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June 9, 2023

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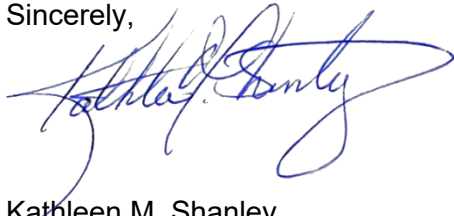
Re: Petition No. 1567 - 1637/1720 Lines Rebuild Project

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-001-22.

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 32, were there any additional comments received from the Towns of Wilton and Weston or the City of Norwalk 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 additional comments from the Towns of Wilton or Weston since the filing of the Petition.

During Eversource's door-to-door outreach, six abutting property owners requested advanced notification prior to work occurring on or near their property, and Eversource agreed to provide such notification. Eversource also communicated to all abutting property owners that if their property is disturbed, Eversource is committed to restoring the property.

Since the Petition filing, we've been working with an abutting property owner at 25 Cardinal Lane in Wilton. This abutter has specific concerns about the proposed structure location, including safety concerns for their children's play area. The abutter also requested we stake the limits of the right-of-way. Eversource met with this property owner onsite to discuss the proposed structure location, engineering standards, and potential visual mitigation measures that may be implemented after standard restoration. This abutter also reached out to the Town of Wilton prior to meeting with Eversource, so Eversource notified the Town that we are working with this abutter to address their concerns.

Also, during outreach, an abutting property owner at 19 Old Weston Road in Weston expressed concern that the Project would increase noise levels at the Weston Substation. Eversource responded by letting this abutter know this Project does not involve any work at the Weston Substation; therefore, an increase in noise at the substation is not anticipated.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 2

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

Response:

In general, the easements along the existing ROW grant Eversource the right to enter upon the land and erect, inspect, operate, replace, remove, repair and patrol, and permanently maintain the right of way, poles, towers, with necessary conductors, wires, cross arms, guys and other fixtures and appurtenances used or adapted for the transmission of electric current for power and other purposes, and adapted for telephone purposes and/or communication service.

The easements, in general, also grant Eversource as "Grantee" the right to trim, cut and remove trees, parts of trees, limbs, branches and underbrush within or projecting into the ROW/on adjoining land of Grantor, as in the judgment of the Grantee may interfere with or endanger poles, towers and wires, and their operation or with any of the appurtenances. In some easement areas along the existing ROW, Eversource has the right to use chemicals to control growth of trees, limbs, branches, underbrush and other growth, provided chemical use shall not apply for areas used for growing crops, other than trees, or for mowing of grassland.

Eversource cannot comment on rights for any other public utility uses as may be present along the ROW.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 3

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: 4

Referencing Petition p. 11, define the terms “maintained ROW” and “full ROW.”

Response:

The term “maintained ROW” refers to the portions of the ROW where vegetation is managed on a cyclical basis. The “maintained ROW” may or may not be the full width of the ROW. For example, where the ROW easement is 80 feet wide, the ROW may be maintained for the full width. That is vegetation is managed from edge to edge (the “full ROW”). In other areas, for example, such as where the ROW easement width is at 165 feet, such as in the area near the West Branch of the Saugatuck River, the “maintained ROW” is only 80 feet wide and the remainder of the “full ROW” of 165 feet is not maintained (refer to Cross-section 4 of Attachment C of the Petition).

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 5

Referencing Petition p. 4, of the 4.0 miles of Project ROW, how many miles of Project ROW are in located in each of the municipalities of Norwalk, Weston and Wilton?

Response:

Approximately 0.2 mile of the Project ROW is located in Norwalk.
Approximately 0.4 mile of the Project ROW is located in Weston.
The remaining 3.4 miles of the Project ROW is located in Wilton.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 7, after the structure replacements for Sub-petitions 1293-WT-01 and 1293- WI-01 and the structure replacements for the project, what number of existing structures would remain and when is replacement of those structures anticipated?

Response:

After the referenced projects are complete, 19 existing 1637/1720 line structures would remain in the right-of-way between Structure 963 at Grist Mill Road and Norwalk Substation. Of the 19 remaining structures, two are lattice towers and 17 are steel monopoles. These structures were constructed in 1987 and 2006.

Eversource would propose replacement of these structures upon the discovery of asset condition assessment concerns as identified through Eversource's routine maintenance inspection program, or an identified system reliability or upgrade need in the Grist Mill – Norwalk Substation segment. Eversource is not presently aware of any asset condition concerns that would provide reason to forecast replacement of those structures.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 7

Referencing Petition Map Sheet 2, Structures 957-1 and 957-2 are marked for replacement with new Structures 957 and 957A, respectively; however, these structures were also marked for replacement in Council Sub-Petition No. 1293-WI-01, approved by the Council on May 17, 2021 and completed on February 18, 2022. Explain why such structures need to be replaced again.

Response:

Eversource makes reasonable attempts to re-use/incorporate newer structures into future project design. For example, adjacent structures 958 and 958-A are proposed for re-use with minor modifications.

Structures 957-1 and 957-2 were originally guyed wood poles and were replaced with guyed steel structures under Sub-Petition No. 1293-WI-01 in 2021. Structure 957-1 was replaced due to asset condition. Companion Structure 957-2 was replaced for construction and cost efficiency opportunity. The structure replacement work was completed prior to the development of the proposed Project.

As part of the currently proposed Project, the two parallel sets of existing lattice towers in the segment between Norwalk Junction and Kent Road would be removed and replaced. As a result, the 1637 and 1720 lines would be slightly relocated within this section to accommodate the replacement structures within the existing right of way. Accordingly, the existing guyed steel Structures 957-1 and 957-2 need to be repositioned to meet the proposed new alignment.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 8

Referencing Petition Map Sheet 7, are existing Structures 19797 and 19797A the same as proposed Structures 933(1) and 933(2) on Council Sub-Petition 1293-WT-01 Map Sheet 2?

Response:

Existing structures 933(1) and 933(2), which were erected as part of the work described in Sub-Petition 1293-WT-01, will be renumbered to 19797 and 19797A, respectively, as part of this Project.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 9

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

Response:

The most recent vegetation management along the Project right of way (ROW) was performed in 2020 and 2021. In 2020, contracted tree crews selectively cut or removed incompatible woody plant species that can reach a height of greater than 15 feet at maturity inside the easement or maintained ROW. Branches from trees outside the easement were pruned to the easement or maintained ROW edge. The work was performed by hand and by machinery. In 2021, a contractor applied herbicide to target incompatible vegetation within the limits of the easement or maintained ROW. Most targets were trunk resprouts or vegetation too small to cut from the previous year.

As part of Eversource's ongoing cyclical vegetation management, referred to as the Transmission Right-of-Way Reliability Program (TRRP), crews will be performing additional vegetation management work within the ROW this summer (June 2023 - August 2023).

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 10

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

Response:

The proposed 1637/1720 Lines Rebuild Project was not identified by an ISO-New England Inc. needs and solutions analysis. The Project is associated with the Asset Condition List and is identified as project number 352.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 11

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

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: 12

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

Response:

The total estimated cost of the Project is approximately \$159.59 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: 13

Referencing Petition p. 22, compare the cost of utilizing weathering steel poles vs. galvanized steel poles.

Response:

Engineered galvanized poles have an approximately 4 to 6 percent material cost premium compared to engineered weathering steel poles. This range is based on present pricing.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 14

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 proposed, planned or constructed projects across Connecticut. The main purpose of such projects is first and foremost to improve transmission system reliability, which is achieved not only by expanding and upgrading existing infrastructure, but also by replacing aged infrastructure, such as structures, conductors or shield wire.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 15

Referencing Petition p. 4, would Eversource need to obtain Connecticut Department of Transportation Encroachment Permits to cross Routes 7, 33, and 53 or any other state roads within the Project area? Explain.

Response:

Eversource would need to obtain Connecticut Department of Transportation Encroachment Permits to cross Routes 7, 33, and 53 for the installation of conductors and OPGW over these routes. In addition, an encroachment permit would also be required for access from Route 53 to construct the work pad for the installation of Structure 19800 and the removal of Structure 936.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 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?

Response:

In addition to Eversource's Best Management Practices ("BMPs"), Eversource would comply with any recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CT DEEP") Natural Diversity Database Determination Letter for additional protection measures, which may include, but not be limited to, providing contractor training, time of year restrictions for work in certain species habitat areas, monitoring, and/or installation of exclusionary features (e.g., silt or snow fencing) as directed by qualified individuals.

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.). These erosion and sediment controls would be regularly inspected and maintained until final stabilization has been achieved.

Additional vernal pool protection measures would be implemented during Project 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, as well as protection of compatible vegetation within the vernal pool envelopes.

In addition to the monitoring requirement under the CT DEEP's *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* ("General Permit"), Eversource will assign a qualified environmental inspector to conduct weekly inspections for the duration of the Project activities, including restoration, and to perform post-restoration inspections on a monthly basis until all disturbed areas are stabilized and the Notice of Termination is filed per the General Permit requirements.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 17

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:

Eversource has not developed a single, stand-alone Protection Plan for wetlands, watercourses, and vernal pools for the Project. However, the Project Stormwater Pollution Control Plan ("SWPCP") that was submitted the Connecticut Department of Energy and Environmental Protection on April 26, 2023, details work areas, erosion and sedimentation control measures and matting configurations. These measures and configurations are intended to protect sensitive resource areas (e.g., wetlands, watercourses, and vernal pools) during construction. Approval of the SWPCP is still pending but would be issued prior to the start of construction.

Project work will comply with the SWPCP, Eversource's BMP Manual, which focuses on the protection of wetlands, watercourses, and vernal pools, and the U.S. Army Corps of Engineers Self-Verification Authorization Conditions for work in wetlands. Eversource will also conduct weekly inspections to ensure compliance with the General Permit, BMPs, authorizations, and permit conditions.

Eversource believes that the protection measures defined in the SWPCP, authorizations, 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: 18

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-WI-01 and 1293-WT-01? Explain how these areas overlap.

Response:

Yes, Eversource would 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-WI-01 and 1293-WT-01. However, for the proposed Project, Eversource would have a slightly different temporary work pad configuration as the scope of the work differs slightly from the previous Sub-Petitions.

The scope of Sub-Petition 1293-WI-01 replaced four (4) existing wood pole structures with weathering steel structures (structures 957, 958, 957B and 958B) in the vicinity of Kent Road in Wilton. For this Project, both 958 and 958B structures will remain in place. Structures 957 and 957B will be replaced using the same work areas, mitigation measures and construction measures as was used for Sub-Petition 1293-WI-01.

The scope of Sub-Petition 1293-WT-01 replaced three (3) structures (947, 947-1, and 933) also in Wilton. But for use of the existing access road, none of the Project work will overlap with this area.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 19

Referencing Petition p. 14 and Sub-petitions 1293-WI-01 and 1293-WT-01, what portions of the existing facility site are common to the Phase 1A Cultural Resources Assessment Survey that was conducted for the structure replacements in 2021?

Response:

The Phase 1A Cultural Resources Assessment Survey conducted for this Petition includes the entire portions of the facility site associated with the scopes of work for Sub-Petitions 1293-WI-01 and 1293-WT-01.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 20

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 the restoration of gravel work pads, as necessary to fulfill any commitments to landowners, or regraded into adjacent uplands and stabilized in accordance with Eversource's BMP Manual and the SWPCP. Any excavated soils that cannot be reused within the Project area would be transported and properly managed off-site in accordance with Eversource BMPs.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 21

Referencing Petition pp. 20 and 21, 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:

In re-classifying the Northern Long-eared Bat (“NLEB”) from threatened to endangered, the United States Fish and Wildlife Service (“USFWS”) provided a NLEB Rangewide Determination Key (“DKey”), published March 6, 2023 and available in the USFWS Information for Planning and Consultation tool. On April 28, 2023, the Project was rerun through the DKey and the determination letter stated, “the [Project] is not likely to result in unauthorized take of the northern long-eared bat.” This reevaluation of NLEB through the new DKey for the Project is consistent with the previous determination letter.

Date Filed: June 09, 2023

Request from: Connecticut Siting Council

Question: 22

How would new conductor and OPGW installation avoid contact with water at crossings?

Response:

The new conductor and OPGW would be installed such that the wire would avoid contact with water at crossings throughout the construction process. Conductor and OPGW are typically installed using “traveler blocks” (a series of pulleys) and rope. The conductor and OPGW installation process is as follows:

1. The existing static wire or existing conductor 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. The existing conductor would be connected to a wire rope (“hardline”).
5. 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.
6. The new conductor will be connected to the hardline and then pulled into position.
7. After the OPGW or new conductor is pulled into position, the traveler blocks will be removed and the OPGW will be clipped in.