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June 20, 2024

Melanie Bachman, Esq.
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: **PETITION NO. 1614** – The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling for the proposed Christian Street Junction to Stevenson Substation Rebuild Project

Responses to Council Interrogatories to Petitioner, dated June 4, 2024.

Dear Attorney Bachman:

This letter submittal provides an original and 15 copies of responses to Interrogatories, received on June 4, 2024; CSC-001-01 through CSC-001-25 for Petition No. 1614 , along with one attachment associated with the Interrogatory No. 19 response.

Please contact me if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Denfeld".

Deborah Denfeld
Team Lead – Transmission Siting
deborah.denfeld@eversource.com

Attachments:

Responses to Petition No. 1614 Set One Interrogatories 01 – 25
SHPO Letter – in response to Interrogatory No. 19

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 29, were any comments received from the Towns of Oxford and Monroe or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

There have been no comments received from the Towns of Oxford and Monroe since the filing of the Petition. There have been questions from abutting property owners since filing, which were addressed and answered in phone calls and meetings. No concerns have been raised.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 2

Referencing Petition p. 19:

- A. Has Eversource received responses from the Federal Aviation Administration (FAA) regarding the proposed structures?
- B. Would lighting and/or marking be required for any of the proposed replacement structures? If so, provide any required marking/lighting plans if applicable.
- C. Would marker balls be required for the conductors to span the Housatonic River? If yes, provide the proposed marker ball plans if applicable.

Response:

Eversource has received responses from the FAA regarding all proposed structures of the Project. No structure on the Project requires lighting. However, the FAA is still evaluating the span across the Housatonic River at Stevenson Dam. If the FAA determines that marker balls are necessary, it is possible that the FAA could revisit the determinations for the two structures supporting the river crossing span and also require lighting on these structures.

Until a final determination has been made by the FAA regarding the river crossing span, no marking or lighting plans are available at this time.

Date Filed: June20, 2024

Request from: Connecticut Siting Council

Question: 3

Referencing Petition pp. 4 and 5, 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 enter upon the land and erect, inspect, operate, replace, remove, repair and patrol, and permanently maintain on the right of way, poles, towers, with necessary conductors, wires, cross arms, guys and other fixtures and appurtenances used or adapted for the transmission of electric current for light, heat, power or any other purpose and used or adapted for telephone purposes.

The easements, in general, also grant Eversource the right to trim, cut and remove trees, parts of trees, limbs, branches and underbrush within or projecting into the ROW/on adjoining land of Grantor, as in the judgment of the Grantee may interfere with or endanger poles, towers and wires, and their operation or with any of the appurtenances.

Eversource cannot comment on rights for any other public utility as may apply to properties along the ROW.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 4

Referencing Petition p. 5, when was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

The most recent vegetation management was conducted in 2023 and primarily consisted of trimming branches that were encroaching into the ROW.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 5

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 Christian Street Junction to Stevenson Substation Rebuild Project (the Project) was not identified by an ISO-New England Inc. needs and solution analysis. The Project is associated with the ISO-NE Asset Condition List (Project number 374).

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 6

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, the Christian Street Junction to Stevenson Substation Rebuild Project is not associated with any generation facilities listed on the ISO-NE queue.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 7

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 \$50.5 million. Of the total, \$45.7 million is associated with Pool Transmission Facilities (PTF). Eversource anticipates these costs will be regionalized pending the final determination of ISO-New England's Schedule 12 C review. The remaining cost of the project will be allocated to customers of The Connecticut Light and Power Company d/b/a Eversource Energy.

The Company anticipates the following overall allocations for the total cost:

- Customers of Eversource: 26.0%
- Other Connecticut customers: 5.7%
- Other New England customers: 68.3%

The estimated allocations are based on 2023 actual loads.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 8

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

Response:

This Project is comparable to many other Eversource proposed, planned or constructed projects across Connecticut. The main purpose of such projects is first and foremost to improve transmission system reliability, which is achieved not only by expanding and upgrading existing infrastructure, but also by replacing damaged, degraded or determined to be at risk aging infrastructure, such as structures, conductors or shield wire.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 9

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:

Application of the subject recommendations, as would be applied to vegetation management, are outside the scope of the Project. Vegetation removal for the Project is limited to the specific needs of the work, consistent with Eversource's standard vegetation management practices.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 10

Referencing Page 6 of this Petition and Petition 1527, response to interrogatory 12, explain in detail the current NESC clearance requirement for conductor sway (blowout) relative to 115-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 9.1 feet of clearance to edge ROW for 115-kV conductors displaced by a 6 pounds per square foot (psf) wind. To provide a buffer for construction tolerance, Eversource typically designs transmission corridors to have 11 feet of clearance to the edge of ROW when displaced by a 9-psf wind.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 11

Identify all other permits required to perform the proposed work.

Response:

The following permits are associated with this Project:

Connecticut Department of Energy and Environmental Protection (“CTDEEP”):

- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
- Natural Diversity Data Base Determination

State Historic Preservation Office Notification – Section 106

United States Army Corps of Engineering/CTDEEP

- Self-Verification Notification under Connecticut General Permits 6 and 21

The Public Utilities Regulatory Authority

- Approval for Method and Manner of Construction

Connecticut Department of Transportation Entry & Crossing Encroachment Permits

- Routes 67, 188, and 34

Housatonic Railroad Temporary Crossing Release of Liability

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 12

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

Response:

The total acreage of the construction limits of disturbance for this Project is approximately 11 acres.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 13

Referencing Petition p. 2, Eversource notes that, “The existing aluminum conductor, steel reinforced (ACSR) conductor wires are approaching their planned service life and are at greater risk of failure due to the degradation and will also be replaced.”

- a. What is the approximate age and remaining useful life in years for the 1580 Line conductor?
- b. What is the approximate age and remaining useful life in years for the 1808 Line conductor?

Response:

The age of the 1580 Line and 1808 Line conductors is approximately 62 years. Eversource estimates the approximate life span of the conductors to be between 60 and 70 years.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 14

Referencing page 2 of the Petition, are the proposed structure replacements due to additional structural loading associated with the proposed conductor replacements and the replacement of shield wire with optical ground wire, asset condition issues associated with the existing structures and/or to meet NESC standards? Explain.

Response:

The structure replacements are driven by a combination of these factors. Most of the existing monopole structures would be overstressed by the increased loading of the proposed OPGW and conductor installations. Additionally, eleven existing lattice tower structures have conductor insulation in a strain configuration. The installation of the proposed larger OPGW also contributes to over stressing some of these structures in the event of a broken wire condition. In some cases, reinforcement of the existing lattice structures may be possible, but would not address NESC clearance concerns, resulting in the need for midspan structures.

Midspan structures would rectify these clearance violations. However, the insertion of midspan structures would not address the aging structures and would result in additional visual impacts.

The benefit of the structure replacements is that they would allow Eversource to realign the replacement monopoles farther away from the right-of-way edge without needing midspan structures to meet clearance requirements. An additional benefit is that the structure replacements would enable Eversource to align structure locations as much as practical with the existing 1619 Line.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 15

In addition to Eversource's Best Management Practices, has Eversource developed a Protection Plan for wetlands and watercourses, including applicable pre-construction environmental resource field delineations and environmental inspections, monitoring and duties, in its construction plans for the project? If yes, submit the plan. If no, when would such a plan be developed?

Response:

Eversource has not developed a single, stand-alone Protection Plan for wetlands, watercourses, and vernal pools for the Project. However, Eversource conducts contractor pre-construction meetings where the environmental permit conditions are reviewed prior to the start of work in the field. The limits of wetlands and watercourse are remarked in the field prior to construction.

The Project Stormwater Pollution Control Plan ("SWPCP") that was submitted to the Connecticut Department of Energy and Environmental Protection on March 21, 2024 and approved on May 23, 2024, details work areas, erosion and sedimentation control measures and matting configurations. These measures and configurations are intended to protect sensitive resource areas (e.g., wetlands, watercourses, and vernal pools) during construction.

Project work will comply with the SWPCP, Eversource's Best Management Practices ("BMP") manual, which focuses on protecting wetlands, watercourses, and vernal pools, and the U.S. Army Corps of Engineers Self-Verification Authorization Conditions for work in wetlands. Eversource will also conduct weekly inspections to ensure compliance with the General Permit, BMPs, authorizations, and permit conditions.

Eversource believes that the protection measures defined in the SWPCP, authorizations, and Eversource's BMP manual are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 16

Referencing Petition p. 24, 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.

Response:

In addition to the qualified inspector required by the General Permit, a qualified individual will oversee implementation of listed species protection measures and conduct contractor training as required by the Project determination letter from the Natural Diversity Data Base ("Determination"). Further, contractors will be responsible for conducting pre-construction and periodic construction sweeps for the presence of listed species. These sweeps will occur prior to the start of work each day and throughout the workday. Contractors will follow established protocol for the removal of listed species from construction areas as detailed in the Determination. Eversource construction representatives will be onsite daily to help ensure that these sweeps are performed by contractors as required.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 17

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: June 20, 2024

Request from: Connecticut Siting Council

Question: 18

Referencing Petition p. 15, Eversource completed the required surveys for NDDB and submitted assessment results to DEEP on December 18, 2023. Provide a copy of the final DEEP NDDB Determination letter. How would specific recommendations for each NDDB species be implemented prior to or during construction?

Response:

The NDDB Determination letter was issued on February 22, 2024, and identified three species that have the potential to exist proximate to the Project Area, including a sensitive species that CT DEEP prohibits Eversource from divulging. The letter provides recommended protection measures for each species. Eversource would provide contractor training and monitor work areas for compliance with the recommended protection measures during construction.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 19

Referencing Petition p. 10, submit a copy of the correspondence from SHPO.

Response:

A copy of the February 2, 2024, correspondence from SHPO is attached.

February 2, 2024

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
Proposed Line 1722 UCMP Rebuild Project
Hartford, Connecticut

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the following technical reports prepared by Heritage Consultants, LLC (Heritage):

Phase IA Review of the Proposed Line 1580 Structure Replacement Project in Oxford and Monroe, Connecticut (revised, dated December 5, 2023)

Phase IB Cultural Resources Reconnaissance Survey of Eversource Energy's Proposed Christian Street Junction to Stevenson Rebuild Project in Oxford and Monroe, Connecticut (dated November 2023)

SHPO understands that the project consists of the replacement of transmission line structures along the Eversource Energy Line 1580 corridor between the Christian Street Junction and the Stevenson 14A segment. The archaeological reconnaissance survey completed by Heritage examined 26 areas of moderate/high archaeological sensitivity identified during a previously completed archaeological assessment survey. The project will require a permit from the United States Army Corps of Engineers; therefore, it is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act. 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 proposed project items. The review identified a single National Register of Historic Places (NRHP) listed property (Stevenson Dam Hydroelectric Plant) and two State Register of Historic Places listed properties (16 Barry Road and the Tomlinson Farmstead) within 500 feet of the project area. Heritage determined that there will be no direct or indirect impact to previously identified cultural resources by the proposed project. No previously reported archaeological sites or cemeteries were recorded in proximity to the project corridor.

During the reconnaissance survey, Heritage excavated 430 of 455 planned shovel tests at 15-meter intervals along transects placed 15 meters apart throughout the 26 identified archaeologically sensitive areas. The field effort resulted in the documentation of four loci (Loci 70-1, 92-N-1, 102-1, and 109-1). Locus 70-1 contained a piece of quartz shatter and a single quartz tertiary flake recovered from a single shovel test. Further delineation testing failed to produce evidence of additional cultural material or

features. Locus 92-N-1 yielded pearlware sherds, whiteware sherds, a stoneware sherd, a clear/octagonal bottle glass base, and a machine-cut nail from five shovel tests. The locus also produced two quartz secondary flakes and four chert secondary flakes from two shovel tests. Locus 102-1 resulted in the recordation of two basalt flakes from a single shovel test. Delineation shovel testing failed to produce evidence of additional cultural materials or features. Finally, Locus 109-1 produced a piece of quartz shatter from a single shovel test. Heritage determined that each of the four identified loci failed to yield substantial quantities of artifacts or evidence of intact cultural features and were therefore ineligible for listing on the NRHP. Based on the information submitted to this office, it is the opinion of SHPO that no historic properties will be affected by the proposed undertaking. Finally, this office requests two bound copies of the final report; one will be kept for use in the office and the other will be transferred to the Dodd Research Center in Storrs for permanent archiving and accessibility.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's historic resources. For additional information, please contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,



Jonathan Kinney
State Historic Preservation Officer



Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 20

Referencing Petition p. 10, has Eversource received any comments from the Tribal Historic Preservation Offices (THPOs) since the filing of the Petition?

Response:

Project cultural resource assessment documentation was submitted to applicable THPOs on January 11, 2024. No comments from any of the THPOs have been received to date.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 21

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

Response:

Invasive species are identified by Project environmental personnel during preconstruction survey work and constructability walkdowns.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 22

Could Eversource use net-less or other type of 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: June 20, 2024

Request from: Connecticut Siting Council

Question: 23

On Petition p. 23, 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 will comply with the referenced updated Guidelines and the Manual. A Stormwater Pollution Control Plan has been prepared in accordance with these documents and a registration has been issued under the Connecticut Construction Stormwater General Permit.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 24

Referencing Petition p. 24, 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:

Per the General Permit requirements, temporary E&S control measures will be inspected at least once a week, as well as after every major storm event, until initial site stabilization has been achieved. Initial site stabilization is achieved after all major construction activities have been completed and the site initially restored per site requirements. Temporary E&S control measures will be removed once the work areas are completely stabilized. These areas will continue to be inspected on a monthly basis after the initial site stabilization and until final stabilization has been achieved. In addition to inspections conducted in accordance with the requirement of the General Permit, the project contractors are also responsible for maintenance of E&S control measures and inspection of the project work areas on a daily basis when active work is occurring. Eversource's Construction Representatives are also on site daily and report concerns about E&S controls when observed so any issues can be addressed immediately.

Date Filed: June 20, 2024

Request from: Connecticut Siting Council

Question: 25

Referencing Petition p. 16, it states portions of the ROW are within New England Cottontail Focus Areas and work area restoration would include the covering either partial or fully, of gravel work pads with soil. The Supplemental Filing dated April 12, 2024 does 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:

As part of the restoration of the ROW, all proposed gravel work pads located within New England Cottontail Focus and Connecticut New England Cottontail Key Habitat Areas would be restored with stockpiled soil and/or processed stone, native grass seed (containing 20% annual Rye) and chopped straw mulch in accordance with Eversource's current New England Cottontail Best Management Practices. During restoration activities, work areas would be monitored weekly to ensure compliance and then monitored monthly after restoration until the sites are stabilized.