

Deborah Denfeld
Team Lead – Transmission Siting
Tel: (860)-728-4654

November 29, 2024

Melanie A. Bachman
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

RE: **PETITION NO. 1640** – The Connecticut Light and Power d/b/a Eversource Energy petition for declaratory ruling for the proposed Towantic Substation to Beacon Falls Junction Rebuild Project

Responses to Council Interrogatories to Petitioner, dated November 13, 2024.

Dear Attorney Bachman:

This letter submittal provides an original and 15 copies of responses to Interrogatories, received on November 13, 2024; CSC-001-01 through CSC-001-24 for Petition No. 1640, along with one attachment associated with the Interrogatory No. 15 response.

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

Sincerely,



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

Attachments:

Responses to Petition No. 1640 Set One Interrogatories 01-24
Connecticut Airport Authority Approval Letter – in response to Interrogatory No. 15

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 44, were any comments received from the Town of Oxford (Town) or abutting property owners since the filing of the Petition, or subsequent to the Memorandum of Understanding with the Town executed on June 11, 2024? If so, what were the concerns, and how were these concerns addressed?

Response:

There have been no comments, questions, or concerns from the Town of Oxford since the filing of the Petition, or subsequent to the Memorandum of Understanding with the Town.

Project representatives have held discussions with the owner of an abutting property regarding an agreement for Eversource to use a portion of the owner's property that is not within Eversource's right of way, for temporary workspace for the Project. Eversource and the owner have not yet reached an agreement for the proposed use.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 2

Referencing Petition p. 33, has Eversource received responses from the Federal Aviation Administration (FAA) regarding the proposed structures? 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:

Eversource has received a response from the FAA for all proposed structures. However, due to changes in design, several structures will need to be screened for refiling. To date, the FAA has determined that no marking or lighting is required for any of the structures.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 3

Referencing Petition pp. 18 and 36, Eversource notes that recent vegetation maintenance activities have been performed in the ROW to maintain existing conductor clearance requirements in July 2024 and continuing through October and November 2024. What is the status of the vegetation maintenance activities, and what work was performed?

Response:

The vegetation maintenance activities performed in the Project ROW between July 2024 and November 2024 are complete. The activities consisted of cut floor work to remove vegetation that would exceed 15 feet in height using hand tools in sensitive resource areas, and machinery in other areas of the ROW.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 4

Has Eversource assessed the existing facility site since the flooding that occurred in Oxford in August 2024 that may alter the scope of the project (ex. referenced stormwater and flood control infrastructure changes or structure installations)? Explain.

Response:

Yes, Eversource has assessed the existing facility since the August 2024 flooding event and no scope alterations are required for the Project.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 5

Referencing Petition p. 13, Footnote 18, the Project is associated with the ISO-NE Asset Condition List. Provide the Asset Condition ID Number(s) for the Project.

Response:

The project is associated with Asset Condition List project number ACL 375.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 14, footnote 21 and Petition p. 43, footnote 40, who determines and communicates to Eversource, United Illuminating and FirstLight as to the appropriate timing associated with project outage switching? What is the sequence of events that triggers the outage switching determination and timing?

Response:

Eversource requests transmission outages to support project work from The Connecticut Valley Electric Exchange (CONVEX) via their database for outage requests. This database is utilized between all utilities in Connecticut. After CONVEX review, it submits the requests to ISO-NE for final approval.

For a typical outage request, Eversource will request a desired timeframe for the outage. Once approved and, to maintain the requested timeframe for the outage, CONVEX will decide what switching is required and when and coordinates the activity between all entities at the local level, which may be required to support the outage. CONVEX then will assign outage switching times according to switching resource availability. Eversource also coordinates directly with United Illuminating and FirstLight as needed to discuss planned project outages and CONVEX-assigned outage switching times.

Date Filed: November 29, 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 \$61.2 million. 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: 18.5%
- Other Connecticut customers: 5.9%
- Other New England customers: 75.6%

The estimated allocations are based on 2023 actual loads.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 8

What is the cost delta between galvanized steel structures and weathering steel structures?

Response:

Galvanized poles have an approximate 4 to 6 percent material cost premium compared to weathering steel poles. This range is based on present pricing.

Date Filed: November 29, 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:

The referenced FERC and NERC reports' recommendations relevant to transmission lines are in regard to vegetation management. The proposed Project includes vegetation management and specific areas of tree clearing necessary for access, construction of the structures, and meeting the current National Electrical Safety Code requirements for transmission system reliability, and so are not consistent with the recommendations in the reports. However, the Company plans to perform additional vegetation management maintenance in 2027 as part of the Transmission Right-of-Way ("ROW") Reliability Program ("TRRP") in the same corridor as the Project. TRRP is an Eversource maintenance program to increase the maintained portion of ROW within the easement area by implementing edge to edge maintenance, which is consistent with the recommendations in the reports.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 10

Identify all other permits required to perform the proposed work.

Response:

The permits required to perform the proposed work are identified in Section 8 (Project Permits and Notifications) and Section 5.10 (Federal Aviation Administration (FAA)) of the filed Petition.

No other state or federal permits are required to perform the proposed Project work.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 11

Approximately when is construction projected to be completed?

Response:

Construction is projected to be completed in January 2026 with full restoration to be completed by June 2026.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 12

Referencing Petition p. 21, when would the State Land Notification (SLN) for work associated with the proposed access to and structure placement within the Bridle Trail be submitted to DEEP?

Response:

The State Land Notification (SLN) for work associated with the proposed access to and structure placement within the Bridle Trail was submitted to CT DEEP on August 29, 2024; response is pending.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 13

For approximately how long would the area surrounding the Bridle Trail be subject to construction activities? How could construction activities directly or indirectly impact the horses on the trail (ex. frightened by noise, escape)?

Response:

In the area surrounding the Bridle Trail, civil construction for installation of a matted work pad and access road improvements are scheduled to be completed in approximately one week in March or April 2025. Drilling and concrete foundation work is planned to be completed in a three-week period between March and August 2025.

Structure construction and wire installation is planned to be completed in an approximately two-week period in late November 2025 and completed prior to December 20, 2025.

Restoration activities would be completed over a two-week period between January and March 2026; however, to ensure successful vegetation growth, it may be necessary to return for a day of work between April - June 2026.

In advance of construction activities, Eversource will coordinate with the trails official(s) at the Connecticut Department of Energy and Environmental Protection (the trail is state owned) as well as any local recreational organizations, such as horseback riding clubs, that use the trail. At a minimum, during construction activities, signage would be posted a month prior to any construction activities alerting trail users of the work activities, and an assigned spotter/flagger will be on-site during all construction activities. Trail traffic (including horses) will infrequently need to be stopped/delayed while structure installation and/or overhead wire pulling activities are underway.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 14

Referencing Petition p. 39, pull pads would be approximately 120 feet by 80 feet, subject to the terrain. What are the typical dimensions or range of dimensions for the proposed work pads?

Response:

Dimensions for the proposed work pads vary by location due to terrain, environmental sensitivities, proximity to other energized lines within the ROW and scope of work required at each location. For the safe execution of work to replace a structure, work pads for the Project are typically 150 feet by 80 feet in Segment 1 (Towantic Substation to Christian Street Junction) and 150 feet by 150 feet in Segment 2 (Christian Street Junction to Beacon Falls Junction).

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 15

Referencing Petition p. 33, please submit the approval received from the Connecticut Airport Authority for the proposed structure replacements.

Response:

A copy of the approval received from the Connecticut Airport Authority for the proposed structure replacements is attached. Due to design changes since the original CAA review, several structures will be screened again to determine if they need to be refiled.



April 9, 2024

Steve Marien
Manager- Transmission Line and Civil Engineering
Eversource Energy Service Company
56 Prospect Street
Hartford, CT 06103

Subject: Eversource 1580 Line Structure Replacement Project (*Christian Road-Towantic Structure Replacement Project*)

Dear Mr. Marien,

We have received your letter dated March 7, 2024 in which Eversource has authorized Federal Airways and Airspace (FA&A) to complete the analysis to comply with all State and Federal regulation and approvals for the replacement of Eversource 1580 Line which includes twelve utility structures in the approach to runway 18-36 at Waterbury Oxford Airport. We have received and reviewed the information submitted by FA&A which included Federal Aviation Administration determinations of No Hazard for the replacement of utility structures 1442,1442-1,1443B,1444-1,1446,1447,1448,1449,1450,1451, Oxford Tap 1 and Oxford Tap 3 along with the request for CAA approval as required by State Statute. Four of the structures listed above are in the 50:1 Approach Surface and have been lowered below the required elevation.

The CAA approves the replacement of the utility structures described above as requested. The contractor must coordinate the work with the CAA and conduct a preconstruction meeting prior to the start of construction. If there are any cranes or equipment needed to complete the work that exceed the heights of the structures or airport approach surfaces additional FAA determinations will be required to be submitted to the CAA prior to construction to ensure there are no impacts to the airport approaches or Nav aids.

If any additional information is required, please feel free to contact Mr. Robert Bruno of my staff at 860-254-5516 or rbruno@ctairports.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin A. Dillon". The signature is fluid and cursive, with the first name "Kevin" and last name "Dillon" clearly distinguishable.

Kevin A. Dillon A.A.E.
Executive Director
Connecticut Airport Authority

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 16

Would there be any interruption to the operation of the CPV Towantic Energy Center during construction of the project?

Response:

There would be no interruption to the operation of the CPV Towantic Energy Center during Project construction.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 17

Referencing Petition p. 37, the 2023 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, effective March 30, 2024?

Response:

The preliminary design of the Project is complete. Construction will comply with the March 30, 2024 Connecticut Guidelines for E&S Control.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 18

Referencing Attachment A to the Petition, Map Sheet 1 of 9, there is a note that W3, S2 and S3 were impacted by private developer in April 2024. How were the watercourses impacted, and how will Eversource prevent contribution to and/or exacerbation of pre-existing impacts?

Response:

Eversource notified the Town of Oxford that impacts to W3, S2, and S3 were identified during pre-construction walkdown/survey activities. The watercourses / wetlands noted on Map Sheet 1 were filled by a private developer. Eversource has revised proposed access roads to avoid this area entirely and the project work would not create any additional impacts to the area.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 19

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 re-marked in the field prior to construction.

The draft Project Stormwater Pollution Control Plan ("SWPCP") is scheduled to be submitted to the Connecticut Department of Energy and Environmental Protection within a few weeks, and 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"), which focuses on protecting wetlands, watercourses, and vernal pools, and the U.S. Army Corps of Engineers ("ACOE") 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, ACOE authorization conditions, and Eversource's BMP Manual are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 20

Referencing Petition pp. 28 and 37, in addition to the NDDB species protection measures inspector and the inspector required by the General Permit, would there be any other environmental inspectors assigned to the Project? If yes, identify specific inspection duties. If no, explain why not.

Response:

In addition to monitoring compliance with NDDB and General Permit requirements, Eversource deploys an environmental inspector for weekly oversight of overall compliance associated with all aspects of project-specific environmental permitting. However, depending on Project needs and compliance conditions, multiple inspectors may not be required.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 21

Referencing the August 19, 2024 DEEP NDDDB Final Determination letter behind Petition Attachment F, generally describe how Eversource will simultaneously comply with each of the listed protection strategies and associated time restrictions during project construction and what construction activities **could** occur, if any, during the listed time restrictions for each of the identified species.

Response:

Compliance with the NDDDB Final Determination requirements will include conducting contractor awareness training to identify the species of concern and respective avoidance and protection measures. Contractors shall also be prohibited from conducting vegetation removal in NDDDB areas between May 1 and July 30 to protect ground nesting birds.

Tree removal in NDDDB areas is not anticipated as part of this work, but if it is later determined that select trees need to be removed, this work would not be done between April 15 and October 31 to protect bat species.

Beyond the specified restriction periods for vegetative management, no other standard construction work would be prohibited.

And, finally, in accordance with the Determination, routine sweeps of work areas shall be conducted at the start of each workday to protect turtles and snakes.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 22

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: November 29, 2024

Request from: Connecticut Siting Council

Question: 23

Referencing Petition Map Sheet 1 of 9, would the proposed stone fords impact the hydrology of Wetland 4 (W4)? If yes, are there any alternatives to the proposed stone fords or any possible mitigation measures to address any potential impacts to W4?

Response:

No, the proposed stone fords will not impact the hydrology of Wetland 4. Negative impacts to Wetland 4 would be avoided by utilizing large diameter stones typically used to create this type of crossing, which would allow water to pass, thus maintaining hydrologic connection and water flow. Eversource utilizes stone fords to accommodate near-term current construction needs and to provide long-term maintenance access, while continuing to support wetland functions.

Date Filed: November 29, 2024

Request from: Connecticut Siting Council

Question: 24

Referencing Petition pp. 21 and 22, 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 in August of 2024. At the time of this response, neither Eversource nor its consultant, Tighe & Bond, have received any comments from the THPOs.