



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

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

July 11, 2019

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

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

Dear Ms. Bachman:

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

Eversource notified the officials of the municipality of Middletown 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 long horizontal stroke 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

Town: Middletown

Sub-Petition No. 1293-MI-02

Project: 384 Transmission Line Structure Replacement Project

Structure Location: Four Transmission Line Structures located in Middletown, 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 384 Transmission Line Structure Replacement Project (the "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 384 Line between River Road and Freeman Road in Middletown. The 384 Line, in its entirety, is a 345-kilovolt single circuit line that extends from Laurel Energy Substation, located at the Middletown Generation Station, to Scovill Rock Substation in Middletown. Of these replacements, four structures require a slight increase in structure height to comply with current clearance requirements. The four structures to be replaced are a mix of wood H-frame and monopole structures.

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

- Replace 4 existing wood structures with new weathering steel structures. Each replacement structure will be of the same design as its corresponding existing structure, though slightly taller (10 feet or less) than the existing structures. The replacement structures will be installed within 15 feet of the existing structure locations.

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) All Work Activities would take place in areas within Eversource's property or existing right-of-way ("ROW") utilizing existing access roads (collectively the "Work Areas"). Some of the existing access roads would be improved. Eversource would access all of the structure replacement locations utilizing its existing rights.
- b) Work Activities would result in no temporary or permanent wetland impacts. 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 direct impacts to vernal pools would result from the proposed Work Activities. However, a portion of the existing access road for Structure 12092 is located within the potential vernal pool envelope ("PVPE") associated with PVP-1 and a portion of the existing access road for Structure 27012 is located within the PVPE associated with PVP-2. These existing access roads will not be widened or altered where they extend into the PVPEs.

An environmental monitor will oversee the Work Areas for activities conducted during the amphibian breeding season. If amphibian migration activity starts during the Work Activities, additional BMPs will be implemented to protect vernal pool species. With the implementation of these protective measures, no adverse impact to vernal pools would result from the proposed Work Activities.

- d) As a result of Eversource's review of the Connecticut Department of Energy and Environmental Protection's Natural Diversity Database ("NDDDB"), no Work Areas are proposed within a NDDDB buffered area and wetland jurisdictional area and/or CTDEEP owned/managed land; and therefore, they would not be subject to a NDDDB 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, no adverse impact to rare species will result from activities proposed in the Work Areas.
- e) The Work Activities 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 ("Heritage") did not identify any National or State Register of Historic Places properties/districts located within 500 feet of the Work Areas. Based on a review of historic maps, aerial photographs, and available soil profiles, the proposed structure replacement locations were identified by Heritage as possessing no to low archaeological sensitivity. Therefore, no additional archaeological examination is warranted, no protective measures are required for the proposed activity and no effect on cultural resources will occur.
- g) Increases in the heights of the 4 replacement structures will average approximately 5 feet and none will exceed 10 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.

- j) No change in noise levels would result from the installation of the new structures and the applicable lines would continue to comply with the State of Connecticut noise regulations.
- k) Any changes in electric and magnetic field levels outside 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.
- Vernal pool protective measures will be incorporated into the Eversource's BMPs during construction.
- Eversource's contractor will 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.

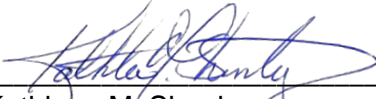
V. Access:

Existing access roads in upland areas may be hardened and temporarily widened at turning areas to facilitate the safe passage of construction vehicles.

Eversource would access the Work Areas by entering its property and/or ROW from existing access points on public roads in Middletown as follows:

- River Road for Structure 27003
- Maromas Road for Structure 27012
- Bear Hill Road Structure 27019
- Aircraft Road for Structure 27020

By:



Kathleen M. Shanley
Manager - Transmission Siting

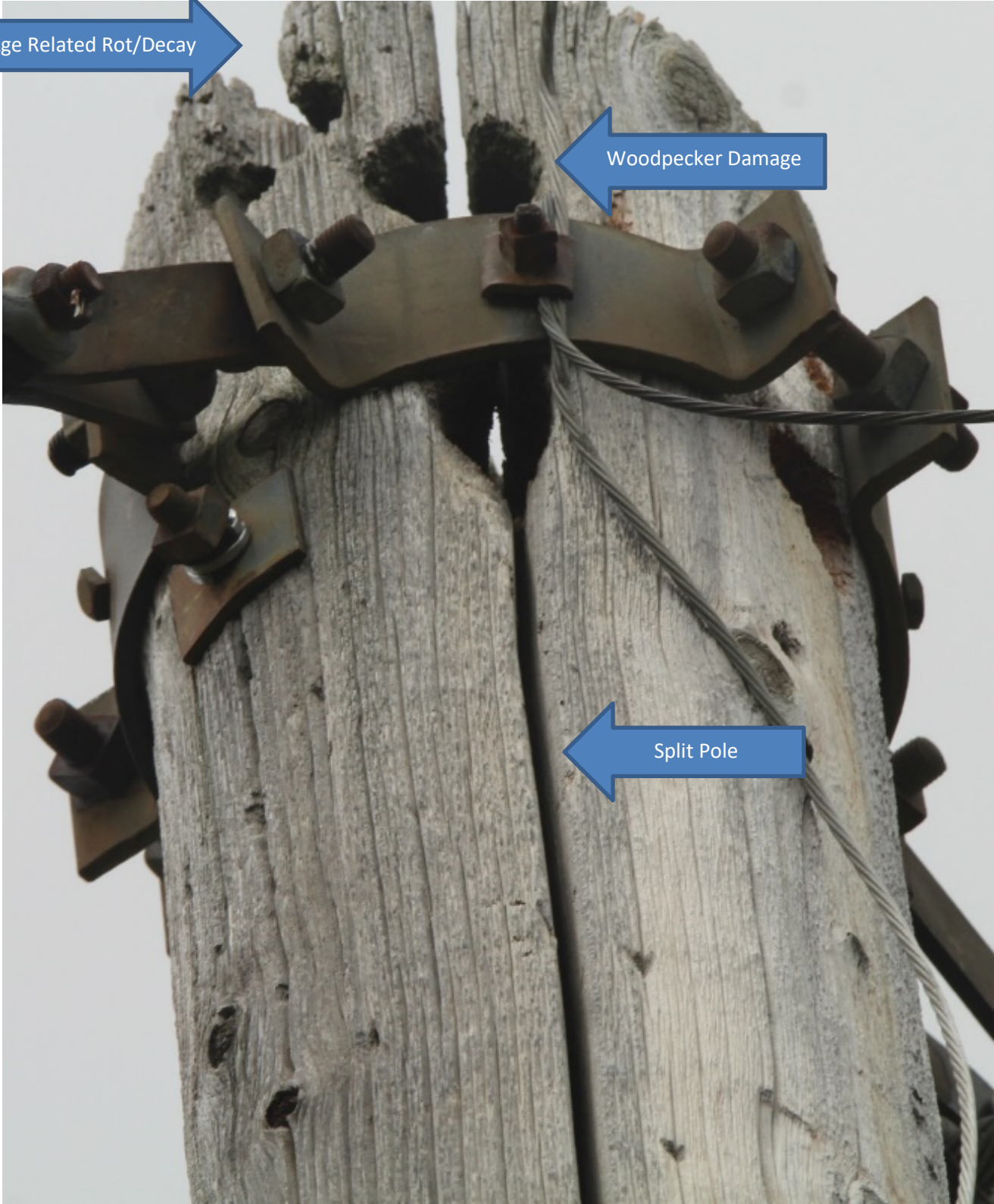
ATTACHMENT B
PHOTOGRAPHS AND
PHOTO SIMULATION

Structure #27003

Age Related Rot/Decay

Woodpecker Damage

Split Pole



Structure #270012



Woodpecker Damage

Age Related Rot/Decay

Deteriorating Mechanical Connections

Structure #27019



Split/Cracking Pole

Woodpecker Damage



EXISTING

384 LINE

STRUCTURE 27019

LOCATION

**AIRCRAFT ROAD
MIDDLETOWN, CT**

ORIENTATION

NORTH





PROPOSED

384 LINE

STRUCTURE 27019

LOCATION

**AIRCRAFT ROAD
MIDDLETOWN, CT**

ORIENTATION

NORTH



**ALL-POINTS
TECHNOLOGY CORPORATION**



**EVERSOURCE
ENERGY**

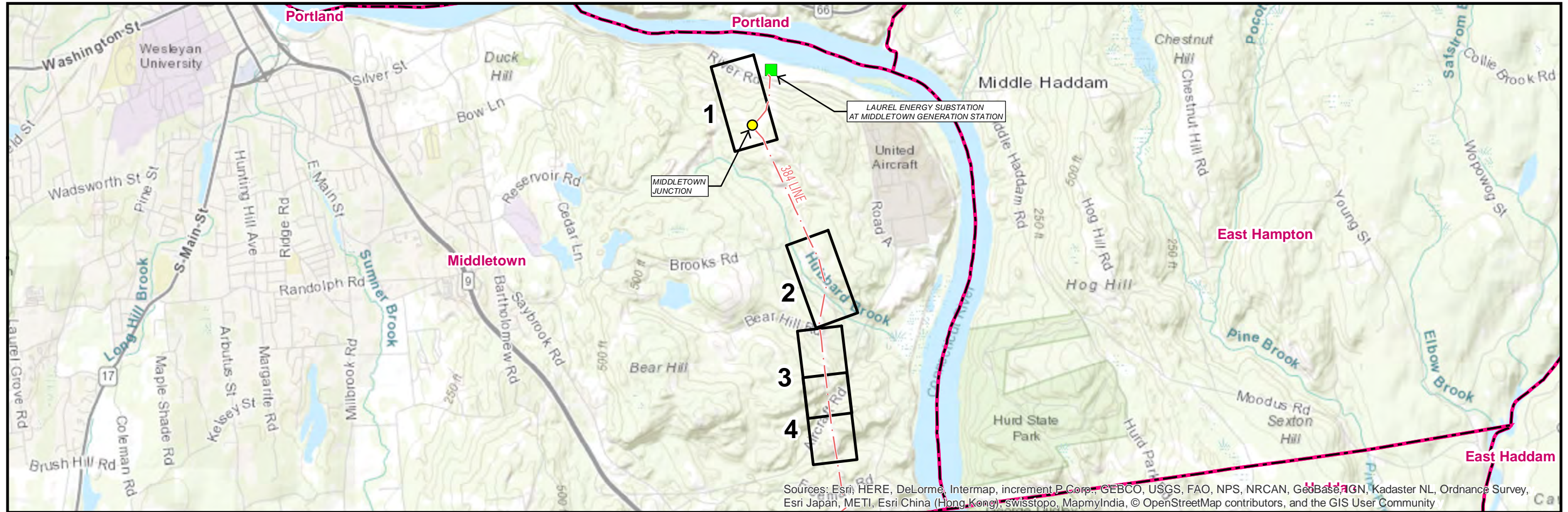
ATTACHMENT C

MAPS

384 LINE STRUCTURE REPLACEMENT PROJECT

Middletown, Connecticut
Sub-Petition Map Set

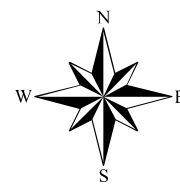
July 3, 2019



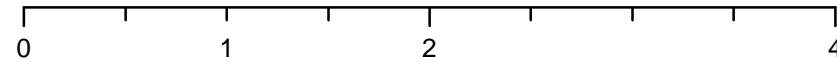
Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

LEGEND

- Junction
- Substation
- - - Overhead Eversource Line
- Map Sheet
- - - Municipal Boundary



Miles



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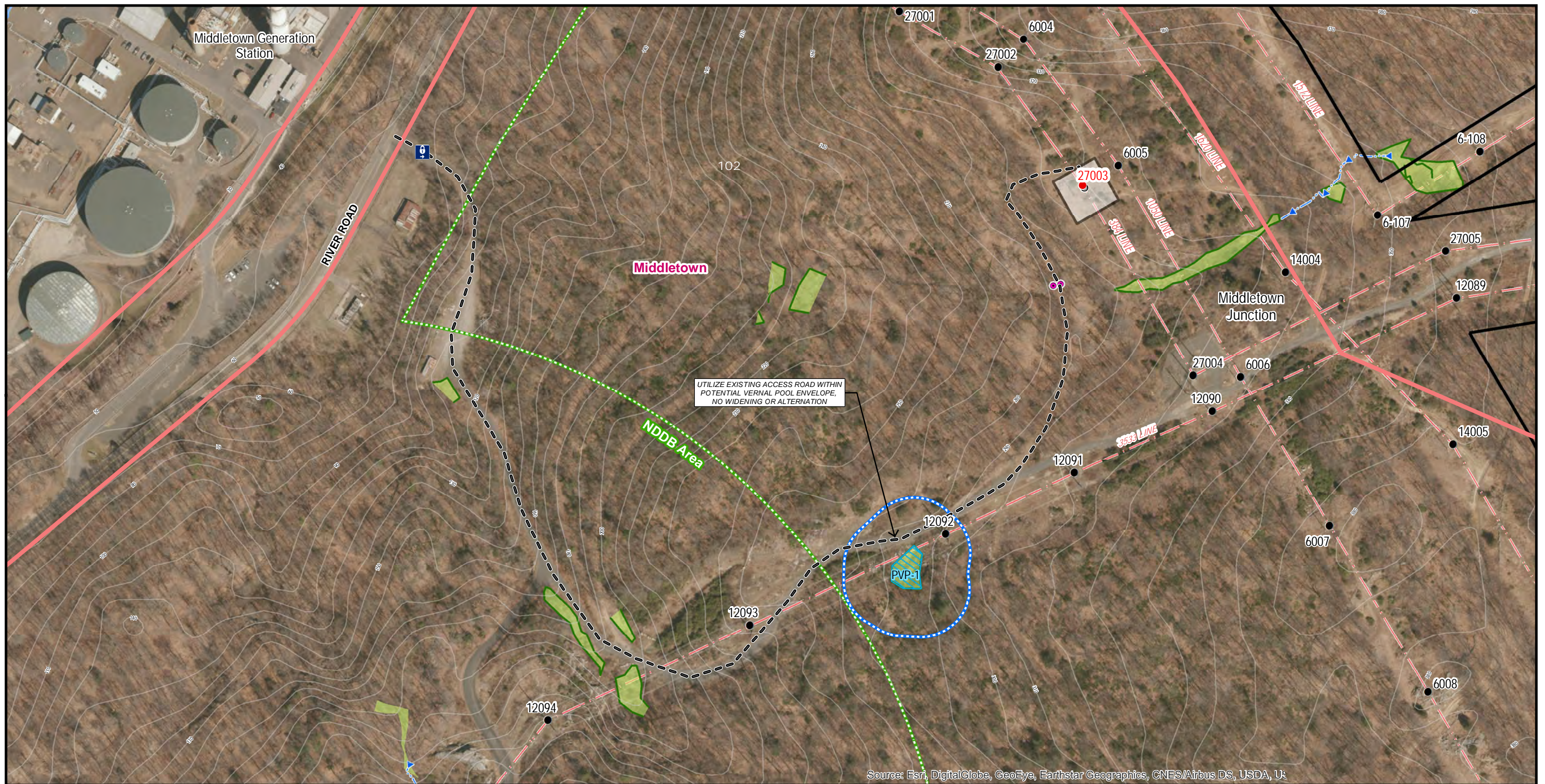
PREPARED BY:



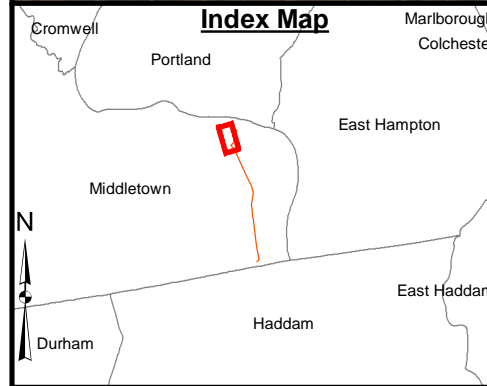
107 Selden Street
Berlin, Connecticut 06037

Map Sheet 01
384 Line Structure Replacement Project
Abutters List

<u>Line List Number</u>	<u>Owner</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
102	CONNECTICUT LIGHT & POWER	RIVER ROAD	Middletown	CT



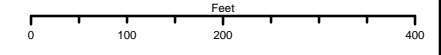
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, U



LEGEND	
● Proposed Structure	Gate
○ Existing Structure to be Removed	10' Contour Line
● Existing Structure	Open Water
- - - Existing Access	Watercourse (Not Delineated)
- - - Proposed Access	● Culvert
▭ Stone Work Pad	▶ Delineated Perennial Watercourse
▨ Temporary Construction Matting	▶ Delineated Intermittent Watercourse
- - - Overhead Eversource Line	▭ Field Delineated Wetland
▭ Existing Right-of-Way	▨ Potential Vernal Pool Extent
	▭ 100' Potential Vernal Pool Envelope
	▭ FEMA 100-Year Flood Zone
	▨ Floodway
	▭ Natural Diversity Database Area (12/18)
	▭ Parcel Boundary
	▭ Municipal Boundary
	▭ State-Owned Property
	▭ Eversource Owned Property



1 inch = 200 feet



Date: 07/03/2019 Prepared by: JSB

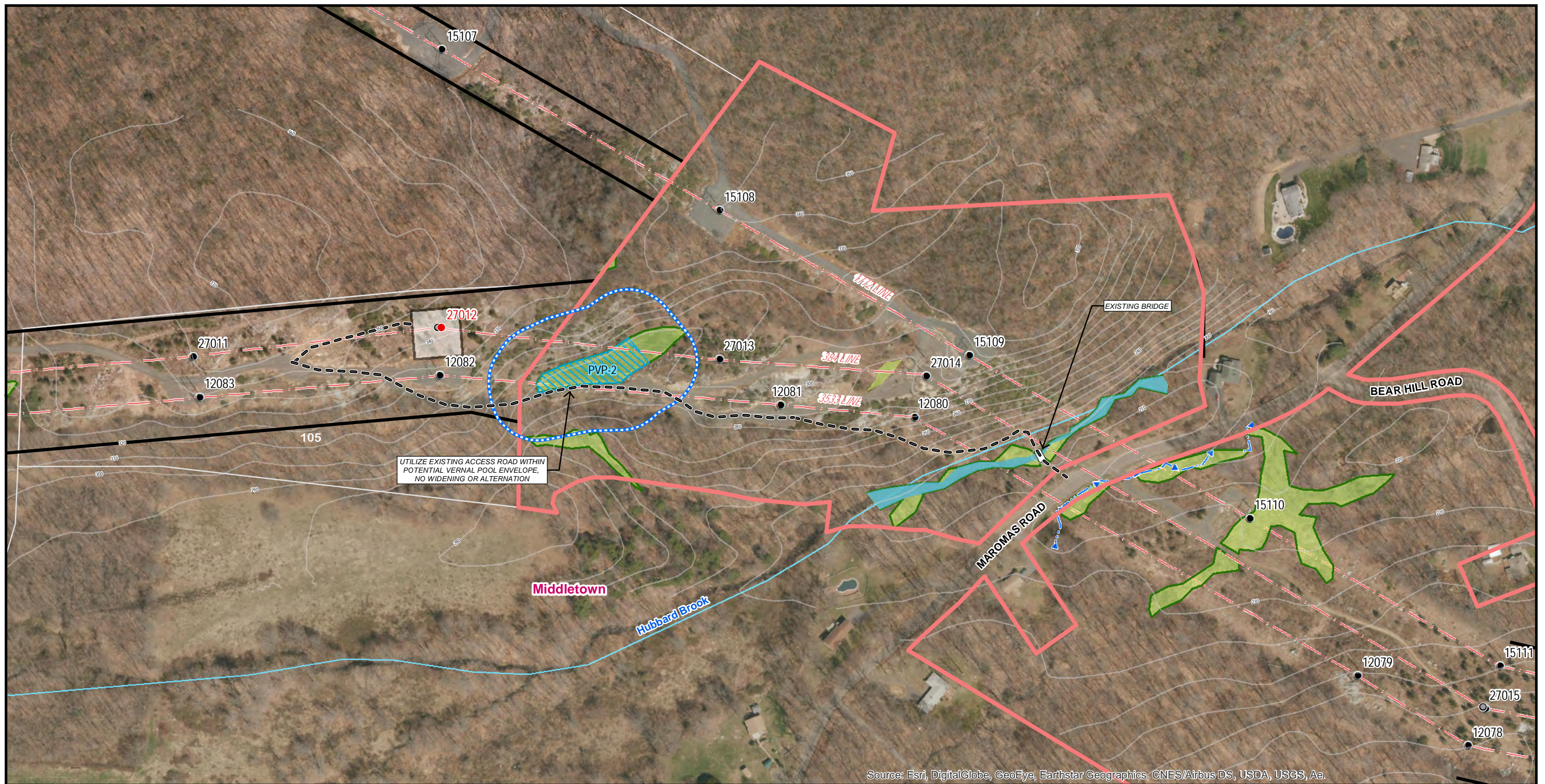


Project/Location:
384 Line
Structure Replacement Project
 Middletown, Connecticut

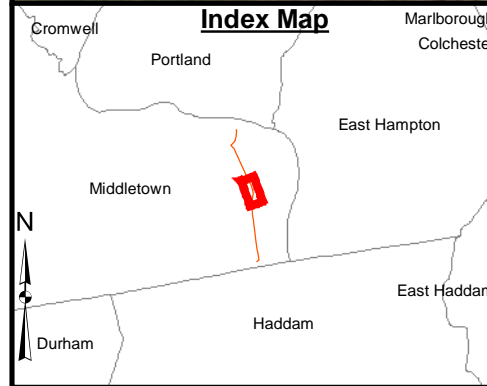
MAP SHEET 1 OF 4

Map Sheet 02
384 Line Structure Replacement Project
Abutters List

<u>Line List Number</u>	<u>Owner</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
105	UNITED AIRCRAFT CORPORATION	RIVER ROAD	Middletown	CT



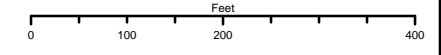
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, Ae



LEGEND	
● Proposed Structure	Gate
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	▭ Parcel Boundary
	▭ Municipal Boundary
	▭ State-Owned Property
	▭ Eversource Owned Property



1 inch = 200 feet



Date: 07/01/2019 Prepared by: JSE

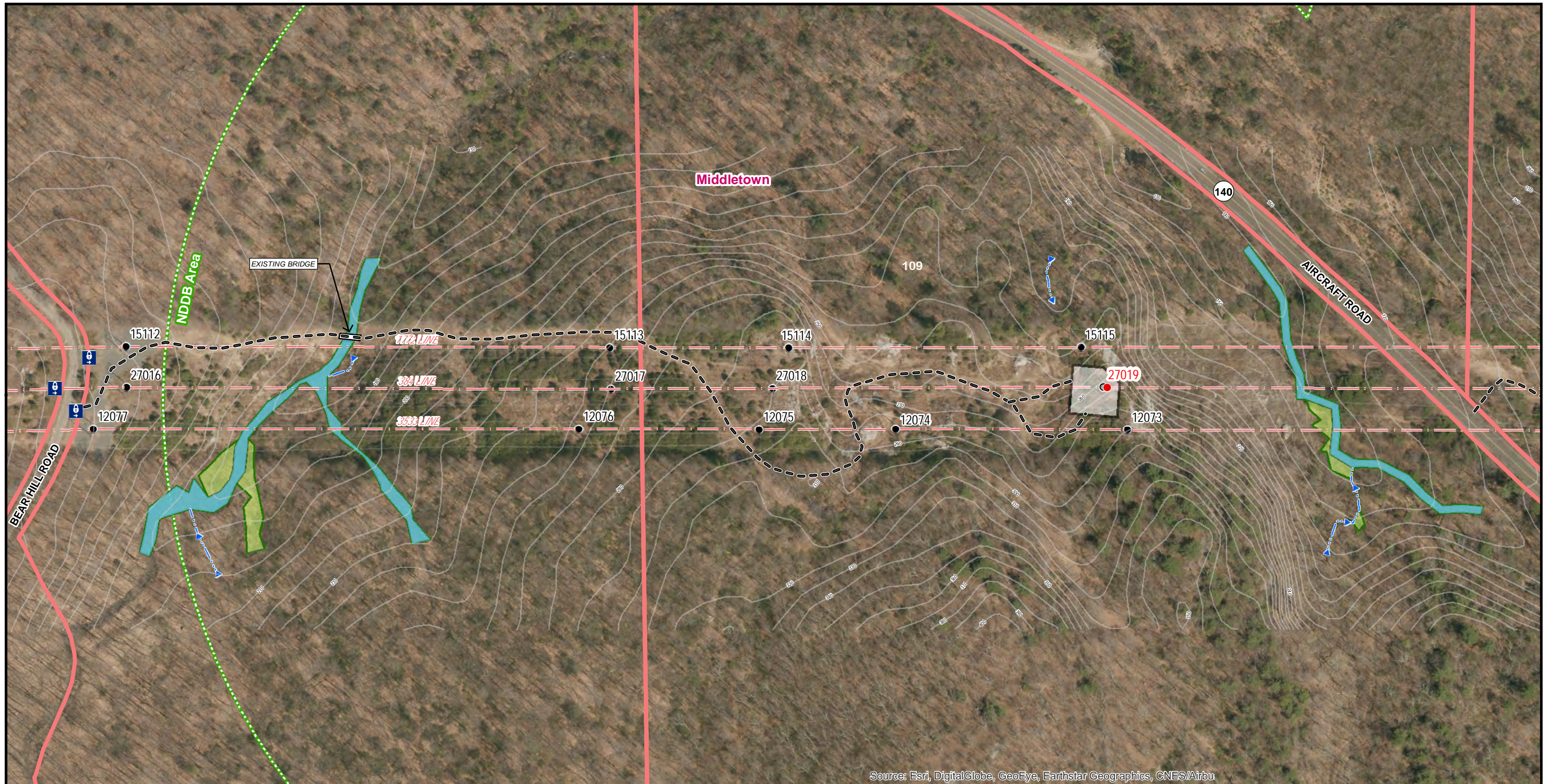


Project/Location:
384 Line
Structure Replacement Project
 Middletown, Connecticut

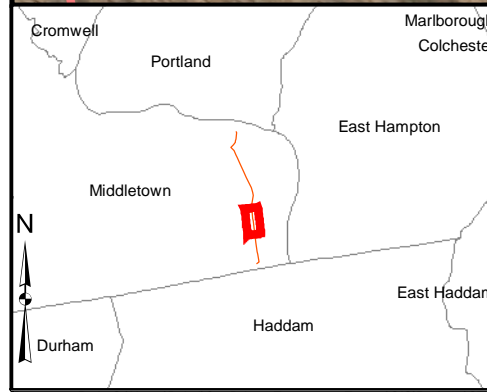
MAP SHEET 2 OF 4

Map Sheet 03
384 Line Structure Replacement Project
Abutters List

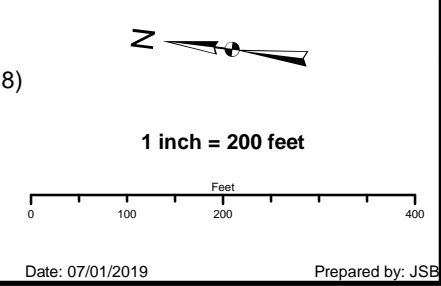
<u>Line List Number</u>	<u>Owner</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
109	ROCKY RIVER REALTY (EVERSOURCE)	RIVER RD	Middletown	CT



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbu



LEGEND <ul style="list-style-type: none"> ● Proposed Structure ○ Existing Structure to be Removed ● Existing Structure - - - Existing Access - - - Proposed Access ▭ Stone Work Pad ▨ Temporary Construction Matting - - - Overhead Eversource Line — Existing Right-of-Way 		<ul style="list-style-type: none"> Ⓜ Gate — 10' Contour Line ■ Open Water — Watercourse (Not Delineated) ● Culvert — Delineated Perennial Watercourse — Delineated Intermittent Watercourse ■ Field Delineated Wetland ▨ Potential Vernal Pool Extent 		<ul style="list-style-type: none"> ▨ 100' Potential Vernal Pool Envelope ▨ FEMA 100-Year Flood Zone ▨ Floodway ▨ Natural Diversity Database Area (12/18) ▭ Parcel Boundary — Municipal Boundary ▭ State-Owned Property ▭ Eversource Owned Property 	
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Project/Location:

384 Line
Structure Replacement Project
 Middletown, Connecticut

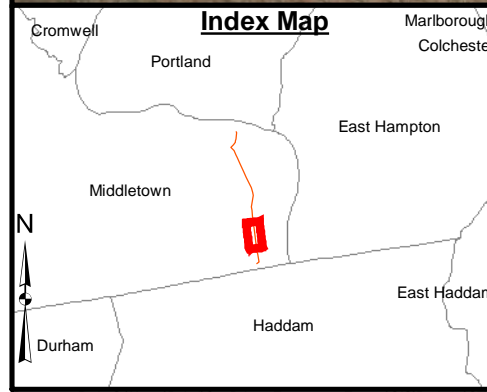
MAP SHEET 3 OF 4

Map Sheet 04
384 Line Structure Replacement Project
Abutters List

<u>Line List Number</u>	<u>Owner</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
109	ROCKY RIVER REALTY (EVERSOURCE)	RIVER RD	Middletown	CT
110	ROCKY RIVER REALTY (EVERSOURCE)	RIVER RD	Middletown	CT



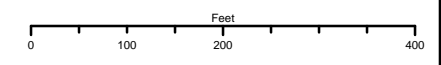
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbu



LEGEND	
● Proposed Structure	Gate
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	▭ State-Owned Property
	▭ Eversource Owned Property



1 inch = 200 feet



Date: 07/01/2019 Prepared by: JSE



Project/Location:
384 Line
Structure Replacement Project
 Middletown, Connecticut

MAP SHEET 4 OF 4

ATTACHMENT D
ABUTTER LETTER AND
PROOF OF NOTICE

July 11, 2019

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. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-MI-02 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 10 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-MI-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,

Eric LeBlanc

Eric LeBlanc
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 July 11, 2019, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-MI-02 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 1 abutter. 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:


City of Middletown
Daniel Drew, Mayor
245 deKoven Drive
Middletown, CT 06457



James L. Smith
Project Siting Specialist

On this the 11th day of July, 2019, 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 expires: 7-31-2023

LISA J. BUSH
NOTARY PUBLIC
MY COMMISSION EXPIRES JULY 31, 2023

