



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

August 4, 2023

Deborah Denfeld
Team Lead – Transmission Siting
Eversource Energy
P.O. Box 270
Hartford, CT 06141
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RE: **PETITION NO. 1582** - 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 Pootatuck to West Devon Rebuild Project consisting of the replacement and reconductoring of electric transmission line structures along approximately 3.3 miles of its existing electric transmission line right-of-way shared by its existing 115-kilovolt (kV) 1580, 1241, 1483 and 1545 Lines between The United Illuminating Company's (UI) Pootatuck Substation in Shelton, UI's Trap Falls Substation in Shelton and Eversource's West Devon Junction in Stratford, traversing the municipalities of Shelton and Stratford, 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 August 25, 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 August 25, 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. 1582 - Eversource
Pootatuck to West Devon Rebuild Project
Shelton and Stratford, Connecticut**

**Interrogatories
August 4, 2023**

Notice

1. Referencing Petition p. 28, were any comments received from the City of Shelton, the Town of Stratford 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 abutting property owners. Have any abutting property owners requested further information? Were right-of-way (ROW) restoration measures described during public outreach?
3. Referencing Petition p. 27, has a response been received from the Federal Aviation Administration (FAA) regarding the three replacement structures that might require marker balls or beacon lights? If yes, provide any response from FAA including any required marking/lighting plans if applicable.

Existing Facility Site

4. Referencing Petition pp. 1 and 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. 8, 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?

11. Please 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

12. Identify all other permits required to perform the proposed work.
13. Referencing Petition pp. 5-6, what are the approximate ages and remaining useful life in years, if any, for the existing 4/0 copper conductor on the 1580 Line and the 795-kcmil aluminum conductor steel reinforced (ACSR) conductors on the 1241/1483 Lines and 1483/1545 Lines?
14. How would conductor and OPGW installation avoid contact with water at crossings?

Environmental Effects and Mitigation Measures

15. 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?
16. 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 the plan. If no, when would such a plan be developed?
17. Referencing Petition p. 23, 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 no, explain why not.
18. Referencing Petition Map Sheet 7 of 7, what is the purpose of the square shaped temporary mat area southwest of VP-2? Could this matted area be relocated farther from VP-2?
19. What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?
20. Referencing Petition p. 15, provide the DEEP Natural Diversity Data Base (NDDB) Determination letter received on May 23, 2023. How are specific recommendations for each NDDB species implemented prior to or during construction?
21. Referencing Petition p. 15, Eversource notes that, "The IPaC report indicated one federally listed threatened species, Northern Long-eared Bat (NLEB)..." Would the re-classification of the NLEB from federally threatened to endangered affect the IPaC determination? Explain.
22. Referencing Petition p. 17, would the proposed weathering steel structures be expected to blend in with the wooded surrounding landscape? Explain.
23. Referencing Petition pp. 10 and 11, submit a copy of the correspondence from SHPO.
24. Referencing Petition pp. 10 and 11, has Eversource received any comments from the Tribal Historic Preservation Offices (THPOs)?

25. How are invasive species within work areas identified prior to the commencement of construction?
26. Could Eversource use net-less or other type of E&S controls to prevent wildlife entanglement?

Public Safety

27. Referencing Petition p. 19, post-construction magnetic field levels would decrease at the edges of the ROW as a result of the project. Would that be due to the generally taller structures? Explain.