

May 29, 2024

Melanie Bachman, Esq.
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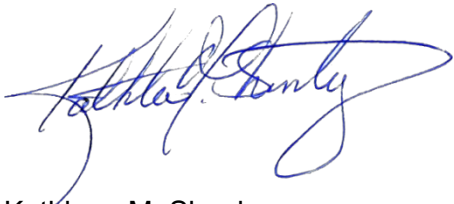
Re: Petition 1613 – Interrogatories

Dear Ms. Bachman,

This letter provides the response to requests for information listed below.

Response to CSC-01 Interrogatories dated May 8, 2024
CSC-Petition 1613 Interrogatory responses

Sincerely,



Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 27, were any comments received from the Towns of East Haddam, Lyme, East Lyme, and Montville or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

Eversource did not receive any comments from the municipalities listed above or from abutting property owners. In April 2024, Eversource received an email from Liz Lacy, who is the Connecticut Field Office Community Planner/River Manger for the National Park Service. Ms. Lacy inquired as to what the Project's impact would be to the Eight Mile River and Eversource's plans to limit any impacts. Eversource provided a response to her explaining that the Project will have no impact to the Eight Mile River.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 2

Is notice to the Federal Aviation Administration (FAA) required regarding the proposed replacement structures? If yes, has Eversource received responses from FAA regarding such structures (e.g. No Hazard Determinations)? Would lighting and/or marking be required for any of the proposed replacement structures? If so, provide any required marking/lighting plans if applicable.

Response:

Yes, a response has been received from the FAA; a determination of "No Hazard to Air Navigation" was received. Based on the FAA's determination, none of the structures would require marking and/or lighting.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 3

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

Response:

In general, the easements along the existing ROW grant Eversource the right to erect, construct, repair, maintain, replace, relocate, inspect, operate and remove upon, over, under and across said ROW, poles, towers, crossarms, guys, foundations, anchors, braces, ducts, manholes and other structures, wires, cables and other conductors, and other fixtures and appurtenances useful for the conduction of electricity and/or for providing and maintaining electric and/or communication service. The right to enter upon and travel and transport materials over and upon the ROW.

The right to trim and keep trimmed, cut, clear and remove by mechanical means or otherwise, trees or limbs and branches thereof, underbrush and other growth other than crops, any part of which are within the limits of the ROW or adjoining land of Grantor and which may interfere with the exercise of the rights and or easements granted.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 4

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 structures and wire pulling sites", "Project work sites" and the Project construction staging area.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 5

Referencing Petition p. 4, how many existing structures are located from East Haddam Junction to Hunts Brook Junction for the 348 Line? How many existing structures are located from East Haddam Junction to Hunts Brook Junction for the 364 Line?

Response:

From East Haddam Junction to Hunts Brook Junction there are 232 existing structures on the 348 Line and 199 existing structures on the 364 Line.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 4, when was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

Vegetation management activities along this ROW were conducted in 2022 under the Transmission Right-of-Way Reliability Program. These activities included removal of all incompatible species from edge to edge of the ROW or within the area starting at the midpoint of the conductors and extending toward the edges of the ROW up to 100 feet from the outside conductor on each side of the ROW, depending on the width of the ROW.

Date Filed: May 29, 2024

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 East Haddam Junction to Hunts Brook Junction Project was not identified by an ISO-NE needs and solutions analysis but is associated with the Asset Condition List project numbers 413 and 414.

Date Filed: May 29, 2024

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, there are no generation facilities listed on the ISO-NE interconnection queue associated with the proposed project.

Date Filed: May 29, 2024

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 \$20.1 million. Eversource anticipates that the entire cost would be regionalized pending the final determination of ISO-New England's Schedule 12C 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: May 29, 2024

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 included in an initiative that aims to increase system reliability by expanding fiber-based communications via the installation of fiber optic lines in the Eversource system. Several of the structures to be replaced as part of this Project are also showing evidence of asset condition issues.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 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.

Response:

The proposed Project does not include tree work beyond what would be necessary for accessing and construction of structures. In 2022, the Right-of-Way (“ROW”) Reliability Program (“TRRP”) work was performed in the same corridor as the Project. TRRP is an Eversource vegetation maintenance program to increase the maintained portion of the ROW within the easement area by implementing edge to edge vegetation maintenance, which is consistent with the recommendations of the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation Report.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 12

Referencing Petition 1527, response to interrogatory 12, explain in detail the current NESC clearance requirement for conductor sway (blowout) relative to 345-kV lines.

Response:

Eversource design criteria for conductor sway (blowout) is primarily based on National Electrical Safety Code (NESC) established horizontal clearance requirements to buildings. Since it is impractical for Eversource to control development activity outside of its rights-of-way (ROW), transmission lines are typically designed with the assumption that a building could be erected at any location along the ROW edge. NESC Rules 234C and 234G result in a calculated clearance requirement of 13.7 feet of clearance to edge of ROW for 345-kV conductors displaced by a 9.1 pounds per square foot wind. To provide a buffer for construction tolerance, Eversource typically designs 345-kV transmission lines to have 16 feet of clearance to the edge of ROW.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 13

Identify all other permits required to perform the proposed work.

Response:

The Project requires a United States Army Corps of Engineers - Section 404 Clean Water Act – Self Verification under the Connecticut General Permit.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 14

What is the total acreage of the construction limits of disturbance for the project?

Response:

The total acreage of construction disturbance encompasses approximately 0.89 acre of new gravel and approximately 0.96 acre of temporary construction matting for the installation of work pads and access roads.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 15

Referencing Petition p. 4, Eversource notes that, for the 348 and 364 Lines, "The conductor is in good shape and will not be replaced as part of the Project." What is the approximate age and remaining useful life in years for the 348 Line conductor? What is the approximate age and remaining useful life in years for the 364 Line conductor?

Response:

The conductors on the 348 and 364 lines are 50 to 54 years old. Eversource estimates the approximate life span of the conductors to be between 60 and 70 years. Consequently, the estimated remaining useful life of the conductors is 6 to 20 years.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 16

Would the proposed Project require the installation of counterpoise? If so, at approximately what depth would it be installed? Would it be arranged to be outside the phase conductors?

Response:

Yes, counterpoise may need to be installed at certain structure locations. When counterpoise is required, it would be installed at a minimum depth of twenty-four inches in cultivated areas and a minimum depth of eighteen inches in wooded and other areas. In areas with surficial rock, the counterpoise would be covered by concrete or grout for physical protection and greater electrical connection to earth. Counterpoise will be installed outside of the phase conductors.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 17

Would the proposed Project require the transfer of the existing lightning arrestors to the new structures and/or installation of new lightning arrestors? Explain.

Response:

The existing lightning arrestors will be transferred to the new structures.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 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?

Response:

Measures will be implemented for the protection of state-listed species documented within the Project corridor. Eversource will comply with recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Natural Diversity Database ("NDDDB") Determination Letter once received (submitted October 2023). Protection measures may include, but are not limited to, additional contractor training, time of year best management practices, monitoring, and installation of exclusionary features (e.g., silt or snow fencing) as directed by NDDDB and executed by qualified individuals.

A qualified inspector will function as the primary environmental compliance monitor assigned to the Project. The qualified inspector would be responsible not only for monitoring Project work areas (at a minimum of weekly) to confirm compliance with the mitigation commitments described in the Petition, but any applicable conditions also directed by the Council, included in the 2024 Connecticut Guidelines for Erosion & Sedimentation Control and as stipulated in the USACE/CTDEEP Self Verification authorization. During the course of the compliance monitoring, the qualified inspector will immediately convey to and discuss with Eversource's Environmental staff and Project Construction Representative(s) any issues observed. This will allow the Project team to respond promptly to any issues. Once primary construction activities are complete, the qualified inspector will monitor restoration until final stabilization has been achieved.

In addition, the Project shall implement the recommendations detailed within the Vernal Pool Survey submitted with the Petition (Attachment E).

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 19

Referencing Petition pp. 9-11 and Attachment D, has Eversource developed protection measures for wetlands and watercourses similar to the protection measures for vernal pools behind Attachment E? If yes, describe the protection measures. If no, when would protection measures be developed?

Response:

Project work will comply with Eversource's Best Management Practices ("BMPs"), which focuses on the protection of wetlands and vernal pools, the protection measures outlined in the Vernal Pool Assessment (Petition Attachment E), the 2024 Connecticut Guidelines for Erosion & Sedimentation Control and the requirements of the U.S. Army Corps of Engineers Self-Verification Authorizations for work in wetlands. Eversource will conduct weekly environmental inspections to ensure compliance with the BMPs, authorizations, and permit conditions.

Additionally, A qualified inspector will function as the primary environmental compliance monitor assigned to the Project. The qualified inspector would be responsible not only for monitoring Project work areas (at a minimum of weekly) to confirm compliance with the mitigation commitments contained in the Petition, the Council's environmental conditions, Eversource's BMP Manual, the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control and the USACE/CTDEEP Self Verification ("SV") authorization. During the course of the field monitoring, the qualified inspector will convey to and discuss with Eversource's Environmental staff and its Construction Representative(s) all environmental compliance monitoring issues observed, if any. This will allow the Project team to respond promptly to such issues, as appropriate, by proactively protecting environmental resources and complying with environmental permitting requirements, as applicable. Once primary construction activities are complete, the qualified inspector will review restoration activities until final stabilization has been achieved.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 20

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 in the vicinity of where they were excavated would be regraded into adjacent uplands and stabilized in accordance with Eversource's April 2022 Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts, and Connecticut ("BMPs") and the Stormwater Pollution Control Plan. Any excavated soils that cannot be reused in such a manner 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: May 29, 2024

Request from: Connecticut Siting Council

Question: 21

Referencing Petition p. 14, Eversource submitted a DEEP Natural Diversity Data Base (NDDB) review request on October 13, 2023. Provide a copy of the DEEP NDDB Determination letter. How would specific recommendations for each NDDB species be implemented prior to or during construction?

Response:

Eversource has not yet received a determination from the Natural Diversity Database (“NDDB”). Once the determination is received, Eversource will provide a copy to the Council as requested.

As stated in Eversource’s response to interrogatory 18, Eversource will comply with any recommendations determined by NDDB and will implement them in accordance with the parameters required for the specific protection measure. For example, additional contractor training requirements would take place prior to the start of construction. Eversource would adhere to time of year restrictions for certain activities or locations, as directed by NDDB, and schedule the work accordingly.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 22

Is the proposed project located within 150 feet of a known northern long-eared bat (NLEB) maternity roost tree or within 0.25-mile of a known NLEB hibernaculum? If so, how would the proposed project protect the NLEB?

Response:

No, the Project is not within 150 feet of a known northern long-eared bat (NLEB) maternity roost tree or located within 0.25-mile of a known NLEB hibernaculum. The nearest location of a known hibernaculum is located in North Branford, approximately 17 miles away from the Project. In July of 2023 the Project received a determination of "No Effect" following completion of the U.S. Fish and Wildlife Service Range-Wide Determination Key.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 23

Referencing Petition p. 8, submit a copy of the October 4, 2023 correspondence from SHPO to Heritage Consultants.

Response:

A copy of SHPO's response is attached per your request.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 24

Referencing Petition p. 8, has Eversource received any comments from the Tribal Historic Preservation Offices (THPOs) since the filing of the Petition?

Response:

At the time of this response, neither Eversource nor its consultant, Heritage Consultants, have received any comments from the THPO.

October 4, 2023

Mr. David George
Heritage Consultants LLC
830 Berlin Turnpike
Berlin, CT 06057
(sent only via email to dgeorge@heritage-consultants.com)

Subject: Archaeological Assessment Survey
Line 348/364 Haddam Neck to Uncasville Substation Reliability Project
Haddam, Lyme, and Montville, Connecticut


Dear Mr. George:

The State Historic Preservation Office (SHPO) received the technical report prepared by Heritage Consultants (Heritage) titled *Phase IA Cultural Resources Assessment Survey of the Proposed Line 348/364 Haddam Neck Switching Station to Uncasville Substation Reliability Project in East Haddam, Lyme, and Montville, Connecticut* dated September 2023. The proposed project consists of the construction of 14 pull pads, the replacement of nine structures with associated guy wires, and the use/construction of nine access roads. Because the project will require permits from the United States Army Corps of Engineers, it is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act, as amended. Based on the information submitted to our office, the completed investigation meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

The archaeological assessment survey consisted of comprehensive background research that examined historic maps and aerial imagery as well as previously identified cultural resources within 500 feet of the proposed project area. The investigation identified a single property (Working Girls Vacation Society Historic District) listed on the National Register of Historic Places identified within 500 feet of proposed project items. Heritage concluded that the proposed undertaking will not impact the character defining features of the district. A pedestrian survey of proposed project locations was completed by Heritage in September of 2023. The results of the survey revealed that the entirety of each proposed project location is heavily disturbed by previous construction activities. Therefore, Heritage concluded that the proposed project areas retained no/low archaeological sensitivity. Based on the information provided to our office, SHPO concurs with the findings of the letter report that no additional archeological investigations are warranted and that no historic properties will be affected by the proposed project.

This office appreciates the opportunity to review and comment upon this project. For additional information, please contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Kinney".

Jonathan Kinney
State Historic Preservation Officer

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 25

How are invasive species within work areas identified prior to the commencement of construction?

Response:

Eversource evaluated the Project area for existing invasive species consistent with Section 3.10 of Eversource's Best Practices Manual ("BMP Manual") and has identified invasive species within both upland and wetland areas. Eversource would follow the practices outlined in the BMP Manual to prevent the spread of invasive species while working in these areas. This includes cleaning vehicles, equipment, materials (including matting), gear, footwear or clothing of all visible soil and plant material on site in the infested area, or as near as practical to the infested area, prior to leaving a work area. Cleaning may be accomplished using a brush, broom, or hand tools, by shaking or dropping mats in a controlled manner to dislodge attached soil and debris or utilizing compressed air.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 26

Could Eversource use net-less or other type of erosion and sedimentation (E&S) controls to prevent wildlife entanglement?

Response:

Eversource prohibits non-biodegradable plastic netting in erosion control products specifically to avoid wildlife entanglement. Eversource is not aware of wildlife entanglement instances with other forms of E&S controls, such as silt fencing, straw wattles, etc. that are commonly used. Eversource could consider using 100 percent natural fiber E&S controls; however, it is unclear whether this change in practice would provide an environmental benefit compared to current methods.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 27

On Petition p. 21, the 2002 Connecticut Guidelines for E&S Control are referenced. Is the preliminary design of the Project at least 50 percent complete? If not, would construction comply with the Connecticut Guidelines for E&S Control and Connecticut Stormwater Quality Manual, effective March 30, 2024?

Response:

The Project design is complete, and the Project is ready to begin construction once all permits and approvals are received. E&S controls for construction would comply with the March 30, 2024, Connecticut Guidelines for Soil Erosion and Sediment Control. Since the total amount of soil disturbance resulting from Project activities is below 1 acre, the Project is not subject to the requirements of the March 30, 2024, Connecticut Stormwater Quality Manual.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 28

Referencing Petition p. 21, temporary E&S control measures would be routinely inspected until Project work is complete and all disturbed areas are stabilized. How often would E&S controls be typically inspected?

Response:

A qualified inspector would monitor the Project work areas at a minimum of once a week, including inspection of E&S controls during active construction and after a qualifying rain event. After construction is complete, inspections would occur monthly through site restoration until final stabilization has been achieved.

Date Filed: May 29, 2024

Request from: Connecticut Siting Council

Question: 29

Referencing Petition p. 14, it states portions of the ROW are 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:

The Project would require the expansion of three existing gravel work pads and the installation of one new gravel work pad within New England Cottontail Focus and Key Habitat Areas ("NEC Areas"). As part of the ROW restoration, all proposed gravel work pads within NEC Areas, including the pre-existing portions of the gravel work pads would be restored with stockpiled native soil and/or fine processed stone, native seed mix and chopped straw mulch in accordance with Eversource's current best management practices in NEC Areas. During restoration, work areas would be monitored weekly to ensure compliance until the sites are stabilized.