering steel poles as part of Sub-Petition 1293-HEHELEMW-01.

After all work associated with this Petition is completed, a total of 10 wood structures would remain along this 3.4-mile ROW segment. Of these 10 structures, five are located on the 364 Line and five support the 1772 Line. All these wood structures were installed within the past nine years and are in good condition.

As a result, Eversource has no current plans to replace these structures.

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 26

Referencing the response to Council interrogatory 15, Eversource notes that it would conduct weekly inspections to ensure compliance with the General Permit, BMPs, authorizations, and permit conditions. In addition to the qualified inspector required by the General Permit, would there be other environmental inspectors assigned to the Project? If yes, identify the specific inspection duties. If not, why not?

Response:

Eversource anticipates that the qualified inspector, as required by the General Permit, will function as the primary environmental compliance monitor assigned to the Project. The qualified inspector would be responsible not only for performing the inspections (routine weekly inspections and after major rain events) required pursuant to the General Permit, but also monitoring active Project work sites (at a minimum of weekly) to confirm compliance with the mitigation commitments in the Petition and associated interrogatory responses for this Petition, the Council's conditions, the best practices contained in Eversource's BMP Manual, conditions of the Project's NDDB Determination (when received), and the USACE/CTDEEP Self Verification ("SV") authorization.

As noted in Eversource's response to Council interrogatory 14, the NDDB Determination letter may include additional protection measures for listed species. If the NDDB Determination letter requires specific monitoring requirements for a listed species, and the Project's qualified inspector does not have the credentials to perform such monitoring, Eversource would retain a specialist to conduct the NDDB-required inspections or other activities (e.g., contractor training).

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 27

Referencing Petition p. 17, existing wooden poles located in wetlands will be cut just above grade and left in place. If known, were the wooden poles chemically treated at the time of installation? Describe any best management practices associated with wooden poles.

Response:

Only one existing wooden structure, Structure 5417 (refer to Petition, Attachment A, Map Sheet 10) is located within a wetland (W15). Although no specific data is available, it is likely that the wood poles of this H-frame structure were treated prior to installation.

Eversource's BMP Manual, Section 3.12.1 – Pole Butt Removal, addresses the BMPs regarding wooden pole removal. Specifically, the BMP Manual states:

When transmission poles are decommissioned or otherwise taken out of service, in most cases the entire pole shall be removed. Treated wood pole butts shall be removed completely from the ground and properly disposed at an off-site location. Locations where the removal of pole butts may cause significant disturbance to wetlands or other sensitive environmental areas will be considered for exception to this practice on a site-by-site basis. The Transmission Line Construction and Maintenance Manager, in consultation with Eversource Environmental Licensing and Permitting, will be responsible for determining if a pole butt can be removed if located in a sensitive environmental area.

The Eversource BMP Manual has been routinely included in submittals to environmental agencies. Because Structure 5417 is located within both a wetland and a Vernal Pool Envelope (which is deemed a sensitive environmental area), Eversource determined that leaving the pole butts in place would best limit disturbance to these resources.

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 28

How would OPGW installation avoid contact with water at crossings?

Response:

The new OPGW will be pulled such that the wire will remain in the air throughout the construction process. The OPGW installation process is as follows:

1. The existing static wire will be unclipped from the existing structures.
2. "Traveler blocks" will be installed at each replacement structure and to the existing structures that are not going to be replaced so that the wire can be pulled.
3. The existing static wire will be connected either to a rope or directly to the new OPGW (depending on the condition of the existing static wire).
4. If a rope is used, the OPGW will be connected to the rope and then pulled into position. If no rope is used, the new OPGW will be pulled in directly using the existing static wire.
5. After the OPGW is pulled into position, the traveler blocks will be removed and the OPGW will be clipped in.

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 29

Referring to Petition p. 14 and Map Sheet 8, the ROW traverses the Salmon River Cove. What precautions are necessary, if any, to ensure recreational boaters are aware of Project construction/OPGW installation?

Response:

Based on the current Project schedule, Eversource proposes to perform wire pulling activities above and across Salmon River Cove during the winter (late 2023-early 2024), when recreational boating activities should be minimal compared to other periods of the year.

Prior to construction activities over Salmon River Cove, the Eversource Outreach (Project Services) team will contact local and state recreational departments (i.e., towns of Haddam and East Haddam, Connecticut Department of Energy and Environmental Protection) to discuss and evaluate the best ways to connect with the public and notify recreational boaters of the Project's construction in general (i.e., structures that are being replaced on either side of the river) and OPGW installation over the river in particular. Eversource proposes to communicate to the public by meeting with local boating associations and informing them of the upcoming work and schedule to caution and prevent boaters from passing through the construction zone during any wire pulling activities. In addition, Eversource proposes to post "CAUTION: ACTIVE CONSTRUCTION ZONE OVER RIVER" signs along the river at any parking locations, boating launch facilities, and information kiosks.

Date Filed: June 05, 2023

Request from: Connecticut Siting Council

Question: 30

Would Eversource implement the same mitigation measures and/or use the same construction methods (ex. watercourse crossings, secured mats in flood zone areas, etc.) for areas of the Project as were implemented and used in Sub-Petition No. 1293-HEHLELMW-01? Explain how these areas overlap.

Response:

Yes, Eversource would implement the same types of mitigation measures and construction methods on this Project as were used during the work on Sub-Petition 1293-HEHLELMW-01, with the following exceptions. Because of the more extensive scope of the current Project (e.g., structure replacements and installation of OPGW), some of the construction methods will differ between this Project and the previous Sub-Petition work, which involved only structure replacements. In addition, for the Project, Eversource will implement mitigation measures specific to the wire pulls over the Salmon River (refer to the responses to Interrogatories 28 and 29) and to the installation of the permanent bridge over Succor Brook.

The mitigation measures that would be implemented for this Project, and that were also implemented for the Sub-Petition work, are summarized as follows:

- Erosion and sediment controls ("E&S") will be employed and maintained, as needed, throughout the execution of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and the Eversource BMPs (the "BMPs").
- Potential impacts to wetlands and watercourses will be mitigated with the use of temporary construction matting and adherence to the BMPs.
- Vernal pool protective measures will be used during construction.
- Potential impacts to the 100-year flood zones would be avoided with adherence to the BMPs and the use of temporary construction matting.
- Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at construction entrances onto public roads to prevent tracking of soil onto local streets.

- Upon completion of the Work Activities, all disturbed/exposed areas would be stabilized and revegetated. After the establishment of permanent ground cover, Eversource's contractor would remove the E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

The Petition 1565 Project area and Sub-Petition 1293-HEHLELMW-01 Project areas overlap between Haddam Neck Switching Station and East Haddam Junction, where the 1772 and 364 lines share the same ROW for approximately 3.4 miles. As part of the Sub-Petition work on this ROW segment, Eversource replaced 12 structures with asset condition issues along the portions of the ROW just south of the switching station, as well as south of the Salmon River crossing. In comparison, as described in the Petition, the current Project will involve work along the length of the ROW, as required, to install OPGW and replace structures.