



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

June 16, 2023

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

RE: **PETITION NO. 1573** - 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 Brookfield Junction to Bates Rock Substation Upgrade Project consisting of the replacement and reconductoring of electric transmission line structures along approximately 6.7 miles of its existing electric transmission line right-of-way shared by its existing 115-kilovolt (kV) Nos. 1887, 1268, and 1485 Lines between Brookfield Junction in Brookfield and Shepaug Substation in Newtown, and along approximately 0.5 mile of its existing electric transmission line right-of-way shared by its existing 115-kV Nos. 1622 and 1485 Lines between Shepaug Substation and Bates Rock Substation in Southbury, Connecticut traversing the municipalities of Brookfield, Newtown and Southbury, 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 July 7, 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 July 7, 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,

Melanie Bachman
Executive Director

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

**Petition No. 1573 - Eversource
1887, 1268, 1485, and 1622 Lines Rebuild Project
Brookfield, Newtown and Southbury, Connecticut**

**Interrogatories
June 16, 2023**

Notice

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

Existing Facility Site

4. Referencing Petition p. 5, what public utility uses/rights are identified under the easements along the existing ROW?
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.
6. When was the most recent vegetation management conducted in the ROW? What work was performed?

Project Development

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

Project Construction

11. Identify all other permits required to perform the proposed work.
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?
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.
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.
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?
16. 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?
17. Referencing Petition Map Sheets 6 -8, why is tree clearing necessary at Structures 4630 to 4629 and in Wetland 21?
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?
19. Referencing Petition p. 32, identify the location of the permanent bridge spanning a watercourse to be installed by the Housatonic Railroad.
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?
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?
22. How would OPGW installation avoid contact with water at crossings?
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?

Environmental Effects and Mitigation Measures

24. 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?
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.
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?
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?
28. What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?
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.
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?
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.
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.
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?