

56 Prospect Street P.O. Box 270 Hartford, CT 06103

Kathleen M. Shanley Manager – Transmission Siting Tel: (860) 728-4527

December 15, 2017

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

Re: Sub-Petition No. 1293-EHLMW-01

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-EHLMW-01 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in, East Haddam, Lyme, Montville, and Waterford, Connecticut. The work includes replacing sixteen existing wooden transmission structures with new weathering steel transmission structures.

Eversource notified the officials of the municipalities of East Haddam, Lyme, Montville, and Waterford of Eversource's submission of the Sub-Petition and sent copies of the Sub-Petition to owners of directly abutting properties (see Proof of Notice).

Enclosed please find an original and 3 copies of this filing.

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Sub-Petition.

Sincerely,

Enclosures

Attachments: Exhibit A: Sub-Petition Exhibit B: Photographs and Photo Simulation Exhibit C: Maps Exhibit C: Abutter Letter and Proof of Notice

ATTACHMENT A

SUB-PETITION

THE CONNECTICUT LIGHT AND POWER COMPANY doing business as <u>EVERSOURCE ENERGY</u>

Sub-Petition CONNECTICUT SITING COUNCIL – PETITION NO. 1293 TRANSMISSION FACILITY ASSET CONDITION MAINTENANCE IMPROVEMENTS TO COMPLY WITH THE UPDATED NATIONAL ELECTRIC SAFETY CODE CLEARANCE REQUIREMENTS

Towns: East Haddam, Lyme, Montville, and Waterford

Sub-Petition No. 1293-EHLMW-01

Project: 348 Transmission Line Structure Replacement

Structure Location: 16 Transmission Structures located in East Haddam, Lyme, Montville, and Waterford, Connecticut

I. Introduction:

In accordance with Condition 1 of the March 30, 2017 ruling by the Connecticut Siting Council (the "Council") (as set forth in the Council's March 31, 2017 letter) regarding Petition No. 1293, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. Description of Transmission Work Activities:

Eversource's 348 Transmission Line Structure Replacement Project is part of an ongoing maintenance program that evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to assure safe and reliable transmission of power to its customers. Due to asset condition, many structures require replacement on a portion of the 348 Line, which is a 345-kV transmission line that extends generally from Beseck Substation in Wallingford to Millstone Substation in Waterford. The structure replacements will occur within that portion of the right-of-way ("ROW") that extends from East Haddam Junction in East Haddam to Millstone Substation in Waterford. Of those replacements, 16 structures require a slight increase in structure height to comply with current clearance requirements.

Eversource plans to conduct transmission structure replacement work to remediate wood structure damage caused by structure age, weather and/or woodpecker/insect activity. The following work ("Work Activities") will be performed:

• Replace 16 existing direct-embedded H-frame, wood structures with new, direct-embedded, H-frame, weathering steel structures that are slightly higher (9 feet or less) than the existing structures. The replacement structures will be installed within 15 feet of the existing structures.

III. No Substantial Adverse Environmental Effect:

Eversource respectfully submits that the proposed modifications would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- a) Work Activities would take place within Eversource's property and existing ROW utilizing existing and proposed new access routes (collectively the "Work Areas"). Eversource can access the structure locations utilizing its existing rights, but is currently working with private landowners to obtain rights to utilize existing alternative off-ROW access routes that would minimize the amount of proposed new access roads that would need to be installed within the ROW to access the replacement structures.
- b) Work Activities would result in ±37,108 square feet ("SF") of temporary wetland impacts limited to matting required for construction work pads at structures 9727 and 9627, and access roads to numerous structures, as detailed in the table below:

Construction Work Pads	Access Roads	Temporary Wetlands Impact (SF)
Structure # 9727		±9,505 SF
Structure #9627		±3,188 SF
	Map #3	±2,441 SF
	Map #4	±1,110 SF
	Map #5	±643 SF
	Map #6	±5,889 SF
	Map #7	±3,597 SF
	Map #7	±446 SF
	Map #9	±516 SF
	Map #9	±265 SF
	Map #10	±5,301 SF
	Map #13	±4,207 SF
		TOTAL ±37,108

Work within the wetland system would be conducted in accordance with Eversource's Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements), September 2016 ("BMPs").

- c) No direct impacts to vernal pools would result from any of the proposed Work Activities. Vernal pools are located in proximity to three (3) structures (9714, 9667, and 9627) and the access to structure 9650. The locations of the work pads for all three of these structures (9714, 9667, and 9627) and the existing wetland crossing to structure 9650 are partially located within the 100-foot Vernal Pool Envelope, but they are not directly within the Vernal Pool. These areas will utilize elevated construction matting to facilitate amphibian access to these pools. Therefore, no likely adverse impact to vernal pools will result from the proposed Work Activities.
- d) As a result of Eversource's review of the Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Data Base ("NDDB"), only structures 9785, 9714, and 9612 will be located within a mapped NDDB area. Eversource is currently in consultation with CTDEEP regarding its proposed work in these areas and will adhere to any state-listed species protection measures recommended by CTDEEP, as necessary, and which will be incorporated into the Company's BMPs during construction.
- e) The structure replacements will not require any tree clearing. However, Eversource may need to undertake minor tree trimming and/or vegetation mowing within the managed ROW corridor to improve access to portions of the Work Area.
- f) A review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office ("SHPO") revealed that no previously identified archaeological site or National or State Register of Historic Places properties/districts are located within 500 feet of any of the Work Areas. Based on a review of historic maps, aerial photographs, soils and SHPO file information, four of the proposed structure replacement locations (structures 9627, 9663, 9726 and 9777) were identified to possess a potential for moderate to high archaeological sensitivity. A Phase IB investigation that included a pedestrian survey has been completed for those structure locations. These structures were reclassified as no/low sensitive areas during the Phase 1B survey since no cultural features were noted and these areas contained steep slopes, wet soils or have been previously disturbed. Based on the foregoing, no additional archeological examination is warranted and no protective measures are required since the proposed structure replacement project will have no adverse effects on cultural resources.
- g) Increased heights of the 16 replacement structures average approximately 6 feet and none will exceed 9 feet.
- h) Replacement structures would be located within 15 feet of existing structures.
- i) With the exception of two structures (structure 9727 and 9612), there are no 100-year flood zones in the Work Areas. Eversource would utilize its BMPs to minimize any impacts to the two flood zone areas including the use of temporary wetlands and uplands matting and work pads for access to the structure locations to ensure that floodplain hydrology is not adversely affected. If temporary gravel is used, material will be removed as soon as work is completed to ensure no net increases in fill in the 100-year flood zone. The proposed 9727 and 9612 replacement structures would not result in any significant changes in flood storage capacity or associated flood elevations since the replacement structure pole's diameter will be similar to the existing structure thereby resulting in no or de minimis increase in flood volume displacement.
- j) No change in noise levels would result from installation of the new structures and the line would continue to comply with the State of Connecticut noise regulations.

k) Any changes in electric and magnetic field levels off the ROW would be negligible.

IV. <u>Mitigation:</u>

Temporary environmental effects from construction would be mitigated as follows:

- Erosion and sediment controls ("E&S") would be employed and maintained, as needed, throughout the execution of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and the BMPs.
- Potential impacts to wetlands and moderate to high archaeological sensitivity areas would be mitigated with the use of temporary wetlands and uplands matting and adherence to the BMPs.
- Eversource's contractor would perform construction sequencing such that any earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at construction entrances onto public roads to prevent tracking of soil onto local streets.
- Potential impacts to 100-year flood zone would be mitigated with the use of temporary wetlands matting and adherence to the BMPs.
- Upon completion of the Work Activities, all disturbed/exposed areas would be stabilized and revegetated. After the establishment of permanent ground cover, Eversource's contractor would remove the temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

V. <u>Access:</u>

Some new access roads would be constructed to facilitate access to structures within the ROW and existing access roads may be hardened and temporarily widened at turning areas to facilitate the safe passage of construction vehicles. Temporary wetlands matting would be used in wetlands as well as in agricultural/maintained lawn upland areas.

Eversource would access the Work Areas by entering its ROW from existing access points on public roads as follows:

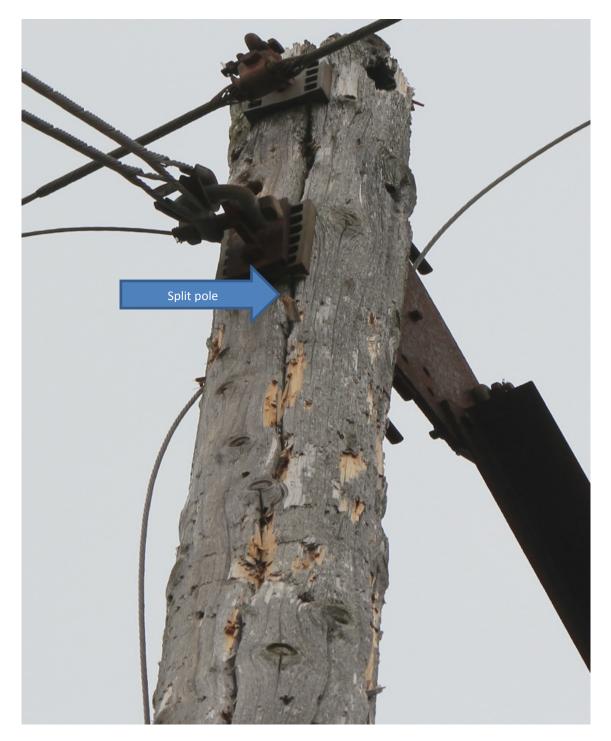
- Mount Parnassus Road, East Haddam for structure 9794
- Shanaghans Road, East Haddam for structure 9785
- Mill Road, East Haddam for structure 9777 (access along an existing off-ROW road to structure 9777 from another location on Mill Road, East Haddam would be used if rights are obtained)

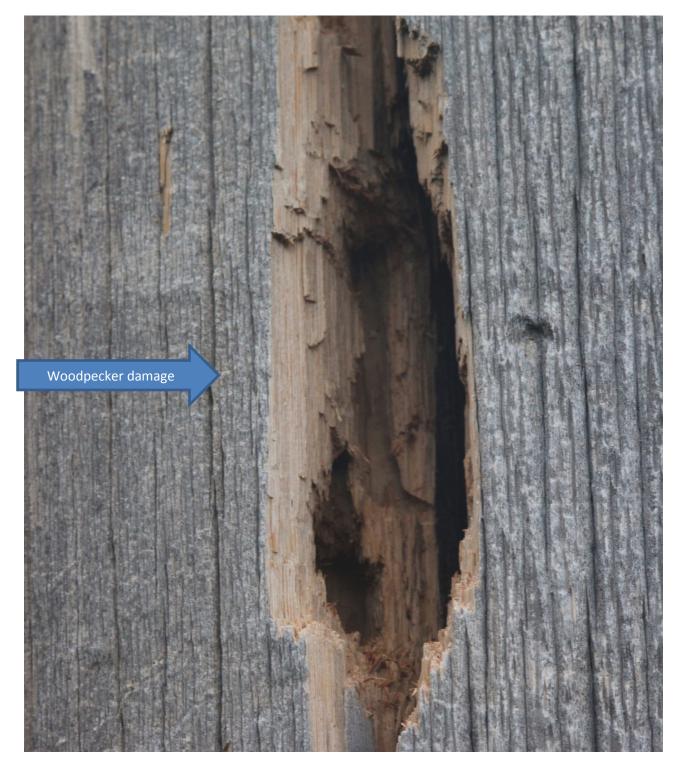
- Salem Road, Lyme for structures 9727 and 9726 (access along an existing off-ROW road to structure 9726 from Old Woods Road, Lyme would be used if rights are obtained)
- Gungy Road, Lyme for structure 9714
- Chesterfield Road, Montville for structures 9667, 9665, 9664, 9663, 9661 and 9650
- Vauxhall Street Extension, Waterford for structure 9627
- Douglas Lane, Waterford for structure 9624
- Hartford Turnpike, Waterford for structure 9612
- Parkway North, Waterford for structure 9606 (access along an existing off-ROW road from Cross Road, Waterford would be used if rights are obtained)

By:

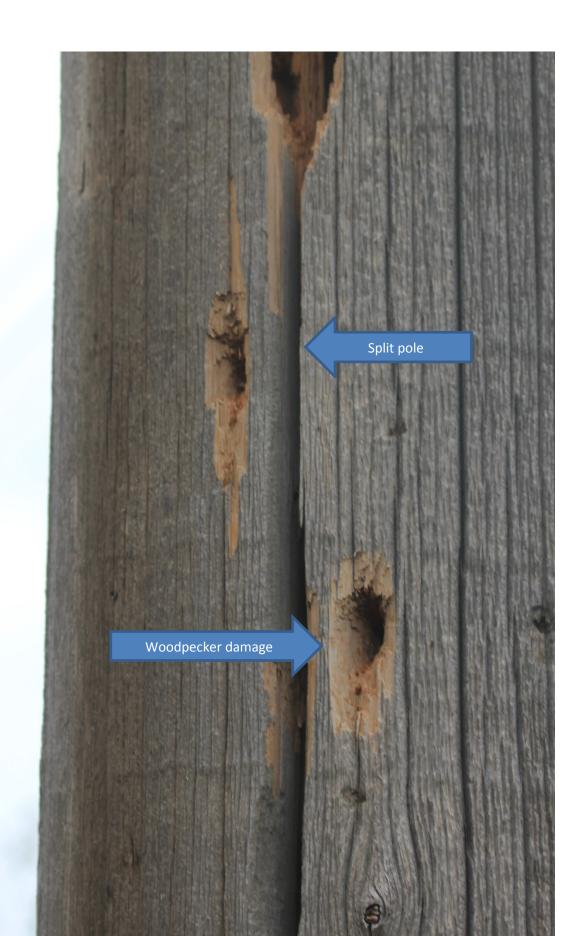
Kathleen M. Shanley Manager - Transmission Siting

ATTACHMENT B PHOTOGRAPHS AND PHOTO SIMULATION



















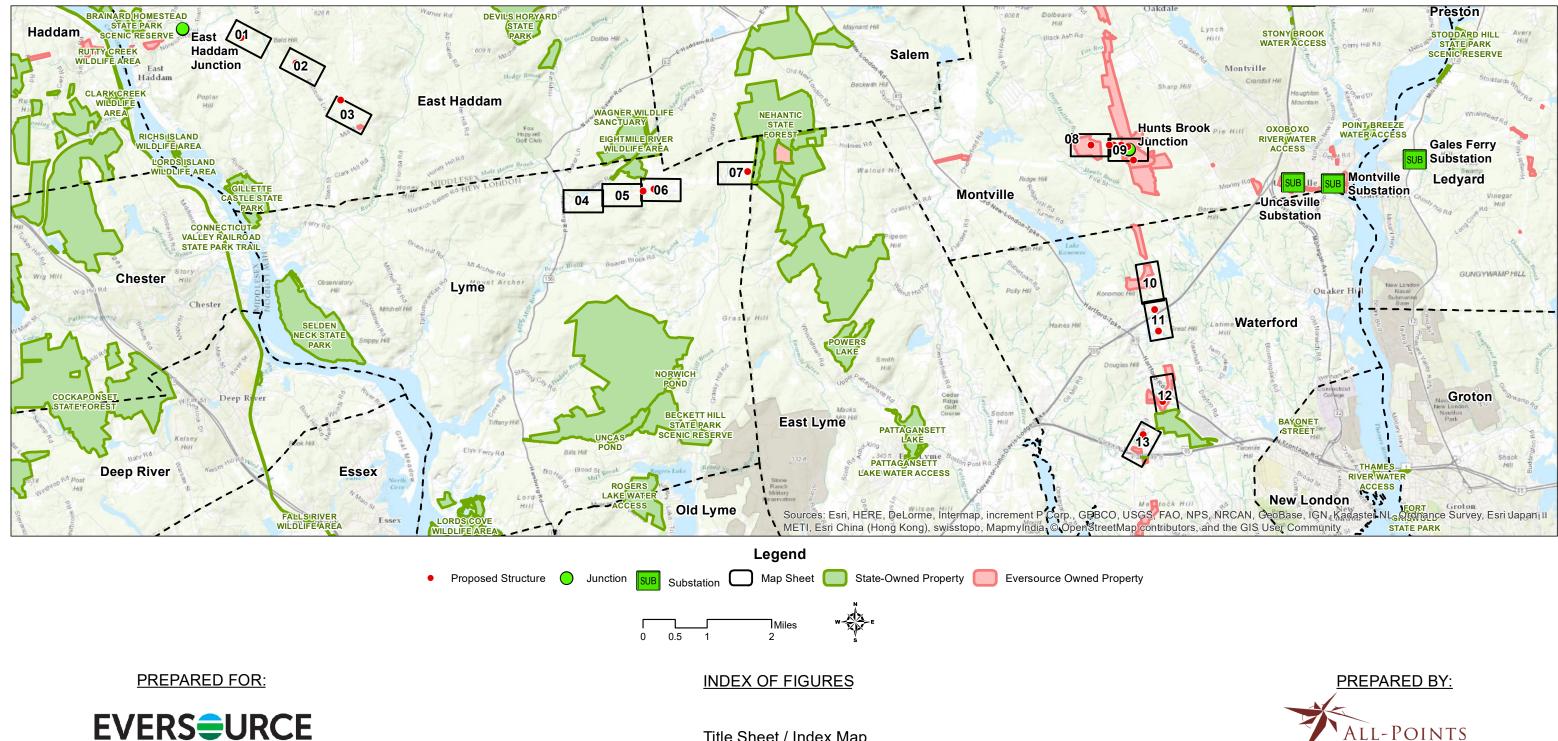


ATTACHMENT C

MAPS

East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project

East Haddam, Lyme, Montville, Waterford CT Sub-Petition Map Set Date: December 07, 2017



ENERGY 107 Selden Street

Berlin, CT 06037

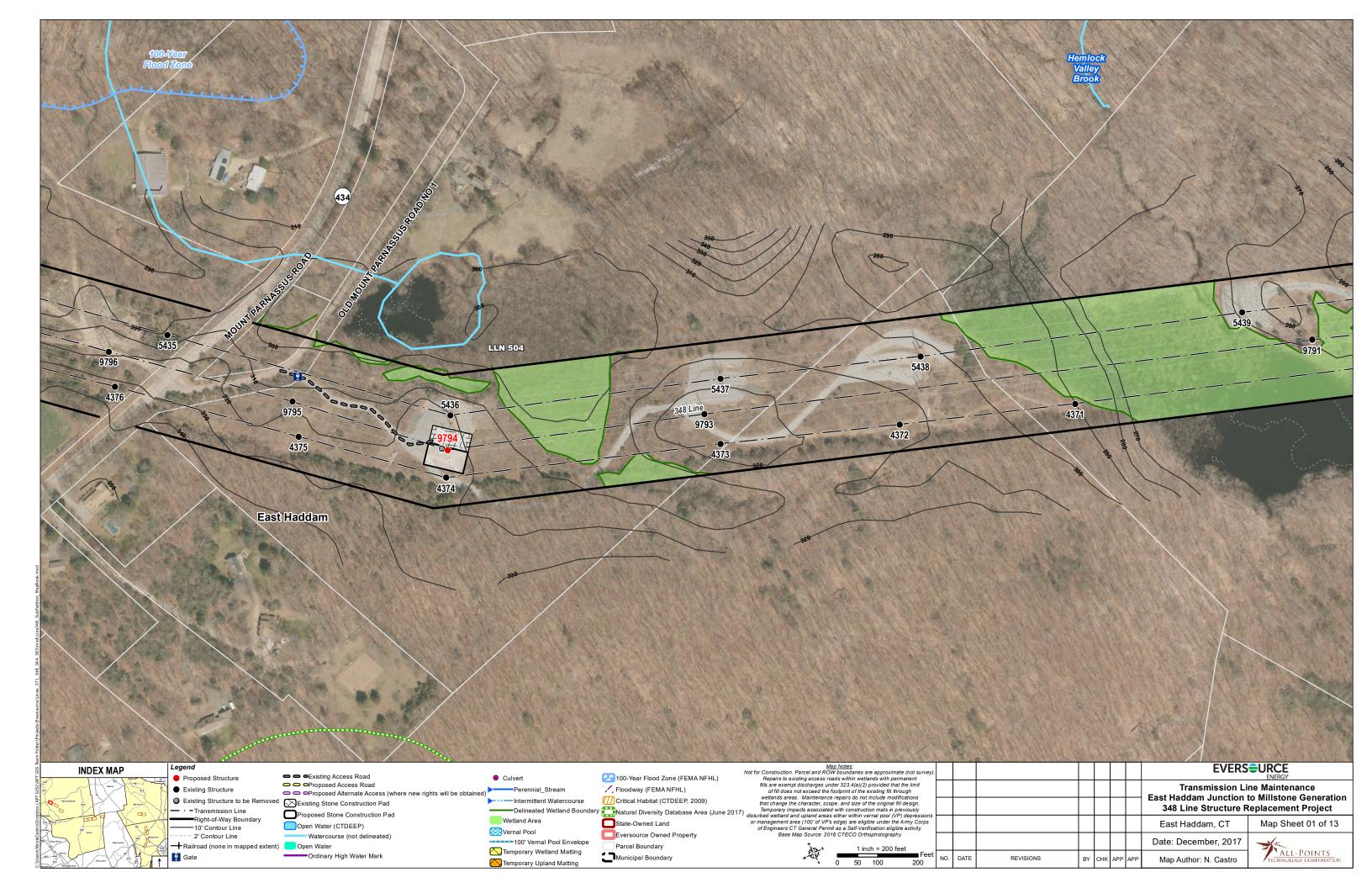
Title Sheet / Index Map Abutter Tables and Map Sheets



Map Sheet 01 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
504	74 MT PARNASSUS ROAD	EAST HADDAM	СТ	ARIADNE ACQUAVIVA

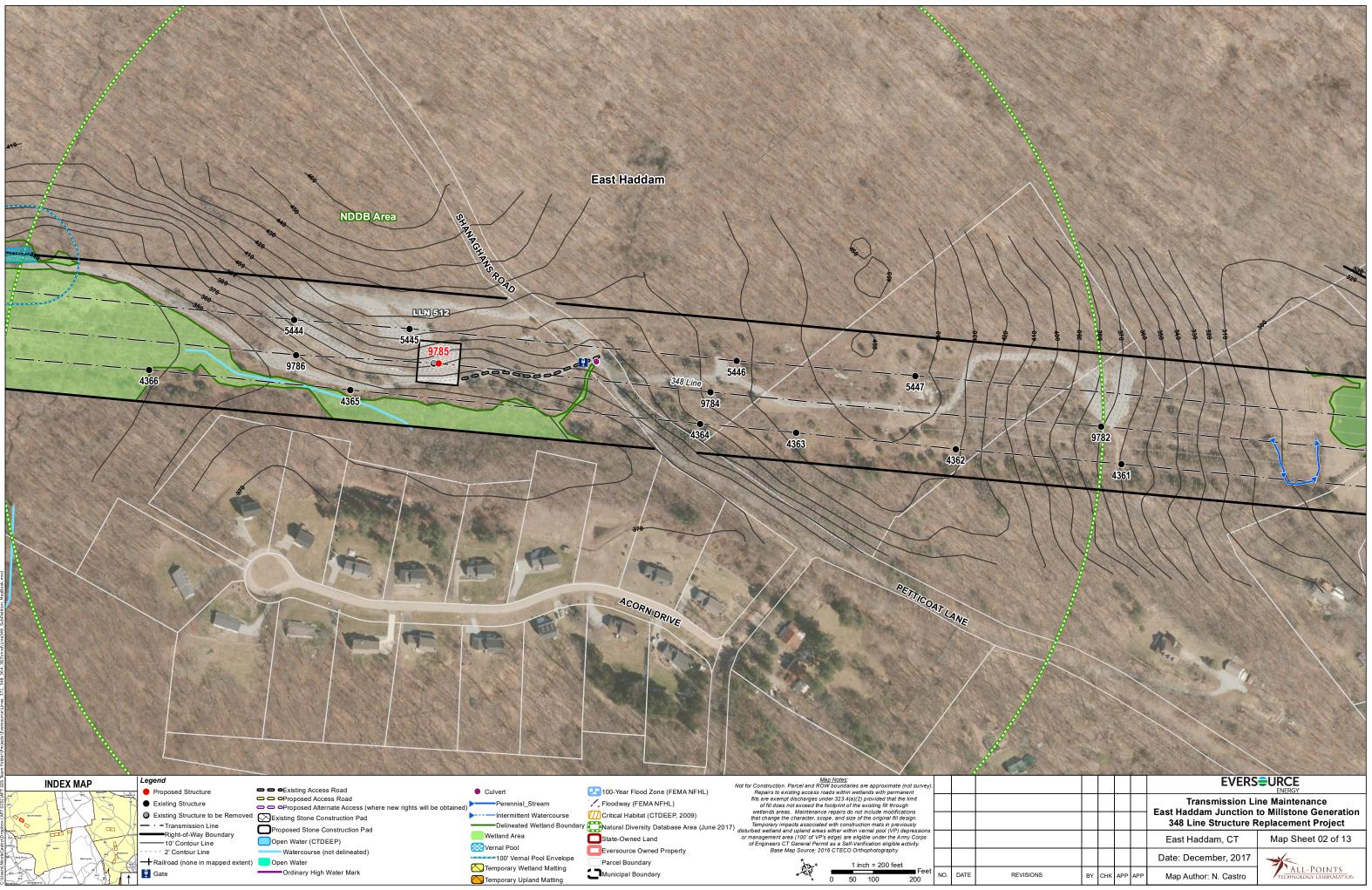




Map Sheet 02 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	<u>Owner Name</u>	
512	SHANAGHAN ROAD	EAST HADDAM	СТ	TOWN OF EAST HADDAM	

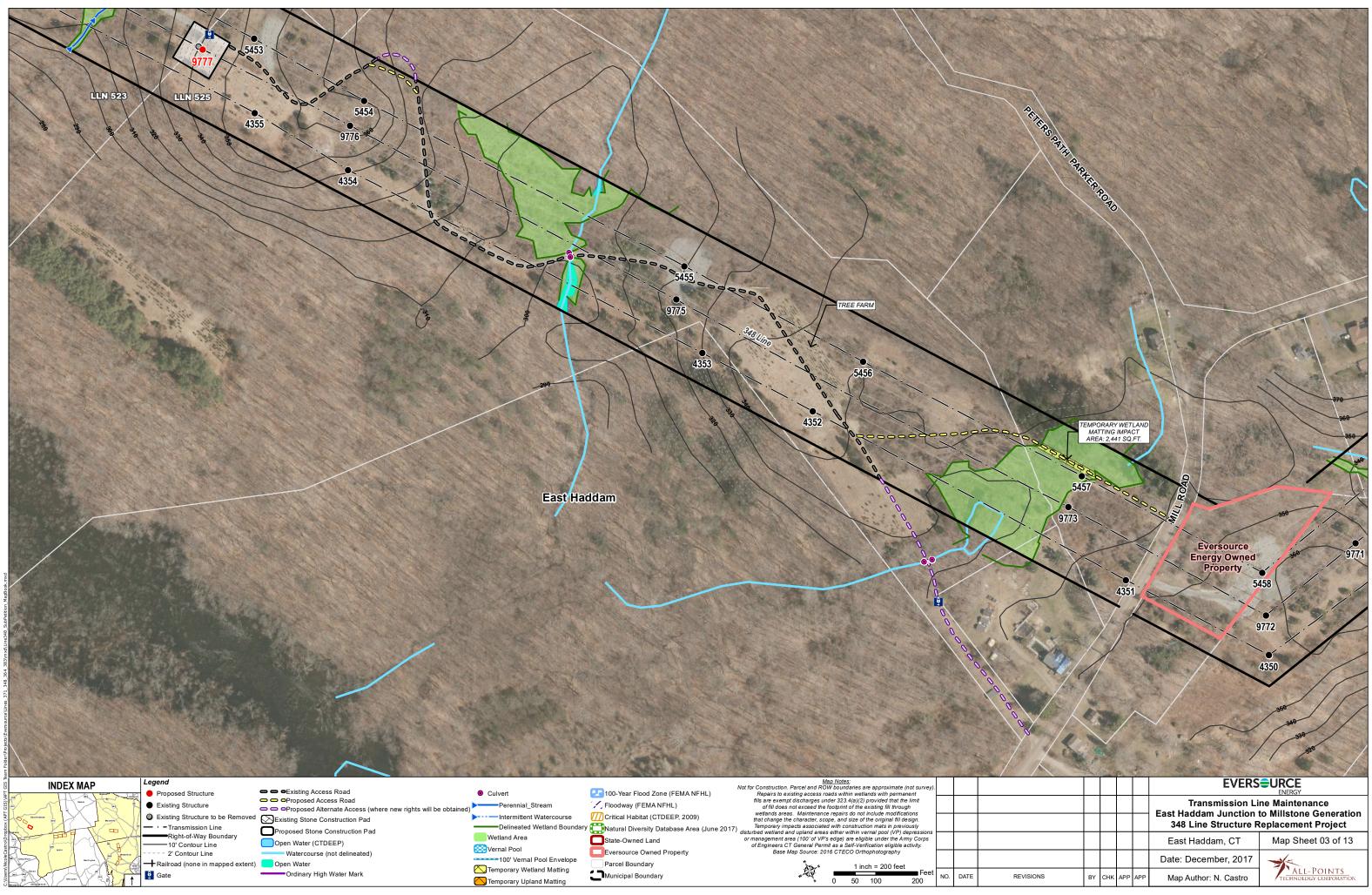




Map Sheet 03 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	<u>Owner Name</u>
523	209 PETTICOAT LANE	EAST HADDAM	СТ	ANTHONY FIALA
525	90 MILL ROAD	EAST HADDAM	СТ	ROBERT & RITA FIALA

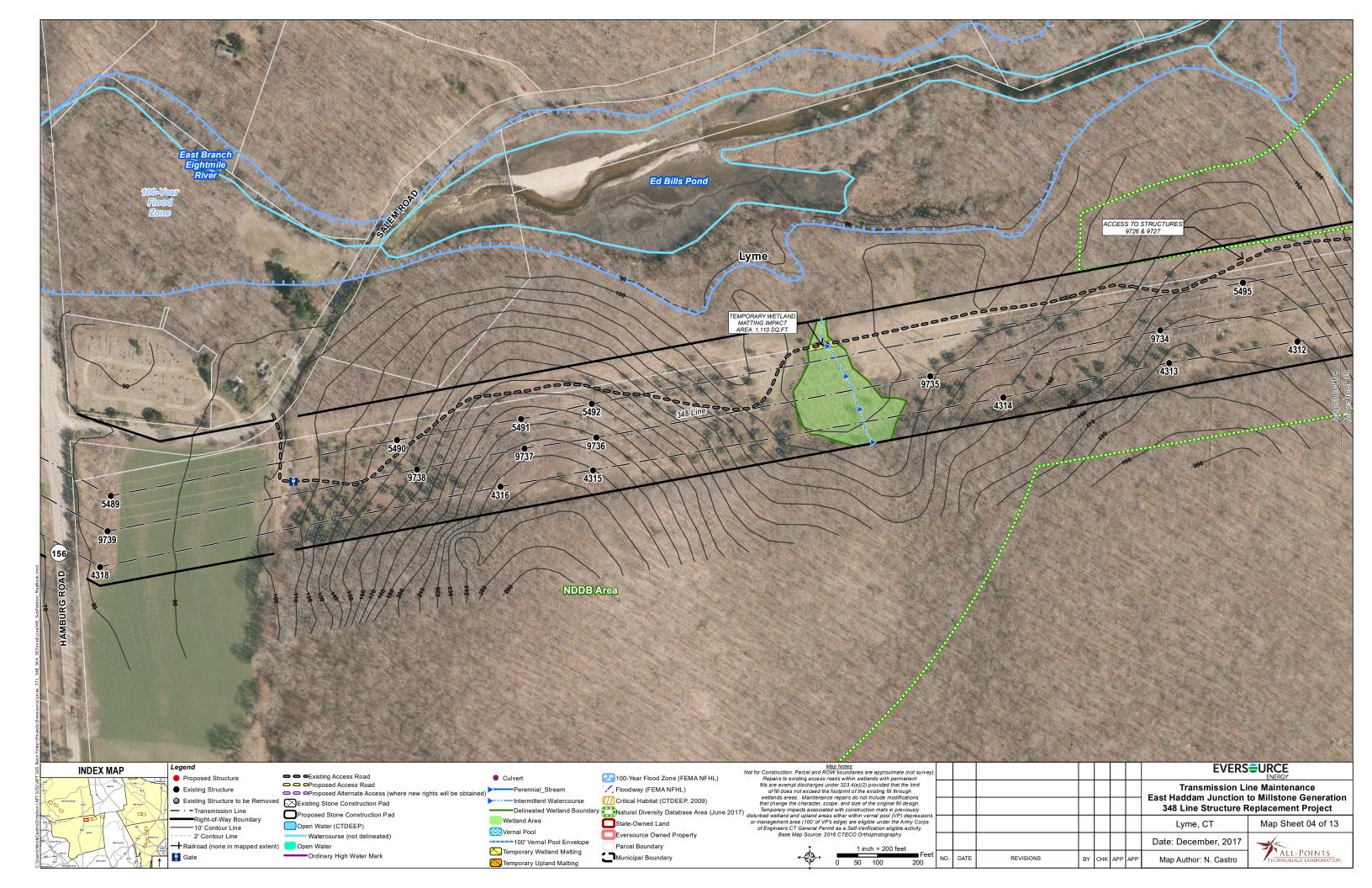






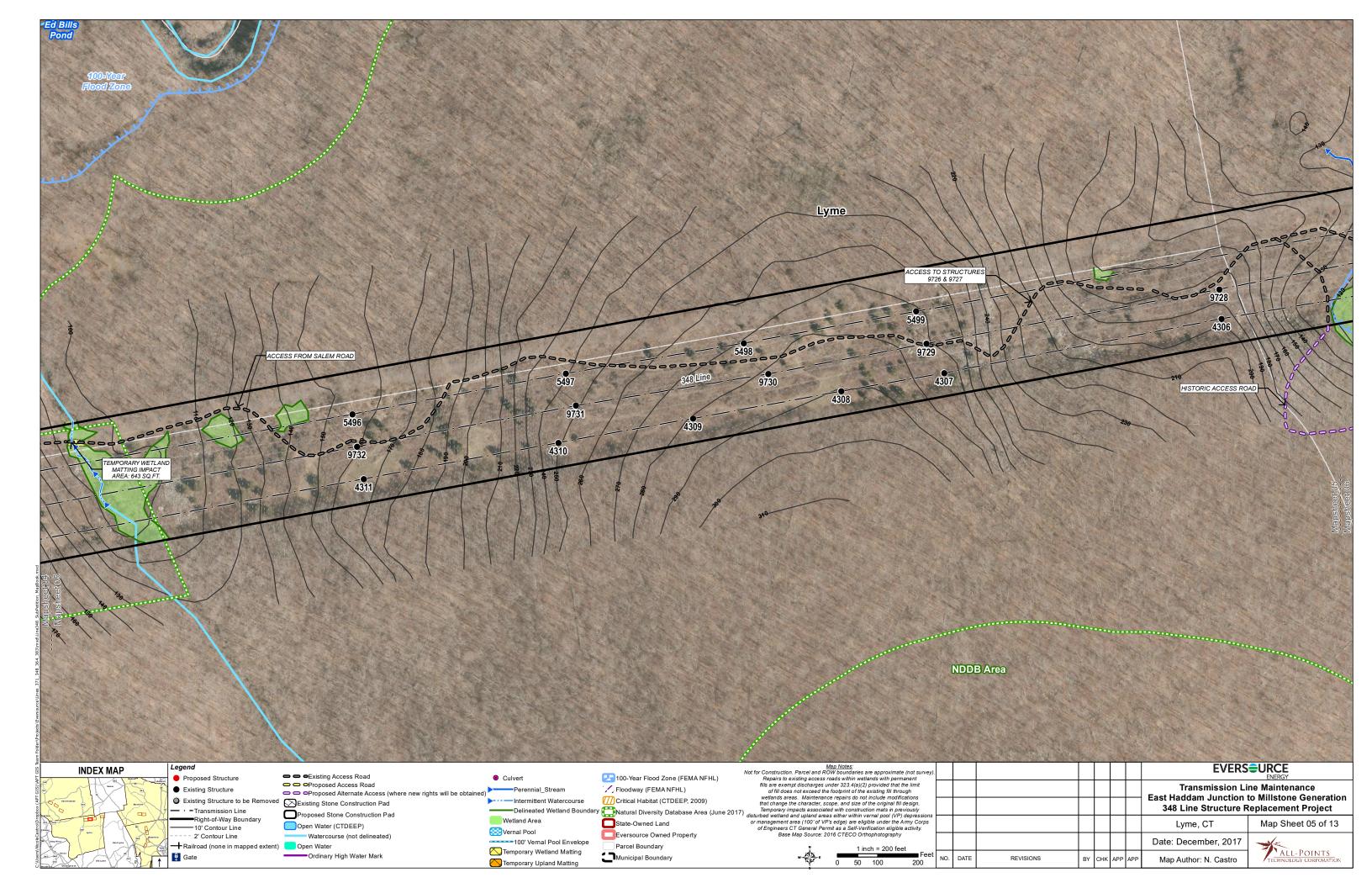
Map Sheet 04 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

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Map Sheet 05 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

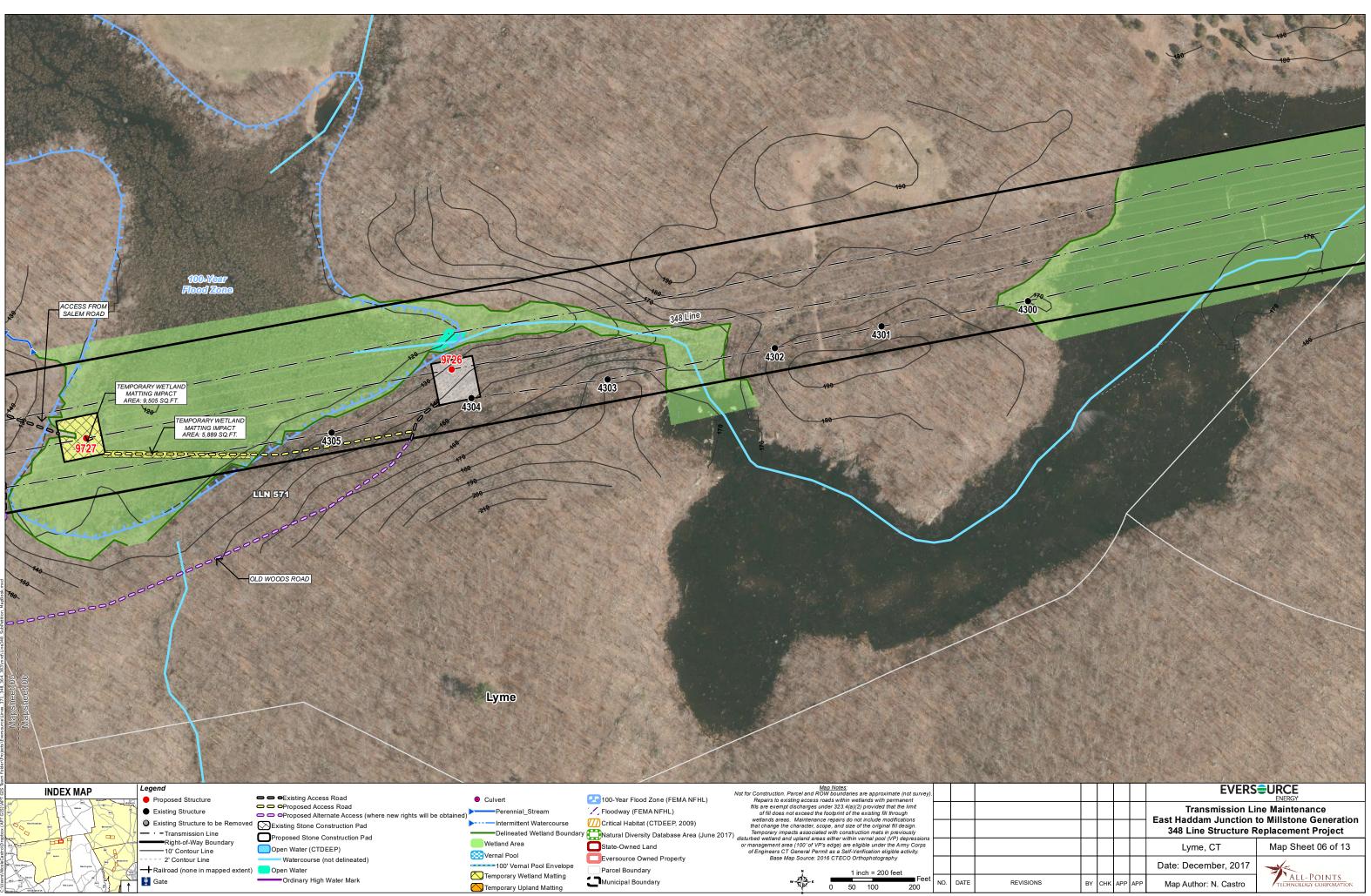
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Map Sheet 06 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
571	131-2 SALEM ROAD	LYME	СТ	EDWARD M BOMBACI





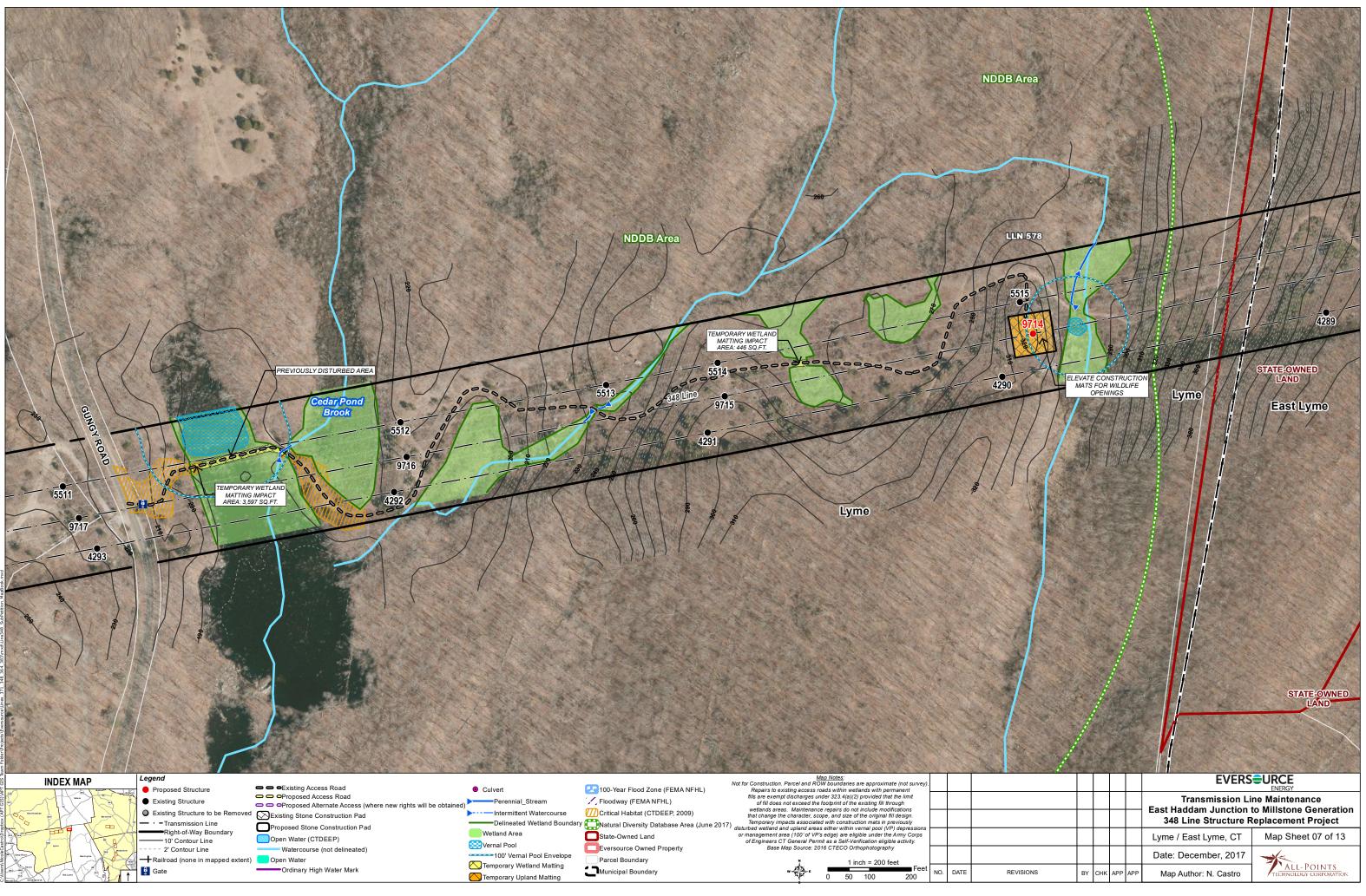
Open Water (CTDEEP)
Watercourse (not delineated
Open Water
Ordinary High Water Mark



Map Sheet 07 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

Line List Number	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
578	0 GUNGY ROAD (HARTMAN PARK)	LYME	СТ	TOWN OF LYME

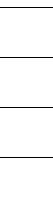


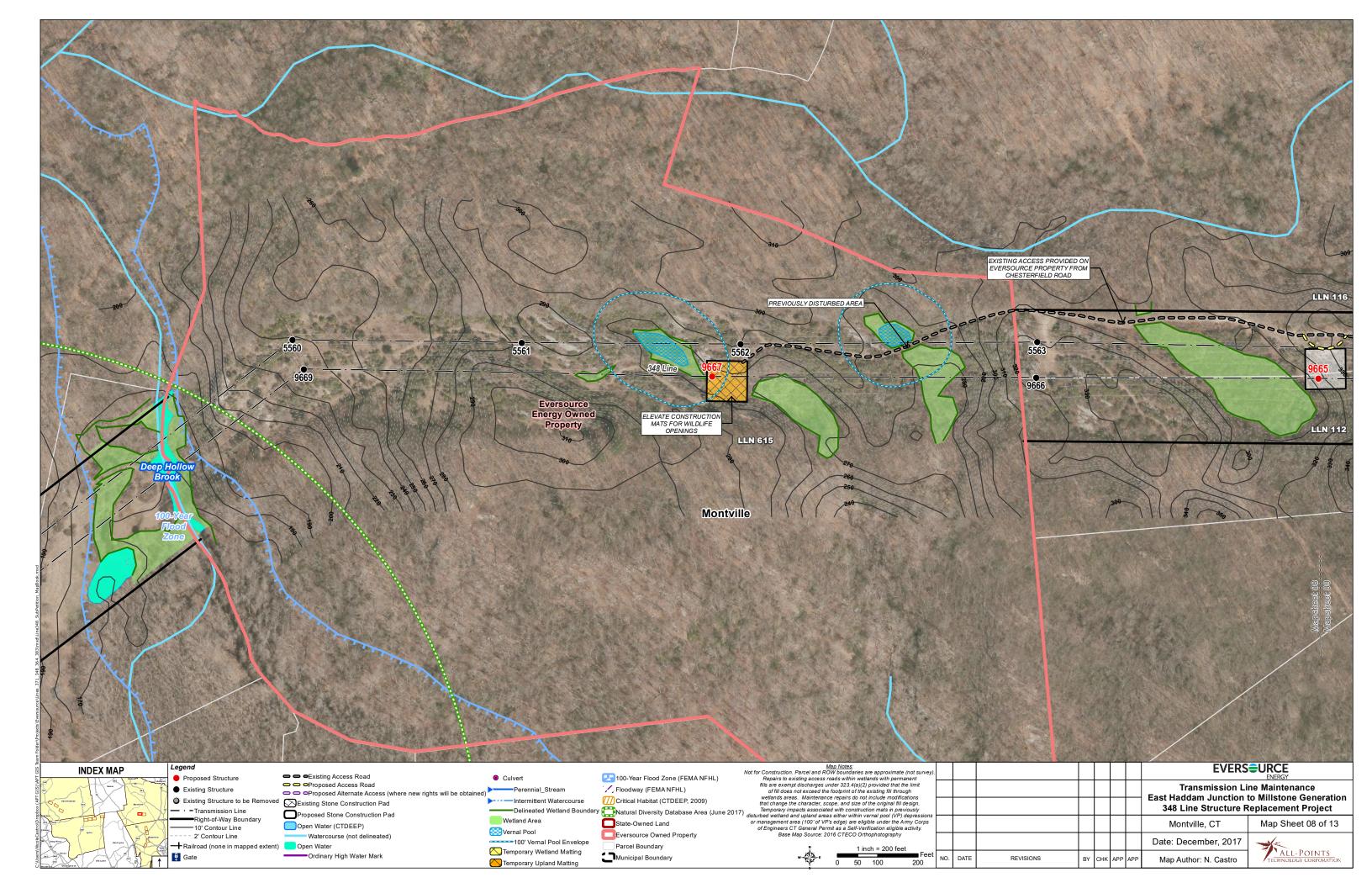


	INDEX MAP		Legend				<u>Map Notes:</u> Not for Construction. Parcel and ROW boundaries are approximate (not survey).	1		
		N IM	Proposed Structure	O O Existing Access Road	Culvert	100-Year Flood Zone (FEMA NFHL)	Repairs to existing access roads within wetlands with permanent			
ہے		S L	Existing Structure	 OProposed Access Road OProposed Alternate Access (where new rights will be obtained) 	Peroppial Stream	Floodway (FEMA NFHL)	fills are exempt discharges under 323.4(a)(2) provided that the limit of fill does not exceed the footprint of the existing fill through wetlands areas. Maintenance repairs do not include modifications			
East Hattan		~ 1	Existing Structure to be Removed	Existing Stone Construction Pad	Intermittent Watercourse	Critical Habitat (CTDEEP, 2009)	that change the character scope and size of the original fill design			
0	Mart.			Proposed Stone Construction Pad		/ 🛄Natural Diversity Database Area (June 2017	Temporary impacts associated with construction mats in previously disturbed wetland and upland areas either within vernal pool (VP) depressions - comparement area (10016/VP) edge) are of lightly upder the Army Corporation			
	FP 7 AN	. Asopio	Right-of-Way Boundary		Wetland Area	State-Owned Land	or management area (100' of VP's edge) are eligible under the Army Corps	1		
	Pun y	AV		Open Water (CTDEEP)	🚫 Vernal Pool		of Engineers CT General Permit as a Self-Verification eligible activity.			
Rhuer		Waterford A	2' Contour Line	Watercourse (not delineated)		Eversource Owned Property	Base Map Source: 2016 CTECO Orthophotography			
2 Kines	fartiyer A	A AN	Railroad (none in mapped extent)	Open Water	100' Vernal Pool Envelope	Parcel Boundary	1 inch = 200 feet	1		
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Map Sheet 08 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

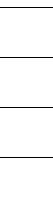
Line List Number	Parcel Address	<u>City</u>	<u>State</u>	<u>Owner Name</u>
112	FIRE STREET	MONTVILLE	СТ	KATHLEEN A LEVERONE
116	FIRE STREET	MONTVILLE	СТ	TARRAGON CORP
615	FIRE STREET	MONTVILLE	СТ	CONNECTICUT LIGHT & POWER COMPANY

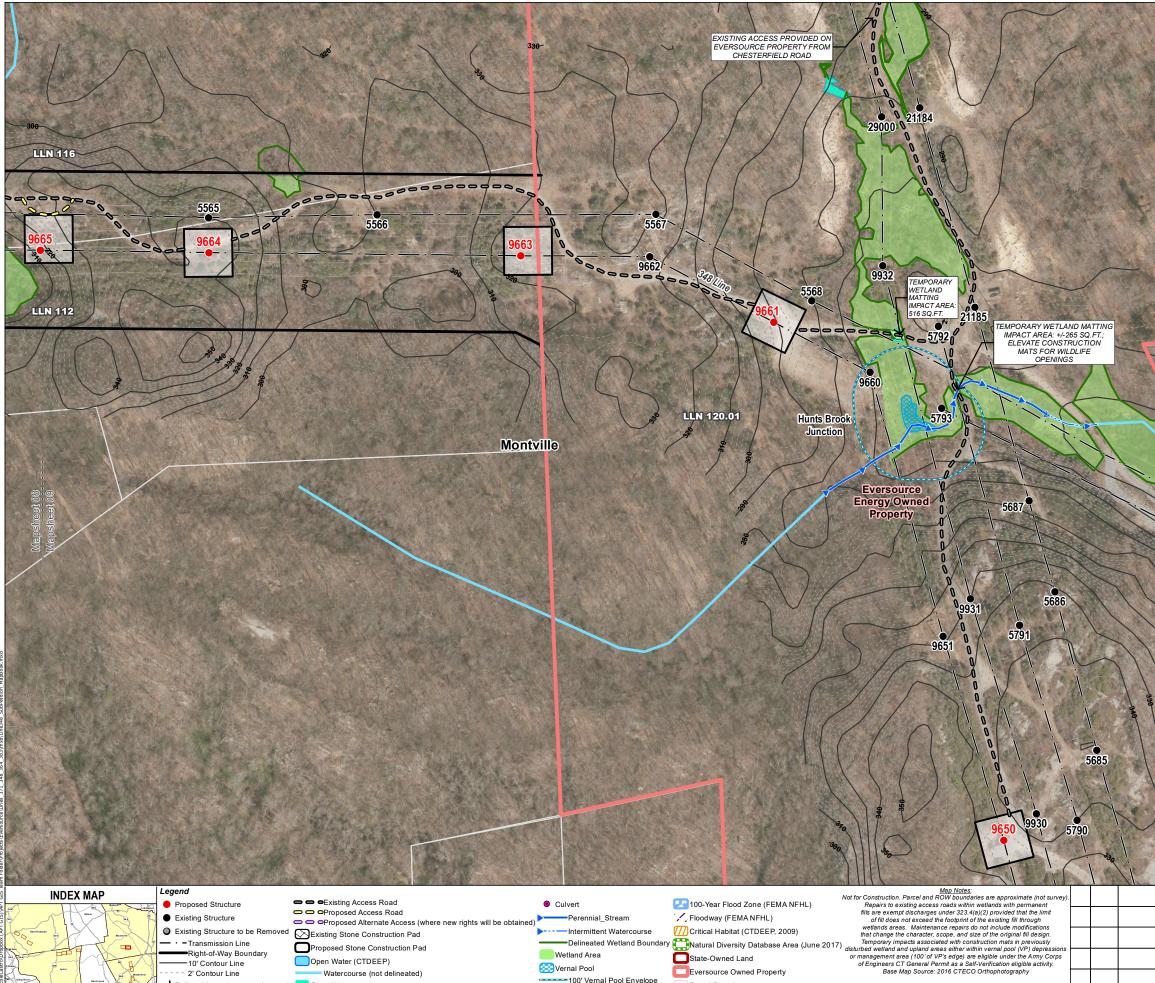




Map Sheet 09 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

Line List Number	Parcel Address	<u>City</u>	<u>State</u>	<u>Owner Name</u>
112	FIRE STREET	MONTVILLE	СТ	KATHLEEN A LEVERONE
116	FIRE STREET	MONTVILLE	СТ	TARRAGON CORP
120.01	OLD COLCHESTER ROAD	MONTVILLE	СТ	CONNECTICUT LIGHT & POWER COMPANY





 Existing Structure Existing Structure to be Removed - · - Transmission Line Right-of-Way Boundary -10' Contour Line - 2' Contour Line

\rm 🤂 Gate

 OProposed Alternate Access (where new rights will be obtained Existing Stone Construction Pad Proposed Stone Construction Pad Open Water (CTDEEP) Watercourse (not delineated) 🕂 Railroad (none in mapped extent) 🛛 📒 Open Water Ordinary High Water Mark

----Intermittent Watercourse Wetland Area 🚫 Vernal Pool Temporary Wetland Matting C Temporary Upland Matting

Parcel Boundary Municipal Boundary 1 inch = 200 feet

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NO. DATE

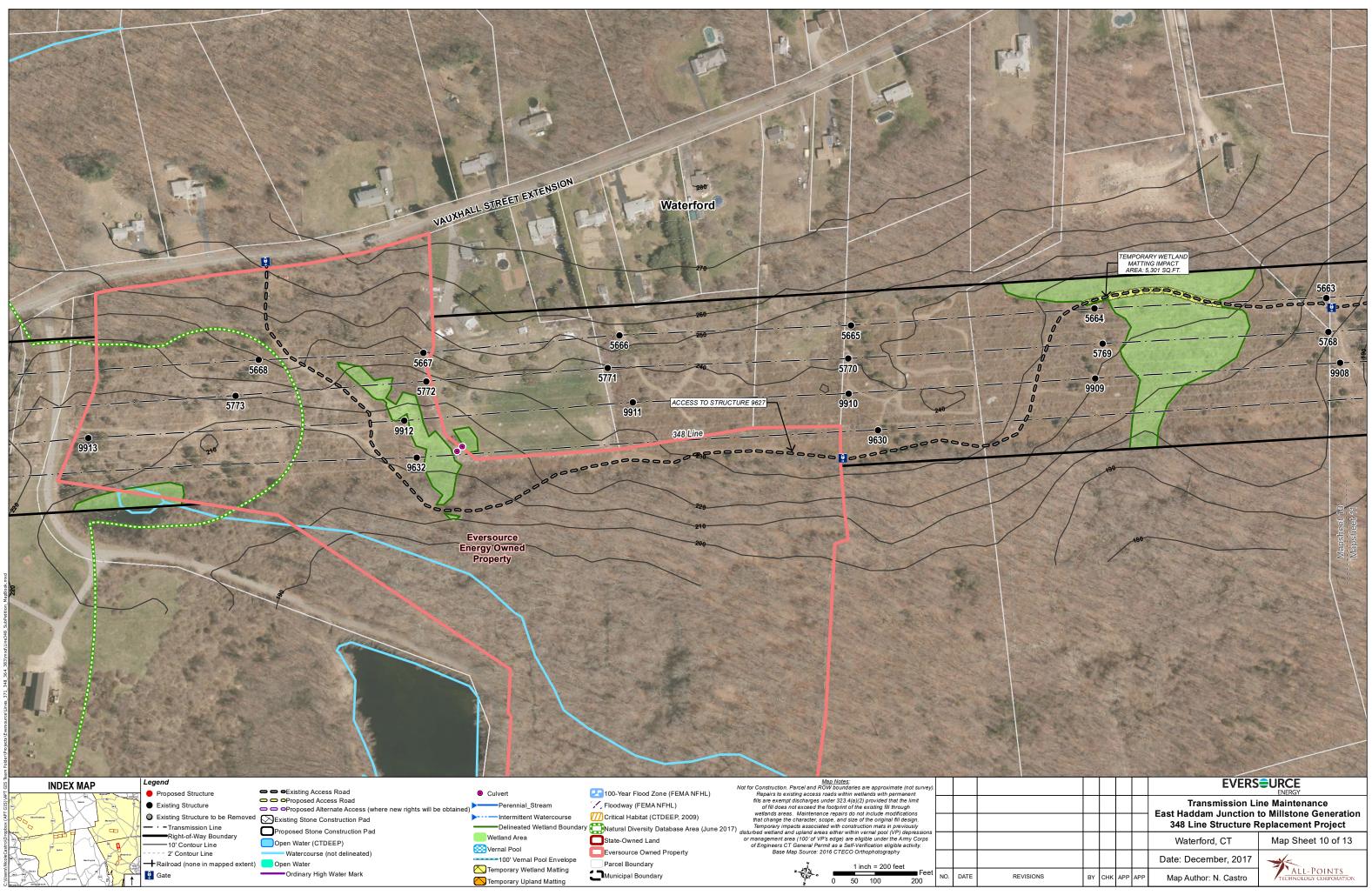
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					Transmission Line Mai East Haddam Junction to Mills	ntenance tone Generation
					249 Line Structure Deplace	mant Drainat
					348 Line Structure Replace Montville, CT Map	
					Montville, CT Map Date: December, 2017	Sheet 09 of 13 ALL-POINTS HNOLOGY CORPORATION

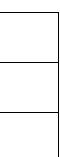
Map Sheet 10 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

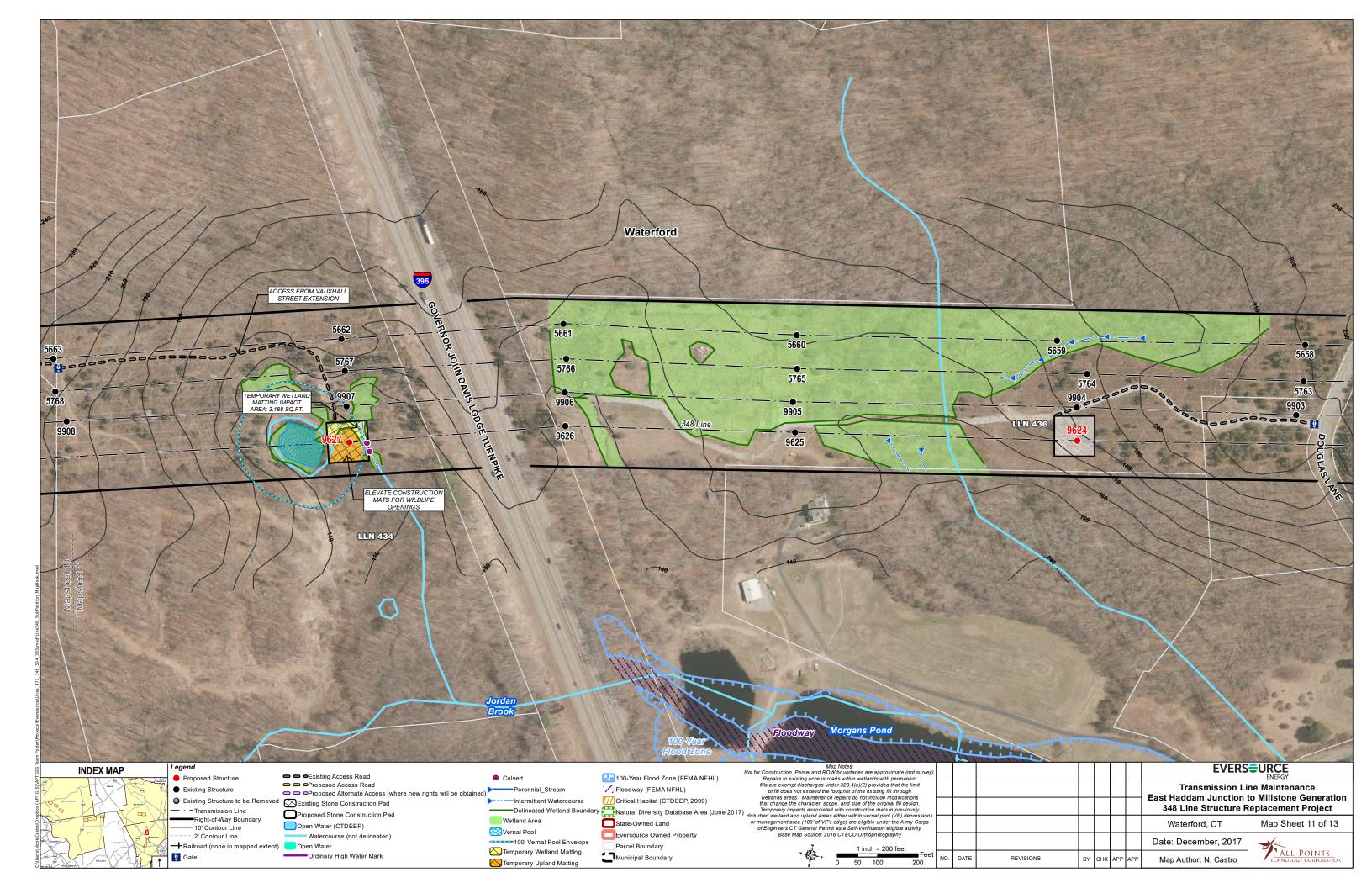
No Abutters



Map Sheet 11 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
434	28 INDUSTRIAL DRIVE	WATERFORD	СТ	SELF STORAGE SOLUTIONS LLC
436	50 DOUGLAS LANE	WATERFORD	СТ	RICHARD T MORGAN

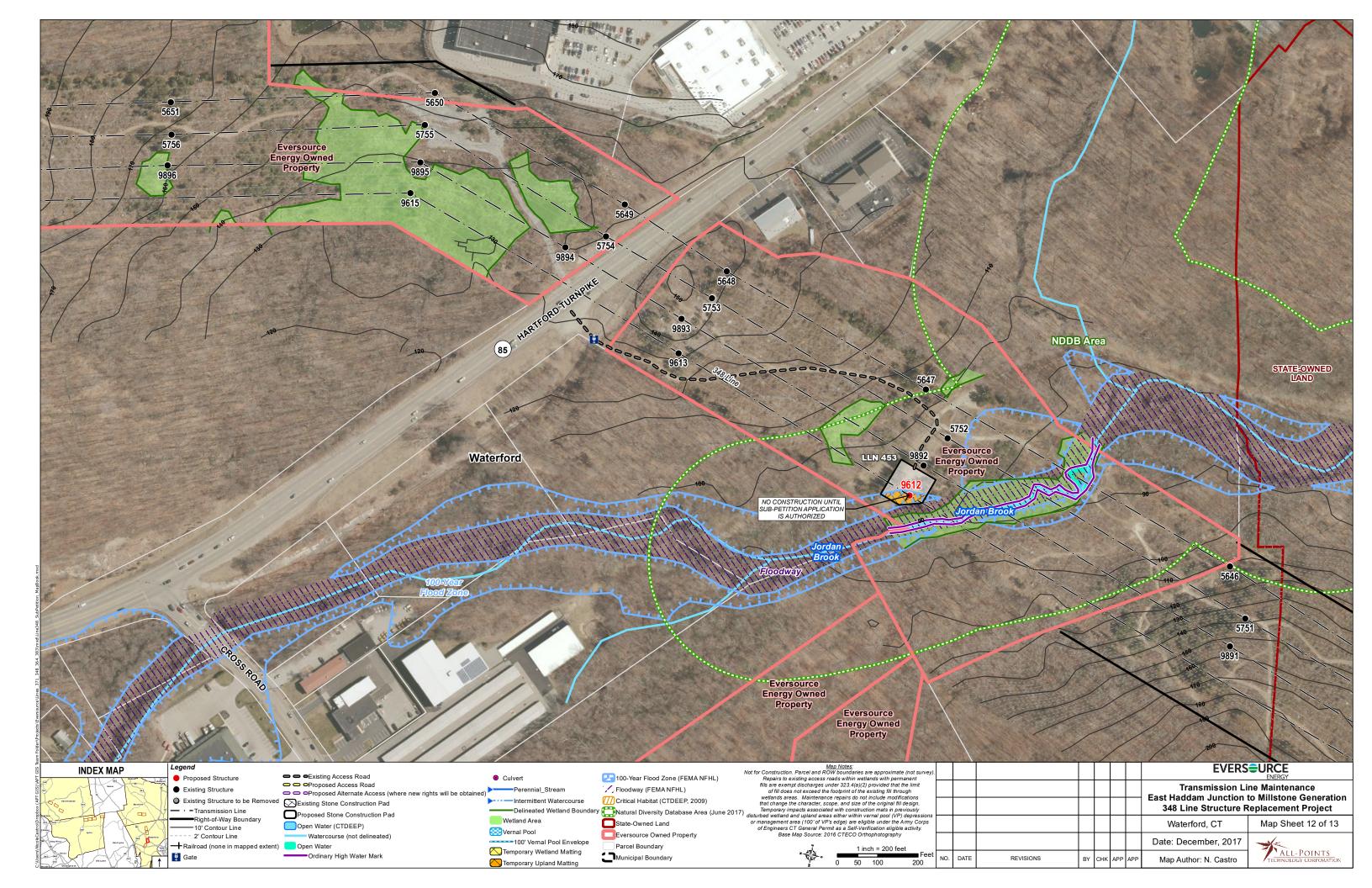




Map Sheet 12 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

Line List Number	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
453	920 HARTFORD TURNPIKE	WATERFORD	СТ	CONNECTICUT LIGHT & POWER COMPANY

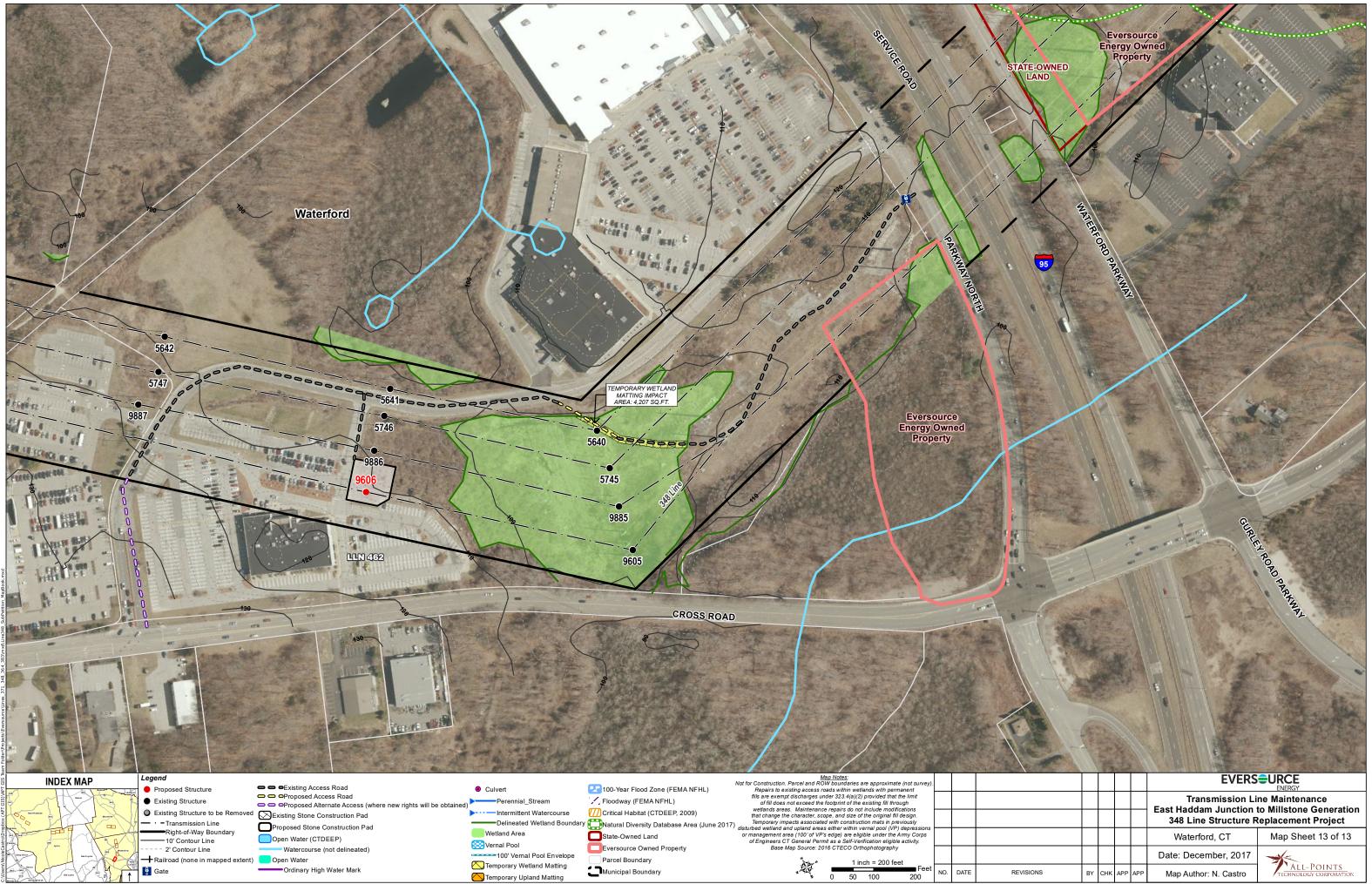




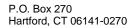
Map Sheet 13 of 13 East Haddam Junction to Millstone Generation 348 Line Structure Replacement Project Abutters List

<u>Line List</u> <u>Number</u>	Parcel Address	<u>City</u>	<u>State</u>	Owner Name
462	167 WATERFORD PARKWAY NORTH	WATERFORD	СТ	CHASE CROSSROADS WATERFORD SQUARE LLC





ATTACHMENT D ABUTTER LETTER AND PROOF OF NOTICE





December 15, 2017

Dear Neighbor,

As part of our everyday effort to deliver reliable energy to our customers and communities, we're planning work in your area to replace electric transmission structures. Maintaining the infrastructure that supports the electric lines is one of the ways Eversource ensures the safe, secure transmission of electricity throughout the region.

You're receiving this letter and a copy of the Sub-Petition because the proposed work would be taking place within the right of way on or near your property in East Haddam, Lyme, Montville or Waterford. A Sub-Petition is a document with detailed information about the proposed upgrades. Every source is submitting Sub-Petition No. 1293-EHLMW-01 this week to the Connecticut Siting Council (CSC) for its review and approval.

About This Electric System Improvement: What You Can Expect

First, we want you to know that this work will not interrupt electric service to your property.

As part of this project, we are proposing to replace and slightly increase the height of the existing wood structure. The new, weathering steel structure will increase in height by 9 feet or less, depending on the location.

We are proposing to do the work within the existing rights of way on or near your property. The new structures will provide continued reliability of the transmission system.

Connecticut Siting Council Process and Timing

With this letter, Eversource is providing notice to you of its proposed work activity, as described in the enclosed Sub-Petition. If you have any comments or concerns about the project, please send them to the CSC at the following address within 30 days of the date of this letter: Melanie Bachman, Acting Executive Director; Connecticut Siting Council; Ten Franklin Square; New Britain, CT 06051. You may also email them to the siting.council@ct.gov. If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-EHLMW-01 in your correspondence.

Our Commitment to You

We are committed to being a good neighbor and doing our work with respect for you and your property. If you would like more information about this work please call 1-800-793-2202, or send an email to <u>TransmissionInfo@eversource.com</u>. Thank you.

Sincerely,

Brian Ragozzine

Brian Ragozzine Eversource Project Manager – Transmission Projects

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT

COUNTY OF HARTFORD

) ss. Hartford

In accordance with Condition 2 of the Connecticut Siting Council's ("Council") March 31, 2017 declaratory ruling on Petition No. 1293, I hereby certify that on December 15, 2017, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-EHLMW-01 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 11 abutters. The notice of the proposed maintenance activities states that comments or concerns regarding the maintenance activities described in the Sub-Petition should be submitted to the Council within 30 days of the date of such notice.

Municipal Officials:

Town of Lyme Steven Mattson, First Selectman 480 Route 156 Lyme, CT 06371

Town of East Haddam Emmett Lyman, First Selectman PO Box K East Haddam, CT 06423

Town of Montville Ronald McDaniel, Mayor 310 Norwich-New London Turnpike Uncasville, CT 06382

Town of Waterford Daniel M. Steward, First Selectman 15 Rope Ferry Road Waterford, CT 06385

Susan J. Bellion Project Siting Specialist

On this the 15 day of December, 2017, 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.

Notary Public My Commission expires: 10/31/22

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