



56 Prospect Street
P.O. Box 270
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Deborah Denfeld

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

December 20, 2024

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

Re: Petition No. 1642 – Danbury Underground Cable Replacement Project
Responses to CSC-001 Interrogatories, dated December 4, 2024

Dear Attorney Bachman:

This letter provides an original and 15 copies of the responses to the requests for information listed below:

Responses to CSC-001 Interrogatories, dated December 4, 2024
CSC-001-1 through CSC-001-41

Sincerely,

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

Deborah Denfeld
Team Lead | CT Siting Transmission

SITING REGULATORY REQUIREMENTS INSTRUCTIONS FOR DATA REQUESTS

ACTION DUE DATE: Internal due dates set to ensure timely filing with the regulator. (Note: This date is earlier and different than the regulatory filing date)

RESPONSE: Draft response below the grey bar. Do **not** alter grey bar or any text above.
Default font = Times New Roman size 12

Note for Drafters: If you are using a response from previous case, please add **REPEAT QUESTION**, one line beneath the question.

NOTE: PLEASE DO NOT USE the SAVE AS only USE SAVE.

Do not alter any text (Question, witness, etc.) above the grey response bar.

Request from: Connecticut Siting Council

Question: The original and 15 copies of the Petition end at the Description for Map Sheet 6 of 6, but do not include Map Sheet 6. The electronic version of the Petition posted on the Council's website contains all drawings and attachments ending at the Affidavit of Service of Notice. Please submit a hard copy of Map Sheet 6 and all attachments that follow.

Response: *** Start typing response on next line ***

Attached are an original and 15 copies of Map Sheet 6 and the additional missing pages.



INDEX MAP

Legend

- Existing Underground 115KV Transmission Line
- Proposed U/G Transmission Lines
- Proposed U/G Vaults
- Proposed Micro Tunnel
- Proposed Receiving/Sending Pit
- Substation Expansion Area
- Proposed Drainage Ditch
- Temporary Construction Matting
- Existing Access
- Proposed Access

- Open Water (not delineated)
- Watercourse (not delineated)
- Delineated Intermittent Watercourse
- Delineated Perennial Watercourse
- Field Delineated Wetland
- Field Delineated Wetland Boundary Outline
- Approx. Wetland Boundary (not delineated)
- Approximate Wetland (not delineated)

- Natural Diversity Database Area (June 2024)
- Critical Habitat (Oct 2019) (none in mapped extent)
- National Registered Area / Main Street Historic Overlay
- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Eversource Owned Property
- Parcel Boundary

- 5' Contour
- 1' Contour
- Railroad
- Culvert
- Gate
- Fence

Map Notes:
Environmental Mapping for Regulatory Permitting.
Existing Survey Data: Eversource June 2022.
Additional utility data digitized from City of Danbury mapping.
Base Map Source: CT ECO 2019 imagery.

EVERSOURCE
ENERGY

Triangle Substation to Middle River Substation
1270-1337 Underground Cable
Modernization Project (UCMP)

Map Sheet 6 of 6

Danbury, CT

Date: September, 2024

ALL-POINTS
TECHNOLOGY CORPORATION

NO.	DATE	REVISIONS

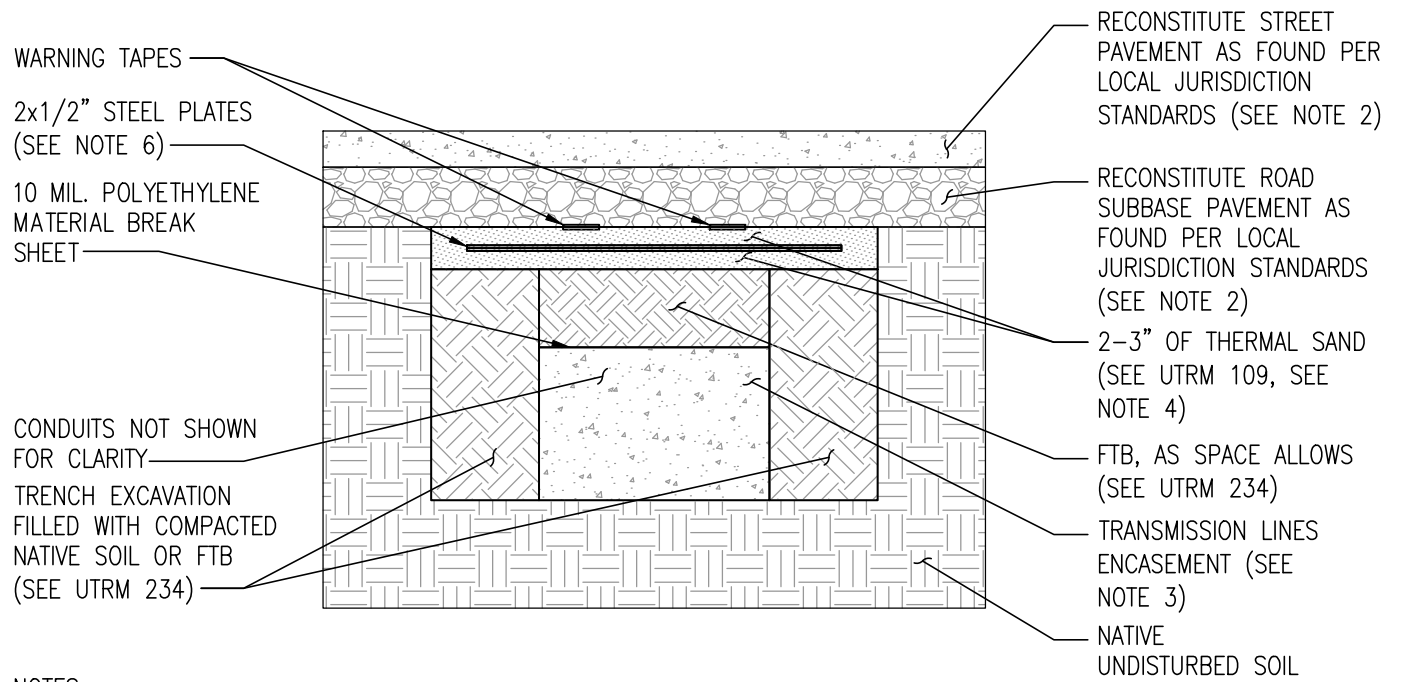
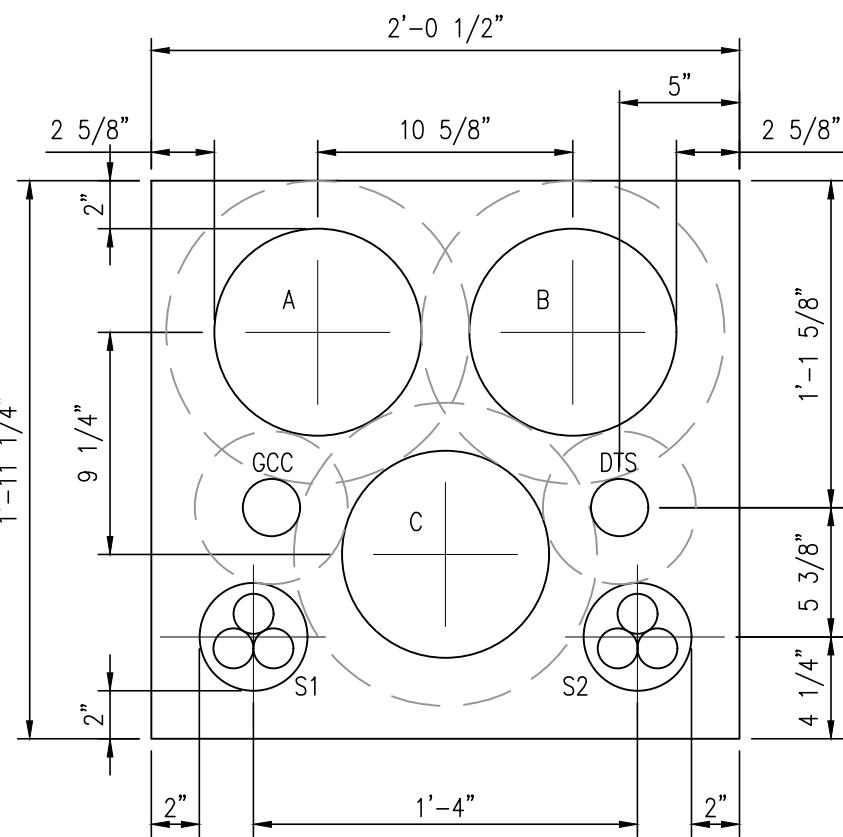
1 inch = 200 feet

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ATTACHMENT 2.1:

TYPICAL DUCT BANK AND CASING CROSS-SECTIONS

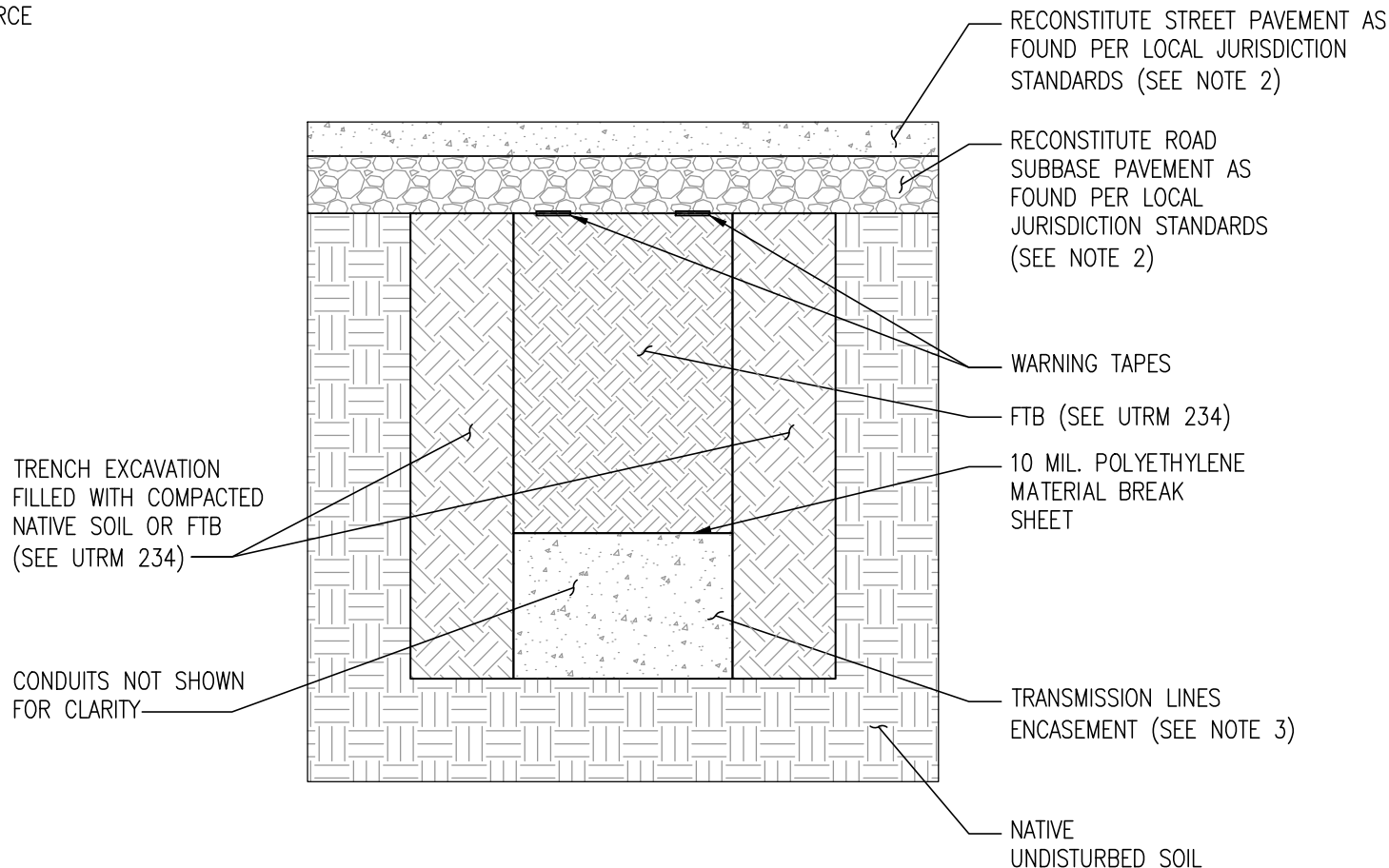
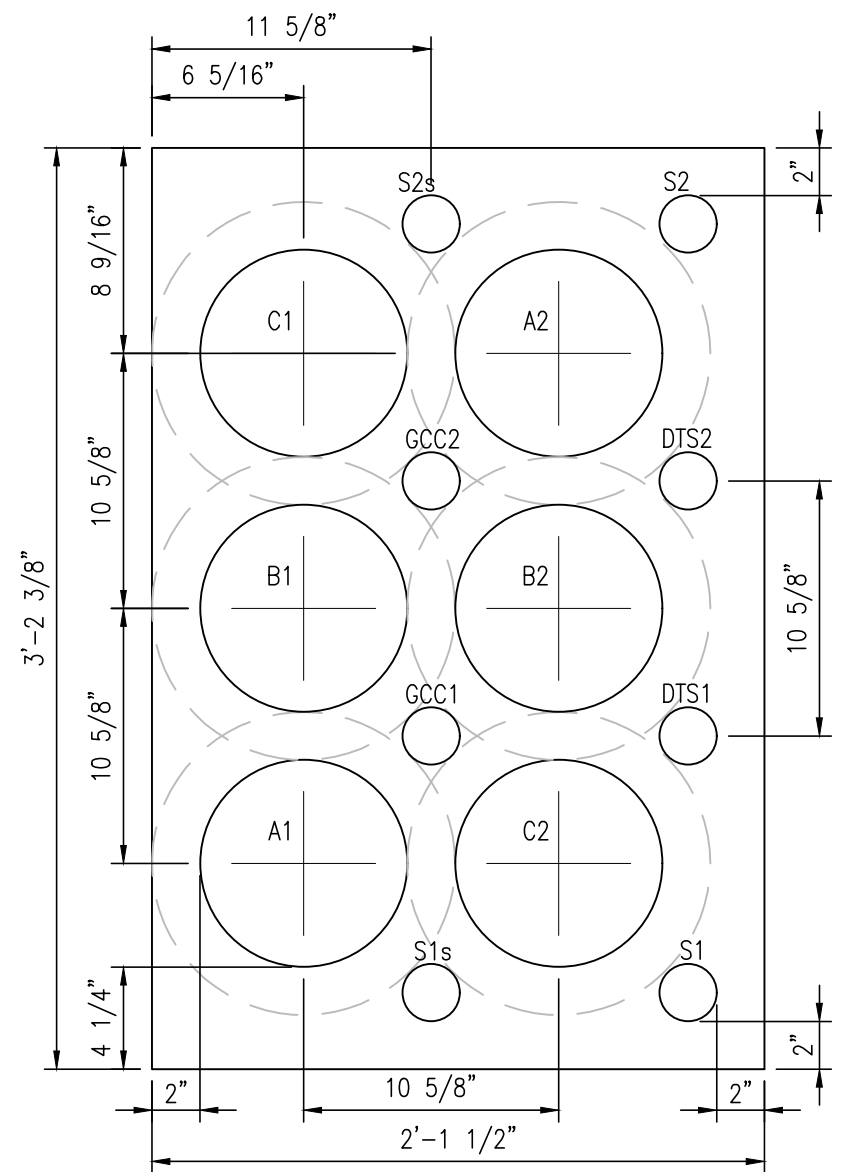
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- NOTES:
- SEE UTM 077 FOR REQUIRED SEPARATION OF OTHER UTILITIES.
 - ROAD AND SUBBASE THICKNESSES TO BE FIELD VERIFIED ON PROJECT.
 - CONCRETE ENCASEMENT (SEE UTM 234) SHALL BE USED UNLESS THERMAL SAND (SEE UTM 109) APPROVED BY EVERSOURCE.
 - THERMAL SAND MAY BE OMITTED IF NOT IN CONTACT WITH A SOLID LAYER (e.g. CONCRETE) UPON APPROVAL FROM EVERSOURCE.
 - FLUIDIZED THERMAL BACKFILL (FTB) MAY BE REPLACED BY THERMAL SAND UPON APPROVAL FROM EVERSOURCE.
 - STEEL PLATES TO BE PLACED ON TOP OF EACH OTHER WITH NO TWO JOINTS OVERLAPPED. STEEL PLATE SHALL OVERHANG ENCASEMENT BY NO LESS THAN 6" ON EACH SIDE.
 - IMPACT ANALYSIS SHALL BE DONE CONSIDERING NON-UNIFORM GROUND SURFACE TEMPERATURE AND IMPACT OF STEEL PLATES.
 - ADDITIONAL STRUCTURAL ANALYSIS AND CONSIDERATIONS ARE REQUIRED TO BE MADE WHERE BELOW CONDITIONS ARE PRESENT:
 - INSTALLATION WHERE UNSUITABLE MATERIAL WITH LOW BEARING CAPACITY IS ENCOUNTERED AT OR BELOW BOTTOM OF THE DUCT BANK.
 - BOTTOM OF THE CONCRETE DUCT BANK IS LOCATED ABOVE FROST DEPTH.
 - DUCT BANK SPANNING OVER EXISTING FACILITIES WITH UNSUPPORTED CLEAR SPAN ABOVE SPECIFIED ALLOWABLE.

CROSS-SECTIONAL DRAWING
SHALLOW (<30" COVER) TRANSMISSION INSTALLATION
SCALE: N.T.S.

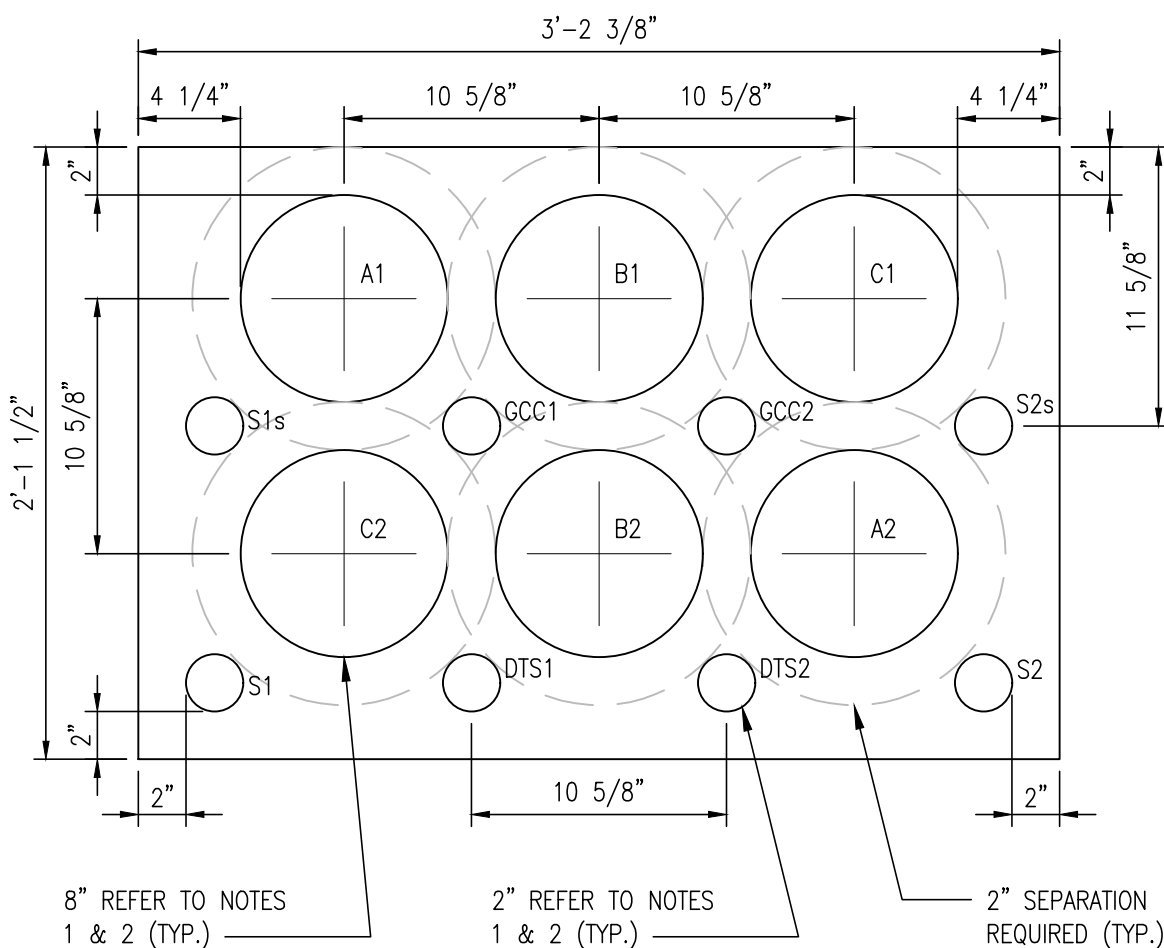
SINGLE CIRCUIT DUCTBANK
SCALE: N.T.S.



- NOTES:
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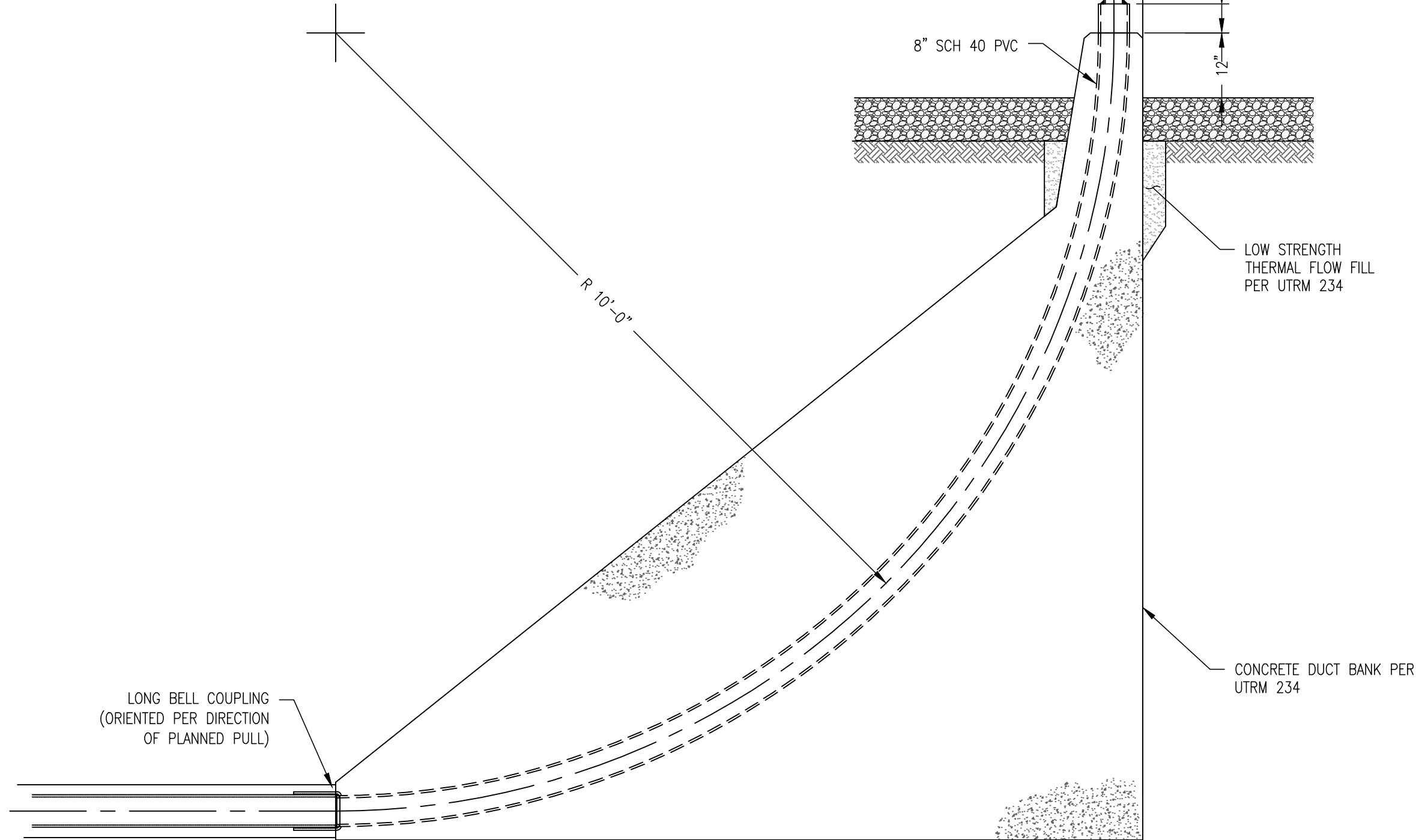
CROSS-SECTIONAL DRAWING
TYPICAL (≥30" COVER) TRANSMISSION INSTALLATION
SCALE: N.T.S.

TWO CIRCUIT DUCTBANK
SCALE: N.T.S.

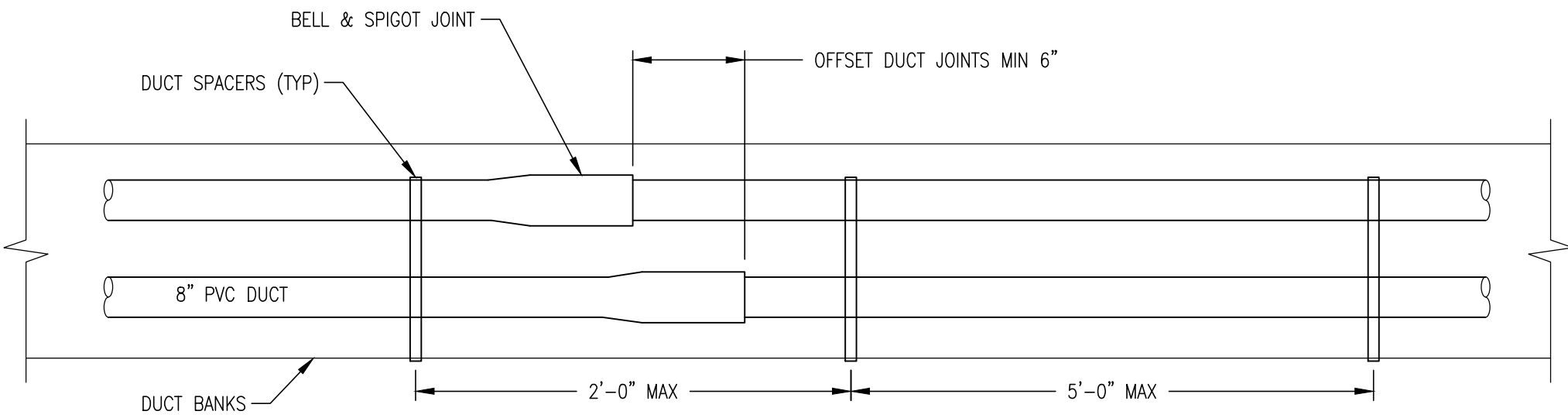


- NOTES:
- REFER TO UTM 235 FOR CONDUIT REQUIREMENTS
 - SCHEDULE 40 PVC REQUIRED UNLESS APPROVED IN WRITING BY EVERSOURCE

TWO CIRCUIT DUCTBANK
SCALE: N.T.S.

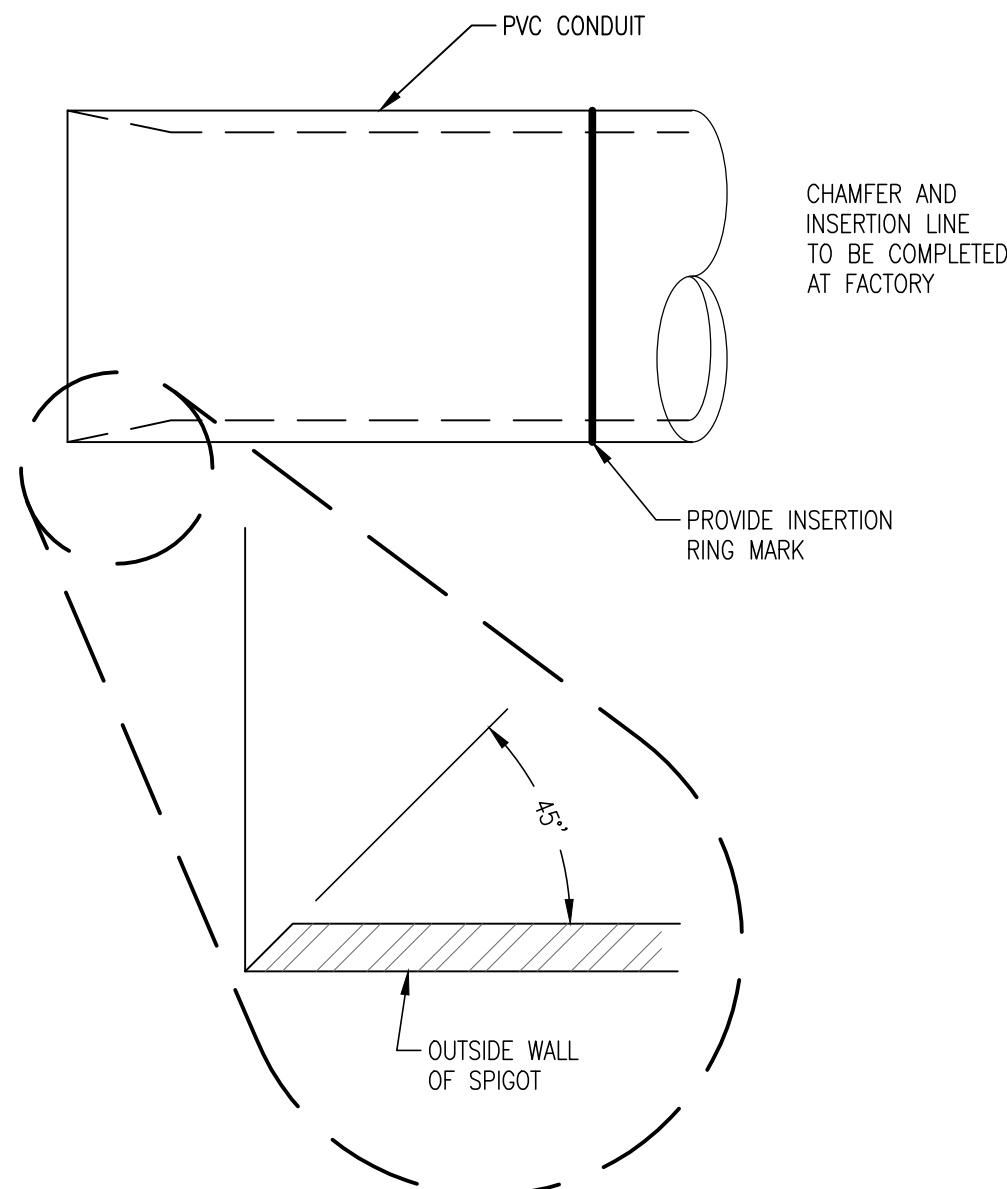


TYPICAL RISER SWEEP DETAIL
SCALE: N.T.S.

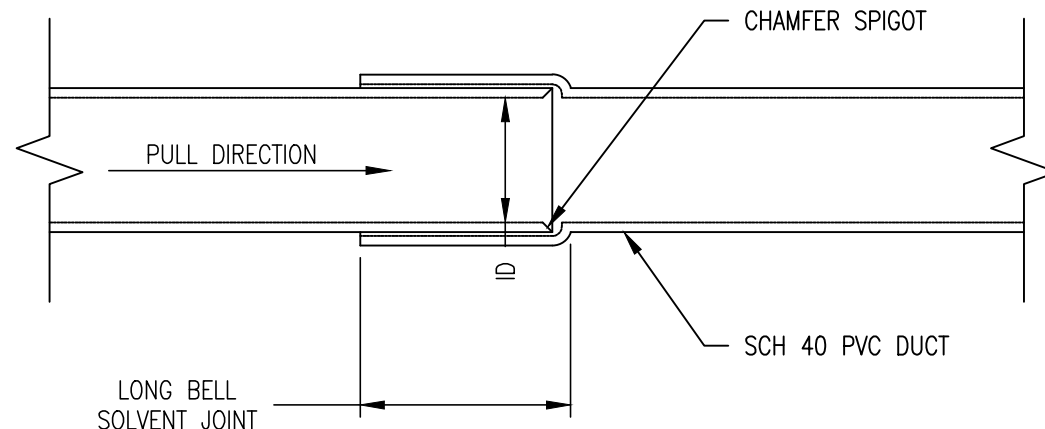


- NOTES:
- INSTALL DUCT SPACERS PER EVERSOURCE UTM 235
 - DUCT SPACER ASSEMBLY AND HARDWARE SPECIFICATIONS SHALL BE ADVANCE PRODUCTS & SYSTEMS DRAWING DBS-0802-39X26-2 OR EVERSOURCE APPROVED EQUAL.

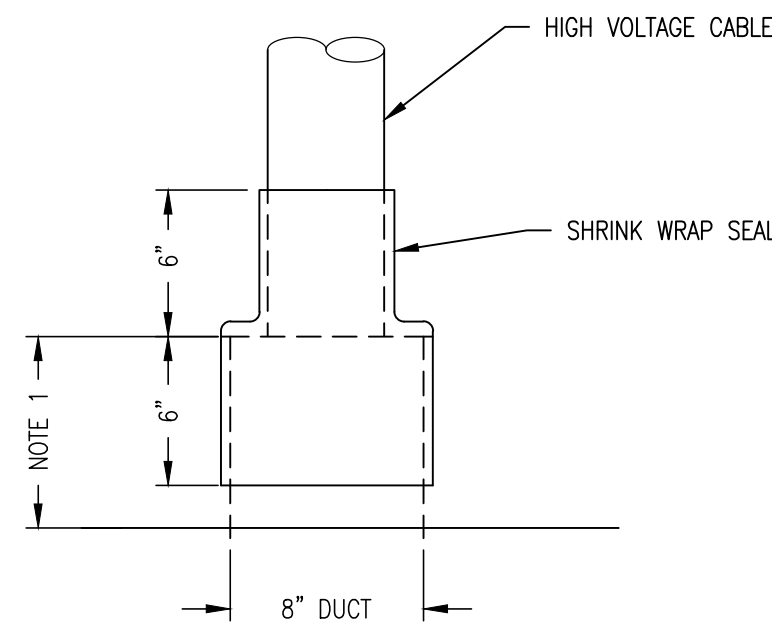
DUCT SPACER DETAIL
SCALE: N.T.S.



SPIGOT DETAIL
SCALE: N.T.S.



BELL & SPIGOT DETAIL
SCALE: N.T.S.



DUCT SEALING DETAIL
SCALE: N.T.S.

ISSUED FOR REVIEW
NOT FOR CONSTRUCTION

CONSTRUCTION-ALL

REVISIONS DURING CONSTRUCTION					
	DATE	DESCRIPTION	BY	CHK	APP
A	11/22	CONCEPTUAL ENGINEERING DESIGN WO #	KLR	KGM	
B	1/24	PRELIMINARY DESIGN - ISSUED FOR REVIEW WO #	DED	KGM	DAG
C	3/24	PRELIMINARY DESIGN - RE-ISSUED FOR REVIEW WO #	DED	KGM	DAG
D	8/24	PRELIMINARY DESIGN - RE-ISSUED FOR REVIEW WO #	GSD	MLB	KGM

EVERSOURCE
ENERGY

TITLE					
TRIANGLE S/S - MIDDLE RIVER S/S 115-kV TRANSMISSION LINE DUCT BANK DETAILS DANBURY, CONNECTICUT					
BY	KLR/TRC	CHKD	DMG/TRC	APP	IG/ES
DATE	11/02/2023	DATE	-	DATE	-
H-SCALE	AS NOTED	SIZE	D	FIELD BOOK & PAGES	
V-SCALE	N/A	V.S.		R.E. DWG	
R.E. PROJ. NUMBER		80137559		DWG NO. 01116-48000p001	





ID	X	Y
A1	-14.6250	25.3312
A2	14.6250	8.4438
B1	0.0000	16.8875
B2	0.0000	0.0000
C1	14.6250	25.3313
C2	-14.6250	8.4437

CONDUIT IDENTIFICATION TABLE	
CONDUIT	USE
A1	1270 LINE "A" PHASE
B1	1270 LINE "B" PHASE
C1	1270 LINE "C" PHASE
GCC1	1270 LINE GROUND CONTINUITY CONDUCTOR
DTS1	1270 LINE DISTRIBUTED TEMPERATURE SENSING
S1	1270 LINE FIBER COMMUNICATION
S1s	1270 LINE FIBER SPARE
A2	1337 LINE "A" PHASE
B2	1337 LINE "B" PHASE
C2	1337 LINE "C" PHASE
GCC2	1337 LINE GROUND CONTINUITY CONDUCTOR
DTS2	1337 LINE DISTRIBUTED TEMPERATURE SENSING
S2	1337 LINE FIBER COMMUNICATION
S2s	1337 LINE FIBER SPARE

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CONSTRUCTION-ALL

REVISIONS DURING CONSTRUCTION					
A	11/22	CONCEPTUAL ENGINEERING DESIGN WO #	KLR	KGM	
B	1/24	PRELIMINARY DESIGN - ISSUED FOR REVIEW WO #	DED	KGM	DAG
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D	8/24	PRELIMINARY DESIGN - RE-ISSUED FOR REVIEW WO #	GSD	MLB	KGM

EVERSOURCE
ENERGY

TRIANGLE S/S - MIDDLE RIVER S/S
115-kV TRANSMISSION LINES 1270 & 1337
TRENCHLESS CROSS SECTION DETAILS
DANBURY, CONNECTICUT

BY	KLR/TRC	CHKD	DMG/TRC	APP	IG/ES	APP	CJL/ES
DATE	11/02/2023	DATE	-	DATE	-	DATE	-

H-SCALE	AS NOTED	SIZE	D	FIELD BOOK & PAGES
V-SCALE	N/A	V.S.		R.E. DWG

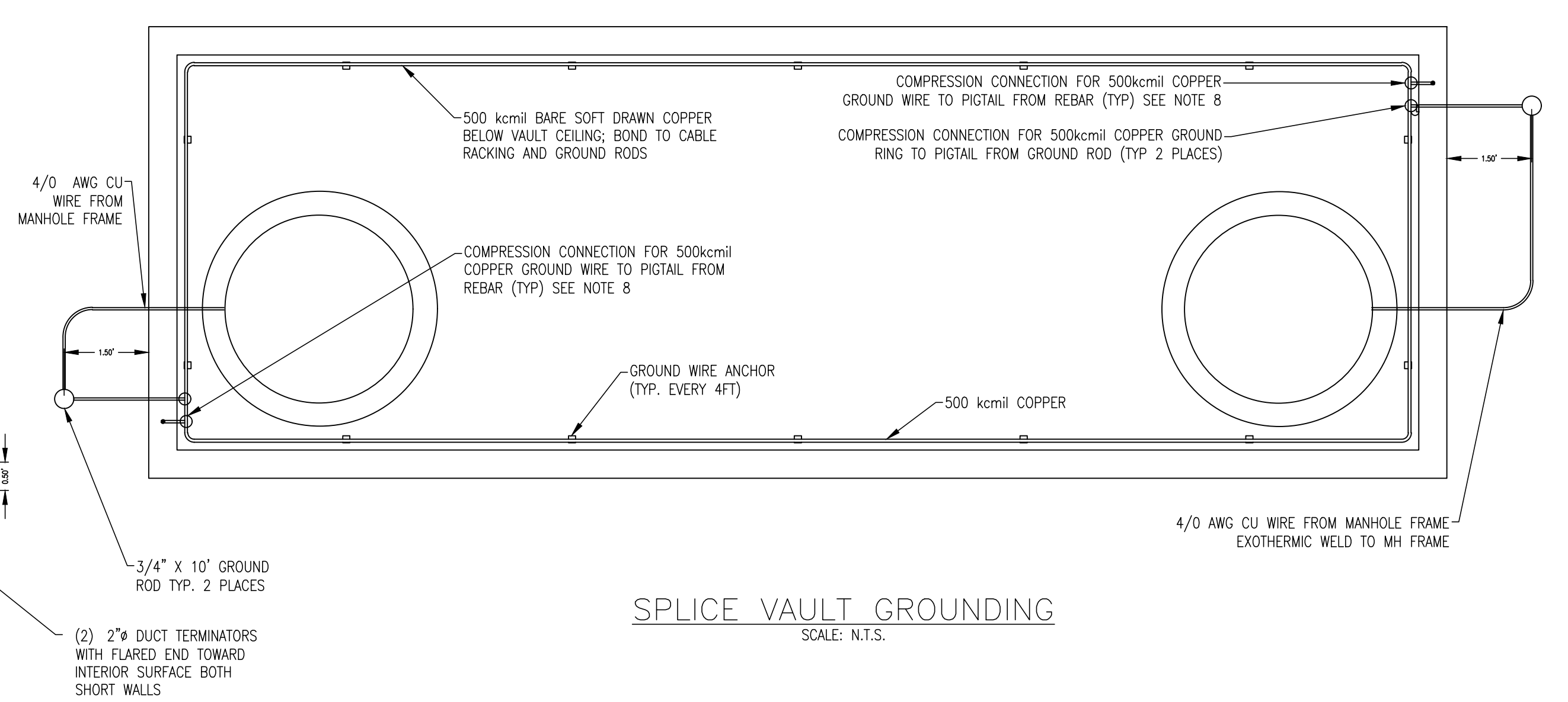
RE. PROJ. NUMBER	80137559	DWG NO.	01116-48001p001
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ATTACHMENT 2.2:

TYPICAL VAULT DETAILS

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BY	KLR/TRC	CHKD	DMG/TRC	APP	IG/ES	APP	CJL/ES
DATE	11/02/2023	DATE	-	DATE	-	DATE	-
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V-SCALE	N/A	V.S.		R.E. DMG			
R.E. PROJ. NUMBER		80137559		DMG NO.		01116-49000p001	

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ATTACHMENT 2.3:

TYPICAL HANDHOLE DETAILS

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1. PAVEMENT AND BASE SHALL BE CONSTRUCTED IN ACCORDANCE WITH THIS DESIGN OR THE LOCAL MUNICIPALITY REQUIREMENTS, WHICHEVER IS MORE RESTRICTIVE.
2. FINISH GRADES AT PAVEMENT SHALL MATCH ADJACENT SURFACES.
3. ALL PAVEMENT EDGES SHALL BE PRIMED PRIOR TO PLACEMENT OF PAVING MATERIAL.
4. PULLING EYES SHALL BE RATED FOR 5,000 PSI PULLING TENSION.
5. HAND HOLE SHALL BE DESIGNED TO HAVE A SAFETY FACTOR OF 1.5 OR GREATER AGAINST FLOTATION WITH THE WATER AT THE GROUND SURFACE. SOIL FRICTION SHALL NOT CONTRIBUTE TO THE SAFETY FACTOR CALCULATION.
6. HANDHOLE EXTERIOR SHALL BE COATED WITH PRE-CASTER'S STANDARD WATERPROOFING COATING.
7. HANDHOLE INTERIOR MAY BE 4' DIAMETER OR SQUARE AT CONTRACTOR'S DISCRETION.

TYPICAL COMMUNICATION HAND HOLE



CONSTRUCTION-ALL

EVERSOURCE
ENERGY

PP	R.E. PROJ. NUMBER	80137559	DWG NO.	01116-49001p001
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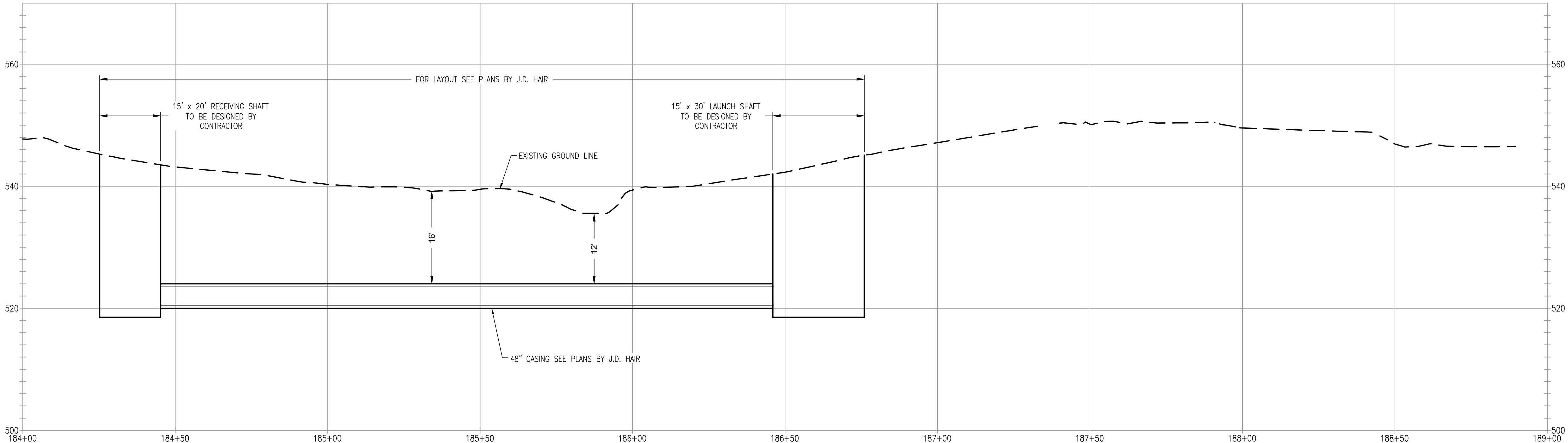
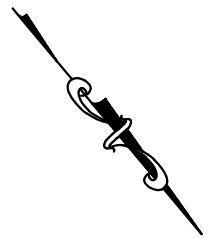
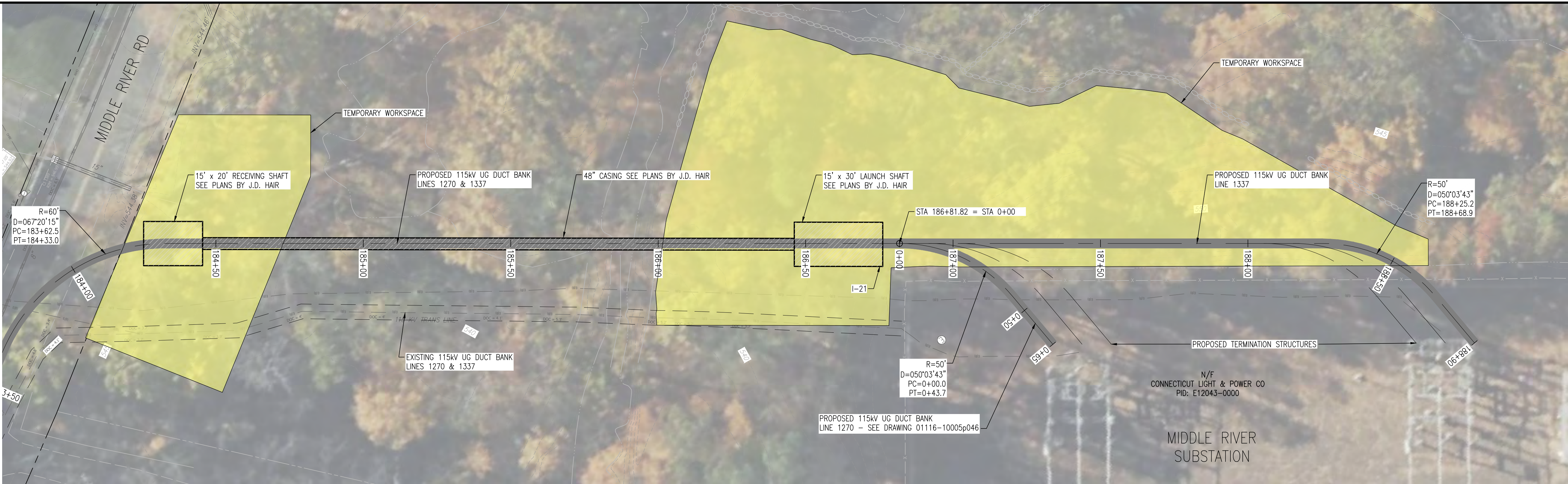
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ATTACHMENT 3:

TRENCHLESS LOCATIONS – PLANS AND PROFILES

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NOTES

- THE UTILITIES SHOWN HEREON ARE BASED ON FIELD SURVEYS, AERIAL PHOTOGRAPHY, AND RECORD DOCUMENTS. OTHER FACILITIES MAY EXIST THAT WERE NOT DISCOVERED THROUGH THE RECORD CHECK. THE CONTRACTOR SHALL VERIFY THE EXACT LOCATION, BOTH HORIZONTAL AND VERTICAL, OF ALL UTILITIES THROUGH THE APPROPRIATE UTILITY COMPANIES. CALL BEFORE YOU DIG ~ 1-800-922-4455.
- VERTICAL RADII SHALL BE 500' UNLESS NOTED OTHERWISE AND MAINTAIN A MINIMUM HORIZONTAL RADIUS OF 50' UNLESS NOTED OTHERWISE. CONTRACTOR SHALL NOT DEVIATE FROM STATED RADII WITHOUT ENGINEER WRITTEN APPROVAL.
- DUCT BANK SHALL MAINTAIN A TYPICAL COVER DEPTH OF 3'-0" UNLESS OTHERWISE SHOWN ON DRAWINGS. MAINTAIN 2'-0" TYPICAL VERTICAL CLEARANCE OVER OR UNDER EXISTING UTILITIES AND MAINTAIN 2'-0" TYPICAL HORIZONTAL CLEARANCE FOR ADJACENT EXISTING UTILITIES SHOWN ON DRAWING UNLESS OTHERWISE NOTED.
- ASSUMED DEPTH OF NON-GRAVITY UTILITIES ARE:
WATER: 4'-6"
GAS: 3'-0"
ELECTRIC: 3'-0"
TELECOMMUNICATIONS: 3'-0"

CONSTRUCTION-ALL

REVISIONS DURING CONSTRUCTION					
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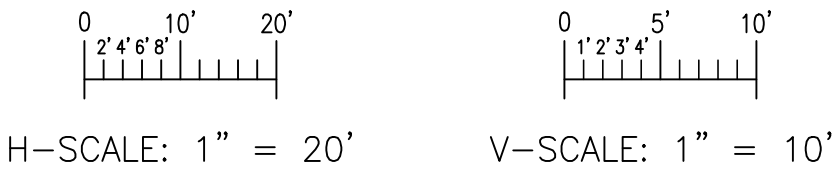
EVERSOURCE
ENERGY

TITLE
TRIANGLE S/S - MIDDLE RIVER S/S
115-kV TRANSMISSION LINES 1270 & 1337
MIDDLE RIVER S/S CROSSING PLAN & PROFILE
DANBURY, CONNECTICUT

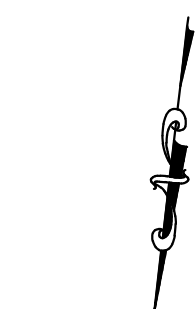
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V-SCALE	1"=10'	V.S.		R.E. DWG			
R.E. PROJ. NUMBER		80137559		DWG NO.		01116-11004p001	



ISSUED FOR REVIEW
NOT FOR CONSTRUCTION



"FOR CURRENT EVERSOURCE PROPERTY RIGHTS, REFER TO PROPERTY RECORD MAPPING LOCATED IN THE T&D ROW AND SURVEY ENGINEERING DEPARTMENT"



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H-SCALE: 1" = 30' V-SCALE: 1" = 15'

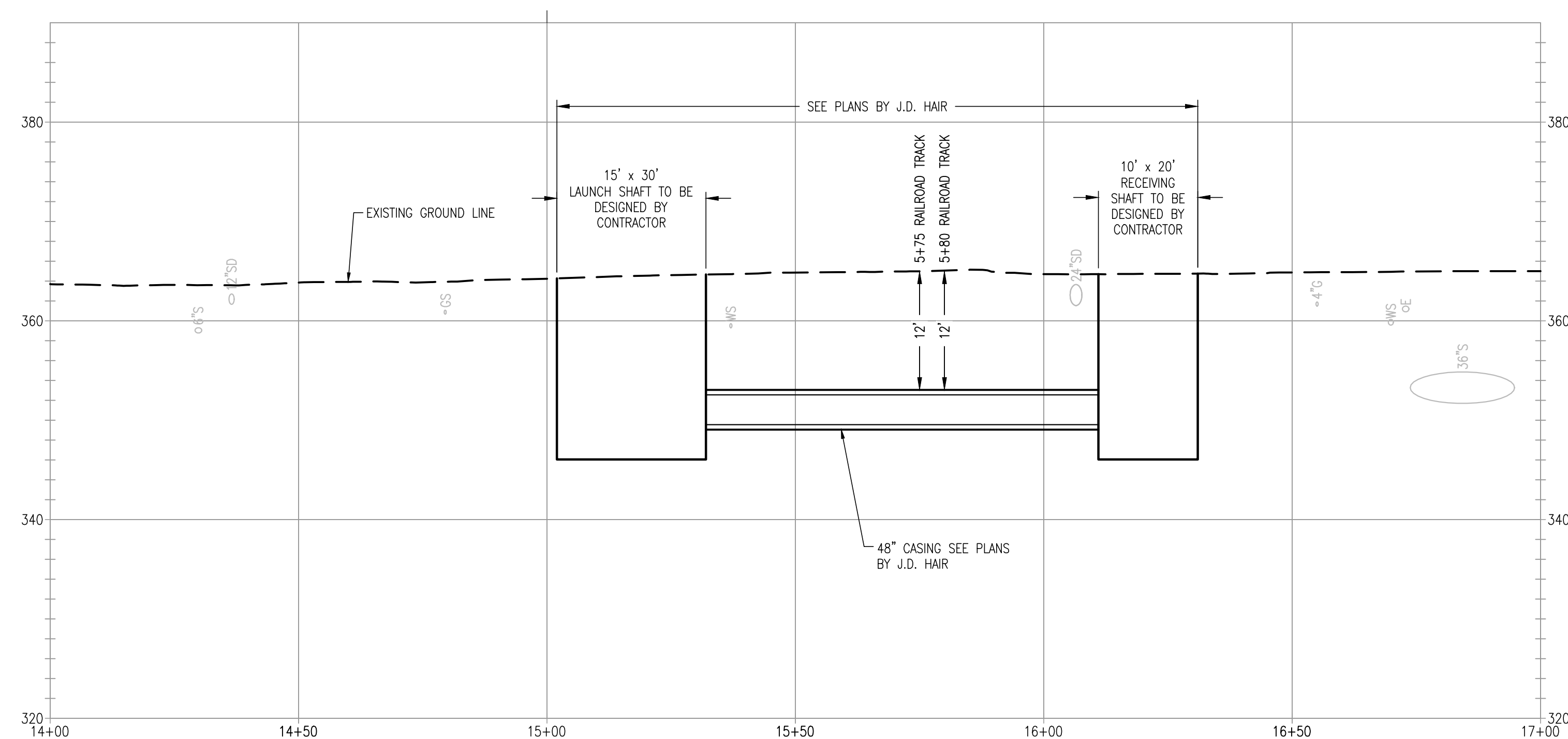
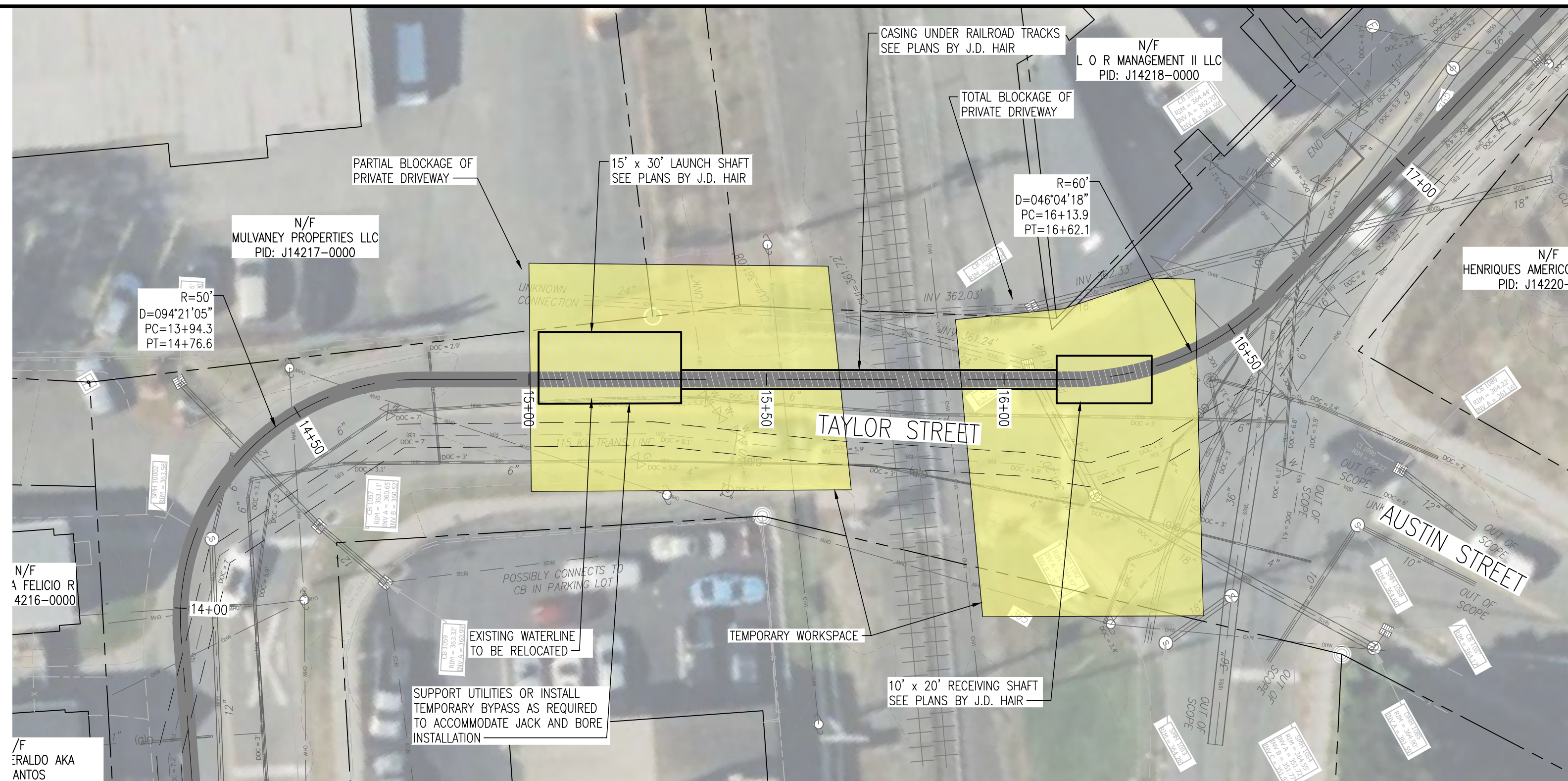
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EVERSOURCE

ENERGY

TITLE	TRIANGLE S/S - MIDDLE RIVER S/S 115-kV TRANSMISSION LINES 1270 & 1337 GARAMELLA BLVD. CROSSING PLAN & PROFILE DANBURY, CONNECTICUT										
BY	SEK/TRC		CHWD	KGM/TRC		APP	IG/ES		APP	CJL/ES	
DATE	11/02/2023		DATE	—		DATE	—		DATE	—	
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V-SCALE	1"=10'		V.S.								
R.E. DWG											
R.E. PROJ. NUMBER						80137559		DWG NO.		01116-11003p001	

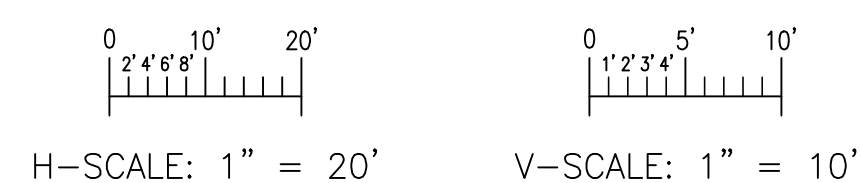


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REVISIONS DURING CONSTRUCTION <table border="1"> <tr> <td>A</td> <td>8/24</td> <td>PRELIMINARY DESIGN – ISSUED FOR REVIEW WO #</td> <td>DED</td> <td>KGM</td> </tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </table>					A	8/24	PRELIMINARY DESIGN – ISSUED FOR REVIEW WO #	DED	KGM															
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EVERSOURCE ENERGY TITLE TRIANGLE S/S - MIDDLE RIVER S/S 115-kV TRANSMISSION LINES 1270 & 1337 TAYLOR ST. CROSSING PLAN & PROFILE DANBURY, CONNECTICUT																								
BY DATE H-SCALE V-SCALE R/E PROJ. NUMBER	SEK/TRC 11/02/2023 1"=20' 1"=10'	CHKD KGM/TRC DATE SIZE V.S.	APP IG/ES DATE FIELD BOOKS & PAGES R/E. DWG.	APP CJL/ES DATE DWG NO.																				
PP		80137559	01116-11001p001																					

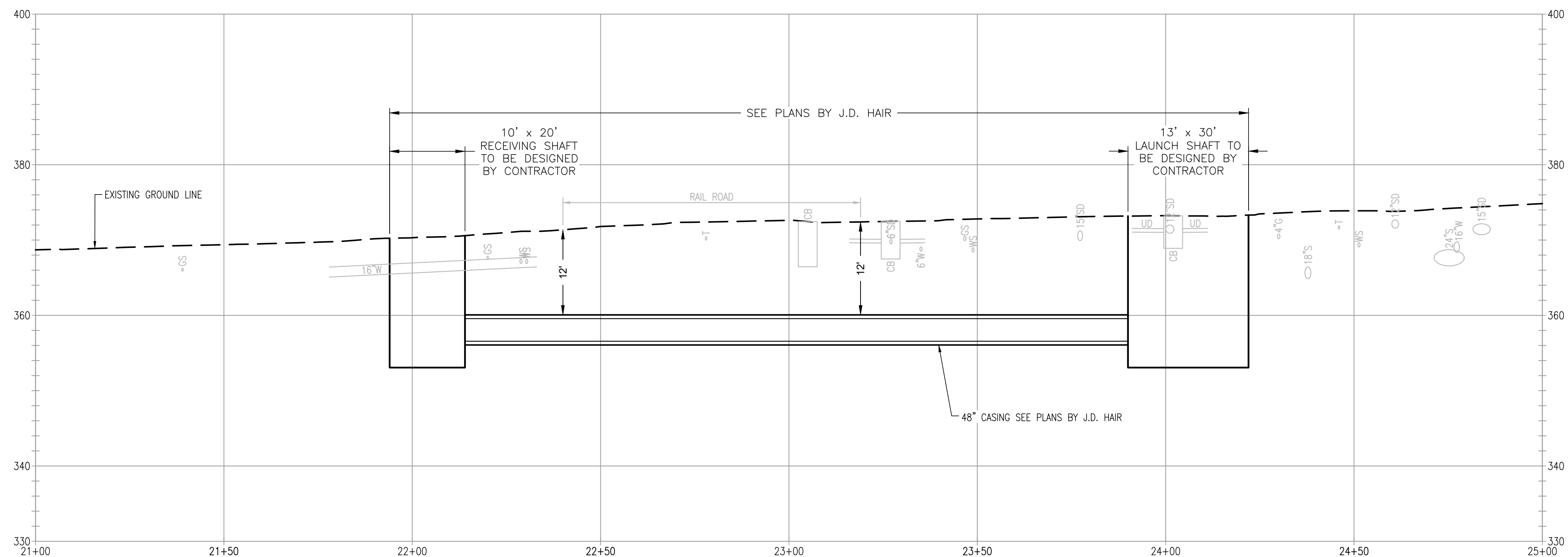
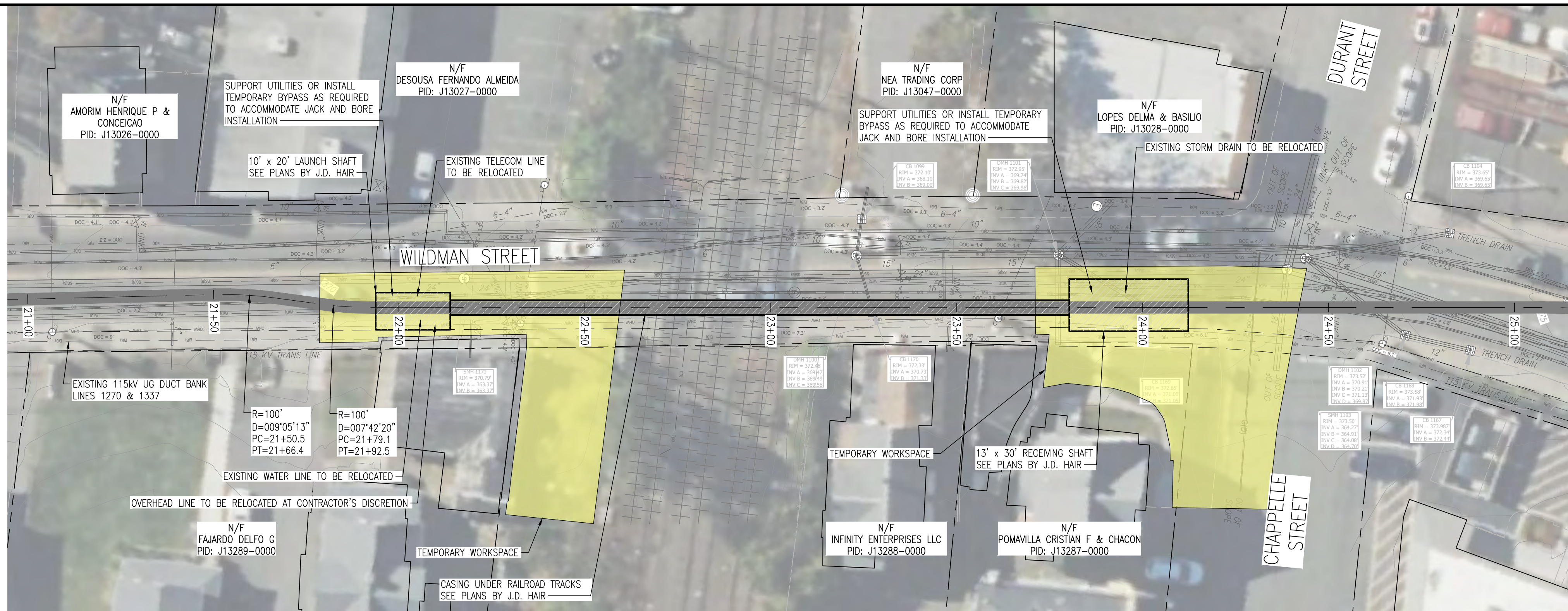


ISSUED FOR REVIEW
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"FOR CURRENT EVERSOURCE PROPERTY RIGHTS, REFER TO
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[illegible]



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REVISIONS DURING CONSTRUCTION DATE				
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TITLE

TRIANGLE S/S - MIDDLE RIVER S/S

115-kV TRANSMISSION LINES 1270 & 1337

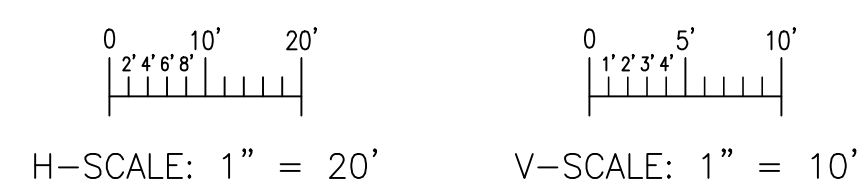
WILDMAN ST. CROSSING PLAN & PROFILE

DANBURY, CONNECTICUT

BY SEK/TRC	CHWD KGM/TRC	APP IG/ES	APP CJL/ES
DATE 11/02/2023	DATE —	DATE —	DATE —
H-SCALE 1"=20'	SIZE D	FIELD BOOK & PAGES	
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R.E. PROJ. NUMBER 80137559		DWG NO. 01116-11002p001	



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PROPERTY RECORD MAPPING LOCATED IN THE T&D ROW AND
SURVEY ENGINEERING DEPARTMENT"

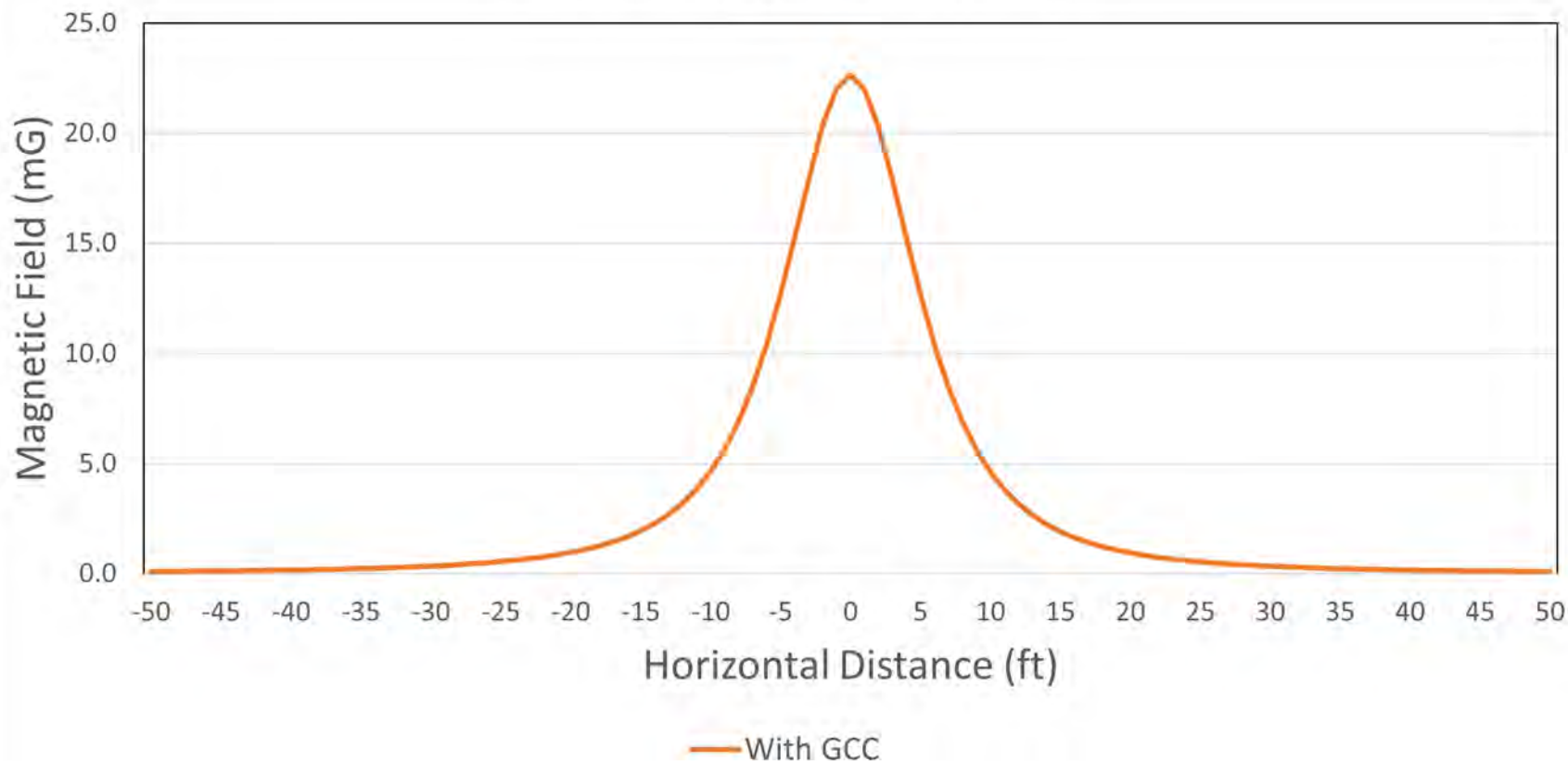
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ATTACHMENT 4

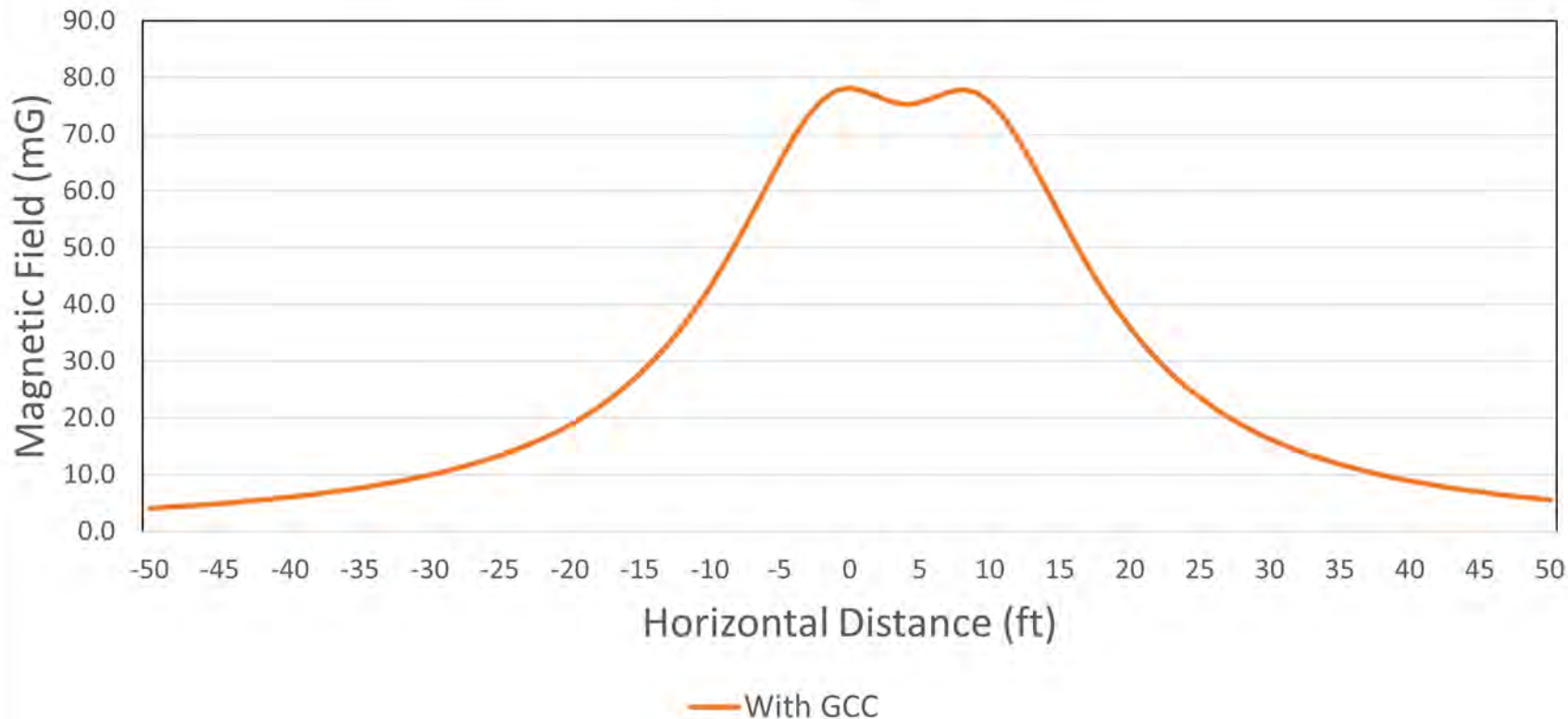
MAGNETIC FIELD STRENGTH GRAPHS

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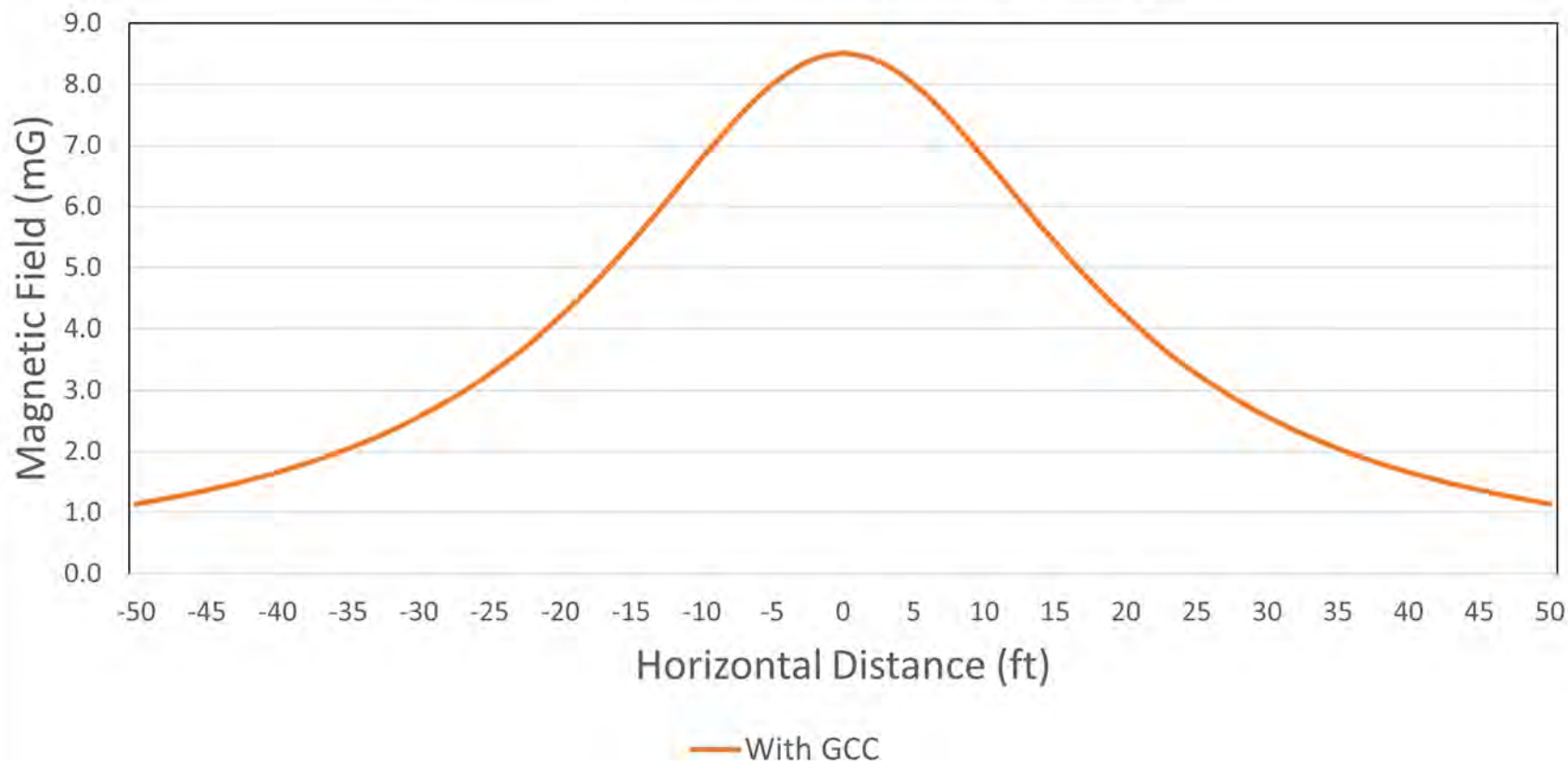
Magnetic Field Strength at 1m Above Ground Surface Near Transmission Line Ductbank



Magnetic Field Strength at 1m Above Ground Surface Near Transmission Line Vault



Magnetic Field Strength at 1m Above Ground Surface Near Transmission Line Trenchless Crossing



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ATTACHMENT 5

LETTER TO ABUTTERS AND AFFIDAVIT OF NOTICE

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EVERSOURCE

P.O. Box 270
Hartford, CT 06141

September 2024

Dear Neighbor,

At Eversource, we're always working to serve you better. We are submitting a petition to the Connecticut Siting Council (CSC) for a proposed underground transmission cable replacement project in your area.

Proposed Project Information

You're receiving this letter because project work will be taking place on or near your property. The majority of the proposed Project route is located within the roadway.

This Project is part of a larger program Eversource is conducting throughout its service territory called the Underground Cable Modernization Program (UCMP). In the Danbury area, the affected lines are the 1270 and 1337 underground transmission lines, which run from Triangle Substation to Middle River Substation, all within the City of Danbury. Both the 1270 line and the 1337 lines need replacement due to their age. The new lines are an upgrade to the system technology, and they have a greater life expectancy.

The proposed Project includes:

- Installation of approximately four files of new 115-kV circuit cross-linked polyethylene ((XLPE) underground transmission lines installed within a concrete-encased polyethylene duct bank.
- Installation of two fiber-optic cables within the duct bank for monitoring and controlling purposes.
- Decommissioning of existing 115-kV high-pressure fluid-filled (HPFF) underground transmission lines.
- Restoration of affected areas, including pavement.

The Transmission Lines are to be installed utilizing best available technology to minimize environmental and neighborhood disruptions. To maintain electric reliability, the replacement lines must be constructed and in service prior to de-energizing the existing lines. Please note there are no interruptions to electric service expected as part of this proposed Project.

What You Can Expect

Pending all necessary approvals for this proposed work, construction is expected to begin in early 2025. We anticipate to complete construction by the end of 2027 and complete decommissioning and restoration of affected areas by the middle of 2028.

For More Information

Eversource is committed to being a good neighbor and doing our work with respect for you and your property. For more information, please call our projects hotline at 1-800-793-2202 or send an email to ProjectInfo@eversource.com.

If you would like to send comments regarding Eversource's petition to the CSC, please send them via email to siting.council@ct.gov or send a letter to the following address: Melanie Bachman, Executive Director, Connecticut Siting Council, Ten Franklin Square, New Britain, CT 06051.

Sincerely,

Chris Cotronei

Chris Cotronei

Senior Project Manager, Eversource Energy



Scan the QR code to check out
our Project Website

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

Sec. 16-SOj-40 of the Regulations of Connecticut State Agencies ("RCSA") provides that proof of notice to the affected municipalities, property owners and abutters shall be submitted with a petition for declaratory ruling to the Connecticut Siting Council ("Council"). In accordance with that RCSA section, I hereby certify that I caused notice of proposed construction of The Connecticut Light and Power Company doing business as Eversource Energy to be served by mail or courier upon the following municipal official:

Mayor Roberto Alves
Danbury City Hall
155 Deer Hill Avenue
Danbury, CT 06810

I also certify that I caused notice of the proposed modifications to be served by mail or courier upon 409 owners of abutting properties shown on the maps in Attachment 1 in the Petition.



Susan J. Bellion
Project Siting Specialist

On this the 26th day of September 2024, before me, the undersigned representative, personally appeared, Susan J. Bellion, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.



Officer of the Superior Court
Juris No. 413393

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 2

Referencing Petition pp. 39-40, were any comments received since the filing of the Petition? If so, summarize the comments and how were these were addressed?

Response:

After filing the petition, Project outreach representatives received feedback from property owners via door-to-door outreach efforts and through a dedicated transmission projects hotline. The property owner concerns were focused on potential impacts to private property. Outreach representatives explained that most of the work will be within the public roadway, and any impacts to private property will be communicated and reviewed in advance with the respective property owner(s).

In addition, representatives from the City of Danbury expressed concerns with potential utility conflicts in the roadway and requested to have a City representative on site during the Level A survey work. The City also wanted confirmation that the community would be informed of the survey work in advance. In response to these concerns/requests, the Project Team conducted a kick-off meeting with City of Danbury representatives and Eversource contractors prior to the commencement of the Level A Survey work. Further, written notifications were mailed to all property owners along the proposed Project route notifying them of the planned survey work, and door-to-door outreach was also conducted prior to work starting in each neighborhood. If no one was present at the time of the door-to-door outreach, door hangers with information about the survey work and contact information were left behind.

Eversource continues to meet with the City of Danbury's representatives to ensure their concerns are addressed and to maintain an open line of communication.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 3

Referencing Petition p. 39, have any proposed duct bank or vault locations changed since the filing of the Petition as a result of consultations between Eversource and the City of Danbury (City)? If yes, provide revised map sheets as applicable.

Response:

No significant changes to proposed duct bank or vault locations have occurred since the Petition was filed as a result of the Project's on-going consultation with the City of Danbury or for any other reason.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 4

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?

Response:

No, no portion of the project is proposed to be undertaken by state departments, institutions, or agencies, nor will it be funded in whole or in part by the state through any contract or grant.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 5

Provide the approximate width (or range of widths) of the road ROW for the entire Project route.

Response:

The approximate widths of the road ROW for the entire route are provided below. The distances are rounded to the closest five-foot increments.

Taylor Street: 50 feet

Wildman Street: ROW width varies from a minimum of 40 feet to a maximum of 60 feet

White Street: 70 feet

9th Avenue: 50 feet

Osborne Street: 50 feet

Garamella Boulevard: ROW width varies from a minimum of 65 feet to a maximum of 70 feet

Franklin Street: ROW width varies from a minimum of 65 feet to a maximum 120 feet

Franklin Street Extension: 120 feet

Gregory Street: ROW width varies from a minimum of 30 feet to a maximum of 35 feet

Westville Avenue Extension: 40 feet

Middle River Road: 40 feet

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 7, the proposed cross linked polyethylene (XLPE) cables would be 5000-kcmil. What size are the existing high pressure fluid filled (HPFF) cables for the 1270 and 1337 Lines in kcmil? Do the existing HPFF 1270 and 1337 Lines have one or two conductors per phase?

Response:

The existing 1270 Line and 1337 Line HPFF cables are 1000-kcmil aluminum. These existing lines have one conductor per phase.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 7

Other than the 1270 and 1337 Lines, do any other transmission lines terminate at Middle River Substation? If yes, identify such lines, indicate if they are overhead or underground, and identify which other substations they terminate at.

Response:

No, there are no other transmission lines that terminate at Middle River Substation.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 8

Other than the 1270 and 1337 Lines, do any other transmission lines terminate at Triangle Substation? If yes, identify such lines, indicate if they are overhead or underground, and identify which other substations they terminate at.

Response:

Yes, in addition to the 1270 and 1337 lines, the 1165 and 1363 lines also terminate at Triangle Substation. The 1165 and 1363 lines are both overhead lines that terminate at Plumtree Substation, Bethel, CT, at the opposite end of the circuits.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 9

If the proposed 5000-kcmil cables are an increase in conductor size versus the existing HPFF cables, explain why.

Response:

The proposed 5000-kcmil cables are an increase in conductor size. In recent years, Eversource has standardized its cable design and construction to simplify the management of spare parts inventory, facilitate maintenance, and streamline internal design and procurement processes. Eversource has selected 5000-kcmil cables for its HPFF replacements because that type of cable fits the current and future needs.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 10

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 project is not included in the ISO-NE Regional System Plan project list or the Asset Condition List. The project is included on Eversource's Local System Plan as "115kV Line 1270-1337 XLPE Replacement", project ID ES-23-LSP-122.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 11

Are any generation or battery storage facilities listed on the ISO-NE interconnection queue associated with the proposed project? If so, please identify the generation and battery storage facilities and queue position(s).

Response:

The Project need is to improve system reliability driven by asset condition concerns. The Project scope is not attributable to support a generator or battery storage facility interconnection.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 12

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.

Response:

ISO-NE will perform a technical review of the Proposed Plan Application for the Project to confirm that it will not have an adverse impact on the transmission system. That review is anticipated to take place in early 2025.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 13

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 aged infrastructure, such as structures, pipes, conduits, conductors or shield wire.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 14

Provide the cost estimates for both the 1270 Line and the 1337 Line replacements. Provide estimates broken down by the following components, and include any assumptions and approximate accuracy band:

- a) Engineering and Indirect
- b) Cable installation
- c) Duct Bank installation
- d) Micro-tunneling
- e) Jack and Bore
- f) Substation work
- g) Commissioning
- h) Land Rights
- i) Environmental
- j) AFUDC
- k) Contingency

Response:

Assumptions:

- Labor estimates are based on a 10 hour workday, Monday through Saturday, and is based on the Project's target goal of achieving 10 to 15 feet of duct bank installation per crew per day. The remaining hours of the Project's normal 7:00 am to 7:00 pm working-hour period is "unproductive time" utilized for setting up the workspace and traffic controls at the start of the shift and breaking down the set up at the end of the shift. No premium or night work is included in the estimate.
- Duct bank construction productivity is presumed to be 10-15 feet, per crew, per day (this presumed productivity reflects the impacts of underground utility congestions, traffic control measures and installation depth of duct bank.
- 1270 and 1337 Lines are to be replaced with 3.6 miles of double circuit XLPE duct bank and conduit with one (1) conductor per phase. The estimate includes eleven (11) vaults and thirteen (13) communication handholes per line, two (2) jack and bore trenchless crossings and two (2) microtunnel trenchless crossings.

Item	Description	Total (\$M)	Line 1270 (\$M)	Line 1337 (\$M)
A	Engineering and Indirect	\$14.8	\$7.4	\$7.4
B	Cable installation	\$31.4	\$15.7	\$15.7
C	Duct bank installation	\$78.9	\$39.4	\$39.4
D	Microtunnel	\$4.6	\$2.3	\$2.3
E	Jack and Bore	\$4.3	\$2.1	\$2.1
F	Substation work	\$10.0	\$5.0	\$5.0
G	Commissioning	\$1.4	\$0.7	\$0.7
H	Land Rights	\$1.6	\$0.8	\$0.8
I	Environmental	\$0.7	\$0.4	\$0.4
J	AFUDC	\$14.0	\$7.0	\$7.0
K	Contingency	\$23.5	\$11.7	\$11.7
Total		\$185.2	\$92.6	\$92.6
	Miles	3.60		

Accuracy band: Overall estimates are +/- 25% .

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 15

Referencing Petition p. 8, Garamella Boulevard Deviation, does this deviation result in a cost savings or incremental cost? If so, by how much?

Response:

The Garamella Boulevard deviation shortens the route by approximately 400 feet and results in a savings of approximately \$1.7 million, as compared to following the existing route.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 16

Referencing Petition p. 9, Middle River Substation Deviation, what is the incremental cost of this approximately 165 foot deviation from the original route (including the micro-tunneling)?

Response:

The micro tunnel is required to avoid impacts from open trenching across wetlands at Middle River Substation. The 165 foot deviation from the original HPFF route is necessary to provide sufficient space for the proposed micro tunneling pits. The length of the proposed micro tunnel remains unchanged with the deviation.

In total, the incremental cost of this deviation route is approximately \$2,800,000. The cost consists of two parts. The incremental cost of the micro tunnel is approximately \$2,100,000, and the total deviation distance of approximately 165 feet additional circuit length to be installed by open trench method adds an incremental cost of approximately \$700,000.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 17

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 \$185.2 million. The Danbury Cable Modernization Program does not include any Pool Transmission Facilities; therefore, the entire cost will be allocated to customers of The Connecticut Light and Power Company d/b/a Eversource Energy.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 18

Provide the estimated life cycle costs of the proposed cable replacement Project based on the three primary cost components from the Council's 2022 Life Cycle Report: first costs, operations and maintenance costs and electrical loss costs. Include the net present value totals of these three components and any assumptions. If first costs are materially different than the proposed Project cost in Interrogatory No. 17, explain the difference.

Response:

Eversource Energy - 1270 & 1337 Life Cycle Costs		
Life-Cycle Cost Components - Estimated Underground Construction Costs/ Typical Mile		
First Costs	1270 Line	1337 Line
	Single Circuit	Single Circuit
Ducts & Vaults	\$8,270,000	\$8,270,000
Cable & Hardware	\$5,840,000	\$5,840,000
Site Work	\$1,000,000	\$1,000,000
Construction	\$8,040,000	\$8,040,000
Engineering	\$700,000	\$700,000
Sales Tax (X %)	\$0	\$0
Project Management	\$1,870,000	\$1,870,000
Totals	\$25,720,000	\$25,720,000
Operations & Maintenance, and Loss Costs		
Annual O&M Cost (Per Mile)	\$10,022	\$10,022
Average Annual Loss Costs (Per Mile)	\$404	\$404
Totals	\$10,426	\$10,426

Electrical, Loss and Cost Assumptions		
Value	XLPE 115-kV	XLPE 115-kV
Cable Size & Type - 1 conductor per phase	5000 kcmil Al XLPE	5000 kcmil Al XLPE
Cable Resistance (Ω /mile)	0.023	0.023
Peak Line Current (Amps)	219	219
Load Growth	0.65%	0.65%
Load Factor	0.49	0.49
Energy Cost (\$/MWh)	\$100	\$100
Energy Cost Escalation	4.1%	4.1%

Assumptions and Clarifications:

1. The average length of the 1270 & 1337 Lines is 3.6 miles.
2. Peak Line Current and Load Factor are averages based on actual loads on the cable during the last 10 years.
3. Assumed load growth is based on ISO-NE projections (i.e., base case database) that is used by ISO-NE to establish substation loads for transmission system assessments.
4. The per mile first costs provided above, when multiplied by the average length of the 1270 & 1337 Lines, result in approximately equivalent total Project costs to those provided in the response to Interrogatory No. 17.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 19

How would Eversource avoid and/or manage project cost overruns? Who would bear the burden of any cost overruns? Explain.

Response:

Eversource has several strategies to avoid or manage project cost overruns. For example, before the Detailed and Issue for Construction drawings are generated, a robust Quality Level A Survey would be completed to precisely identify any subsurface utility conflicts. Eversource would continue to evaluate and confirm cost assumptions and identify any risks in order to incorporate contingency funds into the estimate. Estimated costs for material and labor are based on most recent project costs, to avoid underestimating costs.

Further, the Project would be competitively bid to ensure the lowest priced competent contractor is selected. Once construction begins, robust project controls processes would be implemented, which would include contract management and strict construction oversight, as well as a rigorous justification process for any contractor change orders. Eversource project management also reviews expenditures against the project schedule on a monthly basis and evaluates the consistency with the Project budget and spend forecasting to ensure that key milestones are being reached as planned and that the work is progressing according to the Project schedule and without added cost of delay that could be avoided, mitigated or offset.

Cost overruns would become part of the total project cost, which would be allocated to ratepayers as described in the response to Interrogatory CSC-001-17.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 20

Provide the ratings on the existing and the proposed cables.

Response:

The existing 1270 and 1337 cable ratings are as follows:

Normal: 135 MVA* LTE**: 149 MVA STE***: 153 MVA*.

The replacement 1270 and 1337 cable ratings are as follows:

Normal: 216 MVA* LTE**: 266 MVA STE***: 366 MVA.

* MVA refers to Megavolt-Amperes.

** LTE refers to the Long-Term Emergency cable rating.

*** STE refers to the Short-Term Emergency cable rating.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 21

Referencing Petition p. 10, the power cables would be arranged in a 3 x 2 arrangement within the duct bank. Petition Attachment 2.1 depicts two different double-circuit duct bank configurations: vertical and horizontal. Which duct bank configurations would be located in which portions of the route? Explain.

Response:

The general approach is to use the horizontal arrangement for as much of the route as practical. This minimizes the required depth of excavation. The vertical arrangement is typically used when needed for routing between adjacent utilities and when approaching vaults.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 22

Referencing Petition, p. 14-15, provide the heights of the following:

- a) Tallest existing structure at Middle River Substation;
- b) Proposed termination structure for 1270 Line at Middle River Substation;
- c) Proposed termination structure for 1337 Line at Middle River Substation;
- d) Tallest existing structure at Triangle Substation;
- e) Proposed termination structure for 1270 Line at Triangle Substation; and
- f) Proposed termination structure for 1337 Line at Triangle Substation.

Response:

The heights of the following structures are:

- a) Tallest existing structure at Middle River Substation – 37 feet 6 inches
- b) Proposed termination structure for 1270 Line at Middle River Substation – 21 feet 6 inches
- c) Proposed termination structure for 1337 Line at Middle River Substation – 21 feet 6 inches
- d) Tallest existing structure at Triangle Substation – 77 feet 6 inches
- e) Proposed termination structure for 1270 Line at Triangle Substation – 21 feet 6 inches
- f) Proposed termination structure for 1337 Line at Triangle Substation – 21 feet 6 inches

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 23

Referencing Petition Map Sheet 1 of 6, provide the approximate substation expansion area in square feet at Middle River Substation. What is the existing fence type and height at Middle River Substation? Would the fence expansion area have a matching fence? Would the substation expansion area have a matching base (e.g. traprock)?

Response:

The expansion area at Middle River Substation is approximately 4,900 square feet. The existing fence at Middle River Substation is 8 feet high (7 feet high chain link fencing with 1 foot of three strand barb wire on top). The new fence would match the existing fence in design. The substation expansion area would have a traprock base to match the base of the existing substation.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 24

Referencing Petition p. 37, Eversource notes that the cathodic protection system would be tied in for the long-term casing pipe integrity preservation. Is the existing cathodic protection system currently active, and would it be re-connected during the decommission process? Explain.

Response:

The cathodic protection system is currently active for the existing HPFF pipes. After the dielectric fluid and cables are removed from the pipes in preparation for in-place retirement, the plan is to pressurize the pipes with nitrogen gas. The nitrogen would serve to protect the pipe from internal corrosion, and the cathodic protection system would remain active to protect the pipe from both internal and external corrosion.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 25

Are there other methods for retiring HPFF cables that do not include pressurized nitrogen requiring long term monitoring and maintenance?

Response:

Yes, there are two other methods for retiring HPFF cables that do not include pressurized nitrogen. These options include the injection of vapor corrosion inhibitors or soluble corrosion inhibitors. These technologies involve the injection of various chemicals in a vapor phase or a water-soluble phase to create a coating on the surface of the metal inside the pipe to slow the oxidation process. However, these methods do not provide a mechanism to monitor the integrity of the pipe in real time. Eversource selected the pressurized nitrogen monitoring solution because in addition to preventing internal corrosion, a positive pressure is maintained, and it provides ability to monitor integrity of the pipe in real time. This positive pressure prevents contaminants from entering the pipe as well as alerting operations personnel if the pipe were to become compromised so it can be quickly repaired. If the pipe develops a leak, the inert nitrogen would not result in any environmental contamination or harm to the public.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 26

Would the Project comply with the 2023 National Electrical Safety Code, effective February 1, 2023?

Response:

Yes, the Project would comply with the 2023 National Electrical Safety Code, effective February 1, 2023.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 27

Referencing Petition pp. 14-15, 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?

Response:

The Federal Aviation Administration (FAA) Notice Criteria Tool (NCT) was used to check the proposed substation termination structures. Per the NCT, the proposed terminal structures at Triangle Ave Substation will not require notice to the FAA and therefore, no marking or lighting would be required. Per the NCT, the proposed terminal structure at Middle River Road Substation exceeds the FAA's Notice Criteria and accordingly, a notice will be filed with the FAA to determine whether marking and/or lighting would be required. Because the proposed structure would not be the tallest structure in the substation, Eversource expects that marking and/or lighting would not be required.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 28

Referencing Petition p. 26, Table C-2, are the post-construction magnetic field calculations based on average annual load conditions or peak forecasted steady state load conditions? Explain.

Response:

Table C-2 in the Petition should have stated that post-construction magnetic field calculations are based on peak forecasted steady state load conditions, not average annual load conditions. The peak steady state load conditions will result in higher magnetic field calculated results than using average annual load conditions.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 29

Referencing Petition p. 26, Table C-2, explain why post-construction magnetic field levels would be higher 25 feet from a vault centerline versus a trench centerline.

Response:

The post construction magnetic field levels would be higher 25 feet from a vault centerline versus a trench centerline due to the greater physical separation between conductors for the vault condition. In the duct bank, the conductors are spaced about 10 inches apart (centerline to centerline). In a vault the conductors are spaced about 18 inches apart (centerline to centerline), and 8 feet or more horizontally between circuits for double circuit installations.

Greater physical separation between current carrying conductors tends to increase magnetic field levels up to a certain distance, after which they begin to decrease again. For the phase separation that was modeled, this results in increased magnetic fields around vault locations. This effect is further pronounced for double circuits where the two circuits enter physically separate vaults.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 30

How would the proposed Project affect magnetic field levels at the property boundaries of the two substations? Explain.

Response:

The Project proposes to install the replacement cables at the two substations proximate to the locations of the existing cables. For the existing HPFF cables, due to the close spacing of the conductors and the shielding effect of the steel pipe, the maximum magnetic field surrounding the existing cables is no more than 5 milligauss. For the replacement cables, the maximum magnetic field surrounding the cables will be no more than 23 milligauss. Due to distances between the terminal structures and the property boundaries, as well as the other contributors of magnetic fields (substation bus, distribution feeders, etc.), the change in magnetic fields around the substations as a result of the Project will be negligible.

As mentioned in the Petition, the internationally established exposure limits of magnetic field strength as outlined by International Council on Electromagnetic Safety ("ICES") and the International Council on Non-Ionizing Radiation Protection ("ICNIRP") are 9,040 and 2,000 milligauss, respectively.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 31

Referencing Petition pp. 13-14, identify the drilling fluid to be used for micro-tunneling, if applicable. How is the fluid contained during use?

Response:

In micro-tunneling, the fluid most commonly used is a water-based slurry primarily composed of bentonite clay, often referred to as "drilling mud." It is contained within the tunnel bore by the micro-tunneling bore machine's (MTBM) cutterhead design and is circulated through a closed system to remove excavated soil particles and stabilize the tunnel face.

Containment is managed by monitoring volume, pressure, and flow rates during the micro-tunneling activities via flowmeters that are integrated into the micro-tunneling equipment. The fluid is pumped through the MTBM and back to the surface for filtering and recirculation. If at any time the sensors should register any reading beyond the required parameters, which that could indicate a breach of the containment, the micro-tunneling activity will be immediately stopped and the cause of the aberrant reading investigated.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 32

Referencing Petition pp. 12-13, how long would the jack-and-bore portion of the Project take to complete?

Response:

There are two jack-and-bore trenchless installations planned for the route. Eversource commissioned a contractor specializing in trenchless techniques to complete a feasibility study and report for the two locations. Estimates for completion are based on conceptual design and have not been confirmed with geotechnical data. Based on this initial estimate and subject to final design and the contractor's means and methods it is expected to take approximately 39 days to complete the Wildman Street crossing and 45 days to complete the Taylor Street crossing.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 33

Referencing Petition pp. 13, how long would the micro-tunneling portion of the Project take to complete?

Response:

There are two micro-tunneling trenchless installations planned for the route. Eversource commissioned a contractor specializing in trenchless techniques to complete a feasibility study and report for the two locations. Estimates for completion are based on conceptual design that was developed prior to confirmation of geotechnical data. Based on this initial estimate and subject to final design and the contractor's means and methods, Eversource expects that the Middle River crossing would take approximately 60 days to complete, and the Garamella Boulevard crossing would take approximately 59 days to complete.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 34

Referencing Petition p. 17, the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control are referenced. Would construction also comply with the Connecticut Stormwater Quality Manual, effective March 30, 2024?

Response:

Yes, the Project would be constructed in accordance with 2024 Connecticut Stormwater Quality Manual, as well as the 2024 Connecticut Erosion & Sediment Control Guidelines, established industry practices, and Eversource's Best Management Practices for Massachusetts and Connecticut, April 2022 Manual.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 35

Describe site construction monitoring and inspections that are required for this project under the DEEP General Permit.

Response:

Per the General Permit requirements, temporary erosion and sedimentation ("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 is initially restored per site requirements. These areas will continue to be inspected on a monthly basis after the initial site stabilization and until final stabilization has been achieved, at which time the temporary E&S control measures will then be removed. 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 construction work is occurring. Eversource's construction representatives are also on site daily and will report any concerns regarding E&S controls when observed so any issues can be addressed immediately.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 36

Referencing Petition p. 34, a Traffic Management Plan (TMP) would be developed in coordination with the City. Is the TMP complete? If yes, please provide a copy.

Response:

The development of the Traffic Management Plan (TMP) is in progress. Meetings have been held with the City of Danbury and the Project's traffic consultant and Eversource is currently incorporating feedback from the City to finalize the TMP.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 37

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:

With the exception work areas adjacent to the Middle River Substation, no construction will occur within or proximate to environmentally sensitive areas. A Stormwater Pollution Control Plan (SWPCP) will be prepared and be submitted for Connecticut Department of Energy and Environmental Protection's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. The SWPCP and General Permit identify mitigation measures and monitoring compliance procedures that will be in place whenever work is to occur within environmentally sensitive areas (wetlands and watercourses) adjacent to Middle River Substation.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 38

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?

Response:

Eversource has not developed a single, stand-alone Protection Plan for wetlands and watercourses 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 marked again in the field prior to construction.

The Project's Stormwater Pollution Control Plan (SWPCP) will contain details of work areas, erosion and sedimentation control measures and details. These measures and details are intended to protect sensitive resource areas (e.g., wetlands and watercourses) during construction.

Project work will comply with the SWPCP and Eversource's Best Management Practices for Massachusetts and Connecticut, April 2022 (BMPs), which focus on protecting wetlands and watercourses, 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: December 20, 2024

Request from: Connecticut Siting Council

Question: 39

Referencing Petition p. 23, submit a copy of the correspondence from State Historic Preservation Office dated June 25, 2024.

Response:

Please see the attached letter from the State Historic Preservation Office dated June 25, 2024.

June 25, 2024

Mr. Jeff Bolton
Eversource Energy
107 Selden Street
Berlin, CT 06037
(sent only via email to Jeffrey.bolton@eversource.com)

Subject: Archaeological Assessment Survey
Triangle Substation to Middle River Substation XLPE Line Replacement Project
Danbury, Connecticut

Dear Mr. Bolton:

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 Triangle Substation to Middle River Substation XLPE Project Transmission Line Replacement Project in Danbury, Connecticut* dated February 2024. The completed investigation meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*. SHPO understands that the proposed project consists of the replacement of an existing HPFF underground transmission line system between the Triangle and Middle River Substations with a new XLPE system. Project plans indicate that the proposed cable routes will primarily follow the route of the existing cable. The project will require a stormwater discharge permit issued by the Connecticut Department of Energy and Environmental Protection through the authority of the Environmental Protection Agency. As a result, it is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act, as amended. The project will also require approval by the Connecticut Siting Council.

The archaeological assessment survey consisted of comprehensive background research that examined historic maps and aerial imagery as well as previously identified cultural resources located in proximity to the proposed cable route. The review failed to identify any National Register of Historic Places (NRHP) listed properties within the study area. However, one previously recorded archaeological site (Site 34-10) was reported within 500 feet of the project corridor. The report concluded that there will be no impact to Site 34-10 by the proposed actions. A subsequent pedestrian survey of the Area of Potential Effect (APE) was completed by Heritage in February of 2024. The survey revealed that the entirety of the proposed cable corridor is characterized by modern disturbances related to prior development, landscaping, drainage, utility, and road construction. As a result, Heritage determined that the APE retains a no/low potential to contain significant intact archaeological resources. Based on the information submitted to this office for review, it is the opinion of SHPO that there will be no historic properties effected by the proposed undertaking.

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,



Jonathan Kinney
State Historic Preservation Officer

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 40

Referencing Petition p. 23, 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)?

Response:

Eversource would develop a vibration monitoring plan and vibration threshold limits based on collaboration between the Project team, the Project's cultural resources consultant, and its construction contractors for work activity occurring within 500 feet of historic resources. If threshold limits are exceeded, work in the area would be stopped until a plan is made to continue work within the vibration threshold.

Date Filed: December 20, 2024

Request from: Connecticut Siting Council

Question: 41

Referencing Petition p. 19, provide a copy of the DEEP NDDB determination letter dated September 12, 2024.

Response:

Please see the attached Connecticut Department of Energy and Environmental Protection Natural Diversity Database letter, dated September 12, 2024.



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9/12/2024

Robert Deptula
EVERSOURCE ENERGY SERVICE COMPANY
107 SELDEN ST
BERLIN, CT 06037
eversource.nddb@eversource.com

Subject: 1270 1337 HPFF Line Rebuild

Filing # 118171

NDDb – New Determination Number: 202409329

The Project crosses two NDDb areas: Garamella Boulevard at the Pandarama Brook crossing and Franklin Street. The entire Project extends from Middle River Substation (SS) to Triangle SS via Middle River Road, Westville Avenue Extension, Gregory Street, Franklin Street, Franklin Street Extension, and Garamella Boulevard, Osborne Street, Ninth Avenue, White Street, Wildman Street, Taylor Street, ending at Triangle Street in Danbury, CT.
Danbury

Expiration Date: 9/12/2026

Current data maintained by the Natural Diversity Database (NDDb) and housed in the DEEP ezFile portal indicates that populations of the following State Endangered, Threatened, or Special Concern species (RCA Sec. 26-306) have been documented within the project area or in close proximity to the proposed Energy and Utility Production Facilities and Distribution Infrastructure/Facility modifications, 1270 1337 HPFF Line Rebuild.

Wood turtle (*Glyptemys insculpta*)

In accordance with the project information provided in your request submittal, implementation of the following Best Management Practices will avoid negative impacts to listed species:

Common Name	Wood turtle
Scientific Name	<i>Glyptemys insculpta</i>
Taxa	reptile
Status ¹	SC
General Ecology	Individuals of this species are riverine and riparian obligates, overwintering and mating in clear, cold, primarily sand-gravel and rock bottomed streams and foraging in riparian zones, fields and upland forests during the late spring and summer. They hibernate in the banks of the river in submerged tree roots between November 1 and March 31. Their summer habitat focuses within 90m (300ft of rivers) and they regularly travel 300m (0.2 mile) from rivers during this time. During summer they seek out early successional habitat: pastures, old fields, woodlands, powerline cuts and railroad beds bordering or adjacent to streams and rivers.

	Their habitat in Connecticut is already severely threatened by fragmentation of riverine, instream, riparian, and upland habitats, but is exacerbated by heavy adult mortality from machinery, cars, and collection. This is compounded by the species late maturity, low reproductive potential, and high nest and hatchling depredation rates.
Best Management Practice	This species hibernates in the banks of streams and some nests are vulnerable to flooding. • Do not dewater streams during dormant period (November 1- April 1). • Do not alter stream volume, depth or water flow rates (i.e. there should be no sudden large water released into local streams as a temporary or permanent result of your project) • Do not alter water quality conditions of sandy streams including turbidity, temperature, and substrate. Land disturbance activities need to consider local habitat features and apply fencing and/or time of year restrictions as appropriate. We recommend you consult with a herpetologist familiar with preferred habitats to assist you with proper techniques to ensure the best protection strategies are employed for your site and the scope of your project. • Land disturbance and excavation confined to the upland can be done without risk for impact to wood turtle if work is restricted to the dormant season (November 1- March 31). If land disturbance activity will include significant areas within and around rivers and streams, you will need to take precautions to avoid impacting hibernating adults. Consult with a qualified herpetologist to assess your work impact zone for the potential to impact overwintering wood turtle. • Do not begin instream activity and bank disturbance in suitable overwintering habitat within a river or stream during the turtle's dormant period (November 1- March 31). To prevent turtle access and entry into your upland work zone between April 1- October 31: • Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance as shown on the plans, or be specifically designated by a qualified herpetologist. • Exclusionary fencing be at least 20 inches tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. • Prior to construction, all turtles occurring within fencing work area will be relocated to suitable habitat outside disturbance area. This should be performed by a qualified professional familiar with habitat requirements and behavior of the species. • The Contractor must search the work area each morning prior to any work being done. • All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species. • Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point. These animals are protected by law and no turtles should be relocated from the site.

	• In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume. • Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools. If land disturbance will occur in potential nesting areas designated by a qualified herpetologist, you will need to take precautions to prevent female turtles from entering work area and setting up nests. This fencing would need to be in place before May 15. Potential nesting areas may include open fields, early successional habitat, sandy open patches nearby wetland features, and sandy roads and roadsides.
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¹E = State Endangered, T = State Threatened, SC = State Special Concern, FE = Federally Endangered, FT = Federally Threatened, NA = Not applicable.

Your submission information indicates that your project requires a state permit, license, registration, or authorization, or utilizes state funding or involves state agency action. This NDDB – New determination may be utilized to fulfill the Endangered and Threatened Species requirements for state-issued permit applications, licenses, registration submissions, and authorizations.

Please be aware of the following limitations and conditions:

Natural Diversity Database information includes all information regarding listed species available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection’s Natural History Survey and cooperating units of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Database and accessed through the ezFile portal as it becomes available. New information may result in additional review, and new or modified restrictions or conditions may be necessary to remain in compliance with certain state permits.

- During your work listed species may be encountered on site. A report must be submitted by the observer to the Natural Diversity Database promptly and additional review and restrictions or conditions may be necessary to remain in compliance with certain state permits. Please fill out the [appropriate survey form](#) and follow the instructions for submittal.
- Your project involves the state permit application process or other state involvement, including state funding or state agency actions; please note that consultations with your permit analyst or the agency may result in modifications or additional requirements. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division may be necessary and additional information, including but not limited to species-specific site surveys, may be required.
- If your project involves preparing an Environmental Impact Assessment, this NDDB consultation and determination should not be substituted for conducting biological field surveys assessing on-site habitat and species presence.
- This determination applies only to the project as described in the submission and summarized at the end of this letter. Please re-submit an updated Request for Review if the project’s scope of work and/or timeframe changes, including if work has not begun by 9/12/2026.
- If biological surveys have been conducted in accordance with Best Management Practices

provided, please forward a copy of the results to the address listed at the end of this letter. Include the Project Name and Determination Number on all correspondence.

The NDDB – New determination for the 1270 1337 HPFF Line Rebuild at The Project crosses two NDDB areas: Garamella Boulevard at the Pandarama Brook crossing and Franklin Street. The entire Project extends from Middle River Substation (SS) to Triangle SS via Middle River Road, Westville Avenue Extension, Gregory Street, Franklin Street, Franklin Street Extension, and Garamella Boulevard, Osborne Street, Ninth Avenue, White Street, Wildman Street, Taylor Street, ending at Triangle Street in Danbury, CT., Danbury, as described in the submitted information and summarized at the end of this document is valid until 9/12/2026. This determination applies only to the project as described in the submission and summarized at the end of this letter. Please re-submit an updated Request for Review if the project's scope of work and/or timeframe changes, including if work has not begun by 9/12/2026.

This letter is computer generated and carries no signature. If however, any clarification is needed, or, if you have further questions, please contact the following:

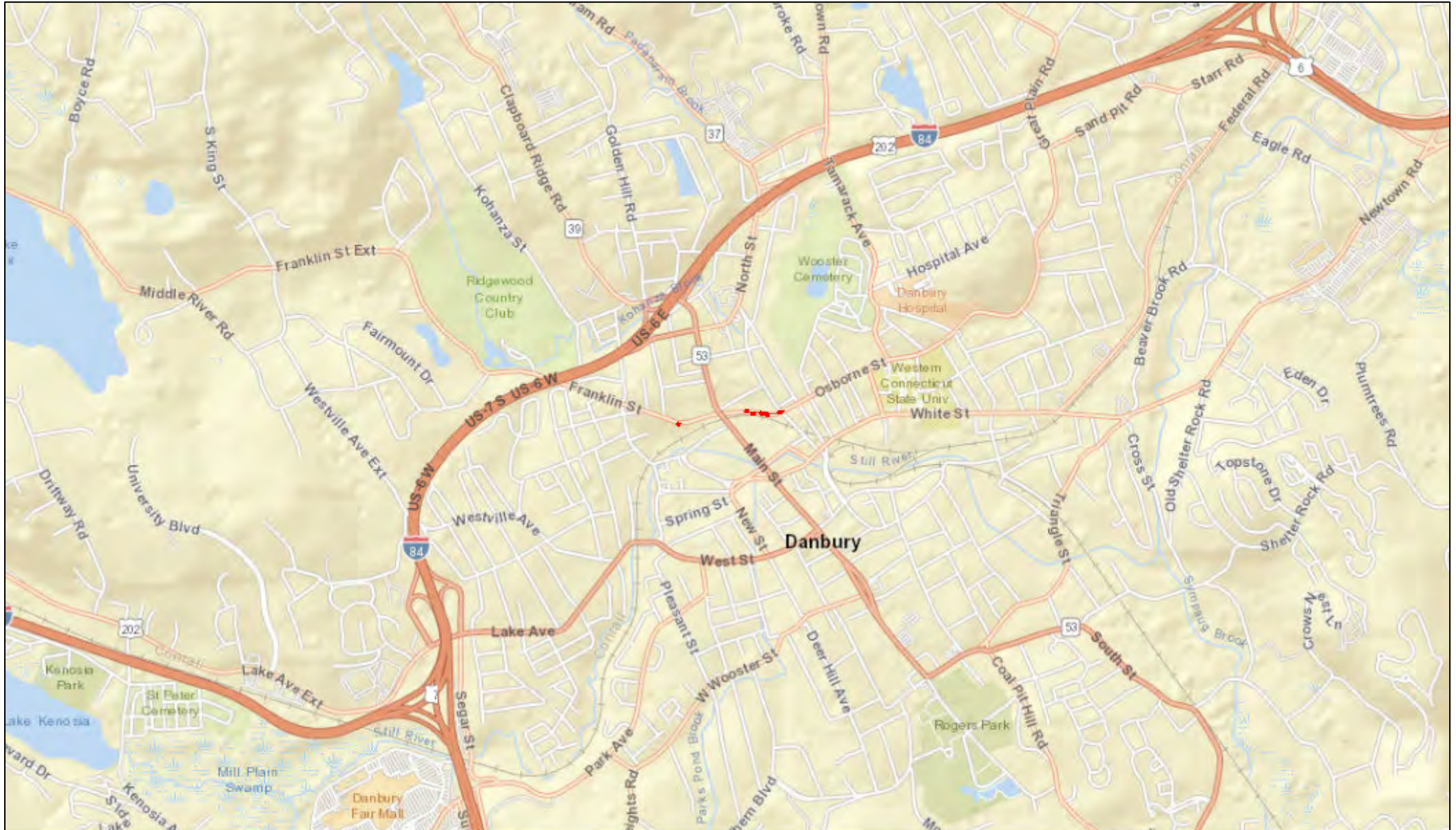
CT DEEP Bureau of Natural Resources
Wildlife Division
Natural Diversity Database, 6th floor
79 Elm Street,
Hartford, CT 06106-5127
(860) 424-3011
deep.nddbrequest@ct.gov

Please reference the Determination Number provided in this letter when you e-mail or write. Thank you for submitting your project through DEEP's ezFile portal for Natural Diversity Database reviews.

Application Details:

Project involves federal funds or federal permit:	No
Project involves state funds, state agency action, or relates to CEPA request:	No
Project requires state permit, license, registration, or authorization:	Yes
DEEP enforcement action related to project:	
Project Type:	Energy and Utility Production Facilities and Distribution Infrastructure
Project Sub-type:	Facility modifications
Project Name:	1270 1337 HPFF Line Rebuild
Project Description:	Replacement of two existing 115kV underground transmission lines (1270 and 1337) from Triangle SS to Middle River SS in Danbury. The existing lines are a High-Pressure Fluid Filled (HPFF) pipe-type cable (PTC) running approx. 4 circuit miles. The underground lines will remain isolated to the existing roadway, requiring temporary disruption to pavement and excavation up to 30ft from the existing ground line. The lines will be replaced with new 115kV circuit cross-linked polyethylene (XLPE) lines.

1270 1337 HPFF Line Rebuild Map



September 12, 2024

