



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

June 29, 2023

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

RE: **PETITION NO. 1576** - 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 Middletown Substation to Oxbow Junction Upgrade Project consisting of the replacement of electric transmission line structures along approximately 5.5 miles of its existing No. 1620 115-kilovolt (kV) electric transmission line right of way between Middletown Substation in Middletown and Oxbow Junction in Haddam, Connecticut, 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 20, 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 20, 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 dark ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

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

**Petition No. 1576 - Eversource
Middletown Substation to Oxbow Junction Upgrade Project
Middletown and Haddam, Connecticut**

**Interrogatories
June 29, 2023**

Notice

1. Referencing Petition p. 23, were any comments received from the City of Middletown and Town of Haddam 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. Identify any proposed new and/or replacement structures that are pending Federal Aviation Administration obstruction evaluation. Are any of the existing structures that would be replaced currently marked/lighted?

Existing Facility Site

4. Referencing Petition p. 2, 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. Referencing Petition p. 5, 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. How would any interruptions to existing generation facilities proximate and/or interconnected to the transmission line be avoided/mitigated?
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?
12. Describe how the proposed project is consistent with the recommendations of the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) Report on Transmission Facility Outages During the Northeast Snowstorm of October 29-30, 2011 – Causes and Recommendations.

Project Construction

13. Identify all other permits required to perform the proposed work.
14. Provide maps for the entire ROW that depict locations of new and temporary access roads, work pads, and pull pads necessary for the static wire replacement with OPGW.
15. Referencing Petition pp. 5-6, the conductors were installed in 1958. Why aren't the conductors scheduled for replacement at this time? What is the life span of these conductors?
16. Referencing Petition p. 7, after the structure replacements for Sub-petition 1293-HM-01 and the structure replacements for the project, what number of existing structures would remain and when is replacement of those structures anticipated?
17. Referencing Petition Map Sheet 4, Structure 14027 is marked for replacement; however, this structure was also marked for replacement in Council Sub-Petition No. 1293-HM-01, approved by the Council on December 10, 2018 and completed on November 6, 2019. Explain why it is necessary to replace this structure as part of this Project.

Environmental Effects and Mitigation Measures

18. 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?
19. Referencing Petition p. 18, required inspections associated with the DEEP SWPCP are mentioned. In addition to the qualified inspector required by the General Permit, would there be other environmental inspectors assigned to the Project? If yes, identify specific inspection duties. If not, why not.
20. Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools, including applicable pre-construction environmental resource field delineations and 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?
21. Describe post-construction 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?
22. What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?

23. Referencing Petition pp. 6-7, six 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 wood poles.
24. 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-HM-01? Explain how these areas overlap.
25. Referencing Map Sheet 3, can the temporary matting within Wetland 10 be eliminated by using existing access roads east and west of the wetland?
26. Referencing Map Sheet 6, can the temporary matting within Wetland 56 be eliminated by installing the work pad in the upland west of the wetland?
27. Has Eversource consulted with the United States Fish and Wildlife Service through its Information, Planning, and Consultation (“IPaC”) service regarding federal-listed species that may be present within the Project area?
28. Referencing Petition p. 13, provide the DEEP Natural Diversity Data Base (NDDDB) Determination letter dated February 27, 2023. How are specific recommendations for each NDDDB species implemented prior to or during construction?
29. Referencing Petition pp. 9-10, submit a copy of the March 28, 2023 correspondence from SHPO addressed to Heritage Consultants, LLC related to the results of the cultural assessment.
30. How are invasive species within work areas identified prior to the commencement of construction?