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August 2, 2023

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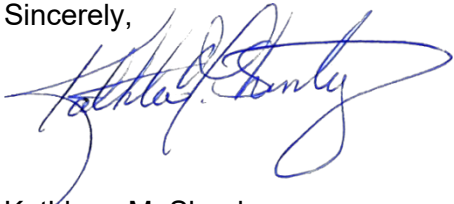
Re: Petition No. 1566 - Card Substation to Wawecus Junction Upgrade Project

Dear Ms. Bachman,

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

Responses to Parties and Intervenors Interrogatories, dated July 6, 2023
SY Set 01 Questions 1 through 94.

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 1

How many transmission line support poles existed at site 7785 in 2016 thru 2019? I have attached photos 1 and 2 taken in 2016 and 2019 to assist you in answering.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 2

Are the number of support poles that existed in 2016 thru 2019 at site 7785 correctly depicted in photo's 1 and 2 attached and do you agree that 4 support poles existed at this site in 2016 thru 2019?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 3

You have stated in your response to motions to dismiss on pdf page 8 that you "replaced wood angle structures #7785 and 7785A on Lines 1490 and 1080, respectively, which were non-jurisdictional". You also stated on this page that this work was performed between May of 2021 and September 15, 2021. When you replaced the wood angle support structures between May and September of 2021, how many new support structures did you install at site 7785? I have attached photos 3 and 4 taken in December of 2021 to assist you in answering.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 4

Are the number of support poles that you replaced accurately depicted in photo's 3 and 4 attached and do you agree that 6 support poles were installed by you in 2021 at this location?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 5

You have stated in your response to motions to dismiss on pdf page 8 that the work to replace these structures was "non-jurisdictional". On pdf page 33 you state in reference to the pole replacements at site 7785, "However, the two structures were not subject to Siting Council Sub-Petition Review as these were considered like for like replacements (i.e., there was no change in the structure height between the proposed and existing structures and there was no design change)" Please define and explain what you mean by like for like, and no design change in reference to replacing 4 existing wooden support structures with 6 new metal support structures?

Response:

The term "like for like" and reference to no design change refers to replacing an existing structure with a new structure that is similar in appearance and without an increase in structure height. In the referenced example, each existing single-circuit structure had two support poles (four total for the two structures) and the replacement single-circuit structures have three support poles per structure (six total for the two structures). Importantly, the basic design of the existing and replacement structures is considered single-circuit H-frame structures that each support three phase conductors.

As for the difference in material, the Council has historically treated wood and weathering steel to be similar enough in appearance as to be considered "like for like", especially as transmission structures are currently rarely replaced with wood.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 6

Is the term "like for like" the same as one for one? If not, where is the term like for like utilized in reference to non-jurisdictional pole replacement.

Response:

The term like-for-like is the same as the term one-for-one, referring to replacing existing structures with new structures that are similar in appearance without a height increase.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 7

How did you determine that the support pole replacement was non-jurisdictional to the Council and what regulations or information did you rely upon to make this non-jurisdictional determination?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 8

Did you notify the Siting Council and the property owner that you were performing this non-jurisdictional work at site 7785? If YES, please provide copies of that notification.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 9

In Sub Petition 1293 LFBNM-01 the Siting Council authorized you to install a mat road from site 7786 to site 7784. That mat road generally followed the westerly side of the ROW and is depicted in photos 5 and 7. Instead of a mat road you installed a stone/ gravel road. This is depicted in photos 6 and 8. Did this gravel / stone road that was installed follow the same route as authorized by the Council in Sub Petition 1293 LFBNM-01? If NO, when did you notify the Council of the route change and when did the Council authorize the change in the route?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 10

Does photo number 2 accurately depict the path of this gravel / stone road as it existed in 2019 as it traverses thru site 7785?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 11

In 2021 you performed work at site 7785. When you performed that work did you change the route of this road from its configuration in 2019? You can use photo 2 from 2019, photo 3 and 4 from December of 2021 to assist you in answering this question. If YES, did you notify the Council and the property owner of the route change and when did the Council approve this route change? If NO, please explain how the route did not change?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 12

Photo 6 is map 6 of 24 that you submitted in petition 1566. That map has a date of April 2023. This map uses an aerial view overlay. What year does this aerial overlay depict and what is the source of this base map? Do you agree that the overlay is a 2019 aerial view?

Response:

The 1566 Petition map set uses a 2019 base map from Connecticut Environmental Conditions Online (CT ECO) Data Source. The 2019 aerial is the most current statewide aerial imagery available (<https://maps.cteco.uconn.edu/map-services/#collapsepanel-916-3-0-00>).

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 13

Do you agree that the submitted map 6 of 24 in petition 1566 represents the road configuration that existed in 2019 and not what road configuration that presently exists? You may use photos 2, 3, 4, 6, and 8 to assist you in answering the question.

Response:

No, the road configuration has remained the same since 2019.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 14

Please explain why the large pad and road configuration depicted in photos 3 and 4 of site 7785 are not shown or depicted in map 6 of 24 in petition 1566 which is photos 6 and 8?

Response:

Eversource depicts existing gravel work pads and roads based primarily on aerial interpolation, therefore, the gravel pad depicted on map 6 at Structure 7785 is based on the latest aerial image available from the 2019 Connecticut Environmental Conditions Online (CT ECO) Data Source. The 2019 aerial is the most current statewide aerial imagery available. In some locations, where sensitive or protected resource areas are located in close proximity, additional field surveys are conducted to more accurately determine the location and extent of gravel needed. In the case of Structure 7785 no sensitive or protected resource areas were identified nearby, and the existing gravel area shown on map 6 is sufficient to support the proposed OPGW work activities.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 15

Utilizing Exhibit 10, a site survey map of site 7785 dated 4/15/22 drawn by Rob Hellstrom Land Surveyor, and photos 6 and 8, please explain why the site characteristics and topo lines depicted in the survey map are not the same as the site characteristics and topo lines that you submitted in map 6 of 24 in petition 1566?

Response:

Topographical lines shown on the Petition 1566 Map Set are based on the most current publicly available statewide LiDAR data from Connecticut Environmental Conditions Online (CTECO) (2016 – <https://maps.cteco.uconn.edu/data/lidar/>) while the referenced Exhibit 10 by Rob Hellstrom is assumed to be from a traditional ground-based survey. It is understood that typically there may be some differences between this statewide data set and a traditional ground-based survey.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 16

Do you have any explanation as to why the Exhibit 10 survey map details the near level area near the 6 transmission line support structures as extending to the bounds of ROW and beyond on both sides of the ROW, where map 6 of 24 in petition 1566 as depicted in photos 6 and 8 does not depict this same site feature?

Response:

Exhibit 10 as provided is difficult to view/read as the image quality is very poor. Photos 6 and 8 portray proposed pad and access as necessary to perform the work associated with the Petition. Eversource depicts existing gravel work pads and roads based primarily on aerial interpolation; therefore, the gravel pad depicted on map 6 at Structure 7785 is based on the latest aerial image available from the 2019 Connecticut Environmental Conditions Online (CT ECO) Data Source. The 2019 aerial is the most current statewide aerial imagery available.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 17

Can you please explain why the topo map lines that you submitted in map 6 of 24 dated in petition 1566 for site 7785 (photo 7) which is supposed to depict present 2023 conditions is nearly identical to the existing topo lines from 2017 as depicted in Sub Petition 1293 LFBNM-01 map 5 of 23 (photo 8). You can use photos 7 and 8 to assist you in your answer.

Response:

As stated in Eversource's response to question 15, topographic lines shown on the Petition 1566 Map Set are based on the most current publicly available statewide LiDAR data from Connecticut Environmental Conditions Online (CTECO), which is dated 2016.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 18

Can you please explain why the survey maps that are Exhibits 10 and Exhibits 1 a-5 and photo 1 when compared to photos 2,3 and 4, show drastic changes in the land topography at site 7785 from what existed in 2017 but map 6 of 24 in petition 1566 dated April 2023, does not appear to reflect these topography changes?

Response:

Exhibit 10 and 1a-5 as provided are difficult to view/read and the image quality is very poor. As stated in Eversource's response to questions 12, 15, and 17, topographic lines shown on the Petition 1566 map set are based on the most current publicly available statewide LiDAR data from Connecticut Environmental Conditions Online (CT ECO), which are dated 2016.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 19

Site 7785 is an angled turn in the line. In petition 1566 on page 24 you state at angled structures you will need a minimum of a 130 x 80 pull pad. Is the 130 foot minimum dimension that is needed running parallel or perpendicular to the transmission lines?

Response:

Structure 7785 is not a splice location; therefore, no pull pad is needed on either side of this location. At splice locations, the 130 foot dimension for the pull pad is parallel with the wire pull to support the equipment used to install the new wire.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 20

In response to Council interrogatory question 14 you stated that no changes in the work pad at site 7785 are anticipated. Petition 1566 map 6 of 24 does not show an existing pad of a 130 x 80 dimension at this site. How do you plan on doing the detailed work of installing the OPGW cable utilizing the minimum criteria that you established at this site if you are not going to make any changes to the site?

Response:

Site 7785 is not a splice location; therefore, it does not require a pull pad on either side of the Site. The existing gravel pad is currently large enough to support the limited OPGW work needed at this structure which is to unclip the existing shield wire and install a running block (roller) for the installation of the OPGW. After the new OPGW has been installed it will be clipped back onto the existing structure.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 21

In petition 1566 on page 24 you state that work pads of 150 x 150 may be needed for the OPGW work. In what locations will these work pads be needed, and will any be needed in areas where the ROW is 125 feet wide?

Response:

Though the preferred standard work pad is 150 feet by 150 feet, work pad size varies based on the location due to such factors as the scope of work, terrain, and space availability. All work pads will be built within the boundaries of the easement and will not extend past the established right-of-way limits.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 22

On page 7 of petition 1566 you state that work will be contained to within the ROW. How do you plan on installing these 150 by 150 pads within a 125 foot ROW?

Response:

The Project will not install work pads that extend past the established boundaries of the right-of-way.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 23

In petition 1293 on page 3 under section 2 -Access and Work Pads you stated, "Work pads in upland areas will remain unless the property owner requests that they be removed". Do you make this same pad removal commitment for work performed under petition 1566?

Response:

No, as stated on page 24 of Petition No. 1566, work pads in upland areas are left in place to facilitate future transmission line maintenance.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 24

On pages 7 and 8 of the Eversource response to motions to dismiss you stated that you performed the work at site 7785 under Sub-Petition No.1293-LFB-01 in 2021. That work in part consisted of building a pad at this site that is approximately 140 x 80 as depicted in photos 3 and 4. Was this work pad constructed under Council authority granted to you in this sub petition? If NO, under what authority was this pad constructed?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 25

Since 2021, we have consistently requested that Eversource restore this area to its pre-construction condition which includes removal of this pad. Since you have claimed it was built under petition 1293, when do you plan on removing this pad? If you do not plan on removing this pad, when do you plan to notify the Council of the deviation from the petition conditions in Sub-Petition No.1293-LFB-01?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 26

On pdf page 44, under Tab 5 of the Eversource response to motions to dismiss you state in support of work at site 7785 that you received State Historic Preservation Office (SHPO) review and approval for that work to ensure there were no adverse impacts to any historic or culturally sensitive resources. You attached a January 14, 2021, letter from SHPO as proof. We contacted SHPO on 6/15/23 to verify the authenticity of this Eversource claim. We received an e mail response back from SHPO on 6/16/23 stating that the January 14, 2021, letter has no relationship or association to site 7785. We have attached this e mail as exhibit 23 at the end of the interrogatories. Could you please explain this discrepancy? If you did NOT obtain the required SHPO approval, when are you going to notify the Council of this deviation from required petition conditions?

Response:

A Phase 1A Cultural Resource Assessment Survey of the proposed Line 1490/1080 Structure Replacement Project was completed in August of 2020 by Heritage Consultants, LLC. The Phase 1A reviewed the location for the Structure 7785 replacement for cultural resource sensitivity and determined that this location was a “no/low” for archaeological sensitivity and that no further investigations were required. The letter that is referenced above, was for structures and access roads that were deemed to contain the potential for moderate to high archeological sensitivity and therefore required a Phase 1B Archeological Survey. Because the area at Structure 7785 did not require any further investigation, it was not submitted to the SHPO for review or concurrence.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 27

We have reviewed petition 1566, sub petition 1293-LFBNM-01, and sub petition 1293- LBF-01 for work sites listed in these petitions that the Council approved for pole replacement in this transmission corridor. We have identified 41 sites that are NOT listed as having been approved by the Council for pole replacement. In answer to Council interrogatories question 6 in petition 1566, you stated that 9 wood structures will remain on this line after completion of work under petition 1566. If this Eversource number is correct, this means that approximately 32 (41 minus 9) sites in this transmission corridor were replaced without being listed in the petitions Council approval. We have listed below all 41 sites that do not show up in the three petitions. Eversource did not detail in their answer which 9 sites are left to be replaced so we do not know which 9 sites to subtract from the list. The sites identified are 7814, 7813, 7810, 7898, 7805, 7802, 7801, 7798, 7791, 7786, 7785, 7775, 7773, 7772, 7771, 7770, 7760, 7759, 7757, 7736, 7724, 7723, 7721, 7720 and 7720A, 7717, 7716, 7715, 7714, 7712A and 7711B, 7709, 7707, 7704, 7703, 7701, 7700, 7699, 7698, 7697, 7696, 7694, 7693. Do you agree that these sites are not listed in petitions as sites to have pole replacements?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 28

In the Eversource response to requests to dismiss on pages 7 and 8 you have stated that sites 7786 and 7785 which are contained in this list above were replaced as non-jurisdictional. Are you claiming that all sites where pole replacement occurred in the list above were also non-jurisdictional? If YES, please explain how you determined these sites to be non-jurisdictional?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 29

Did you file notifications to the Council and the property owners that these structures were going to be replaced? If NO, please explain why notification is not required?

Response:

Eversource objects to this question as Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status. However, Eversource routinely provides notification to all owners of property where structure replacements or other work in the right-of-way will take place. The Council is not required to be notified regarding structure replacements or other work that is not jurisdictional to the Council

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 30

We filed an FOIA request on the Council recently for any work notifications or notifications of exempt work provided by Eversource for sites 7785 and 7786. We have attached this document at the end of the interrogators. The Council replied that they had no notifications on file for these sites. Did you file notifications to the Council and property owners for the structure replacements at site 7785 and 7786? If YES, could you please provide copies of this notification.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 31

Are you claiming that the notice requirements for the Council and property owner contained in RSCA 16-50j-58 - Notice of intent to install exempt energy components and associated equipment, does not apply to the replacement of structures 7786 and 7785? If YES please explain how this notification process described in this regulation does not apply to these structures?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 32

For the 32 structures replaced as listed above in question 27, was each site a one for one replacement. Since there appears to be some misunderstanding as to what one for one means, in answering this question we mean one existing transmission line support structure replaced with one new transmission line support structure, one old one for one new one.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 33

In the Eversource response to requests to dismiss on pages 12 and 13 you state "The "sub-petition process" described in Petition No. 1293 does not apply to any line upgrades or reconductoring work. (Decision in Petition No. 1293, Staff Report.) It was designed to address projects where structure replacements were needed for transmission structures that had to be replaced because they were "exhibiting cracking, splitting, rot, woodpecker holes, etc." (Id.) You have stated in the response to motions to dismiss on page 5 that sites 7786 and 7785 were replaced due to "asset condition". If the petition 1293 sub petition reporting process was for transmission structures that were "exhibiting cracking, splitting, rot, woodpecker holes, etc. and sites 7785 and sites 7786 were replaced due to asset condition why were these sites NOT included in any sub petitions for Council review as sites proposed by Eversource to be replaced?"

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 34

We ask the same question for the 30 other structures that were also replaced on this transmission line where no record of Council approval for these structure replacements appears to exist. Why were these 30 structures also not included in the sub petitions filed with the Council for asset condition replacement?

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 35

In petition 1293 on page 1 in all capital letters you petition the Council for a declaratory ruling for two specific items.

Improvements pursuant to transmission facility asset conditions AND adherence to the national electric safety code.

In the description section of this petition, you describe the same two reasons.

The Council approval letter for petition 1293 specifically states; "Eversource shall file with the Council, a sub petition for each specific site transmission line maintenance activity.

Are you claiming that the sub petition Council review process for petition 1293 was limited to and only applied to structures that were having an increase in height? If YES, please identify the section in your petition that describes this and please identify the section in the Council approval letter where the filing of required sub petitions only applies to structures that are having an increase in height.

Response:

Eversource objects to this question. Eversource believes that the question does not pertain to Eversource's proposed work in Petition 1566 and therefore is not consistent with the Council's condition in its grant of party and CEPA intervenor status.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 36

Eversource has stated in Petition 1566 their intention to follow the Eversource best management practices book, 2022 edition. Under section 3.5 - Historic/ Cultural Resources - Eversource identifies stone walls as a historic cultural resource. In the manual Eversource states its intention to preserve stone walls beyond those identified as historic and cultural. BMP Section 3.5.1 details an extensive list of stone wall protection measures that Eversource is committed to doing that takes up over a full page of the manual, including "Avoiding the stone wall altogether - This may involve re-routing an access road or selecting a new access point". A review of the maps provided by Eversource in petition 1566 shows that NO stone walls are depicted on the maps and the map legend does not even contain an identifier for stone walls. Please explain how you plan on following the April 2022 BMP protections for stone walls when you do not depict the stone walls on your maps?

Response:

The data and information depicted on Project mapping is relative to the work being performed. Project work is limited almost entirely to work pads at existing structures and existing access roads, which do not impact stone walls. Avoidance, where feasible, occurs early in the Project design during constructability reviews. During these constructability reviews Eversource Construction and Environmental representatives determine the best access routes and work pad locations in consideration of a number of factors, including avoidance of sensitive resource areas or features, such as stone walls. Where impacts to stone walls are unavoidable, they may be rebuilt.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 37

We have accused Eversource of burying stone walls on our property during previous work and we believe that petition 1566 proposed work will further bury or damage stone walls on our property. In response to this allegation in the Eversource response to dismiss, you stated on pdf page 44 in tab 5 "There is no indication of a stone wall in the area from the Eversource aerial or Project maps". When responding to allegations of burying stone walls you reference your maps that do not depict stone walls. Please explain what protection measures for stone walls you will institute to prevent contractors performing work under petition 1566 from damaging stone walls?

Response:

A detailed assessment of each proposed work location is completed with the goal to avoid sensitive resource areas, such as stone walls. Any stone walls identified will be documented and protective measures, such as silt fence, will be implemented as needed. Eversource is aware of the stone wall located along the outer edge of the existing gravel pad near Structure 7784. The OPGW work proposed at Structure 7784, will not require disturbance of this existing stone wall.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 38

You stated on pdf page 44 in tab 5 "To ensure that there are no adverse impacts to any historic or culturally sensitive resource (e.g. stone walls), the project completed the necessary field visits and exploratory surveys, and received an approval from the CT State Historic Preservation Officer. Said approval is attached. There is no indication of a stone wall in the area from the Eversource aerial or Project maps and the Claimants have never mentioned burial of a stone wall to Eversource Project representatives". Is this reference to a letter, the same January 14, 2021, letter that SHPO has denied applies to site 7785? See SHPO response e mail at the end of the interrogatories.

Response:

Please see Eversource response to question 26.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 39

In petition 1566 map 6 of 24 at site 7784 you detail a work pad that extends beyond our property line. The southern side of our property is marked by the southern stone wall that traverses along the old mill road that according to your submitted map is buried in the existing work pad. The stone wall on the northern side of the old mill road marks the boundary rights of the old mill road. Your map depicts that this wall is also buried under your existing work pad. Your map does not identify that these existing stone walls even exist. What remediation measure do you plan on taking at this location for the stone walls buried by the stone pads previously installed?

Response:

There is no indication that stone walls have been buried by the work pad installed by Eversource at Structure 7784; therefore, no remediation measures are planned. Although Map Sheet 6 does not show the stone wall near Structure 7784, Eversource is aware of its presence. The OPGW work proposed at Structure 7784 under Petition 1566 will not require disturbance of the existing stone wall at the outer edge of the existing gravel pad.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 40

Your map note for this site 7784 states "use existing gravel for OPGW work pad". What modifications to the existing work pad do you plan on making with petition 1566 work at this site?

Response:

The Project team does not currently anticipate that the existing gravel work pad located at Structure 7784 would require improvement or extension. The condition of this work pad will be reevaluated again 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: August 02, 2023

Request from: Connecticut Siting Council

Question: 41

We ask the same question for sites 7785 and 7786. What modifications to the existing work pad do you plan on making in petition 1566 for these sites.

Response:

In regard to the work pads located at Structures 7785 and 7786, the Project team does not currently anticipate that the existing gravel work pads would require improvements or extension. However, the condition of these work pads will 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: August 02, 2023

Request from: Connecticut Siting Council

Question: 42

Will the modifications to these existing pads for the OPGW work proposed in petition 1566 extend beyond the land area presently covered by the existing stone work pads?

Response:

No, if additional gravel is installed it would not extend beyond the land area presently covered by the existing gravel work pads. As stated in Eversource's response to question 41, the Project team does not currently anticipate that the work pads located at Structures 7785 and 7786, would require improvements or extension. However, the condition of the work pads will be reevaluated during construction and minor improvements may be required.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 43

Please explain why petition 1566 map 6 of 24 for site 7785 depicts a proposed area that may need a stone pad installed when Hallstrom Land Surveyors in Exhibit 10 has already identified that you presently have an existing pad in this exact location? Why does your petition 1566 submitted map not identify the existing pad at site 7785?

Response:

Exhibit 10 as provided is difficult to view/read as the image quality is very poor. Map 6 depicts an existing gravel work pad at Structure 7785 and proposes the expansion of the existing gravel pad within the right-of way, if needed. However, the Project team 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: August 02, 2023

Request from: Connecticut Siting Council

Question: 44

In petition 1566 map 6 of 24 you have no notations about work proposed at sites 7783 and sites 7782 but you have proposed to install wetland mats between the two structures. How do you plan on installing the OPGW cable over this approximate 1300 foot distance? What is the purpose of the wetland mats?

Response:

As depicted on map 6, the proposed gravel work pads at Structure 7782 and Structure 7783 will be used to install OPGW on those structures. The purpose of the proposed temporary construction matting is to traverse Wetland 10, which is located between Structures 7782 and 7783. 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: August 02, 2023

Request from: Connecticut Siting Council

Question: 45

Please explain why gravel work pads of 125x125 are needed on our property such as exists at sites 7786 and 7784 but the work pads needed on our neighbors property for sites 7783 thru 7776 are much smaller?

Response:

The existing work pads at Structures 7786 and 7784 were previously constructed to facilitate structure replacement work. The proposed work pads associated with Structures 7783 through 7776 will be used to facilitate only the installation of OPGW, which generally requires smaller work pads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 46

The transmission lines on both properties ours and our neighbors property traverse steep hillsides, please explain how you are able to use mats for work pads and matted roads on my neighbor's property that will be removed at the end of the job generally restoring the property to pre-construction condition but for our property you have installed large gravel pads and gravel access roads that to date you have refused to remove?

Response:

The work pads and access roads proposed for your neighbor's property will be utilized for OPGW work only. OPGW work typically requires a smaller work pad area of 50 feet by 50 feet. Two of the pads will be constructed with gravel, while the remainder will be constructed with matting. Temporary matting for the work pads and access roads will be utilized to protect the wetlands and agricultural areas on your neighbor's property. The Project will utilize the existing gravel access roads that traverse through your neighbor's nonagricultural areas.

The work pads previously constructed on your property were needed to replace structures and so required a larger work pad size of approximately 125 feet by 125 feet. Due to the extended areas of steeper terrain, matting was not considered a safe option for the work pads or access roads on your property; therefore, gravel was utilized and has been left in place for future emergency access and/or maintenance work at these structures.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 47

On pdf page 66 under tab 10 you state "The team explains to Mr. Spaulding that the land cannot go back to its original condition because the access road needs to be permanent to access the structures in the future". Please explain how you require permanent access roads on our property but on our neighbor's property and other properties along the ROW you utilized mats for access which you will remove upon work completion and hence denying you the the permanent access to those structures that you state you need for structures on our property?

Response:

Permanent access roads are installed within the right-of-way ("ROW") wherever possible to provide future access for emergency and/or maintenance work. Temporary matting is utilized to avoid, minimize, and/or mitigate impacts to environmentally sensitive areas (including cultural resource areas), recreational areas, maintained properties and agricultural areas.

Temporary matting is being utilized on your neighbor's property and other properties along the ROW to avoid, minimize or mitigate impacts to these sensitive areas. Due to the difficult terrain on your property, it would not be safe or feasible to utilize matting for the access roads and is consistent with Eversource's practice of maintaining permanent access for future use.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 48

For the installation of the OPGW cable on our property please provide us with the minimum distance of level ground area needed perpendicular to the existing lines from some reference point that presently exist on the transmission line system? Example, from the outermost transmission cable we will need 20 feet of level space in the direction of the ROW boundary or from the ground wire being replaced we will need If the distance varies due to some variable such as transmission line direction changes please specify the distance for each variable. If the level ground area distance is different than the above ground area distance needed please specify the distance for each.

Response:

For OPGW installation, workspace requirements can vary based on the proposed scope of work at each structure location, such as if bucket trucks will be utilized or if a structure is a splice location. Work pad sizes can also vary depending on structure configuration, terrain, and environmental factors and are determined on a case-by-case basis.

The approximate ground area needed to conduct the OPGW work at Structures 7784, 7785, and 7786, which are located on the subject property, is approximately 50 feet by 50 feet positioned from the 1080 circuit side of the structures, which is generally the eastern edge of the right-of-way ("ROW") in this location. The approximate ground area needed to conduct structure replacement activities at Structures 7787 and 7788, also located on the property, is 125 feet by 125 feet, which is generally the width of the ROW in this location. As detailed on map 6, the work pads would be constructed surrounding the structure, so that the structures are located approximately in the center of the work pads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 49

How do you plan on implementing the Eversource remediation plan that you presented to us on April 13, 2023 which changes the road between site 7786 and 7785 if you do not plan on doing any work on this section of the road? Please see your answer to Council interrogatory question 15.

Response:

Implementation of Eversource's March 2023 proposed Restoration Plan will take place along with other Project-related work, as is typical for similar activities on other projects where Eversource has entered into agreements with property owners regarding any restoration work.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 50

Are you going to amend Petition 1566 to incorporate the work described in the Eversource Remediation Plan?

Response:

In reference to the March 2023 Restoration Plan, there is no intent to amend the Petition, as is typical with any agreements Eversource makes with land owners regarding restoration.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 51

If you are not going to amend the petition to include the Remediation Plan how do you plan on performing the required remediation that you determined was necessary?

Response:

Implementation of Eversource's March 2023 proposed Restoration Plan will take place along with other Project-related work, as is typical for similar activities on other projects where Eversource has entered into agreements with property owners regarding restoration.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 52

The work that you have proposed to do in petition 1566 at site 7784 is in the middle of the area that you proposed remediation to reestablish the drainage. How do you plan to allow continued drainage in this area if you are covering the entire area with mats?

Response:

Matting is not proposed at Structure 7784.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 53

What is the physical size of the OPGW cable proposed to be installed in petition 1566, meaning diameter?

Response:

The OPGW cable has a 0.646 inch outside diameter.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 54

What is the public need for this OPGW cable?

Response:

The public need for installing the OPGW is to increase reliability and safety of the electric grid by improving communications between substations and control centers, which are essential to efficiently operate the grid.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 55

What is the purpose for installing the OPGW cable?

Response:

The purpose for installing the OPGW is to extend and increase reliability of communications between substations, across the system, to control centers and operators, for security, for SCADA (Supervisory Control and Data Acquisition – a system for gathering real time data to monitor and control critical equipment), and for efficient operation of the electric grid.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 56

How many fiber optic cables are contained in the OPGW wire that you are installing?

Response:

There are 96 strands of fiber within the OPGW cable.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 57

Will the OPGW cable be used exclusively for system reliability and communication between sub stations?

Response:

In addition to system reliability and communication between substations, the OPGW cable will also be used for security, SCADA (Supervisory Control and Data Acquisition - a system for gathering real time data to monitor and control critical equipment) and other system communications.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 58

Is there any other purpose for installing this OPGW cable other than the system reliability and communication between sub stations?

Response:

The purposes for installing OPGW are to promote transmission and distribution system reliability and enhance communications between substations and to maintain lightning protection for the transmission lines.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 59

Will the OPGW cable be used exclusively by Eversource for electric related purposes?

Response:

See Eversource responses to questions 57 and 62.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 60

What is the data capacity of the cable and what is the present data capacity needed by Eversource for the stated purpose of the cable.

Response:

The term capacity does not fully capture the complexity of fiber systems. Fiber can carry tens of terabytes of data per second (capacity), but the system use case does not utilize the entire capacity. Currently, there is no fiber on the existing lines. The current system has fiber on other transmission lines, but there is inadequate redundancy in the system; a single event will disable multiple key systems. The new OPGW will provide the redundancy, which will improve the reliability and safety of the system.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 61

Will the cable have any excess capacity once installed and operational? If YES, how will this extra capacity be utilized?

Response:

Yes. Spare fibers will be held in reserve for operations if there is a fiber breakage along the line. There also will be expanded capacity to accommodate additional planned equipment, and fiber that can be used for temporary communications while adjacent circuits' fiber are out of service.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 62

Will any of the cable capacity be leased, bartered, sold, or used by or to a third party?

Response:

There is currently no plan for any of the capacity of the OPGW cable to be leased, bartered, or sold. There are plans for neighboring utilities to use a portion of the OPGW cable fiber optic communication capacity over select segments of the lines to maintain their desired substation to substation communications.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 63

Will this cable be utilized for any third party communications?

Response:

See Eversource response to question 62.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 64

How many feet of counterpoise will be installed on our property?

Response:

Approximately 200 linear feet of counterpoise will be installed for each replacement structure. For each of the three-pole H-frame structures proposed on your property, counterpoise will be laid and extend 50 feet ahead and back of each outside pole.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 65

At which sites will the counterpoise be installed and where on each site will it be installed?

Response:

Counterpoise will typically be installed at every structure replacement location. For the typical structure type located in this right-of-way, counterpoise shall be laid under the outside phase conductors of the transmission line.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 66

At what depth will the counterpoise be installed?

Response:

Counterpoise is typically installed at a depth of 18 inches.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 67

Will the OPGW cable require additional / more / increased grounding capacity or counterpoise grounding than the existing grounding cable I system presently on the transmission line? If so what are the differences in the requirement parameters between the old and new?

Response:

The change in shield wire does not affect the amount of counterpoise grounding being installed at the structure locations.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 68

Is the OPGW cable required by NESC or any other regulatory authority for this transmission line.

Response:

While the OPGW cable specifically is not required by the NESC or any other regulatory authority, it is required as part of Eversource and the Independent System Operator – New England’s effort to install diverse communication paths. OPGW is the typical and most widely used option to accomplish modern electric system communications.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 69

Have you considered other options for attaining the substation communications and electric reliability goal you are attempting to reach such as an ADSS system?

Response:

Yes. However, installation of ADSS would potentially require additional structures to accommodate required standard clearances and/or to support the additional loading as the ADSS would represent a new load to the structures, while OPGW is a modified load, as it also replaces an existing shield wire. ADSS does not have this functionality of replacing existing shield wire. See Eversource's response to question 73 for further information on use of ADSS.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 70

According to Wikipedia an OPGW cable does not increase loading on towers and considering the weight of a fiber optic cable that is the size of a hair, could you please explain why the cable you are installing requires the replacement of towers due to increased loading?

Response:

The diameter of the OPGW that is being installed is larger than the diameter of the existing shield wire in order to house the necessary fiber count. The increased diameter size necessitates consideration of resulting increased radial ice loading, area subject to wind and weight.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 71

Is the reason for the increased tower loading due to the fact that you are installing a much larger OPGW cable than is presently needed for your communication requirements?

Response:

The increased structure loading is due to a larger OPGW diameter. See Eversource response to question 70 for more detail.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 72

Can you install a smaller OPGW cable to meet your data needs that would not increase tower loading to the point of requiring tower replacement on this transmission line?

Response:

No, the minimum standard Eversource OPGW diameter to support 96 fibers is 0.646 inch.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 73

Some data cable manufactures recommend installing ADDS cable instead of an OPGW cable on existing transmission lines due to the difficulty and cost to install and OPGW system on an existing transmission line. Have you evaluated the cost and environmental impact of each system and if so could you provide that information.

Response:

Installing All-Dielectric Self-Supporting (ADSS) cable is another project alternative to installing OPGW but it has a separate scope. This type of project would require installing the ADSS at a lower elevation below conductors. The ADSS would need to be designed to maintain appropriate clearances to ground, and also maintain clearance above to the energized conductor. Since this line was not designed considering the additional structural loading or sag characteristics of an ADSS under build wire, the project would most likely require additional structure height increases beyond what is proposed for the Project (using OPGW) to achieve appropriate clearances above and below the ADSS, and/or additional mid span structures to support the ADSS. These conditions may alter the cost and environmental impact of the project.

The OPGW alternative is the preferred project alternative as it also provides a solution to replacing the obsolete Copperweld shield wire that has reached its end of asset life and is planned for replacement, while also providing lightning protection, minimal increase in structure loading, and a fiber communications path. ADSS would not address the Project need to replace the existing obsolete Copperweld shield wire.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 74

Is the cost of installing an ADDS cable less than OPGW cable for the same data capacity?

Response:

The cost comparison was not performed because the ADSS cable was not a considered alternative. See Eversource response to question 73.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 75

Does the ADDS cable system require the counterpoise grounding that a OPGW cable requires?

Response:

Counterpoise is grounding for transmission structures. Fiber optic communications supported by either All Dielectric Self-Supporting ("ADSS") or Optical Ground Wire ("OPGW") will not affect the need for counterpoise on a transmission line structure.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 76

Agriculture is not defined in your best management practices manual do you accept and acknowledge the Connecticut General Statutes Section 1-1 q definition of agriculture? If not what definition do you utilize for agriculture when applying the provisions of your best management practices?

Response:

Connecticut General Statutes Section 1-1 (q) does define agriculture. However, Eversource's BMPs refer to a more colloquial application of the term "agriculture", referring to such uses as traditionally planted crops, grasses for pasture land, and raising livestock and poultry. See also: <https://www.eversource.com/content/docs/default-source/transmission/transmission-rights-of-way-activities-agricultural-lands.pdf>

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 77

Petition 1566 states on page 8 "In general, vegetation will be cut to an above ground height of 6-8 inches" and "In most locations, the vegetation removal work would be accomplished using mechanical methods." According to the Eversource Northeast Cottontail Best Management Practices Focus Area Map, approximately 81 percent of the petition 1566 work area is within this focus area. Eversource Northeast Cottontail Best Management Practices number 2 states that "vegetation removal shall be limited to non-compatible species" and "all noncompatible vegetation shall be cut manually". Could you please explain how generally cutting all vegetation to a 6 to 8 inch height in the approximately 153 acres of this ROW that is in the NEC Focus Area using mostly mechanical methods is compatible with BMP practice number 2? We have attached the Eversource BMP document at the end of the interrogatories.

Response:

Project work practices will be consistent with the Eversource New England Cottontail Best Management Practices within NEC Focus Areas. Project mowing will be limited to work pads and access roads, not the entire right-of-way ("ROW") as indicated above. Any additional side-trimming or tree removal work that must be undertaken along the edge of the ROW will not adversely impact NEC habitat.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 78

Eversource Northeast Cottontail Best Management Practices Manual item number 8 states that "all wood chips shall be removed from the ROW" in the NEC Focus Area. Could you please explain how mechanical mowing in most of the area which will produce wood chips is compatible with NEC BMP item number 8?

Response:

The term wood chips in the context of these BMPs refers to the "chipped" material generated when larger vegetation (large branches, whole trees, etc.) are processed through a wood chipper. The concept behind NEC BMP 8 is to ensure that large quantities of the chipped material (e.g., piles several inches thick or more) is not left on the ROW that would suppress the regrowth of other, desirable/compatible vegetation. The debris generated by mowing does not create the same potential risk of smothering regrowth.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 79

Eversource Northeast Cottontail Best Management Practices item number 1 requires that vegetation to be removed and vegetation that will remain be identified prior to construction commencing. Have you performed this identification? If so, can you provide that information.

Response:

As noted in Eversource response to question 77, mowing will be limited to work pads and access roads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 80

Eversource Northeast Cottontail Best Management Practices item number 2 requires that NEC compatible vegetation NOT be removed. Have you identified the NEC compatible vegetation in the NEC focus area and if so can you provide that information?

Response:

The BMP states that compatible vegetation not be removed "unless deemed necessary by the designated representative". Since mowing is limited to access roads and work pads which must be mowed to perform the Project, this work would be deemed necessary.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 81

Eversource Northeast Cottontail Best Management Practices Manual item number 6 which states that "clearing extend shall be generally evaluated from structure to structure and not on an entire project basis". This site to site requirement is to determine if the amount of clearing is greater than 50% of the NEC vegetation cover. Have you performed this site by site evaluation and if so can you please provide that information.

Response:

This evaluation was completed, and it determined that the Project clearing will be less than 50% of vegetation cover, because mowing will be limited to work pads and access roads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 82

Eversource Northeast Cottontail Best Management Practices Manual item number 4 requires an evaluation of available NEC available cover in relation to certain invasive species. Have you performed this evaluation and if so could you provide that information.

Response:

The BMP actually states that unless suitable NEC habitat is available elsewhere within the right-of-way ("ROW"), invasive shrubs that are designated as compatible species on transmission line corridors may remain. Since there is suitable NEC habitat throughout the ROW that will be unaffected by the Project work, there was no need to evaluate whether invasive species should remain. Mowing will be limited to work pads and access roads. The vast majority of NEC habitat (scrub-shrub cover) within the ROW will not be affected by the Project work.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 83

Eversource Northeast Cottontail Best Management Practices Manual item number 5 requires the identification of all green briar in the NEC focus area. Have you performed this identification and if so can you provide that information?

Response:

The BMP states that greenbriar shall remain within the right-of-way unless it hinders access to Project work areas and if present will be mowed only where it hinders access to facilities (e.g., work pads and access roads); therefore, a survey is not required.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 84

Eversource Northeast Cottontail Best Management Practices Manual items number 6 and 7 discuss mitigation options in the NEC focus area such as leaving woody debris and brush piles. Have you identified if these mitigation options will be performed with this project and if so, specifically what sites are you proposing to perform this mitigation?

Response:

As noted in the NEC BMPs, mitigation is considered where clearing of shrubs in the managed ROW exceeds 50% of total vegetation cover. Mowing for the Project will be limited to areas of work pads and access roads. Thus, clearing will not exceed 50% of total vegetation cover in NEC areas.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 85

Eversource Northeast Cottontail Best Management Practices Manual items number 9 requires that vegetation removal be minimized in NEC Focus areas between December 1 and March 1. How do you plan to comply with this BMP if work starts in the third quarter o of 2023.

Response:

Eversource considers the limited vegetation removal (mowing) for only work pads and access roads to be consistent with this BMP. The vast majority of NEC habitat within the Project right-of-way will not be disturbed.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 86

Eversource Northeast Cottontail Best Management Practices Manual items number 10 discusses that in the NEC Focus Area that stone work pads would typically 50x50 surrounded by construction matting if a larger pad is needed. The submitted plans do not appear to reflect this BMP policy please explain.

Response:

The BMP actually starts with the qualifying language, "Where topography, construction and safety permit". Where gravel work pads are larger than 50 feet x 50 feet, it is due to the existing topography that requires a larger gravel work pad to construct a level work area for safety.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 87

Please explain how mechanical mowing of vegetation in most locations is compatible with Eversource Northeast Cottontail Best Management Practices number 2 which states that " broad, non selective mowing, and the use of a feller-buncher or other mechanical land clearing, shall not be employed"

Response:

As stated in Eversource's responses to questions 77 and 79, mowing for the Project will be limited to work pads and access roads. As detailed in Eversource's NEC BMPs, the use of mowers or other mechanical equipment is authorized when deemed necessary. Mowing is typically employed when the stem density of incompatible species is too great for manual cutting to be effective.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 88

Eversource Northeast Cottontail Best Management Practices Manual items number 11 discusses how roads should not exceed 13 feet where possible in NEC focus areas. This BMP policy does not appear to be reflected in work proposed in petition 1566 please explain. When is work completed with this project will all roads in the NEC Focus Area be pulled back to 13 feet wide?

Response:

The Project will utilize existing access roads or temporary matted access roads in most locations, with very few new access roads proposed. Where new access roads are constructed within NEC Focus Areas, Eversource will comply with this BMP. Existing access roads will not be modified.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 89

In response to Council interrogatory question number 22 you stated that all proposed gravel work pads in the NEC focus area would be restored with stockpiled soil or processed stone and seeded. Does "proposed" mean just the new pads being installed in petition 1566 or all work pads that are identified as being utilized in petition 1566 work in the NEC focus area.

Response:

Eversource's response to the Council's question number 22 (Set One) refers to new gravel work pads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 90

In response to Council interrogatory question number 22 you stated, "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 P's". This Eversource BMP policy of work pad restoration appears to only apply this BMP policy for "key habitat areas" which according to the Eversource NEC BMP map does appear to contain any "key habitat areas". On page 16 of the petition, you state that portions of this ROW are "known habitat". Could you clarify what "known habitat" areas are and where they are located on this transmission line? Could you clarify if Eversource proposes to perform this mitigation measure to all work pads in the NEC Focus area or only "key habitat areas" of which none appear to exist in this ROW?

Response:

The NEC habitat data layer and "Focus Area/Key Habitat" designations are provided to Eversource by the Connecticut Department of Energy and Environmental Protection. The "known habitat" reference in the Petition is a general reference to the CT DEEP designation for a Focus Area. In this location, Eversource intends to restore proposed gravel work pads in compliance with Eversource's NEC Key Habitat BMPs following construction.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 91

91. In the petition on pages 16 and 17 under Wildlife Habitat you detail the importance of dense woody shrubs and herbaceous plants that provide "critical habitat" for wildlife in the ROW. You state that this critical habitat develops due to your policy of precluding tree growth in the ROW. On page 7 you identify that most of the ROW is in undeveloped forest and agricultural both of which due to shading and mowing generally do have the dense woody underbrush as you state is contained in the ROW due to precluding tree growth. The petition calls for the mowing of the ROW to a height of 6 to 8 inches. Considering that the entire ROW is 189 acres could you explain the criteria utilized and how you determined as stated on page 17 "The Project activities are not anticipated to have a substantial adverse environmental effect on wildlife habitat"? When you remove the 12.5 miles of "critical habitat" by close cut mowing where do you anticipate this wildlife to move to so that no substantial adverse effect occurs?

Response:

As stated elsewhere, mowing for this Project will be limited to work pads and access roads.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 92

Eversource Best Management Practices for control of the spread of invasive species stresses decontamination of equipment "in the infested area". What specific areas have you identified in the project area as containing invasive species and what specific decontamination areas have you established for those invasive species locations"?

Response:

Project work areas are limited almost entirely to work pads and access roads where mugwort is present and unavoidable. Where mugwort is encountered in these areas, decontamination will be undertaken within the infested area, or as near as practical to the infested area, prior to leaving the work area.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 93

What specific invasive species have you identified on our property, and where are they located?

Response:

An abundant amount of the invasive species mugwort was identified on the property designated as Line List #226A-287. It was observed in varying densities within the proposed work areas on this property.

Date Filed: August 02, 2023

Request from: Connecticut Siting Council

Question: 94

Will you be installing work and equipment staging areas on our property and if so, specifically where do you anticipate these staging areas to be located?

Response:

A staging area will be required to support the Project. Details of the proposed Eversource staging area is described in the Petition along with a Figure detailing the location. Project contractor(s) would be responsible for identifying and managing other staging areas as needed and any such additional staging areas will be identified at a later date. These additional staging areas, if needed, would not be located on your property. However, equipment and materials needed to support the work on your property would temporarily be located on your property within the Eversource ROW during construction.