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July 7, 2023

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

Re: Brookfield Junction to Bates Rock Substation Upgrade Project

Dear Ms. Bachman:

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

Response to CSC-01 Interrogatories dated June 16, 2023
Set 01- Questions 1-33

Sincerely,

Deborah Denfeld

Deborah Denfeld

Enclosures

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 1
Referencing Petition p. 36, were there any additional comments received from the Towns of Brookfield, Newtown or Southbury or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

Since the Petition filing, no additional comments have been received from any of the respective towns.

Door-to-door outreach commenced in the 3rd quarter of 2022 and will continue throughout the duration of the Project. During door-to-door outreach, Eversource documented five requests from property owners for advance notification prior to work occurring on or near their property, including a request from a neighborhood association. Additional concerns were expressed by some property owners regarding restoration. All abutting property owners were assured that Eversource will restore all disturbed areas of their properties. Eversource will document and track these and other requests/commitments and communicate them to the contractors as appropriate.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 2
Describe outreach efforts to project abutters. Have any abutters requested further information? Were right-of-way (ROW) restoration measures described during public outreach?

Response:

A project introduction letter was mailed to abutting property owners in November 2022. During the fourth quarter of 2022 and the first and second quarter of 2023, Eversource conducted door-to-door outreach to property owners located along the route to provide an overview of the Project and the phases of work, including restoration. Eversource representatives will continue communication with adjacent property owners throughout construction and restoration.

Heritage Village Neighborhood Association representatives requested project updates, including construction schedules, be provided to them to disseminate amongst its residents. Several abutters also requested advance notification of start of construction near their properties. Eversource tracks these requests as well as any commitments made regarding restoration of private property and follows up with property owners as appropriate.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 3
Referencing Petition p. 24, did the Federal Aviation Administration (FAA) indicate marking and/or lighting would be required for any structure? Are any of the existing structures that would be replaced currently marked/lighted?

Response:

The Federal Aviation Administration (FAA) indicated that marking and/or lighting is not necessary for any of the proposed structures. There are no existing structures that are currently marked/lighted.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 4
Referencing Petition p. 5, what public utility uses/rights are identified under the easements along the existing ROW?

Response:

In general, the easements pertaining to properties along the existing Right of Way ("ROW"), grant the right to enter upon the land and erect, inspect, operate, replace, remove, repair, patrol, and permanently maintain 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 the right to trim, cut and remove trees, parts of trees, limbs, branches and underbrush within the ROW or projecting into the ROW from 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, the easements include 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: July 07, 2023

Request from: Connecticut Siting Council

Question: 5
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: July 07, 2023

Request from: Connecticut Siting Council

Question: 6
When was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

Removal of incompatible trees and side trimming in the right of way ("ROW") was conducted in October and December 2020 respectively. In October 2021 an herbicide application was done to control the growth of incompatible and woody invasive species in the ROW along with hazard tree removal and side trimming.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 7
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 Brookfield Junction to Bates Rock Substation Upgrade Project (the Project) was not identified by an ISO-New England Inc. needs and solution analysis. The Project is associated with the Asset Condition List (project number 258).

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 8
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 generation facilities listed on the ISO-NE interconnection queue are associated with the proposed Project.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 9
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 $46.63 million. Eversource anticipates that the entire cost will be regionalized pending the final determination of ISO-New England's Schedule 12 C 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: July 07, 2023

Request from: Connecticut Siting Council

Question: 10
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: July 07, 2023

Request from: Connecticut Siting Council

Question: 11
Identify all other permits required to perform the proposed work.

Response:

Please see below:

United States Army Corps of Engineers
- Self-Verification Notification under Connecticut General Permits 6 and 21

The Public Utilities Regulatory Authority
- Approval of Method and Manner of Construction

Connecticut Department of Transportation
- Encroachment Permit for access off of and pulling wire over Route 25.

Connecticut Department of Energy and Environmental Protection
- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
- Natural Diversity Data Base Determination
- State Historic Preservation Office Notification

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 12
Referencing Petition p. 6, after the structure replacements for Sub-Petition 1293-BS-01 and the structure replacements for the project, what number of existing structures would remain and when is replacement of those structures anticipated?

Response:

According to Eversource and Council records 1293-BS-01 is Bristol/Southington and 1293-BS-02 should be the correct reference.

The total current number of structures between Brookfield Junction and Bates Rock S/S is 154. After this Project is completed, 96 structures of the structures existing at the time that the Sub-Petition 1293-BS-01 work commenced will remain.

Eversource does not have current plans to replace any of the remaining structures but will continue to monitor their condition in the future.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 13
Referring to Petition p. 3, provide more information regarding the current National Electrical Safety Code (NESC) clearance requirements that require the addition of six mid-span structures.

Response:

Eversource design criteria for conductor clearance is primarily based on NESC Section 234, which has its basis in horizontal clearance requirements to buildings. Since it is impractical for Eversource to control development activity outside of its rights-of-way, new lines are typically designed with the assumption that a building could be erected at the right-of-way (ROW) edge. NESC Rules 234C and 234G result in a calculated clearance requirement of 9.1 feet of clearance to ROW edge for 115-kV conductors displaced by a 6 pounds per square foot wind. To provide a buffer for construction tolerance, Eversource designs new corridors to maintain 11 feet of clearance to ROW edge.

Due to the number of long spans, it was necessary to place mid-span structures in several locations to shorten the span lengths to allow conductor to meet current horizontal clearance standards. Shortening the distance between two structures significantly decreases the amount of horizontal conductor displacement due to wind.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 14
Could the number of additional mid-span structures proposed within the existing ROW be reduced by utilization of anti-galloping devices or other design options? Explain.

Response:

Anti-galloping devices work by changing the way that wind passes over the conductor, especially during iced conditions. Installing these devices would have no considerable effect on the distance that conductor displaces horizontally (blowout) in weather conditions. Other design options, such as strut insulators (to stop insulator swing) and higher design tensions, were considered and implemented in many areas. These mitigation measures allowed some spans to avoid the mid-span structure solution, while other spans were just too long to maintain appropriate blowout clearances without the use of mid-span structures. The number of additional mid-span structures cannot be further reduced because they serve to limit the span length between structures, which is the largest variable contributing to blowout distance.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 15
Referring to Petition pp. 9-11, provide more information on additional easements that would be necessary if new mid span structures were not installed. Where would the new easements be located, how many acres would be required and at what cost?

Response:

See below for the information on additional easements that would be necessary if the following new mid span structures were not installed.

Mid-span Structure	Property Owner(s)	Approximate acreage (Total per structure)	Estimated cost to acquire (Total per structure)
4650A	LL264-017*	0.034	$13,000
4628A	LL264-072*	0.003	$9,000
4622A	LL264-088	0.095	$18,000
4610A	LL264-110, LL264-112, LL264-113, LL264-114	0.252	$36,000
4609B/4609C	LL264-114, LL264-116	0.113	$18,000

* These property owners indicated that they were not willing to grant easements. Eversource does not know whether the other owners would be willing to grant easements.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 16

1. Referencing Petition Map Sheet 11;
    a. why are mid span structures necessary between Existing Structures 4608/4608A and 4609/4609A?
    b. What is the conductor span between these existing structures?
    c. Would replacement of existing Structures 4608/4608A and 4609/4609A with taller structures eliminate the need for new mid-span structures?

Response:

Please see the response below:

a. These mid-span structures have been added to reduce horizontal movement "blowout" of the conductor under wind loading to the edge of ROW. Limiting the span length between structures is the most effective solution to reduce blowout distance. The mid span structures are necessary to maintain appropriate clearances consistent with National Electric Safety Code and Eversource design criteria.

b. The span between existing structures 4608/4608A and 4609/4609A is approximately 857 feet.

c. Replacing existing structures 4608/4608A and 4609/4609A with taller structures would not eliminate the need for new mid span structures. Changing the height of these structures would not reduce the span length between the structures. Span length is the largest contributing factor to span sag and concurrently the span blowout. Increasing structure height can allow for a marginally smaller insulator swing angle by shifting weight span from one structure in the span to the other, but for these specific structures it does not provide enough reduction of conductor blowout to eliminate the need for mid span structures.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 17
Referencing Petition Map Sheets 6 -8, why is tree clearing necessary at Structures 4630 to 4629 and in Wetland 21?

Response:

Tree clearing at Structures 4630 to 4629 is necessary to meet standard horizontal clearance requirements from conductor to mature vegetation.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 18

Referencing Petition Map Sheets 7 and 8,

a. provide more detail regarding the proposed permanent bridges spanning Currituck Road and Georges Hill Road. What permits would be required?
b. Can structure 4628A be moved further to the east, away from Currituck Road?

Response:

Please see responses below:

a. The motor vehicle bridges that will be installed across Currituck Road and Georges Hill Road will be built by Housatonic Railroad and located adjacent to the existing railroad bridges. Eversource cannot speak to what permits are required, as the Housatonic Railroad is responsible for any permitting for the installation of these bridges.

b. No. Moving structure 4628A further east away from Currituck Road would result in the conductor not meeting horizontal clearance standards to the edge of the right-of-way under wind conditions at the abutting property located between structure 4628 and Currituck Road.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 19
Referencing Petition p. 32, identify the location of the permanent bridge spanning a watercourse to be installed by the Housatonic Railroad.

Response:

This bridge's location is between structures 4639 and 4638 and spans wetland S04, as is shown on Map Sheet 4 of 17.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 20
Referencing Petition Map Sheet 9, why does the replacement of Structure 4621 require two structures instead of one? Can both the 1485 Line and 1887 Line be supported on one structure?

Response:

The replacement of Structure 4621 requires two structures instead of one due to constructability concerns and because it is Eversource standard practice to "dead-end" each circuit on its own structure when in vertical configuration. Typically, deadend structures are located at right-of-way angle points and at reasonable distances to facilitate construction of the line.

"Deadend" structures are designed to support the full longitudinal tension loads from the wires. To not affect the sag and tension characteristics of the wires, the deadend structures need to be sufficiently rigid and not flexible. The load transfer is most effective when wires are supported by the rigid pole column itself, transferring the loads directly through the pole column, down to the foundation, and into the ground. In a double-circuit configuration, there needs to be two single circuit deadends at every deadend location, one structure for each circuit. A monopole structure supporting two circuits in a "strain" on arms configuration would be too flexible and could not effectively transfer the wire loads without affecting the sag and tension characteristics of the line

At this location, the 1485 Line and 1887 Line cannot be supported on one structure.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 21
The existing conductors on the 1485 and 1622 lines are approximately 43 years old. Why aren't the conductors scheduled for replacement at this time? What is the life span of this section of conductors?

Response:

Eversource estimates the approximate life span of the conductors to be between 60 and 70 years.

Conductors frequently go beyond, sometimes well beyond, the 40-year life span referenced in the Council's 2022 Life Cycle Report. The 40-year life reflects an average period utilized for assessing depreciation for transmission system assets, and in some cases 40 years proves to be the life span of such assets depending on the environmental conditions that the particular asset is exposed to.

However, Eversource performs regular inspections and maintenance on its infrastructure with the goal to reasonably maximize the remaining useful life of its installed assets, provided that such assets continue to meet transmission system needs. While some transmission system assets are replaced around the 40-year mark, Eversource will keep the assets in operation provided that they are assessed to be reliable, in good condition, and sufficient for transmission system needs.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 22
How would 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 by maintaining appropriate tension and utilizing construction means and methods. 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. "Traveler blocks" will be installed at each replacement structure and at the existing structures that are not going to be replaced so that the wire can be pulled.
2. The existing static wire or existing conductor will be unclipped from the existing structures and put into the traveler blocks.
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 wires will be clipped in.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 23
Describe post-construction cleanup procedures in the ROW, including the disposition of woody debris from tree clearing. In what areas will woody debris and other natural materials be disposed of? Have abutters been notified of the disposal areas?

Response:

Post-construction cleanup procedures include the removal of construction debris, signage, flagging, and temporary fencing, as well as the removal of construction mats and work pads that are designated for removal. Areas affected by construction will be re-graded as practical and stabilized using revegetation or other measures before removing temporary erosion and sedimentation controls. Eversource will perform right of way ("ROW") restoration in accordance with the protocols specified in Eversource's Best Management Practices Manual and in consultation with affected property owners. For gravel work pads within Natural Diversity Database areas and key habitat areas of New England Cottontail ("NEC"), Eversource is proposing restoration utilizing a top-dress of stockpiled soil and/or processed stone with a native conservation seed mix. Gravel work pads located in NEC focus areas will be reduced in size where feasible, to minimize potential effects to NEC habitat in accordance with Eversource's 2021 NEC Best Management Practices.

Tree parts including logs and branches will be removed from the ROW. Where not in conflict with any other permits, policies, or commitments, a portion of cut woody debris shall be left within the ROW to provide cover/structure for NECs. The portion of material to remain shall be determined by the designated representative. If there are areas where debris removal is not possible because there is no equipment access, slash will not be piled greater than three feet in height or within 50 feet of any road, or within 25 feet of any property boundary. If chipping debris, then all chips are hauled away from the ROW. All wood waste must be managed as required without delay and within 30 calendar days of initial cutting. All debris must be properly disposed of at the discretion of the Vendor.

If the property owner requests that the wood be left on the property, wood will be left as logs not to exceed 25 feet in length. Wood will be piled typically along the new edge of clearing.

The main area of interest expressed by abutters is restoration: i.e., work pads, lawns, driveways. When abutters inquire, Eversource shares its standard work practices and disposal methods as described above.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 24
Describe post-construction cleanup procedures in the ROW, including the disposition of woody debris from tree clearing. In what areas will woody debris and other natural materials be disposed of? Have abutters been notified of the disposal areas?

Response:

In addition to Eversource's Best Management Practices ("BMPs"), Eversource would comply with recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Natural Diversity Database ("NDDB") Determination Letter (once received) for additional protection measures, which may include, but are not 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.), which would be regularly inspected and maintained until final stabilization has been achieved.

Vernal pool habitat and species protection measures would be implemented during construction. These include but are not limited to avoiding civil construction near vernal pools to the maximum extent practicable during high sensitivity periods for the observed vernal pool indicator species, and protection of compatible vegetation within the vernal pool envelopes.

In addition to the monitoring requirement under the CTDEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit"), Eversource will hire an 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. Furthermore, should the NDDB Determination letter include additional protection measures for listed species and if the Project's qualified inspector does not have the credentials to perform such species-specific monitoring, then Eversource would retain a specialist to conduct the NDDB-required inspections or other activities (e.g., contractor training).

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 25
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-Petition 1293-BS-01? Explain how these areas overlap.

Response:

According to Eversource and Council records 1293-BS-01 is Bristol/Southington and 1293-BS-02 should be the correct reference.

Yes, the proposed Project would utilize the same mitigation measures and/or use the same construction methods as used in the work described in Sub-Petition 1293-BS-02. Since the geographic area covered under Sub-Petition 1293-BS-2 was limited to a small area in and around Brookfield Junction and a relatively small area near Bates Rock Substation, there is only minor overlap with the area of the proposed Project.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 26
Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools in its construction plans for the project? If yes, submit the 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"), which will be finalized upon receiving the requested final Determination from NDDB (request submitted November 16, 2022), 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. The SWPCP will be finalized 60 to 90 days prior to the start of construction.

Project work will comply with the SWPCP; Eversource's Best Management Practices ("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 also will 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 spirit and intent of a single Protection Plan.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 27
Referring to Petition p. 24, it states most of the ROW is within New England Cottontail Focus and Key Habitat Areas and work area restoration would include the covering either partial or fully, of gravel work pads with soil. The Petition Map Sheets do not contain any callouts as to what gravel pads would be partially or fully covered. Provide further information regarding gravel pad restoration. How would Eversource ensure the New England Cottontail post-construction mitigation measures have been satisfactorily completed?

Response:

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

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 28
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 on the property where they were excavated would first be used for restoration of gravel work pads within the subject property and New England Cottontail Focus and Key Habitat Areas and then regraded into adjacent uplands and stabilized in accordance with Eversource's Best Management Practice ("BMP") manual and the Project Stormwater Pollution Control Plan. Any excavated soils that cannot be reused on the subject property from which they were excavated would be transported from the Project area and properly managed off-site in accordance with Eversource BMPs and any applicable local, state, or federal laws.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 29
Referencing Petition pp. 10-11, three existing wood pole structures would be removed. If known, were the wooden poles chemically treated at the time of installation? Describe any best management practices associated with the disposal of the wooden poles.

Response:

Although no specific data is available, it is likely that the wood poles of the H-frame structures were treated prior to installation.

Eversource's Best Management Practice ("BMP") Manual, Section 3.12.1 – Pole Butt Removal, addresses the BMPs regarding wooden pole removal. Specifically, the BMP Manual states:

> *When transmission poles are decommissioned or otherwise taken out of service, in most cases the entire pole shall be removed. Treated wood pole butts shall be removed completely from the ground and properly disposed at an off-site location. Locations where the removal of pole butts may cause significant disturbance to wetlands or other sensitive environmental areas will be considered for exception to this practice on a site-by-site basis. The Transmission Line Construction and Maintenance Manager, in consultation with Eversource Environmental Licensing and Permitting, will be responsible for determining if a pole butt can be removed if located in a sensitive environmental area.*

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 30
Referencing Petition pp. 14 and 21, the hand cutting of trees is described for the "vernal pool depression" for Confirmed Vernal Pool 2. Are hand clearing methods proposed for the vernal pool itself, the vernal pool envelope, or both?

Response:

No hand clearing is required within the "vernal pool depression". Some hand clearing may be necessary within the vernal pool envelope for the matted pad and the matted access road.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 31
Referencing Petition p. 22, provide more information as to the specific best management practices that would be employed for work within Aquifer Protection Areas.

Response:

As stated in the Petition under Section 5, Water Supply, Eversource would require its contractors to employ best management practices for the proper storage, secondary containment, and handling of diesel fuel, motor oil, grease, and other lubricants, to protect water quality within the Project area. Construction activities would conform to Eversource's and Aquarion's Best Management Practices, as well as to the requirements of Project-specific Stormwater Pollution Control Plan and the contractor's spill prevention and control measures.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 32
Referencing Petition p. 23, 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 Information for Planning and Consultation (IPaC) tool. On April 27, 2023, the Project information was rerun through the new USFWS DKey and the determination letter from that review 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 did not materially change the previous determination letter.

Date Filed: July 07, 2023

Request from: Connecticut Siting Council

Question: 33
Explain how the work contractor is made aware of sensitive environmental and cultural resources along the ROW that require certain protective work procedures? What entity ensures that specified work procedures are adhered to?

Response:

Specific Eversource Best Management Practices ("BMPs") and protection measures are typically incorporated in the contractors' agreements for the Project work. Further, all contractors will be required to sign off on specific documents, such as the BMPs, prior to conducting any work on the Project. Each contractor is also made aware of specific environmental and/or cultural resource protection measures as part of the bid process. After a contractor is selected and the agreement signed, the Project team will hold a "kick-off" meeting where the Eversource Environmental Specialist reviews all environmental protection measures, including those for cultural resources. During construction, a daily "tail board" meeting is held to review the details of each day's work, which may include work in environmentally sensitive areas. During the tail board meetings, any protection measures are reviewed. An Environmental Monitor is responsible for inspecting site conditions in the field and, if necessary due to special species requirements, an additional inspector that has specific species qualifications will also be on site to ensure compliance with all protection measures. In addition to these monitors/inspectors, the Project Management personnel and Construction Managers are also responsible for compliance and adherence to the BMPs and protection measures that are incorporated in the agreements with the contractors that perform the Project work.