

June 9, 2023

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

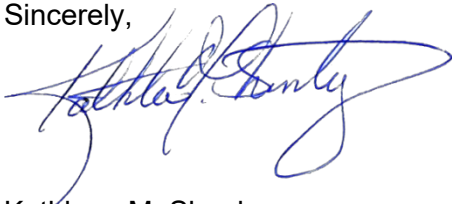
Re: Petition No. 1566 - Card Substation to Wawecus Junction Upgrade Project

Dear Ms. Bachman,

This letter provides an original and 15 copies of the responses to the requests for information listed below:

Responses to CSC-001 Interrogatories, dated May 23, 2023
CSC-001-1 through CSC-001-26.

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 28, Eversource responded to comments received to date from abutting property owners. Summarize abutting property owner comments and Eversource responses.

Response:

The owners of property located on Beaumont Highway in Lebanon expressed various concerns about past project work done on their property including those related to drainage, tree removal, work pad construction, mugwort and also expressed concerns about the current project related to vegetation removal and clearance requirements. Eversource has been in contact with the property owners to respond to these various concerns and, for example, has presented the property owners with a drainage plan to mitigate the drainage issue.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 2

Referencing Petition pp. 27-28, were there any additional comments received from the Towns of Lebanon, Franklin and Bozrah, the City of Norwich, or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

Eversource has not received comments or concerns from the Towns of Lebanon, Franklin and Bozrah, or the City of Norwich.

The Town of Franklin was contacted after the Petition filing by a property owner located on Lebanon Road in Franklin. This property owner expressed concerns to the Town about how the Project would access the property, potential impacts to the property, and the need for advanced notification to secure the goat pen that extends into the Eversource right-of-way ("ROW"). To respond to the property owner's concerns, Eversource is investigating alternative options to reduce impacts to this property. Once a contractor is onboarded to the Project in fall 2023, the Project will meet with the property owner prior to construction to discuss and coordinate the work and/or access for the Project that may impact this property.

A property owner in Norwich asked if it would be possible to climb the existing structure to avoid using matting on a manicured lawn. The Project is currently evaluating this request and, with the contractor, will determine the feasibility of climbing the structure. If matting cannot be avoided, Eversource will direct the contractor to limit the temporary impacts to the property owner's lawn as much as possible, and restore the property to as-good or better-than existing condition. Project representatives have explained this to the property owner and will set up a meeting with the property owner in the fall of 2023 prior to construction.

A property owner in Lebanon requested gravel work pads instead of matted work pads on his property, if possible. However, because of existing wetlands, Eversource will utilize matting, rather than gravel, to mitigate impacts to the environment. The property owner understands and has accepted this explanation. A site meeting was offered to the property owner to review the area of matting in the wetland area and the existing gravel work pads. The Project will coordinate a site meeting with this property owner prior to construction in the fall of 2023.

A few property owners requested tree flagging prior to any tree removal and the Project agreed to tag any trees that would be removed from the properties prior to the removal work. The Project will also meet with these property owners in fall 2023 prior to construction, as well as

provide future notifications to these property owners prior to tree crews facilitating any removals.

The owners of property on Beaumont Highway in Lebanon expressed various concerns about past project work done on their property including those related to drainage, tree removal, work pad construction and mugwort and also expressed concerns about the current Project related to vegetation removal and clearance requirements. Eversource has been in contact with the property owners to respond to these various concerns and, for example, has presented the property owners with a drainage plan to mitigate the drainage issue.

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Request from: Connecticut Siting Council

Question: 3

Referencing Petition p. 2, what public utility uses/rights are identified under the easements along the existing ROW?

Response:

Although some of the easements have minor wording differences, the easements grant Eversource public utility uses/rights consistent with the following:

A perpetual easement, privilege and right of way for electric lines for the transmission of electric currents of any character necessary or convenient from time to time in the conduct of Eversource's business and the right at any time and from time to time to erect, inspect, operate, use patrol and permanently maintain the said electric lines, upon over and across the easement land. The electric lines may consist of poles, towers, other supporting structures (which may be substituted one for the other at any time), circuits, cables, wires, crossarms, guy wires, anchors, guys stubs and other overhead and underground appurtenances and fixtures, any or all of which constitute, parts of electric lines may be erected, relocated, replaced, repaired or changed in number, size or type from time to time. Together also with the right to enter upon, pass and transport materials, along and over said right of way to and from adjoining land of others or highways.

The right to trim, cut, take down and remove at any and all times trees, parts of trees, limbs, branches, underbrush and structures within or projecting into the right of way as in the judgment of Eversource may interfere with or endanger any of said electric lines or their operation, whenever they are erected.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 4

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 09, 2023

Request from: Connecticut Siting Council

Question: 5

Referencing Petition p. 4, of the 12.5 miles of Project ROW, how many miles of Project ROW are in located in each of the municipalities of Lebanon, Franklin, Bozrah, and Norwich?

Response:

The 12.5 miles of Project ROW is split between the four municipalities as follows:

- Lebanon, 6.65 miles
- Franklin, 3.43 miles
- Bozrah, 2.02 miles
- Norwich, 0.4 mile

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 5, after the structure replacements for Sub-petitions 1293-LFB-01 and 1293-LBFNM-01 and the structure replacements for the project, including the reinforcements to Structure 7707, what number of existing structures would remain and when is replacement of those structures anticipated?

Response:

After the referenced Projects are complete, one steel lattice structure, Structure 7707, and nine wood structures would remain within the ROW sections detailed in the Petition. The existing wood structures were installed within the last 10 years. Based on the typical lifespan of a wood pole structure in this area, it is anticipated that the nine remaining wood structures would need replacement in approximately 40 years. The remaining lives of these structures could decrease based on several unforeseen environmental factors such as accelerated pole decay and extensive woodpecker damage over time. Based on recent inspections and the minor amount of aging observed, it is estimated at this time that Structure 7707 will need replacement, at a minimum, in 10 years.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 7

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

Response:

Eversource cyclical maintenance vegetation management was conducted between April and December of 2021. Work performed included the removal of incompatible tree species and hazard trees, and side trimming along the maintained 125 foot wide right of way between Card Street Substation and Wawecus Junction. Herbicide application targeting incompatible species and select invasive species was also completed within the ROW, where permissible, the following year between June and November of 2022.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 8

Is the proposed project identified in any ISO-New England, Inc. (ISO-NE) needs and solutions analyses? Is the proposed project on the ISO-NE Regional System Plan (RSP), Project List and/or Asset Condition List? If yes, identify.

Response:

The Card Substation to Wawecus Junction Upgrade Project was not identified by an ISO-New England Inc. (ISO-NE) needs and solutions analysis. The Project is associated with the Asset Condition List, project number 376.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 9

Are any generation facilities listed on the ISO-NE interconnection queue associated with the proposed project? If so, please identify the generation facilities and the queue position.

Response:

No, there are no generation facilities listed on the ISO-NE interconnection queue associated with the proposed Project.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 10

What is the total estimated cost of the project? Of this total, what costs would be regionalized, and what costs would be localized? Estimate the percentages of the total cost that would be borne by Eversource ratepayers, Connecticut ratepayers, and the remainder of New England (excluding Connecticut) ratepayers, as applicable.

Response:

The total estimated cost of the project is approximately \$25.71 million. Eversource anticipates that the entire cost will be regionalized pending the final determination of ISO-New England's Schedule 12C Review.

The Company anticipates the following overall allocations for the total cost:

- Customers of Eversource: 19.2%
- Other Connecticut customers: 6.0%
- Other New England customers: 74.8%

The estimated allocations are based on 2022 actual loads.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 11

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

Response:

This Project is comparable to many other Eversource projects across Connecticut. The main purpose is to improve transmission system reliability, which the Project would achieve by replacing the structures and installing OPGW.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 12

Referencing Petition p. 19, would Eversource need to obtain Connecticut Department of Transportation Encroachment Permits to cross Routes 289, 207, 87, 2, and 608 within the Project area? Explain.

Response:

Yes, Eversource would need to obtain Connecticut Department of Transportation ("CT DOT") Encroachment Permits from CT DOT District 2 for the OPGW aerial crossings over Routes 289, 207, 87, 2, and 608.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 13

How does Eversource determine where to use a gravel access road and where to use a matted access road? Explain.

Response:

Eversource will first try to use existing gravel access roads as much as possible. To determine whether gravel or matting will be used to construct an access road, Eversource takes into consideration topographical and environmental factors, as well as the need for long-term safe access for emergency and/or maintenance work. A detailed assessment of each proposed access road location is completed with the goal to avoid, minimize, and/or mitigate impacts to environmentally sensitive areas (including cultural resource areas), recreational areas, maintained properties and agricultural areas. Matting is used to the extent possible to protect these sensitive areas, whereas gravel is used primarily in non-sensitive areas and in areas that contain difficult terrain.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 14

Under what circumstances would the stone work pad beyond the existing gravel work pad located at Structure 7785 on Map Sheet 6 be employed? How would the stone work pad be installed and would it be left in place or removed after completion of construction?

Response:

Since the Petition was filed, the Project does not currently anticipate that the existing gravel work pad located at Structure 7785 would require improvement or extension. The condition of this work pad would be reevaluated during construction and minor improvements may be required. If additional gravel is installed, it would be left in place after completion of construction.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 15

What improvements, if any, would be required for the existing gravel access road between Structures 7784 through 7786?

Response:

The Project does not currently anticipate the need for road improvements to the existing gravel access road between Structures 7784 and 7786. However, the condition of the road would be reevaluated just prior to construction to determine whether any minor improvements are needed.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 16

In addition to Eversources Best Management Practices, what other specific environmental mitigation measures and/or monitoring would be conducted for construction within environmentally sensitive areas?

Response:

In addition, to Eversource's Best Management Practices ("BMPs"), Eversource would comply with the monitoring requirements under the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit"). Additionally, Eversource will conduct weekly inspections for the duration of the project activities, including during restoration, and to perform post-restoration monitoring on a monthly basis until all disturbed areas are stabilized and the Notice of Termination is filed per the General Permit requirements.

The Project area does not overlap any Natural Diversity Database ("NDDB") polygons. Therefore, protection measures associated with threatened or endangered species are not anticipated.

Gravel work pad restoration measures would also be implemented to mitigate impacts within environmentally sensitive areas, which would include amendment of the work pad surface with stockpiled topsoil or fine process gravel, application of a native warm season grass mix, and installation of temporary erosion and sediment controls (e.g., straw mulch, compost filters, biodegradable erosion control blankets, etc.), which would be regularly inspected and maintained until final stabilization has been achieved.

The Project Vernal Pool Report (Attachment E of Petition 1566) includes additional habitat and species protection measures that would be implemented during construction. These include, but are not limited to, avoiding civil construction near vernal pools to the maximum extent practicable during high sensitivity periods for the observed vernal pool indicator species, and protection of compatible vegetation within the vernal pool envelopes.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 17

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-Petitions 1293-LFB-01 and LFBNM-01? Explain how these areas overlap.

Response:

Yes, Eversource would implement the same types of mitigation measures and construction methods on this Project as those that were used during the work described in Sub-Petitions 1293-LFB-01 and LFBNM-01. The Petition 1566 Project area and Sub-Petitions 1293-LFB-01 and LFBNM-01 project areas overlap at several locations between the Card Street Substation and Wawecus Junction, where the 1080/1490 and 1080/1070 lines share the same ROW.

The OPGW work will encompass the length of the ROW, including those structures replaced under the prior sub-petitions. There are 42 structure replacement work pad locations associated with Sub-Petition 1293-LFBNM-01 that will be utilized by the OPGW work and four structure replacement locations associated with Sub-Petition 1293-LFB-01 that will also be utilized for the OPGW work. In addition, there are 14 structures associated with Sub-Petition 1293-LFBNM-01 and two structures associated with Sub-Petition 1293-LFB-01 that are adjacent to structures proposed to be replaced under Petition 1566. The work associated with Sub-Petition 1293-LFBNM-01 occurred between August 2017 and June 2019 and the work associated with Sub-Petition 1293-LFB-01 occurred between April 2021 and September 2021.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 18

Referencing Map Sheets 4, 7, 8, 10, 19, and 20-24, explain why temporary construction mats are being utilized in areas outside of the wetlands.

Response:

Temporary construction mats at these locations are planned primarily to protect existing agricultural land and/or grassy areas at the request of the property owners.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 19

Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools, including applicable environmental inspections and duties, in its construction plans for the project? If yes, submit such plan. If no, when would such a plan be developed?

Response:

The Project Stormwater Pollution Control Plan (“SWPCP”), submitted to the Connecticut Department of Energy and Environmental Protection on May 12, 2023, with an anticipated permit approval by July 12, 2023, details work areas, erosion and sedimentation control measures, and matting configurations, which are intended to protect sensitive resource areas during construction.

Project work will comply with the SWPCP, Eversource’s Best Management Practices (“BMPs”), which focuses on the protection of wetlands and vernal pools, Vernal Pool Report - Recommended Protection Measures (Attachment E of Petition 1566), and U.S. Army Corps of Engineers Self-Verification Authorizations for work in wetlands. Eversource will conduct weekly inspections to ensure compliance with the BMPs, authorizations, and permit conditions.

Eversource believes that the protection measures defined in the SWPCP, Vernal Pool Report, U.S. Army Corps of Engineers authorization, and BMP Manual are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 20

Referencing Petition p. 10, footnote 8, how is the determination made as to what resources are protected, who makes that determination and under what authority? Explain.

Response:

It is the policy of the State Historic Preservation Office (“SHPO”) that archaeological sites are non-renewable resources, and their locations should not be disclosed in public documents, as these resources may be subject to looting and unauthorized excavation. Archaeological sites are considered protected resources and, in compliance with SHPO’s instruction, their locations should either be omitted or redacted from documents that will be available to the public.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 21

Referencing Petition p. 11, Sub-petitions 1293-LFB-01 and 1293-LBFNM-01, what portions of the existing facility site are common to the Phase 1B Cultural Resources Reconnaissance Study that was conducted for the structure replacements in 2017 and 2020?

Response:

Each Project item (i.e., new structure locations, work areas, and access roads) was evaluated based on previously recorded cultural resources on file with the Connecticut State Historic Preservation Office ("SHPO"), a Pedestrian Survey to field evaluate existing conditions, and prior research. While some of the locations of work areas associated with Petition 1566 and Sub-petitions 1293-LFB-01 and 1293-LBFNM-01 may be similar, each Project item associated with Petition 1566 was assessed and reviewed independently.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 22

Referencing Petition pp. 16-17, it states that portions of the ROW are within New England Cottontail Focus Areas, and work area restoration would include the covering either partial or fully, of gravel work pads with soil or fine processed stone, and such areas would be seeded. 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?

Response:

As part of the restoration of the ROW, all proposed gravel work pads located within New England Cottontail Focus Areas would be restored with stockpiled soil and/or processed stone, native grass seed and chopped straw mulch in accordance with Eversource's current New England Cottontail BMP's. During restoration, work areas would be monitored weekly to ensure compliance and then monitored monthly after restoration until the sites are stabilized.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 23

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

Response:

Excavated soils from the Project that cannot be used as backfill would first be used for gravel work pads within New England Cottontail Focus Areas (refer to the Interrogatory Response to Interrogatory 22) and then regraded into adjacent uplands and stabilized in accordance with Eversource's BMP Manual and the SWPCP. Any excavated soils that cannot be reused on the property from which they were excavated would be transported from the Project area and properly managed off-site in accordance with Eversource BMPs and any applicable local, state, or federal laws.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 24

Referencing Petition p. 13, 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:

Although no specific data is available, it is likely that the wood poles that will be replaced were treated prior to installation. Currently, two existing H-frame structures, Structures 7719 and 7713, are located within wetlands W35 and W38, respectively. In addition, Structures 7711A (W38), 7726 (W29), 7731 (W29) and 7792 (W8) are aligned partially or within existing wetlands.

Section 3.12.1 – Pole Butt Removal of the Eversource BMP Manuals 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. Eversource has determined that best way to minimize any significant disturbance to the wetlands mentioned above is to leave the pole butts in place.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 25

Referencing Petition p. 17, would the re-classification of the Northern Long-eared Bat from federally threatened to endangered affect the USFWS Information, Planning, and Consultation determination? Explain.

Response:

With the re-classification of the Northern Long-eared Bat (“NLEB”) from threatened to endangered, the United States Fish and Wildlife Service has provided a NLEB Rangewide Determination Key (“DKey”), published March 6, 2023, and made it available in the agency’s Information for Planning and Consultation tool. A formal “may effect, not likely to adversely affect” determination for the Project resulted from evaluation of NLEB through the DKey evaluation tool. As a result, reevaluation of NLEB through the application of the DKey has not materially changed the previous “no adverse effect” determination when NLEB was listed as threatened.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 26

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.