



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 23, 2023

Deborah Denfeld
Team Lead – Transmission Siting
Eversource Energy
P.O. Box 270
Hartford, CT 06141
deborah.denfeld@eversource.com

RE: **PETITION NO. 1566** - The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Card Substation to Wawecus Junction Upgrade Project consisting of the replacement of electric transmission line structures along its existing 12.5-mile electric transmission right-of-way shared by its existing 115-kilovolt (kV) Nos. 1080/1490 and 1080/1070 Lines between Card Substation in Lebanon, Stockhouse Road Substation in Bozrah and Wawecus Junction in Norwich, Connecticut traversing the municipalities of Lebanon, Franklin, Bozrah and Norwich, and related electric transmission line and substation improvements.

Dear Deborah Denfeld:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 13, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the June 13, 2023 deadline.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

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

Petition No. 1566
Eversource Card Substation to Wawecus Junction Upgrade Project
Lebanon, Franklin, Bozrah, Norwich, Connecticut

Interrogatories
May 23, 2023

Notice

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

Existing Facility Site

3. Referencing Petition p. 2, what public utility uses/rights are identified under the easements along the existing ROW?
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.
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?
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?
7. When was the most recent vegetation management conducted in the ROW? What work was performed?

Project Development

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.
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.
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.

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

Project Construction

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.
13. How does Eversource determine where to use a gravel access road and where to use a matted access road? Explain.
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?
15. What improvements, if any, would be required for the existing gravel access road between Structures 7784 through 7786?

Environmental Effects and Mitigation Measures

16. In addition to Eversource's Best Management Practices, what other specific environmental mitigation measures and/or monitoring would be conducted for construction within environmentally sensitive areas?
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 LBFNM-01? Explain how these areas overlap.
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.
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?
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.
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?
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?

23. What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?
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.
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.
26. How would OPGW installation avoid contact with water at crossings?