

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 8, 2024

Deborah Denfeld
Team Lead – Transmission Siting
Eversource Energy
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RE: **PETITION NO. 1605** – 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 Hartford Underground Cable Replacement Project consisting of the replacement and partial relocation of its existing 115-kilovolt (kV) 1722 and 1740 high pressure fluid filled (HPFF) electric transmission cables with cross linked polyethylene (XLPE) electric transmission cables along approximately 6.7 miles of existing and new right-of-way between Northwest Hartford Substation, Southwest Hartford Substation and South Meadow Substation and retirement of two transmission line taps at Capital District Energy Center Cogeneration Associates and O'Brien Energy Systems, Inc. cogeneration facilities in Hartford, Connecticut and related electric transmission cable and substation improvements. **Council Interrogatories to Petitioner.**

Dear Deborah Denfeld:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 1, 2024. 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 April 1, 2024 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: Service List dated January 2, 2023

Petition No. 1605 - Eversource Hartford Underground Cable Replacement Project Hartford, Connecticut

Interrogatories March 8, 2024

Notice

- 1. Referencing Petition pp. D-1 and D-2, were there any comments received from the City of Hartford (City) or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?
- 2. Have any abutting property owners requested further information? Were restoration measures described during public outreach?
- 3. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?

Existing Facility Site

- 4. Provide the approximate width (or range of widths) of the road ROW for the entire Project route.
- 5. How long is the 1722 Line Tap in linear miles?
- 6. Referencing Petition p. A-8, the proposed cross linked polyethylene (XLPE) cables would be 5000-kcmil. What size are the existing high pressure fluid filled (HPFF) cables for the 1722 and 1704 Lines? Do the existing HPFF 1722 and 1704 Lines have one or two conductors per phase?

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 queue position.
- 9. Is Eversource required to seek any ISO-NE reviews and/or approvals for the replacement of the transmission facilities? Provide the status or copy of any such ISO-NE approvals if applicable.
- 10. How does the Project relate to other proposed, planned or constructed Connecticut reliability and asset condition projects?
- 11. Provide the cost estimates for both the 1722 Line and the 1704 Line replacements. Provide estimates broken down by components that Eversource believes are appropriate.
- 12. Referencing Petition pp. A-9 and A-10, 1722 Line Bulkeley Avenue Deviation, what is the incremental cost for this approximately 800 foot deviation from the original route? Explain how the church and carwash impede the easements when the existing cable is located in the street.

- 13. Referencing Petition p. A-10, 1704 Line Hamilton Street Deviation, what is the incremental cost of this approximately 150 foot deviation from the original route (including the micro-tunneling)?
- 14. Referencing Petition p. A-10, what is the impact of an outage on the 1704 Line if it were attached to the Hamilton Street bridge? Could a portable generator be installed to maintain service while the installation onto the bridge occurs? Were there other alternatives explored? Explain.
- 15. Referencing Petition pp. A-10 and A-11, 1704 Line Colt Park Deviation, what is the incremental cost of this approximately 100 foot deviation from the original route?
- 16. 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.
- 17. How would Eversource avoid and/or manage project cost overruns? Who would bear the burden of any cost overruns? Explain.

Proposed Project

- 18. Provide the ratings on the existing and the proposed cables.
- 19. Referencing Petition p. A-12, Eversource notes that, "Depending on subsurface conditions, the arrangement of the three power cable PVC conduits can be in a triangular arrangement of a standard duct bank, in a vertical arrangement for a narrow duct bank, or in a horizontal arrangement for a shallower duct bank." These duct bank configurations are identified in Petition, Attachment 2, Typical Duct Bank Casing Cross-Sections. When would subsurface conditions be evaluated and the determinations on the duct bank configurations be made? If this has already been evaluated, which portions of the routes for each circuit would have which duct bank configurations?
- 20. Referencing Petition Attachment 2, Typical Duct Bank Casing Cross-Section, explain what Phase A, B, and C refer to?
- 21. Referencing Petition p. A-8, is the Capital District Energy Center Cogeneration Associates (CDECCA) line tap also HPFF? Page A-8 indicates the line would be retired in place, please provide retirement details.
- 22. Referencing Petition, pp. A-15 and A-16, provide the heights of the following:
 - a) Tallest existing structure at Northwest Hartford Substation;
 - b) Proposed termination structure for 1722 Line at Northwest Hartford Substation;
 - c) Tallest existing structure at Southwest Hartford Substation;
 - d) Proposed termination structure for 1722 Line at Southwest Hartford Substation; and
 - e) Tallest existing structure at South Meadow Substation.
- 23. Referencing Petition, pp. A-15 and A-16, other than the proposed replacement cables and associated fiber optic lines entering the substations, would substation equipment modifications generally remain within the fenced substations?
- 24. Referencing Petition p. C-37, after removal of the HPFF, the pipes would be capped and pressurized with low pressure nitrogen. Explain why this would be performed on the decommissioned HPFF pipes.

Public Safety

- 25. Would the Project comply with the 2023 National Electrical Safety Code, effective February 1, 2023?
- 26. Referencing Petition p. A-15, would notice to the Federal Aviation Administration be required for the proposed substation termination structures? Would marking and/or lighting be required for such structures?
- 27. Referencing Petition p. C-30, Table D-2, are the post-construction magnetic field calculations based on average annual load conditions? Explain.
- 28. How would the proposed Project affect magnetic field levels at the property boundaries of the three substations? Explain.
- 29. Referencing Petition p. A-14, identify the drilling fluid to be used for micro-tunneling, if applicable. How is the fluid contained during use?
- 30. Referencing Petition Attachment 4, Flood Contingency Plan, bullet point 11 notes "Protect HDD drill shafts and entry/exist pits from flooding..." Would this apply to the proposed micro-tunneling noted on page A-14 of the Petition? What time of year is the micro-tunneling expected to take place?
- 31. Is there a possibility that night-time work hours would be required during construction? If yes, what type of construction activities would occur at night, and what is the noise-generating propensity of these activities?

Environmental Effects and Mitigation Measures

- 32. 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?
- 33. Has Eversource developed a Protection Plan for wetlands and watercourses, including applicable pre-construction environmental resource field delineations and environmental inspections and duties, in its construction plan for the Project? If yes, submit the plan. If no, when would such a plan be developed?

Scenic, Historic and Recreational Values

- 34. Referencing Petition p. B-26, have the Phase 1A and/or Pedestrian Survey results been submitted to the State Historic Preservation Office (SHPO)? If yes, provide any comments received from SHPO.
- 35. Referencing Petition pp. B-24 to B-26, how would Eversource protect the historic resources within 500 feet of the existing and proposed route during construction (i.e. vibrations generated by excavation equipment)?

Fish, Aquaculture and Wildlife

- 36. Referencing Petition p. B-18 and Map Sheet 5A of 10, the unnamed watercourse would be diverted via temporary coffer dams and a flexible flume pipe. For approximately how long would this watercourse be diverted?
- 37. Referencing Petition p. B-22, Eversource notes that for northern long-eared bat (NLEB), "...[T]ree clearing would not occur during the NLEB inactive season." Explain how this would or would not impact the NLEB.

Project Construction

- 38. Referencing Petition p. A-13, how long would the jack-and-bore portion of the Project take to complete?
- 39. Referencing Petition p. A-14, how long would the micro-tunneling portion of the Project take to complete?
- 40. Refencing Petition p. A-14, would the micro-tunneling require a pilot hole prior to the 4-foot diameter drilling process? If yes, approximately what would the pilot hole diameter be?
- 41. Describe site construction monitoring and inspections that are required for this project under the DEEP General Permit.
- 42. Referencing Petition p. C-35, a Traffic Plan Management (TPM) would be developed in coordination with the City. Is the TPM complete? If yes, please provide a copy.