



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

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

June 29, 2018

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

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

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-MHEH-01 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Middletown, Haddam, and East Haddam, Connecticut. The work includes replacing 4 existing wooden transmission structures with new weathering steel transmission structures.

Eversource notified the officials of the municipalities of Middletown, Haddam, and East Haddam 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,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley". The signature is fluid and cursive, with a large loop at the end.

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  
EVERSOURCE ENERGY**

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: Middletown, Haddam and East Haddam

Sub-Petition No. 1293-MHEH-01

Project: 1772 Transmission Line Structure Replacement Project

Structure Location: 4 Transmission Structures located in Middletown, Haddam and East Haddam, 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 1772 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 1772 Line between Maromas Road in Middletown to Boardman Road in East Haddam, Connecticut. The 1772 Line, in its entirety, is a 115-kV transmission line that extends from the Pratt & Whitney Substation in Middletown to the Haddam Substation in Haddam, Connecticut. Of these replacements, four of the structures require slight increases 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 four existing wood H-Frame structures with new weathering steel H-Frame structures 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"). 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.
- b) Work Activities would result in ±2,680 square feet ("SF") of temporary wetland impacts limited to temporary construction matting required for the construction of an access road to structure 3720. 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 Department of Energy and Environmental Protection's Natural Diversity Data Base ("NDDB"), none of the Work Areas are proposed within a NDDB buffered area and wetland jurisdictional area, and therefore, they would not be subject to a NDDB review request. Work would be conducted in accordance with Eversource's *BMPs* to avoid and minimize impact to terrestrial habitats that may support rare species. Consequently, it is not likely that an adverse impact to rare species will result from activities proposed in the Work Areas.
- e) The structure replacements will not require any 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 1 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, all four of the proposed work pad locations and associated access roads were identified to possess either no or low potential for archaeological sensitivity. Therefore, no surveys or subsurface testing is recommended.
- g) Increased heights of the four replacement structures would average approximately 7 feet and none will exceed 9 feet.
- h) Replacement structures would be located within 15 feet of existing structures.
- i) There are no 100-year flood zones in the Work Areas where the proposed Work Activities would be performed.
- 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.
- 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.

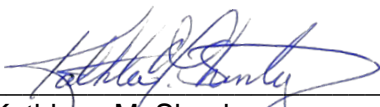
V. Access:

Some new permanent access roads will 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:

- Bear Hill Road for structures 15111 and 15112
- Cove Road for structure 15158
- Boardman Road for structure 3720 (off-ROW access from an alternative location on Boardman Road would be used if rights are obtained)

By:

  
\_\_\_\_\_  
Kathleen M. Shanley  
Manager - Transmission Siting

**ATTACHMENT B**  
**PHOTOGRAPHS AND**  
**PHOTO SIMULATION**

Structure #3720



Structure #15111

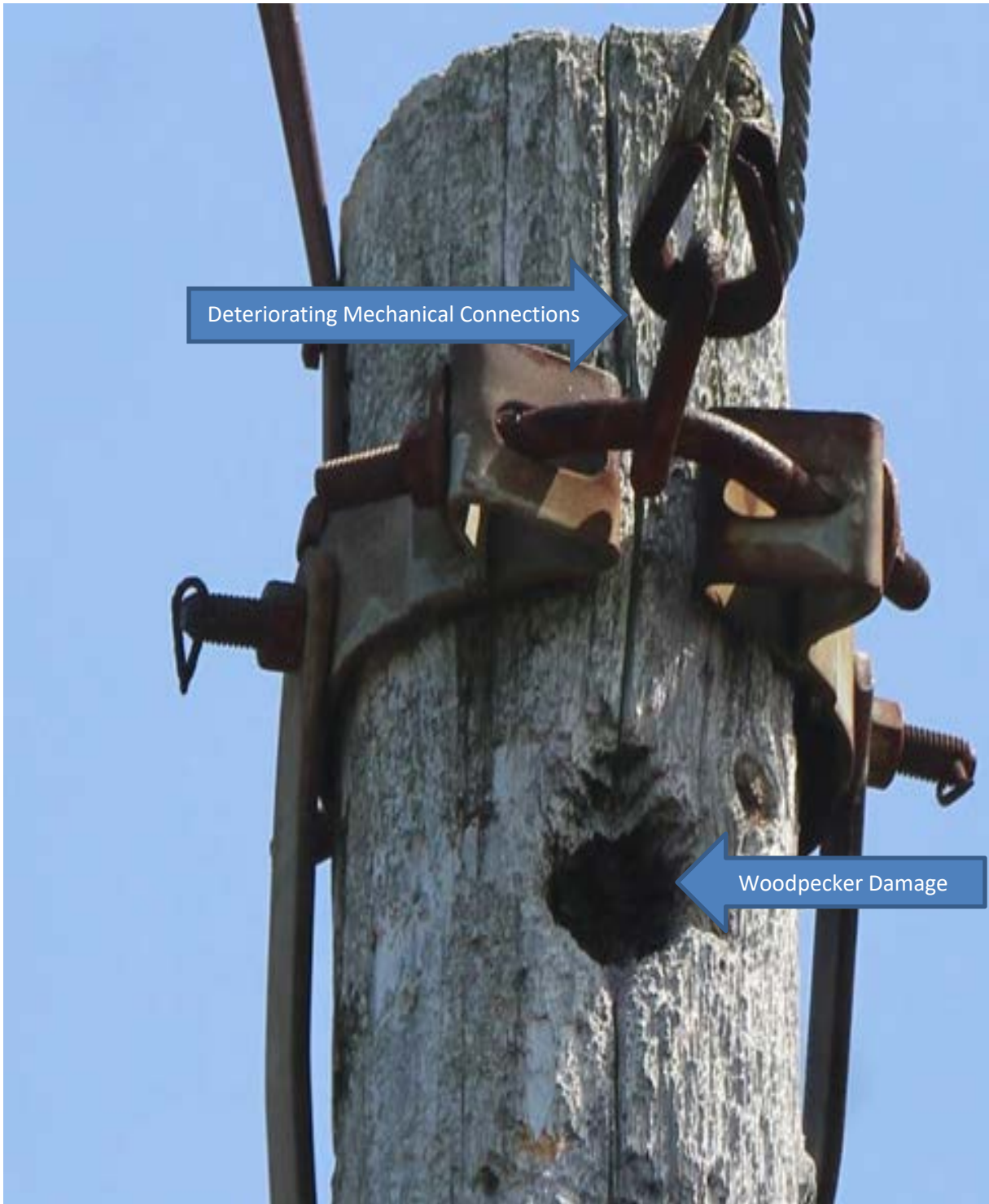




Structure #15112



Structure #15158



Deteriorating Mechanical Connections

Woodpecker Damage



**EXISTING**

1772 LINE

**STRUCTURE 15111**

LOCATION

**BEAR HILL ROAD - MIDDLETOWN, CT**

ORIENTATION

**NORTH**





**PROPOSED**

1772 LINE  
STRUCTURE 15111

LOCATION  
BEAR HILL ROAD - MIDDLETOWN, CT

ORIENTATION  
NORTH



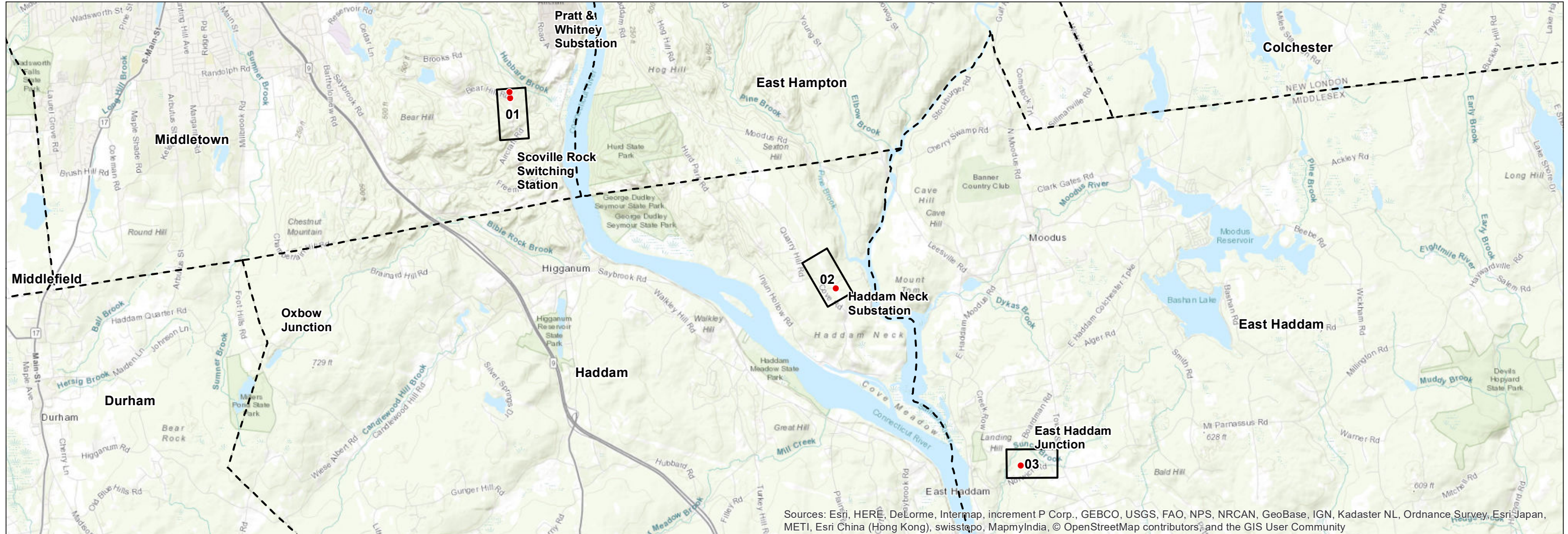
**ATTACHMENT C**

**MAPS**

# 1772 Line Structure Replacement Project

Middletown, Haddam, and East Haddam, CT  
Sub-Petition Map Set

Date: June 11, 2018



## Legend

● Proposed Structure    □ Map Sheet

0 0.5 1 2 Miles



PREPARED FOR:

**EVERSOURCE**  
ENERGY

107 Selden Street  
Berlin, CT 06037

INDEX OF FIGURES

Cover/Index Sheet  
Abutter Tables & Map Sheets

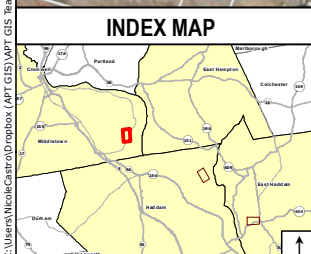
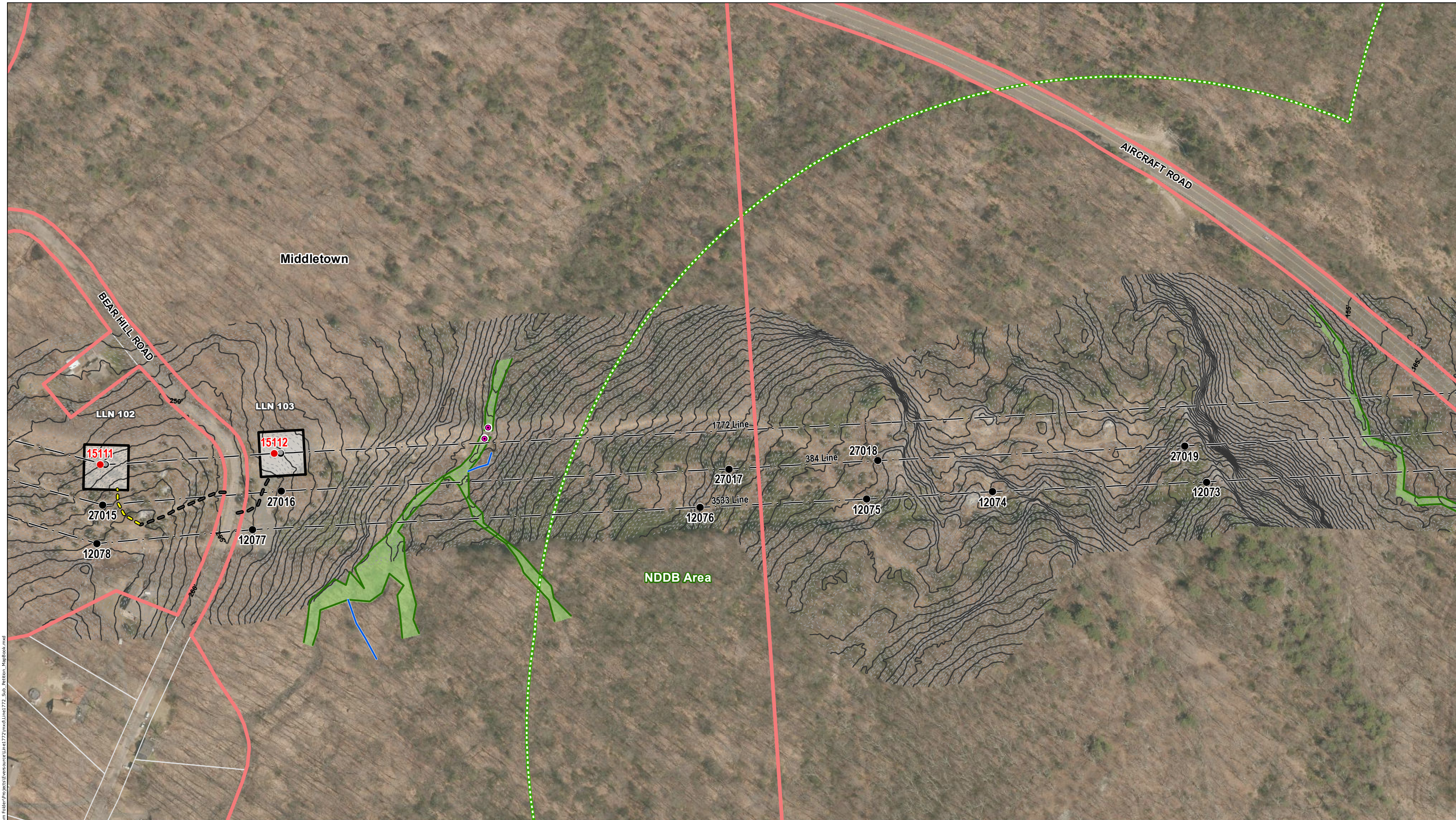
PREPARED BY:

 **ALL-POINTS**  
TECHNOLOGY CORPORATION

3 Saddlebrook Drive  
Killingly, CT 06419

**Map Sheet 01**  
**1772 Line Structure Replacement Project**  
**Abutters List**

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
102	BEAR HILL RD	MIDDLETOWN	CT	CONNECTICUT LIGHT & POWER
103	RIVER RD	MIDDLETOWN	CT	ROCKY RIVER REALTY (EVERSOURCE)



- Legend**
- Proposed Structure
  - Existing Structure
  - Existing Structure to be Removed
  - Overhead Eversource Line
  - Existing Right-of-Way (ROW)
  - 1' Contour Line
  - 5' Contour Line
  - Gate
  - Culvert
  - Existing Access
  - Proposed Access
  - Proposed Alternate Access
  - Stone Work Pad
  - Delineated Perennial Watercourse
  - Delineated Wetland Boundary Outline
  - Field Delineated Wetland
  - Temporary Construction Matting

- FEMA 100-Year Flood Zone
- Critical Habitat (2009; none in mapped extent)
- Natural Diversity Database Area (Dec. 2017)
- CT NE Cottontail Focus Area
- State-Owned Land (none in mapped extent)
- Eversource Owned Property
- Parcel Boundary

**Map Notes:**  
 Not for Construction. Parcel, ROW boundaries, and str locations are approximate.  
 Repairs to existing access roads within wetlands with permanent 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 that change the character, scope, and size of the original fill design. Temporary impacts associated with construction mats in previously disturbed wetland and upland areas either within vernal pool (VP) depressions or management area (100' of VP's edge) are eligible under the Army Corps of Engineers CT General Permit as a Self-Verification eligible activity.  
 Base Map Source: 2016 CTECO Orthophotography

1 inch = 200 feet  
 0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

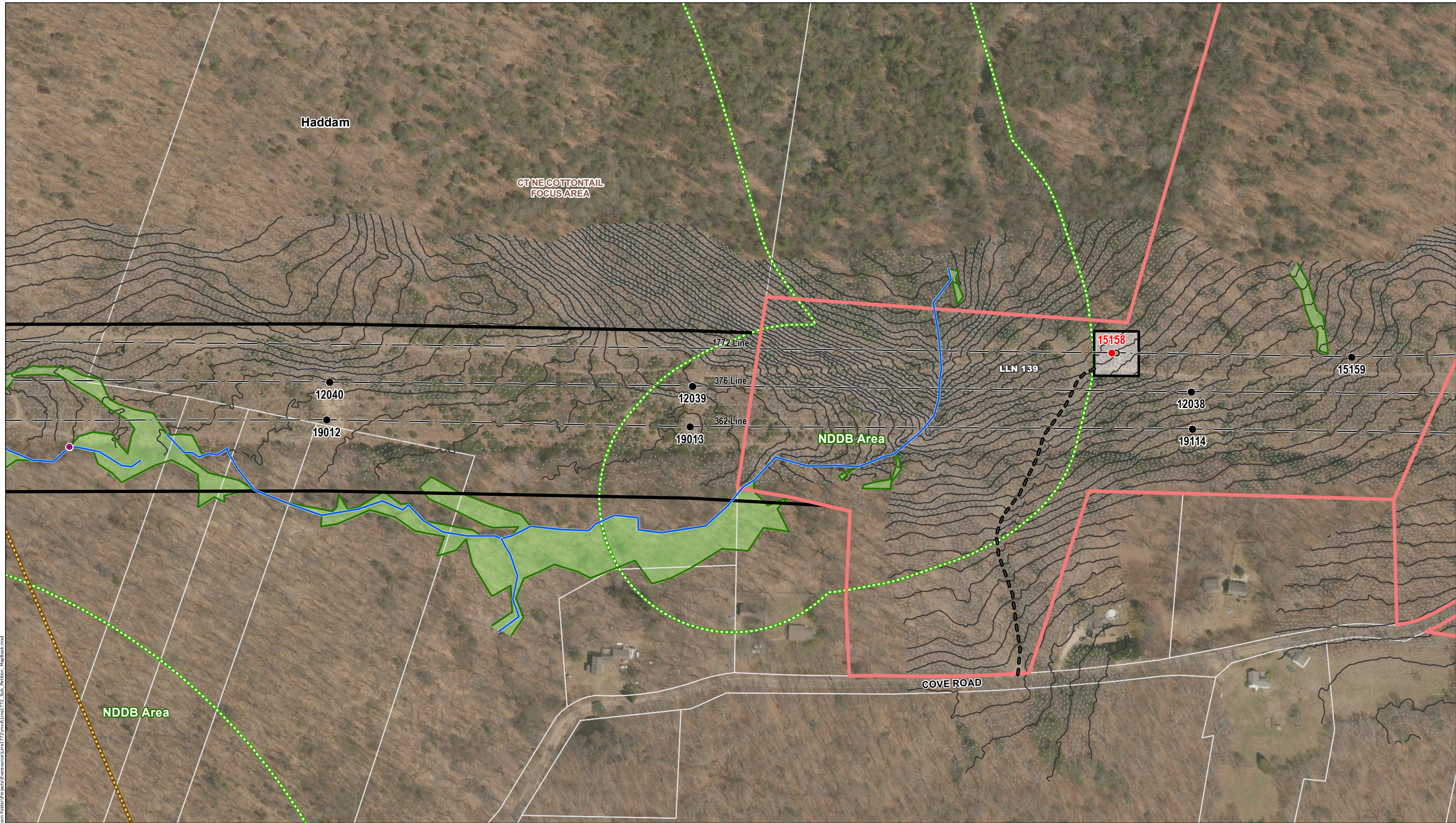
**EVERSOURCE ENERGY**  
**Transmission Line Maintenance**  
**1772 Line Structure Replacement**  
**Pratt and Whitney Substation to East Haddam Junction**  
 Middletown, CT      Map Sheet 01 of 03  
 Date: June, 2018  
 Map Author: N. Castro

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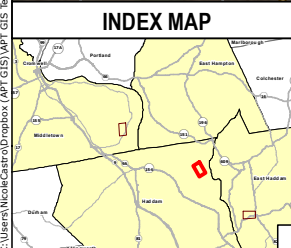


Map Sheet 02  
1772 Line Structure Replacement Project  
Abutters List

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
139	COVE RD	HADDAM	CT	CONNECTICUT LIGHT & POWER



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Legend	
● Proposed Structure	Existing Access
● Existing Structure	Proposed Access
● Existing Structure to be Removed	Proposed Alternate Access
--- Overhead Eversource Line	Stone Work Pad
--- Existing Right-of-Way (ROW)	Delineated Perennial Watercourse
--- 1' Contour Line	Delineated Wetland Boundary Outline
--- 5' Contour Line	Field Delineated Wetland
Gate	Temporary Construction Matting
● Culvert	
FEMA 100-Year Flood Zone	Critical Habitat (2009; none in mapped extent)
Natural Diversity Database Area (Dec. 2017)	CT NE Cottontail Focus Area
State-Owned Land (none in mapped extent)	Eversource Owned Property
Parcel Boundary	

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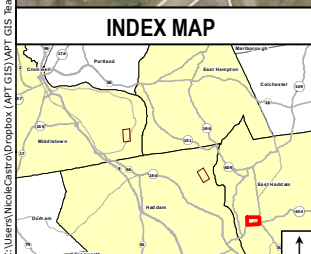
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NO.	DATE	REVISIONS	BY	CHK	APP	APP

**EVERSOURCE ENERGY**  
**Transmission Line Maintenance**  
**1772 Line Structure Replacement**  
**Pratt and Whitney Substation to East Haddam Junction**  
 Haddam, CT      Map Sheet 02 of 03  
 Date: June, 2018  
 Map Author: N. Castro

**Map Sheet 03**  
**1772 Line Structure Replacement Project**  
**Abutters List**

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
152	24 BOARDMAN RD	EAST HADDAM	CT	ALLAN P IV & NANCY B MACKINNON



Legend	
● Proposed Structure	● Existing Structure
● Existing Structure to be Removed	● Existing Right-of-Way (ROW)
--- Overhead Eversource Line	--- 1' Contour Line
--- 5' Contour Line	Gate
○ Culvert	● Existing Access
● Proposed Access	● Proposed Alternate Access
■ Stone Work Pad	■ Delineated Perennial Watercourse
■ Delineated Wetland Boundary Outline	■ Field Delineated Wetland
■ Temporary Construction Matting	■ Existing Access
■ FEMA 100-Year Flood Zone	■ Critical Habitat (2009; none in mapped extent)
■ Natural Diversity Database Area (Dec. 2017)	■ CT NE Cottontail Focus Area
■ State-Owned Land (none in mapped extent)	■ Eversource Owned Property
■ Parcel Boundary	

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 Base Map Source: 2016 CTECO Orthophotography

1 inch = 200 feet  
 0 50 100 200 Feet

<b>EVERSOURCE ENERGY</b>						
<b>Transmission Line Maintenance 1772 Line Structure Replacement Pratt and Whitney Substation to East Haddam Junction</b>						
East Haddam, CT				Map Sheet 03 of 03		
Date: June, 2018						
Map Author: N. Castro						
NO.	DATE	REVISIONS	BY	CHK	APP	APP



**ATTACHMENT D**  
**ABUTTER LETTER AND**  
**PROOF OF NOTICE**

June 29, 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. 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 Middletown, East Haddam and Haddam, CT. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-MHEH-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 structures. The new, weathering steel structures 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](mailto:siting.council@ct.gov). If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-MHEH-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 [TransmissionInfo@eversource.com](mailto:TransmissionInfo@eversource.com). Thank you.

Sincerely,

*Brian Ragozzine*

Brian Ragozzine  
Eversource Project Manager – Transmission Projects

