

Cory Spaulding and Leslie Yeisley request that the Siting Council reject Petition 1566 and require the petitioner to separate the two distinct items of work contained in the present petition.

Installation of a new fiber optic communication system, OPGW and Maintenance required to comply with NEC code. Work intertwined in petition 1566.

Is the benefit of the OPGW system being proposed to be installed worth the significant damage to the environment that such work will cause and is it in the public need?

The petitioner has conjoined maintenance of electric transmission structures for NEC compliance with the new work of installing a fiber optic cable that is not required to be installed per NEC requirements. The petitioner has also merged consideration of the environmental impacts of the two separate projects in the described work. **By doing so no one can make a determination as to whether the benefit of the installation of the optional OPGW system is greater than the environmental damage to be done or if it is in the best public need.**

The Council previously set up a procedure in petition 1293 for Eversource to file for NEC compliance maintenance work and that work should not be conjoined with new work not required for NEC compliance.

In petition 1566 two separate items of work distinctly different from each other are being proposed. To determine if the environmental impacts of the installation of the OPGW system, which is elective work, is in the best interest or public need, the two items of work must be separated. The petition seeks approval of extensive work with adverse environmental impacts. Example - the petition calls for mowing of all vegetation in the ROW to a height of 5 to 8 inches above the ground. The entire ROW is 189.5 acres traversing steep terrains. Example – the petition appears to imply that this close-cut mowing will include the mowing of the wetland areas as well. This would destroy regulated wetland vegetation. Are both of these examples of substantial environmental impacts required for NEC compliance or for the optional OPGW fiber optic cable system?

As owners of property impacted by this petition, we believe that the public need for the maintenance and new work, and its potential environmental damage should be balanced separately.

There may be no public need for a fiber optic cable of the SIZE AND CAPACITY proposed however that cannot be determined in that the petitioner never disclosed in the petition the size of the cable or its data carrying capacity compared to the justifications for its install. As an impacted property owner and rate payer is their a public need for a fiber cable of this size or can a smaller cable be installed doing less damage to the environment and still meet the need for the cable described in petition 1566.

Since this OPGW system may have the potential of being utilized as a for profit enterprise by potentially leasing excess data cables, should the electric ratepayers be subsidizing this enterprise if in fact this is what is being installed?

Does the installation of the data cable transform these structures into telecommunication towers which may fall under different regulatory requirements?

Other issues in the new work present themselves which we believe would be best handled separately such as the present easement may not grant Eversource the rights to install a data cable or install underground counterpose.

We request that the Council required the NEC maintenance portion of this petition be filed separately under the previously established requirements of petition 1293.

We request that the Council consider the impacts of the OPGW system separately from the NEC required maintenance proposed work in this petition to determine separately if each rises to the level of requiring a certificate of environmental compliance and is in the public need.

Certification

I hereby certify that an electronic copy of the forgoing document was mailed to

The Connecticut Light and Power Company d/b/a Eversource Energy

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5/22/23

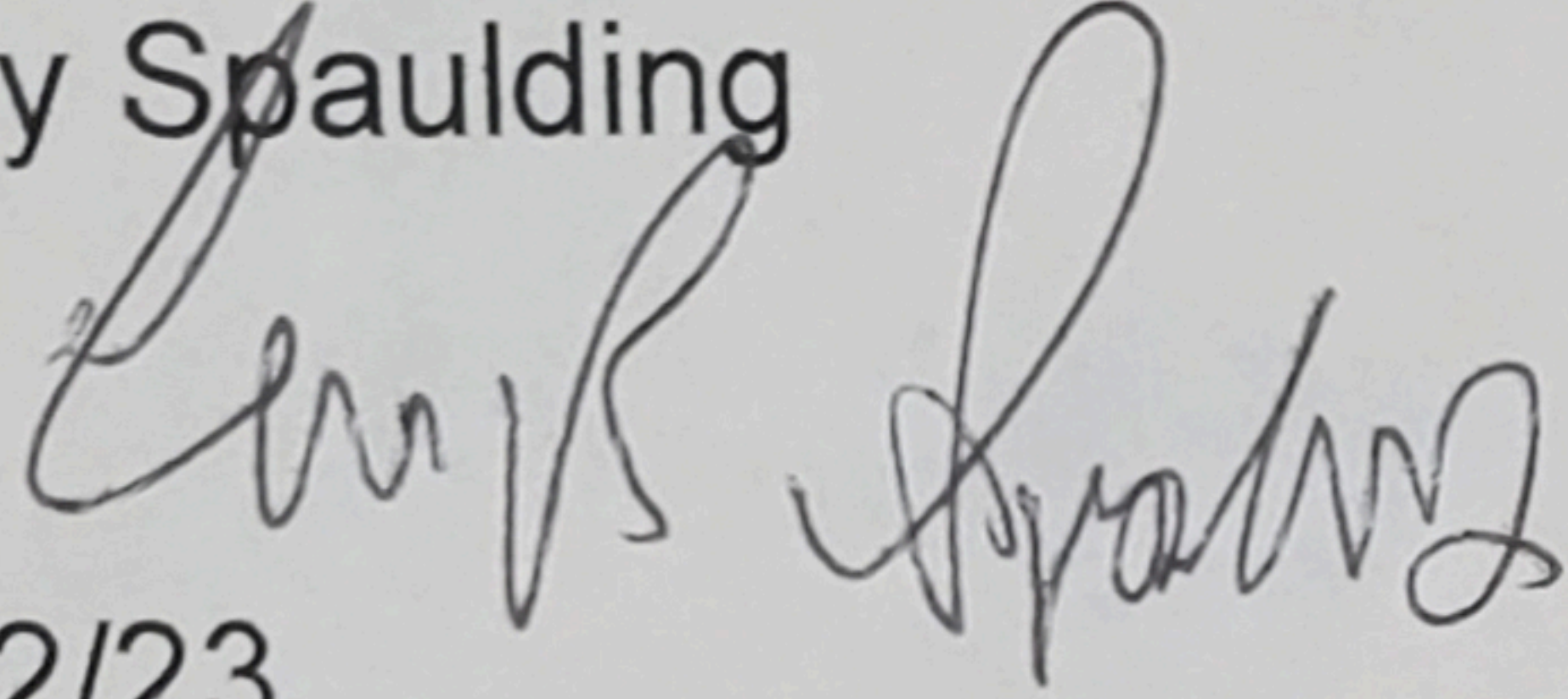
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