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September 11, 2018

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

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

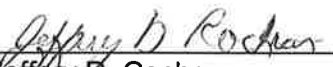
with longer mat rental periods and/or repeated mat installations and removals, increased construction contractor staff costs due to longer overall construction period.

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: 
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Its Attorney

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