

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER
COMPANY D/B/A EVERSOURCE
ENERGY PETITION FOR A DECLARATORY
RULING THAT NO CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED IS REQUIRED FOR
PROPOSED MODIFICATIONS TO AN
EXISTING TELECOMMUNICATIONS
FACILITY ON ELECTRIC TRANSMISSION
LINE STRUCTURE NO. 9950, OWNED BY
EVERSOURCE ENERGY WITHIN AN EXISTING
EVERSOURCE ENERGY ELECTRIC
TRANSMISSION LINE RIGHT-OF-WAY,
LOCATED AT THE BIRCHWOOD
CONDOMINIUM COMPLEX, 27 CROWS
NEST LANE, DANBURY, CONNECTICUT

PETITION NO. 1325

NOVEMBER 16, 2017

**BIRCHWOOD CONDOMINIUM ASSOCIATION RESPONSES TO
CONNECTICUT SITING COUNCIL INTERROGATORIES**

Birchwood Condominium Association (the "Association") submits the following responses to the Interrogatories dated October 27, 2017, propounded by the Connecticut Siting Council ("CSC") in connection with the above-captioned Petition.

CSC QUESTION 1:

When was the parking lot constructed?

RESPONSE TO CSC QUESTION 1:

The parking lot adjacent to the site of the proposed Project was built in or around when the Association was declared in the latter half of the 1980's. The construction of the parking lot occurred at the same time as construction of the other improvements adjacent to the parking lot, including the swimming pool and tennis courts.

CSC QUESTION 2:

Is the parking lot associated with resident parking for a particular building or is it associated with overflow?

RESPONSE TO QUESTION CSC 2:

During the warmer months, this parking lot is used extensively for parking for residents using the pool, tennis courts and surrounding green areas for recreational activities. The parking lot is also used for overflow parking for residents and visitors of Building 2.

CSC QUESTION 3:

Why is the parking lot chained off during the winter?

RESPONSE TO CSC QUESTION 3:

When the Association receives heavy amounts of snow, the Association is required to undertake efforts to remove snow from the common areas of the Association, including parking lots. To avoid the increased expense of using a loader and dump truck to remove snow, the Association determined that it would be more feasible and cost-effective to use snow plows to store the snow in the parking lot adjacent to the proposed Project site.

Two wooden posts, with one connected to a chain and a sign that states "DO NOT ENTER," are located along the sides of the entrance to the parking lot year-round. (See Affidavit of Lauren Zane dated October 12, 2017, Pictures 8 & 9). During heavy winters, the Association has chained off the entrance to the parking lot so that the lot could be used for storage of snow that was removed from the Association's common areas. This allows the Association to reduce snow removal expenses while keeping the rest of the Association's parking lots available for parking.

Eversource has never objected to this use of the parking lot during the winter.

CSC QUESTION 4:

Where does the school bus pick up/drop off the children - on the road near the entrance to condominiums or within the parking lot?

RESPONSE TO CSC QUESTION 4:

The school bus picks up the children on the road near the entrance to the parking lot. (See Petition, Attachment 7, Photo 5). When it is not being used for storage of snow, the parents of the younger children park in the parking lot when waiting with their children for the bus to arrive.

The school bus drops off children in the same location.

CSC QUESTION 5:

What is the bus stop schedule during the summer?

RESPONSE TO CSC QUESTION 5:

Generally, children continue to use the area as a bus stop during the summer for school and camp activities. However, the Association does not know the detailed summer schedule of the school buses. It contacted the bus company, Student Transportation of America, and was informed that bus stop schedule for next summer is not available at this time but buses will be provided for activities this coming summer.

CSC QUESTION 6:

Would Birchwood Condominium Association prefer the propane tank be buried?

RESPONSE TO CSC QUESTION 6:

If the Association's concerns relating to the impact associated with the proposed Project are ameliorated, the Association would prefer the propane tank be buried rather than above-ground as proposed in the Petition. Subject to a review of the plans associated with such a revised project, burying the tank underground may address some of the Association's security and safety concerns related to people illegally accessing Association facilities and causing damage, including vandalism.

The Association has been working with the police to deal with these security and safety issues. Therefore, the Association urges Eversource and the Siting Council to take those security and safety issues into account in this proceeding.

RESPONSE TO CSC QUESTION 6 (continued):

Finally, in the event the propane tank cannot be buried, if this Project is approved, the Association urges Eversource to explore the use of a diesel option.

CSC QUESTION 7:

What is Birchwood Condominium Association's preference for Eversource's antenna and base equipment location?

RESPONSE TO CSC QUESTION 7:

The Association prefers that the equipment be located on an undeveloped piece of land on Crow's Nest Lane directly across from the main entrance to the Association's complex, which land is believed to be owned by Woodland Hills Condominium Association and lies on the outer perimeter of that association's property.

If the undeveloped land is not a feasible or possible location, the Association would consider discussing alternate options on its own property that are less intrusive and have less adverse impact, subject to review of any revised plans relocating the equipment elsewhere on its property.

Respectfully Submitted,
BIRCHWOOD CONDOMINIUM ASSOCIATION

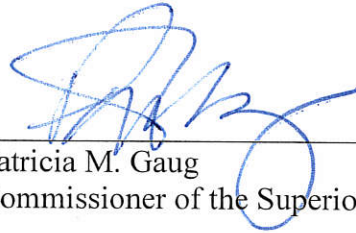
By:  _____

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CERTIFICATION

I hereby certify that on November 16, 2017, that a copy of foregoing was delivered by electronic mail and regular mail, postage prepaid, in accordance with § 16-50j-12 of the Regulations of State Agencies, to all parties and intervenors of record, as follows:

Kathleen Shanley
Manager – Transmission Siting
Eversource Energy
56 Prospect Street
Hartford, CT 06103



Patricia M. Gaug
Commissioner of the Superior Court