

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

September 12, 2018

Jeffery Cochran, Esq.
Senior Counsel
Eversource Energy
107 Selden Street
Berlin, CT 06037

RE: **PETITION NO. 1293** - Eversource Energy petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for all transmission facility asset condition maintenance improvements to comply with the updated National Electric Safety Code clearance requirements. **Sub-petition BR-02_Bethel_Redding.**

Dear Attorney Cochran:

The Connecticut Siting Council (Council) is in receipt of Eversource Energy's (Eversource) September 11, 2018 Request for Reconsideration of the Council's grant of a 30-day extension of time to October 24, 2018 for the Town of Redding (Town) to submit comments on the above-referenced sub-petition.

In the March 31, 2017 final decision rendered on Petition No. 1293, the Council established a case-by-case process for review and evaluation of requests from Eversource to replace individual, existing wood electric transmission line structures throughout the state that are exhibiting compromised conditions, such as deterioration due to age, weathering, cracking, splitting, rot and woodpecker holes, to comply with the 2017 updated National Electric Safety Code (NESC) standards.¹ This case-by-case process for review and evaluation of Eversource requests includes a 30-day period from the date notice of a sub-petition is provided to the towns and abutting property owners for the submission of any comments or concerns about a project.

The above-referenced sub-petition was submitted to the Council on August 24, 2018. The original deadline date for comments was September 24, 2018. On September 10, 2018, the Town submitted a Request for Limited Appearance and a Request for an Extension of Time to submit written comments. On the same date, the Council granted the Town a 30-day extension of time to October 24, 2018 to submit comments. The Town's September 10, 2018 request states in part, "There are many residents of the Town that will be directly affected by Eversource's proposed transmission structures and are **concerned with their appearance** and... the Town requests the opportunity to submit written comments regarding a **reasonable alternative to the proposed weathering steel transmission structures**" (Emphasis added).

It should be noted that in its March 2, 2017 Petition No. 1293, Eversource clearly indicated that it has targeted wood transmission structures in several locations in Connecticut that are in need of replacement due to compromised asset conditions and that the existing wood structures would be replaced with similar in appearance weathering steel structures. It should also be noted that on page 4 of its August 24, 2018 sub-petition, Eversource indicates that it briefed municipal officials in the Towns of Bethel and Redding in early

¹ In 2011 and 2015, the Council developed the same case-by-case process for review and evaluation of statewide requests from Eversource and United Illuminating to conduct statewide transmission line remediation activities to comply with the North American Electric Reliability Corporation (NERC) reliability standards for conductor clearance requirements and to conduct statewide transmission substation remediation activities to comply with the NERC reliability standards for critical infrastructure protection. See Council Petition Nos. 1000, 1073 and 1157.



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August 2018, met with the Town of Redding to provide additional details on the proposed project on August 9, 2018 and attended a public meeting to present details of the project and answer questions in the Town of Redding on August 13, 2018. The Council has not received any comments from residents of the Town of Redding or from residents of the Town of Bethel to date.

Eversource's September 11, 2018 Request for Reconsideration indicates the Town and some of its residents have expressed a preference for galvanized steel structures over weathering steel structures. As more fully described above, Petition No. 1293 clearly indicated that existing wood transmission structures exhibiting compromised asset conditions would be replaced with similar in appearance weathering steel structures. The Council issued the declaratory ruling for Petition No. 1293 on March 31, 2017. Eversource's Request for Reconsideration also describes the current schedule to perform the structure replacement work, including, but not limited to, the necessity to complete civil construction work on the access roads and work pads, drilling work to allow for installation of each structure pole and electrical work for structure installation. This schedule includes planned electrical outages from November 15 until December 19.

The Council's statutory charge under the Public Utility Environmental Standards Act is to balance the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and to promote energy security. Given that delay in replacing these structures would result in continuing risk of structure failure, thereby compromising reliability of the transmission line, and result in increased costs due to an overall longer, or two-phase, construction period, thereby increasing costs to the ratepayers, Eversource's Request for Reconsideration is hereby granted.

Therefore, the deadline for the Town's comments on this sub-petition shall be before the close of business on October 4, 2018.

Sincerely,



Melanie A. Bachman
Executive Director

MAB/lm

c: Kathleen Shanley, Manager – Transmission Siting, Eversource
Paul R. Michaud, Esq.
Council Members



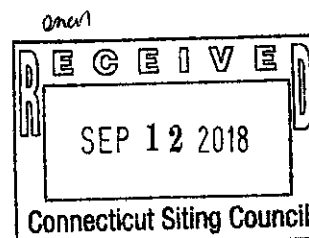
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September 11, 2018

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VIA EMAIL AND REGULAR MAIL

RE: Sub-Petition No. 1293-BR-02 – Request for Reconsideration of Grant of 30-Day Extension of Time for Town of Redding to Submit Comments on Eversource’s Sub-Petition Filing

Dear Ms. Bachman:

For the reasons explained in detail below, The Connecticut Light and Power Company doing business as Eversource Energy (Eversource or the Company) requests that the Connecticut Siting Council (Council) reconsider its September 10, 2018 letter ruling that granted the Town of Redding’s (Town) requested 30-day extension of time to file its comments regarding Eversource’s Sub-Petition Filing. Eversource respectfully requests that the Council reduce the extension period for the Town’s comments and require that the Town submit its comments by October 4, 2018 (approximately 24 days after today), so that the Council can issue its determination on Sub-petition No. 1293-BR-02 (the Sub-petition) by October 10, 2018, in order to reduce the impact on the schedule for the needed structure replacement work.

Background

As explained in Eversource’s Petition 1293, the Company routinely evaluates the current condition of its transmission line structures and implements repair, upgrades or replacement of structures that have been damaged by factors such as structure age, weather and woodpecker activity. In this instance, many wood transmission structures on the segment of Eversource’s 1565 Line between Plumtree Substation in Bethel and Peaceable Substation in Redding have been damaged by these factors and now require replacement to ensure continued safe and reliable transmission of power to its customers over this line. Of the many structures that require replacement on this line segment, 22 structures need to be replaced with slightly taller structures to comply with currently applicable clearance standards. The Sub-petition requests Council acknowledgement to authorize the Company to replace those 22 structures with slightly taller structures.

In Petition 1293, Eversource proposed that to replace existing wood structures with weathering steel structures because they are similar in appearance to wood structures – see, e.g., photo-simulation of proposed replacement structure 2860 relative to existing structure 2860, which was attached to the Sub-petition. The Town and some of its residents have expressed a preference for galvanized steel structures over weathering steel structures.

Current Schedule to Perform Structure Replacement Work

For this structure replacement work, Eversource first needs to complete civil construction work on the access roads to be used to access the locations of the existing and replacement structures and on work pads needed to install the replacement structures and to remove existing structures. Some new access roads are needed, combined with improvements to existing access roads to accommodate use by construction vehicles. The civil construction work is required to start, at a minimum, two weeks prior to the subsequent work step, drilling work. Eversource needs to commence the civil work in the first part of October to be ready for electrical circuit outages scheduled to start November 15 and run intermittently until December 19.

Drilling work involves drilling and installing metal cans approximately 10 to 12 feet deep to allow for installation of each structure pole (H-frame structures each have two structure poles). This work needs to start approximately five weeks prior to the applicable scheduled outage work. As a result, the drilling work should commence in the middle part of October to be ready for the circuit outages.

Electrical work includes transporting poles and hardware to work pads once the roads and pads are constructed, preassembling the structures and hardware on work pads in preparation for structure installation, structure and hardware installation and transfer of the conductors during the outages. Delay in the civil construction and drilling work can delay this electrical work.

Request for Reconsideration and Reduction of Extension

If the Council's decision on the Sub-petition is delayed until after the Town's comments are filed on October 24, Eversource will not be able to complete a substantial portion of the structure replacement work on this segment of the 1565 Line during the outages scheduled for November and December of this year, which would mean that a substantial portion of the work would need to be postponed. At this time, Eversource does not know when it would be able to schedule additional outages to complete the remaining structure replacement work.

The delay in replacing some of these structures would result in continuing increased risk of structure failure due to the condition of the structures that would be replaced during the currently scheduled outages. To reduce the risk of such failures, Eversource would work to complete as many of the structure replacements as possible during the currently scheduled outages and then return later to complete the remaining structure replacement work. However, splitting this structure replacement work into two segments would cause Eversource to incur additional costs such as repeated mobilization and demobilization costs, increased costs for construction mats associated

with longer mat rental periods and/or repeated mat installations and removals, increased construction contractor staff costs due to longer overall construction period.

Conclusion

For the reasons set out above, Eversource respectfully requests that the Council reconsider its September 10, 2018 letter ruling that granted a 30-day extension to the Town of Redding to file comments and reduce the extension period by requiring the Town to submit its comments by no later than October 4, 2018 to reduce the potential for delay in the needed structure replacements.

Respectfully submitted,

The Connecticut Light and Power Company dba Eversource Energy

By: Jeffery D. Cochran
Jeffery D. Cochran
Senior Counsel
Eversource Energy Service Company

Its Attorney

cc: Paul R. Michaud (via email)
Kathleen Shanley (via email)