

**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

**FIRST SET OF INTERROGATORIES OF
BIRCHWOOD CONDOMINIUM ASSOCIATION**

Birchwood Condominium Association (the "Association") directs the following interrogatories to Eversource:

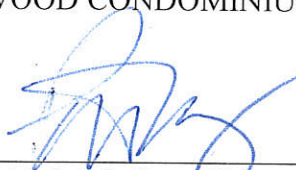
1. Reference Petition, Page 9, in which it is stated that "Eversource has agreed to limit work hours as not to interfere with school bus pick up schedules during the school year." Identify and provide a copy of any such agreement, if any. In addition, identify the specific work hours that Eversource has agreed to follow during construction, and provide the drop-off and pickup bus schedules that Eversource has agreed its construction will not interfere with.
2. Identify all steps Eversource will take during construction to ensure the safety of children using the area as a bus stop, and traversing the Association's property to access Shelter Rock Elementary School.
3. Identify all steps Eversource will take during construction to ensure the safety of people traversing the Association's property.
4. Reference Petition, Page 16, section F ("Schedule"). If Eversource has revised its schedule for construction of the Project, please submit the revised schedule.
5. Identify all trees that would be removed if the Project is approved.

6. Identify all laws, codes, regulations or other standards that relate to the security and/or safety of placing the above-ground 500-gallon propane tank and generator in an uncovered equipment compound as proposed in the Petition.
7. With respect to the 500-gallon propane tank and generator, identify all safety measures Eversource will take to protect the safety of: i) Association residents living in any proximity to the 500-gallon propane tank; ii) families and children who use nearby areas for recreation; and iii) people who use the Association's pool and tennis courts.
8. Identify all measures Eversource intends to take to prevent external objects from interfering with the propane tank and generator within the equipment compound.
9. Identify any investigation undertaken by Eversource to determine the impact of the Project on the issue of potential trespassers illegally accessing Association facilities and causing damage, including vandalism.
10. Identify any additional steps – not currently in place – that Eversource believes the Association is required to take to ensure the safety and security of the equipment compound after construction. Identify the estimated cost of those additional steps.
11. Identify any and all measures Eversource will take to address trespassers' ability to use the equipment compound to conceal illegal or improper activity on the Association's property.
12. Reference Petition, Page 16, in which it is stated that, "While anti-graffiti paints are on the market, there does not appear to be one that would accomplish the intended goal on vinyl fencing; therefore, Eversource will not use such paints unless a suitable product is made available." Identify the steps taken by Eversource to identify an anti-graffiti paint product suitable for the Project. If Eversource contends that no such products are suitable, identify the products and specify the reason for their unsuitability. If no such products are available, identify all steps Eversource will take to prevent graffiti on the proposed equipment compound.
13. Produce photo-simulations comparing the before and after views of the proposed equipment compound from the locations identified as "A" through "___" on the attached diagram entitled "Birchwood Interrogatory 11 – Request for Photographic Simulations."
14. Identify all measures Eversource will take to mitigate the impact of the Project on the landscape and scenic views from: i) the parking lot near the proposed Project site, ii) the grassy area near the proposed Project site, and iii) travelers along Crows Nest Lane.
15. Reference Petition, Page 8, in which it is stated that the construction "would not involve a significant alteration in the physical or environmental characteristics of the Site or the surrounding area." Identify all documents and expert opinions supporting that statement in the Petition.

16. Reference Petition, Page 9, in which it is stated that, “Subsequent to completion of construction, the Replacement Facility would not generate any additional traffic to the area other than routine, periodic maintenance visits.” Identify any review or investigation made by Eversource before making this statement, including all traffic studies. In addition, identify the frequency and length of the “routine, periodic maintenance visits.”
17. Reference Petition, Page 14, in which it is stated that, “the installation of the equipment compound, fence, shelter, emergency generator and propane tank would require minimal Site work, including shallow excavations and trenching as well as the proposed plantings of arborvitae to provide an additional natural screen from nearby Complex recreational facilities.” Identify the additional landscaping measures Eversource contends will be required of the Association in order to maintain the area around the site and explain how that is different from the Association’s current obligations. Identify the costs of all such landscaping measures.
18. Identify all communications from Eversource to the Association in which Eversource has ever objected to: i) the use of the parking lot adjacent to the Project site for storage of snow during the winter, or ii) the use of a chain to cordon off the parking lot for that purpose.
19. Explain the steps Eversource will take to mitigate the impact of the Project on access to the Association’s parking areas and snow removal efforts, both during and after construction.
20. Explain the impact of the Project, both during and after construction, on pedestrian access to the Association’s pool, tennis courts and open grassy area adjacent to the parking lot. Identify all steps to be taken by Eversource to mitigate that impact.
21. Provide maps of the area in and around the Project site depicting the locations that will be closed off to vehicular or pedestrian traffic both during construction and for maintenance after construction.
22. Identify all communications between Eversource and any representative of the Association concerning the Project.
23. Identify all communications between Eversource and the City of Danbury concerning the Project.
24. Identify all communications between Eversource and any member of the Danbury Board of Education concerning the Project.
25. Identify all communications between Eversource and any representative of the Danbury Police Department concerning the Project.
26. State whether Eversource considered alternative locations for the proposed Project. In addition, identify and provide copies of all research Eversource conducted into alternative locations.

Respectfully Submitted,
BIRCHWOOD CONDOMINIUM ASSOCIATION

By: _____

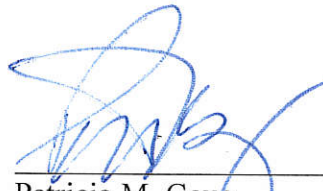


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CERTIFICATION

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