



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 1, 2023

Deborah Denfeld  
Team Lead – Transmission Siting  
Eversource Energy  
P.O. Box 270  
Hartford, CT 06141  
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RE: **PETITION NO. 1565** – The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed East of Hurd State Park to East Haddam Junction Line Rebuild Project consisting of the replacement of electric transmission line structures along its existing 6.2-mile electric transmission line right-of-way shared by its existing 115-kilovolt (kV) No. 1772 and 345-kV Nos. 362, 376 and 364 Lines between Structure Nos. 12053 and 19099 east of Hurd State Park in East Hampton, Haddam Neck Switching Station in Haddam, and East Haddam Junction in East Haddam, Connecticut traversing the municipalities of East Hampton, Haddam and East Haddam, and related electric transmission line and substation improvements.

Dear Deborah Denfeld:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 22, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the May 22, 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

L.M.

c: Kathleen M. Shanley, Eversource Energy ([Kathleen.shanley@eversource.com](mailto:Kathleen.shanley@eversource.com))

**Petition No. 1565 - Eversource  
1772, 362, 376, and 364 Lines Rebuild Project  
East Haddam, Haddam, East Hampton, Connecticut**

**Interrogatories**

**Notice**

1. Referencing Petition p. 37, were there any additional comments received from the Towns of East Haddam, Haddam or East Hampton or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?
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?
3. Referencing Petition p. 27, did the Federal Aviation Administration (FAA) indicate marking and/or lighting would be required for Structures 3725 and 3724? Are the existing structures currently marked/lighted? What was the result of the FAA circularization process?

**Existing Facility Site**

4. Referencing Petition p. 2, what public utility uses/rights are identified under the easements along the existing ROW?
5. Referencing Petition p. 4, for the lattice “opportunity structures,” how was the determination made to proactively replace them and what is the typical life span of these lattice structures?
6. Referencing Petition p. 7, why did Structure Nos. 3733 and 3734 deteriorate to an unsatisfactory condition in less than 10 years?
7. Referencing Petition Map Sheet 10, Structure No. 5417 is marked for replacement; however, this structure was also marked for replacement in Council Sub-Petition No. 1293-HEHLELMW-01, approved by the Council on February 4, 2019 (with an extension to complete improvements to February 4, 2024). Has this structure been replaced prior to the filing of the petition? If yes, why does it need to be replaced again?
8. The existing conductors on the lines are approximately 55- 60 years old. Why aren’t the conductors scheduled for replacement at this time? What is the life span of the different conductor types on the lines?
9. When was the most recent vegetation management conducted in the ROW? What work was performed?

**Project Development**

10. 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.

11. 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.
12. 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.
13. How does the project relate to other proposed, planned or constructed Connecticut reliability and asset condition projects?

### **Environmental**

14. 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?
15. Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools in its construction plans for the project? If yes, submit the plan. If no, when would such a plan be developed?
16. Referring to Petition Map Sheet 12;
  - a. why is a permanent bridge proposed to span Succor Brook in Wetland 20 rather than using temporary matting or a temporary rail car crossing (as specified for the brook crossing in Wetland 19)?
  - b. provide details/specifications of the proposed permanent bridge and abutments.
  - c. What bridge design methods would be used to ensure the bridge is not damaged or flood storage is not affected during a 100-year flood event?
17. Referring to Petition Map Sheet 5, is it feasible to utilize temporary matting at some of the upland structure work areas where topographic condition allows?
18. Referring to Petition p. 22, it states most of the ROW is within New England Cottontail Focus and Key Habitat Areas and work area restoration would include the covering either partial or fully, of gravel work pads with soil. The Petition Map Sheets do not contain any callouts as to what gravel pads would be partially or fully covered. Provide further information regarding gravel pad restoration. How would Eversource ensure the New England Cottontail post-construction mitigation measures have been satisfactorily completed?
19. What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?
20. Referring to Petition p. 23, would the re-classification of the Northern Long-eared Bat from federally threatened to endangered affect the USFWS Information, Planning, and Consultation determination? Explain.
21. Referring to Petition p. 20, has Eversource conducted a site survey to determine the presence or absence of vernal pool species or will Eversource presume vernal pool species are present and implement the protection plan behind petition Attachment F? Explain.

22. Referring to Petition Map Sheet 10, the temporary access to the work pad for Structure No. 5417, extends through a forested area. How much tree clearing is required to install the temporary access road?
23. Referring to Petition p. 21, would installing the permanent bridge and associated fill within the Succor Brook 100-year flood zone require any notifications/permits from the Federal Emergency Management Agency or the US Army Corps of Engineers?