

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

Kathleen M. Shanley

Manager – Transmission Siting Tel: (860) 728-4527

August 24, 2018

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

Re: Sub-Petition No. 1293-BR-02

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No. 1293-BR-02 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Bethel and Redding, Connecticut. The work includes replacing 22 existing wooden transmission structures with new weathering steel transmission structures.

Eversource notified the official of the municipality of Bethel and Redding 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: Bethel and Redding Sub-Petition No. 1293-BR-02

Project: 1565 Transmission Line Structure Replacement Project

Structure Location: 22 Transmission Structures located in Bethel and Redding, 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 1565 Transmission Line Structure Replacement Project is part of an ongoing maintenance program, which evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to ensure the safe and reliable transmission of power to its customers. Due to asset condition, many structures require replacement on a portion of the 1565 Line between Plumtree Substation in Bethel and the Peaceable Substation in Redding, Connecticut. The 1565 Line in its entirety, is a 115-kV transmission line that extends from Plumtree Substation in Bethel to Ridgefield Substation in Ridgefield, Connecticut. Of these replacements, 22 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 woodpecker activity. The following work ("Work Activities") will be performed:

• Replace 22 existing wood structures with new weathering steel structures of the same design that are slightly taller (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 in areas within Eversource's property and existing right-of-way ("ROW") utilizing existing and proposed new access roads as well as some temporary access roads (collectively the "Work Areas"). Some of the existing access roads will be improved. 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 temporary access roads that would need to be installed through wetlands within the ROW. In some areas, alternative off-ROW access routes would minimize the amount of newly proposed roads within the ROW and also lessen the impact to residential areas.
- b) Work Activities would result in ±25,874 square feet ("SF") of temporary wetland impacts and ±300 SF of temporary watercourse impacts limited to temporary construction matting required for the construction of access roads to structures 2849, 2908, 2911, 2918, 2920, and 2927 and work pads for structures 2847, 2848, 2849, 2908, and 2926. See table below for details.

Access Roads	Construction Work Pads	Temporary Wetland Impacts (SF)	Temporary Watercourse Impacts (SF)
Access to structure 2849		±1,345	
Access to structure 2908		±500	
Access to structure 2911		±3,286	
Access to structure 2918		±900	
Access to structure 2920		±730	
Access to structure 2927			±300
	Structure 2847	±2,198	
	Structure 2848	±3,900	
	Structure 2849	±7,600	
	Structure 2908	±5,145	
	Structure 2926	±270	
		Total: ±25,874 (SF)	Total: ±300 (SF)

Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, September 2016 ("BMPs") to avoid impact to nearby wetland and watercourse resources.

- c) No vernal pools are located in proximity to the Work Activities.
- d) As a result of Eversource's review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Data Base ("NDDB"), only the Work Activities associated with a portion of the work pad for structure 2847 are proposed within a NDDB buffered area and wetland jurisdictional area and therefore would be subject to a NDDB review request. Eversource submitted an NDDB review request to CTDEEP in May 2018 regarding structure replacement work for the project and received a response from NDDB on August 7, 2018 with recommendations for the protection of rare species potentially present. The recommended protection measures identified in the NDDB letter have been accepted by Eversource and will be incorporated into the Company's BMPs, project plans and construction activities. With these protection measures, no adverse impacts to state-listed rare species

are anticipated.

- e) The structure replacements will not require any tree clearing. However, Eversource may need to undertake minor tree trimming and/or vegetation removal/mowing within the managed ROW corridor to improve access to portions of the Work Areas.
- f) A Phase IA assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC did not identify that any National or State Register of Historic Places properties/districts are located within 500 feet of the Work Areas. Based on a review of historic maps, aerial photographs and available soil profiles, six of the proposed work pad locations were identified to possess a potential for moderate to high archaeological sensitivity. A Phase 1B cultural reconnaissance survey (shovel pit testing) at these locations found no physical evidence of archaeological significance. No further investigation is recommended or warranted.
- g) Increased heights of the 22 replacement structures average approximately 5 feet and none will exceed 9 feet.
- h) Replacement structures would be located within 15 feet of existing structures.
- i) With the exception of the proposed work pads for structures 2847, 2848, 2849, which are entirely located within the 100-year flood zone associated with East Swamp Brook and structure 2860, which is partially located within the 100-year flood zone associated with Wolf Pit Brook, there are no 100-year flood zones in the Work Areas. Eversource would utilize its BMPs to minimize any impacts to the flood zone. The work pads for structures 2847, 2848, 2849, and 2860 will be constructed using temporary construction matting; this matting will be removed following structure replacement. Use of temporary construction matting within the 100-year flood zone ensures that the floodplain hydrology will not be adversely affected. Therefore, no adverse impact to the 100-year flood zone will result from the proposed Work Activities.
- 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 outside of the ROW would be negligible.

IV. Mitigation:

Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment controls ("E&S") will 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 will be mitigated with the use of temporary matting and adherence to the BMPs.
- NDDB recommended rare species protective measures will be incorporated into the Company's BMPs during construction.

- Potential impacts to 100-year flood zones associated with East Swamp Brook and Wolf Pit Brook would be avoided with adherence to the BMPs and the use of temporary construction matting.
- 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.
- 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. Access:

Some new permanent 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. Construction matting would be used on temporary access roads in wetlands as well as in agricultural/maintained lawn upland areas. The matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

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

- Walnut Hill Road for structures 2847, 2848, and 2849
- Plumtree Road for structure 2852
- Route 302 for structures 2860 (off-ROW access from an alternative location on Route 302 would be used if rights are obtained)
- Diamond Hill Road for structure 2908
- Windy Hill Road for structures 2911 and 2912
- Quarry Rock Road for structure 2915
- Quarry Rock Road and Seventy Acres Road for structures 2916, 2917, and 2918
- Seventy Acres Road for structures 2920, 2921, 2922, 2923 and 2925 (alternative off-ROW access from Indian Hill Road, (a private road), would be used to access structures if rights are obtained)
- Peaceable Street for structures 2926, 2927, 2929, 2930, and 2932 (unless alternative off-ROW access from an alternative location on Indian Hill Road would be used to access structures if rights are obtained)

VI. Municipal and Property Owner Outreach:

In early August 2018, Eversource briefed municipal officials in Bethel and Redding on the proposed Project. On August 9, 2018, Eversource met with the Town of Redding to provide additional details on the proposed Project. On August 13, 2018 Eversource attended a public meeting in Redding and presented details of the project and participated in a question and answer session.

In August 2018, Eversource initiated outreach to property owners located along the ROW. Concurrent with the filing of this Sub-Petition, the municipal officials in Bethel and Redding and all abutting property owners received written notification of the Sub-Petition filing and direct abutters to proposed work pads were provided a copy of the Sub-Petition as well as information on how to obtain additional information on the Project and how to submit comments to the Connecticut Siting Council. Eversource also provided a courtesy notification to other property owners along the same ROW who will be affected by underground maintenance work later this year, but which is not subject to this Sub-Petition filing. Subsequent to these notifications, Eversource has received feedback from the Town and some residents that galvanized structures are preferred over the weathering steel structures.

Eversource's standard practice is to use galvanized structures to replace steel lattice structures or where galvanized steel structures are already utilized in the ROW, in order to maintain a similar visual appearance. In Petition 1293, Eversource proposed that wood structures be replaced with weathering steel structures because they are similar in appearance to the wood structures, thus reducing the visual impacts of the replacement structures. The asset condition work that prompted the submittal of Petition 1293 is ubiquitous across the state. Consistent with the Council's ruling on the use of weathering steel structures for this program, which is estimated to require approximately 1,100 wood structure replacements, weathering steel structures are available as a stock item ready for installation. Eversource recommends that weathering steel structures continue to be utilized for this work.

Eversource representatives will contact municipal officials and property owners to provide advance notification of the start of the Project construction activities and will continue to update property owners throughout construction and restoration.

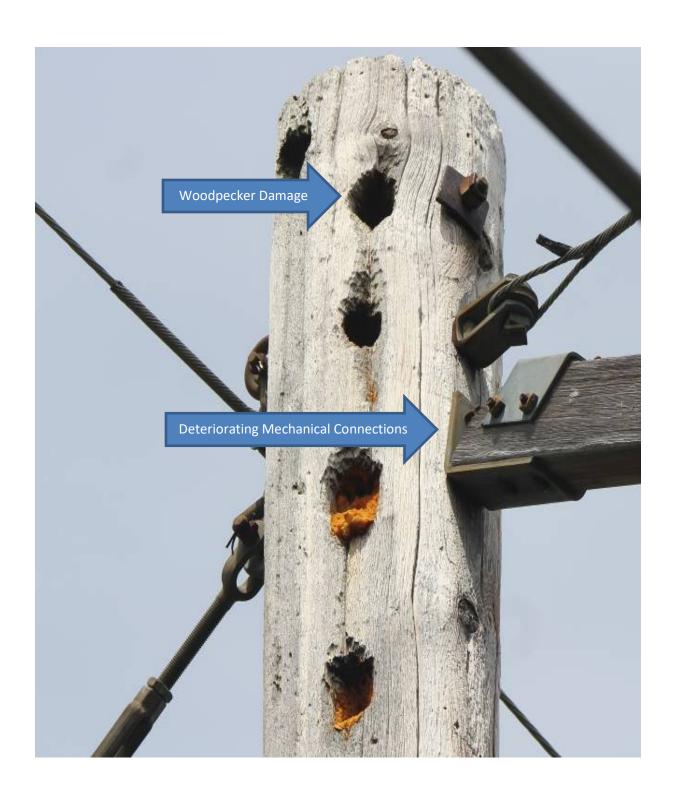
By:

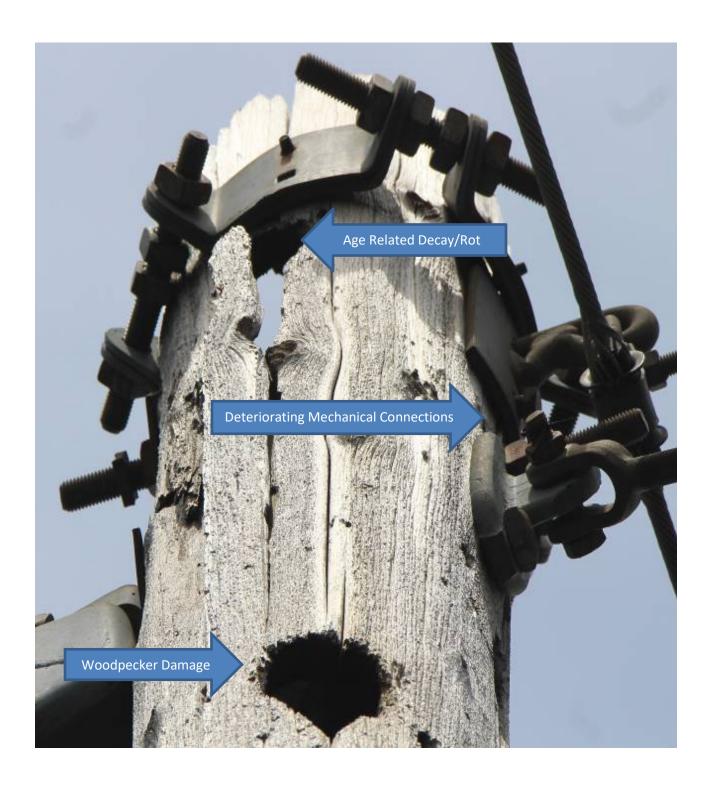
Kathleen M. Shanley

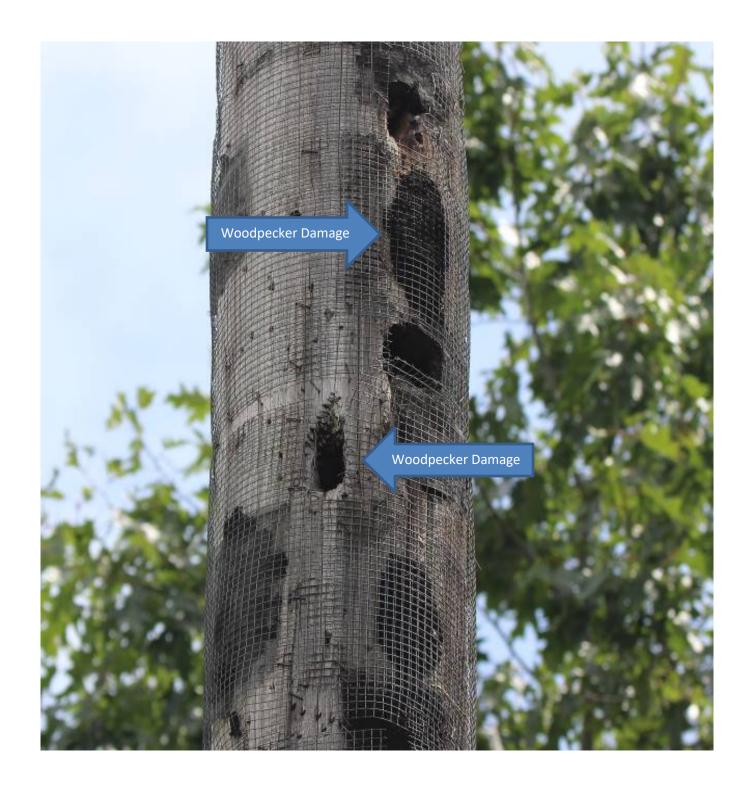
Manager - Transmission Siting

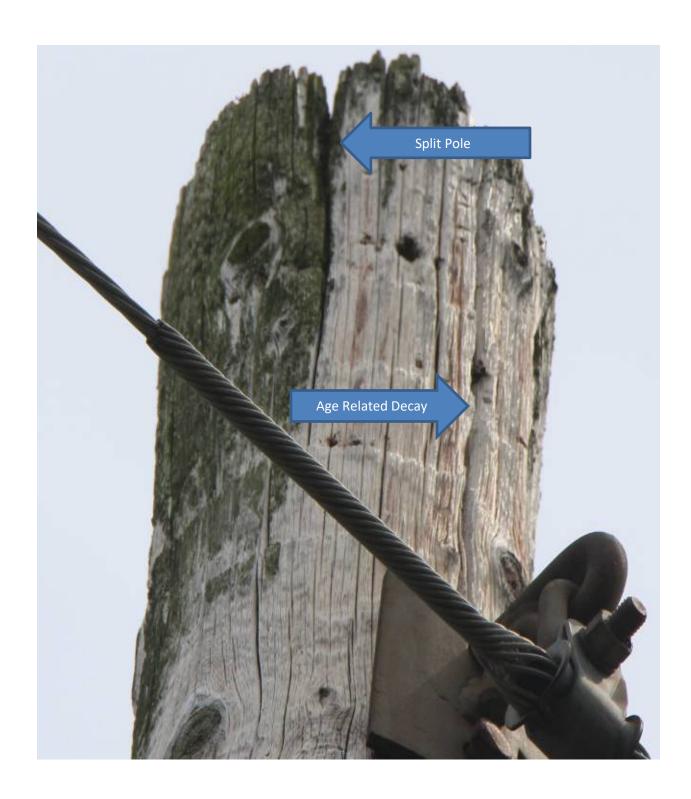
ATTACHMENT B PHOTOGRAPHS AND PHOTO SIMULATION











ORIENTATION NORTHEAST

EXISTING

1565 LINE

STRUCTURE 2860



ORIENTATION NORTHEAST

STRUCTURE 2860



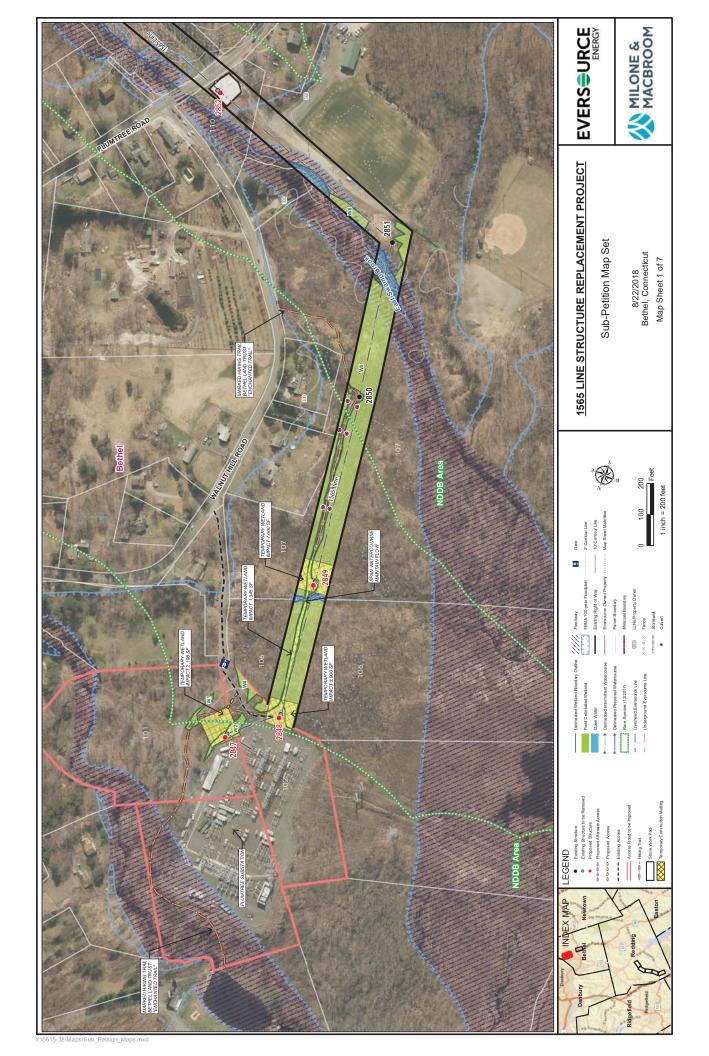


ATTACHMENT C MAPS

MILONE & MACBROOM 99 Realty Drive Cheshire, CT 06410 PREPARED BY: Map Sheet --- Underground Eversource Line --- Overhead Eversource Line 1565 Line 1565 LINE STRUCTURE REPLACEMENT PROJECT TMiles 1.5 Bethel & Redding, Connecticut Sub-Petition Map Set Date: August 22, 2018 T1 - Index Sheet 1-7 - Abutters List & Map Sheets INDEX OF FIGURES: * LEGEND: 0.375 Bethel EVERS EVERGY ENERGY 107 Selden Street Berlin, CT 06037 PREPARED FOR:

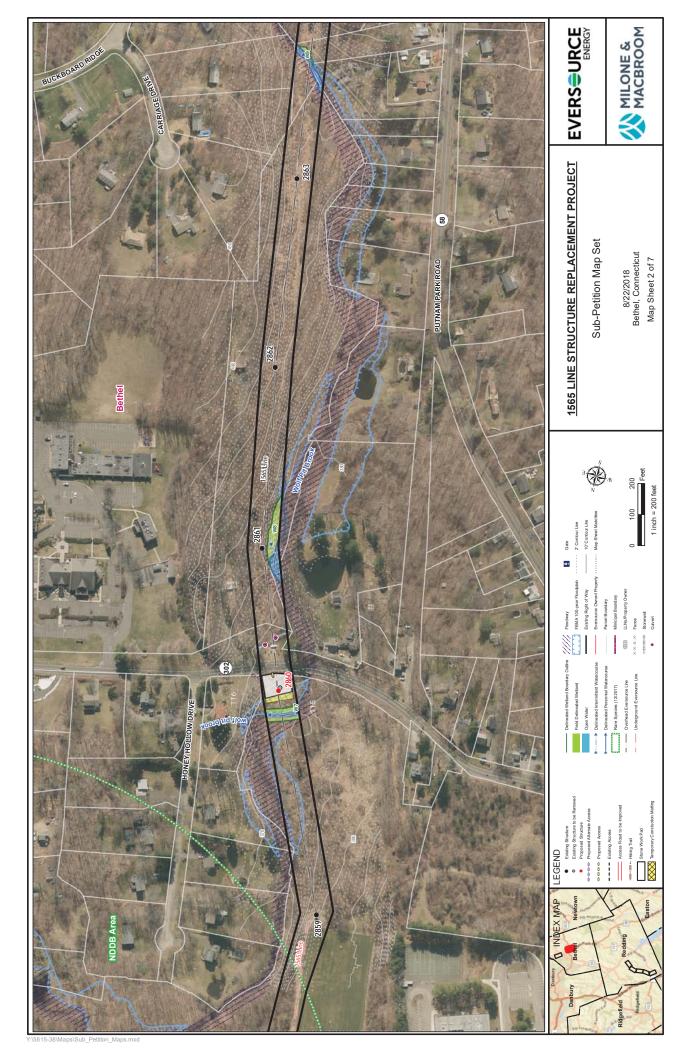
Mapsheet 1 of 7 1565 Line-Structure Replacement Project

	Sub-P	Sub-Petition Abutters List			
LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN PARCEL STATE	PARCEL STATE
101	CONNECTICUT LIGHT AND POWER COMPANY		16B WALNUT HILL ROAD	BETHEL	Ŋ
102	CONN LIGHT & POWER CO		16 WALNUT HILL ROAD	BETHEL	٦
106	BETHEL LAND TRUST		SHELTER ROCK ROAD	BETHEL	٦
107	TOWN OF BETHEL		49 PLUMTREES ROAD	BETHEL	L)
110	TOWN OF BETHEI		PI LIMTREES ROAD	RFTHFI	Ţ



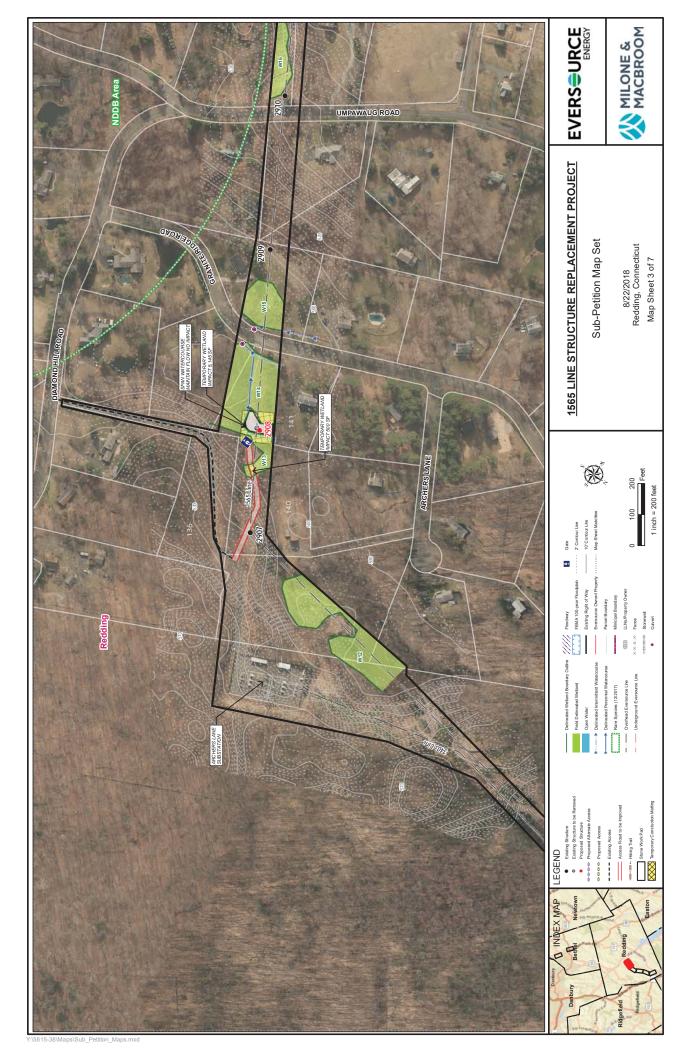
Mapsheet 2 of 7 1565 Line-Structure Replacement Project

	Sub-F	Sub-Petition Abutters List			
LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN	I PARCEL STATE
115	TOWN OF BETHEL		300 WHITTLESEY DRIVE	BETHEL	CT
116	RONALD & ARTHUR	DEBRUYN	2 HONEY HOLLOW DRIVE	BETHEL	CJ



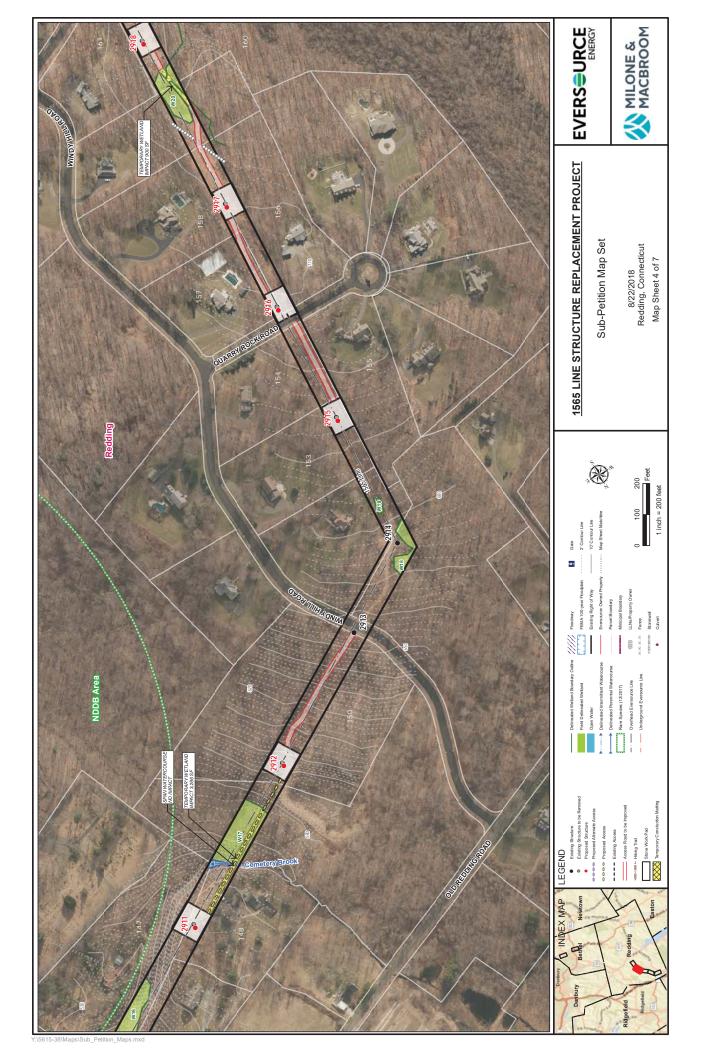
Mapsheet 3 of 7 1565 Line-Structure Replacement Project Sub-Petition Abutters List

LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN	PARCEL STATE
136	TOWN OF REDDING		21 DIAMOND HILL ROAD	REDDING	CT
140	MARY S	GRADY	10 ARCHERS LANE	REDDING	CT
141	DEBBA DEPASS	Sanoi	16 GRANITE RIDGE ROAD	RFDDING	L



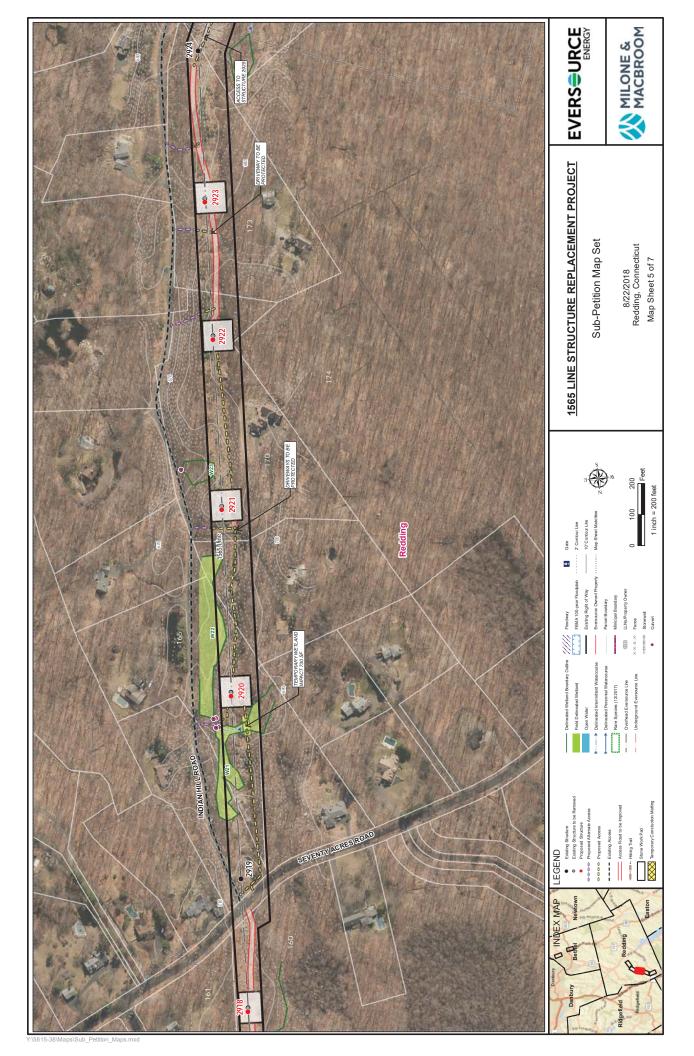
Mapsheet 4 of 7 1565 Line-Structure Replacement Project Sub-Petition Abutters List

	d-ens	Sub-Petition Abutters List			
LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN PARCEL STATE	PARCEL STATE
147	ANDREW & KIMBERLY	ALLEN KING	155 UMPAWAUG ROAD	REDDING	CT
148	CHRISTOPHER	KIERAS	161 UMPAWAUG ROAD	REDDING	CT
150	CATANIA	CHARLES	9 WINDY HILL ROAD	REDDING	CT
153	CHRISTOPHER & IRENE N	WONG	12 WINDY HILL ROAD	REDDING	CJ
154	RICHARD P & PAULINE	SMITH	10 WINDY HILL ROAD	REDDING	CT
155	ANTHONY & JANINE	RUSSO	2 QUARRY ROCK ROAD	REDDING	CT
156	ELIZABETH J	UEHLING	1 QUARRY ROCK ROAD	REDDING	CT
157	MICHAEL J & ANNA	PIZZO	8 WINDY HILL ROAD	REDDING	CT
158	JOHN G & REGINA A	LEONARD	6 WINDY HILL ROAD	REDDING	CT
160	REDDING LAND TRUST		101 SEVENTY ACRE ROAD	REDDING	CT
161	JOSEPH P & KAREN H	DOLAN	2 WINDY HILL ROAD	REDDING	CT



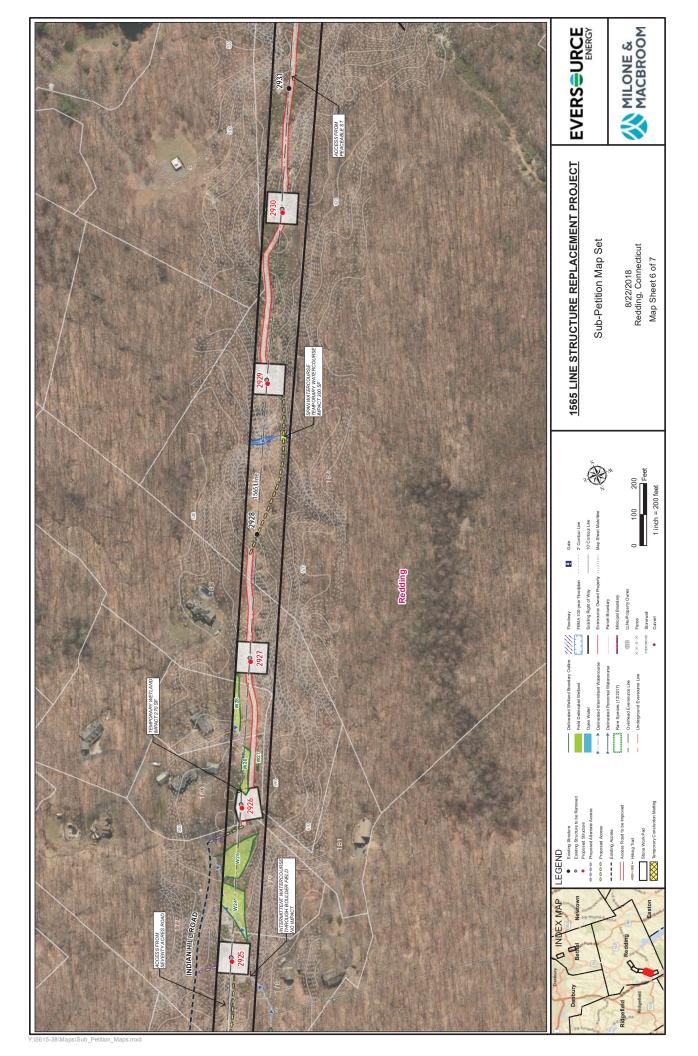
Mapsheet 5 of 7 1565 Line-Structure Replacement Project Sub-Petition Abutters List

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LINE LIST NOWIDER	OWINER FIRST INAINE	OWINER LAST NAINE	OWNER LAST NAME PARCEL ADDRESS	PARC	PARCEL SIAIE
160	REDDING LAND TRUST		101 SEVENTY ACRE ROAD	REDDING	CT
161	JOSEPH P & KAREN H	DOLAN	2 WINDY HILL ROAD	REDDING	CT
165	PETER	COURTWAY	2 INDIAN HILL ROAD	REDDING	CT
170	PETER & LESLIE AKA LESLIE ARON	SWAN	8 INDIAN HILL ROAD	REDDING	CT
173	MATTHEW & KRISTIN E	BEDOUKIAN & BOYLE 12 INDIAN HILL ROAD	12 INDIAN HILL ROAD	REDDING	CT
174	TOWN OF REDDING		70 SEVENTY ACRE ROAD	REDDING	C



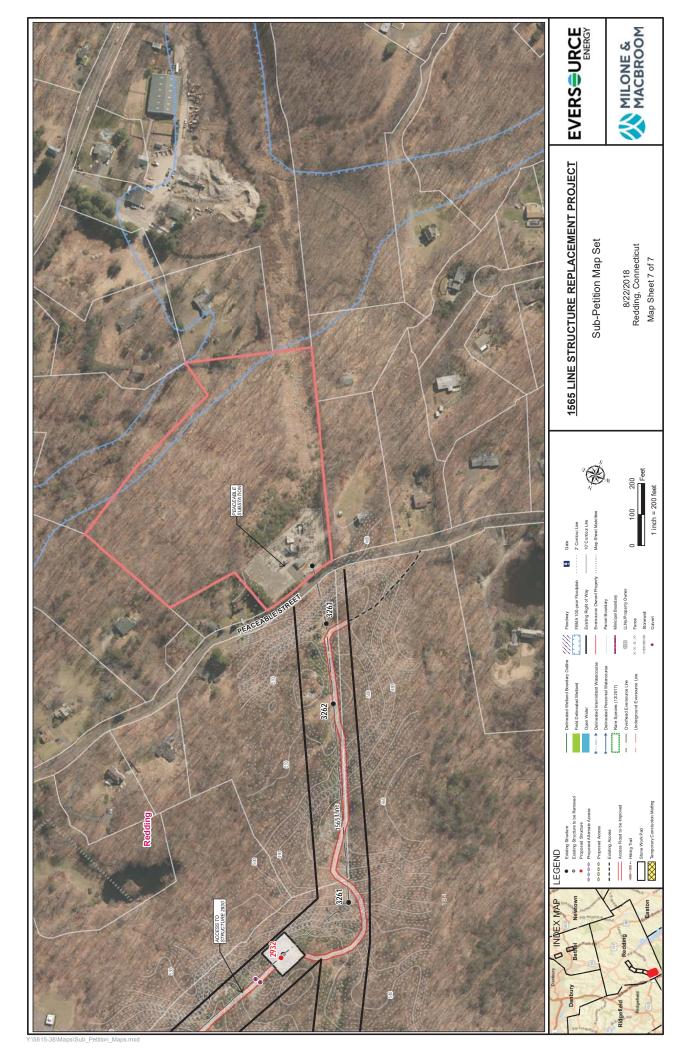
Mapsheet 6 of 7 1565 Line-Structure Replacement Project

LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN PARCEL STATE	PARCEL STATE
177	ROBERT & DIANA	KHALIL & MCKEOWN 23 INDIAN HILL ROAD	23 INDIAN HILL ROAD	REDDING	LJ
178	DAVID & MAURA N	IMPROTA	18 INDIAN HILL ROAD	REDDING	IJ
179	DAVID	IMPROTA	18 INDIAN HILL ROAD	REDDING	IJ
180	DONNA M, REVOCABLE TRUST	HEERE	27 INDIAN HILL ROAD	REDDING	IJ
181	BETTYJ	WESTERFIELD	22 INDIAN HILL ROAD	REDDING	IJ
183	RAMESH M & SUSHAMA R	BHAT	28 INDIAN HILL ROAD	REDDING	IJ
184	REDDING LAND TRUST		47 PEACABLE STREET	REDDING	L



Mapsheet 7 of 7 1565 Line-Structure Replacement Project Sub-Petition Abutters List

184 REDDING LAND TRUST 47 PEACABLE STREET REDDING CT	LINE LIST NUMBER	OWNER FIRST NAME	OWNER LAST NAME	PARCEL ADDRESS	PARCEL CITY/TOWN	PARCEL STATE
	184	REDDING LAND TRUST		PEACABLE STREE	REDDING	CT



ATTACHMENT D ABUTTER LETTER AND PROOF OF NOTICE



August 24, 2018

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 on the 1565 Line in Bethel and Redding. Maintaining the infrastructure that supports the electric lines is one of the ways Eversource ensures the safe, secure transmission of electricity throughout the region.

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 existing aged wood structures with new, more durable, weathering steel structures. Some of the structures being replaced must increase in height to comply with National Electric Safety Code (NESC). Those structures will increase in height between 4.5 feet and 9 feet, depending on the location.

Eversource has submitted Sub-Petition No. 1293-BR-02 to the Connecticut Siting Council (CSC) for approval to construct structures that have proposed height increases. A Sub-Petition is a document with detailed information about the proposed upgrades.

You're receiving this letter and a copy of the Sub-Petition because a structure within the right of way on or near your property is proposed to have a height increase. Other structures along this transmission line are being replaced as well; however, since they will be the same height and installed in relatively the same location as existing structures, they are not included in the Sub-Petition.

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-BR-02 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 TransmissionInfo@eversource.com. Thank you.

Sincerely,

Brian Ragozzine

Brian Ragozzine Eversource Project Manager – Transmission Projects

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF 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 August 24, 2018, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-BR-02 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipalities listed below and 30 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 Official:

Town of Bethel Attn: The Honorable Matt Knickerbocker, First Selectman Bethel Town Hall 1 School Street Bethel, CT 06801

Town of Redding Attn: The Honorable Julia Pemberton, First Selectwoman Redding Town Hall 100 Hill Road P.O. Box 1028 Redding, CT 06875

James L. Smith

Project Siting Specialist

On this the 24th day of August, 2018, before me, the undersigned representative, personally appeared, James L. Smith, 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 exp

CYNTHIA A. ARTHUR NOTARY PUBLIC STATE OF CONNECTICUT MY COMM. EXP.09-30-2018