



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

www.ct.gov/csc

VIA ELECTRONIC MAIL

June 22, 2017

Amy S. Hicks
Analyst – Public Outreach & Permitting
The United Illuminating Company
180 Marsh Hill Road
M/S AD-1C
Orange, CT 06477

RE: **PETITION NO. 1304** – The United Illuminating Company petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed Stratford 115-kV Transmission Line Upgrade Project consisting of the removal and relocation of northern and southern sections of existing 115-kilovolt (kV) transmission line structures from Connecticut Department of Transportation (ConnDOT) catenary structures within the Metro-North Railroad corridor to new 115-kV transmission line structures to be located within the existing ConnDOT right of way and upgrade of 115-kV conductors extending approximately 1.9 miles from UI's Baird Substation to just west of the Housatonic River in Stratford, Connecticut, and related substation improvements.

Dear Ms. Hicks:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 7, 2017. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie A. Bachman
Executive Director

MB/MP

c: James R. Morrissey, Attorney, UIL Holdings Corporation
Council Members

Petition No. 1304
Interrogatories
June 22, 2017
Set One

Abutters

1. Have any comments been received by UI from abutting property owners regarding the proposed project? Provide the addresses of such abutters and the nature of the comments and/or inquiries.

Safety

2. The proposed monopoles will raise the conductors higher than their existing height on the bonnets. Explain why. For example, is this due to more recent National Electrical Safety Code (or other) clearance requirements as opposed to when the bonnets were originally installed?
3. On page 3 of the Petition, UI notes that, "The Project will result in safer conditions for UI maintenance crews..." Is this because the new structures would be taller (with greater clearances) and would also result in the transmission lines being farther (e.g. north and south) from the active railroad tracks?
4. On page 17 of the Petition, UI notes that, "...[S]ince the proposed structures are below 200 feet in height, no Federal Aviation Administration (FAA) mandated navigational strobe lights or any special painting of the proposed structures will be required." However, is it correct to say that the Sikorsky Memorial Airport is less than three nautical miles from the proposed project? Would that distance impact the need for FAA marking or lighting of the proposed permanent structures or necessitate notice to FAA? Would UI need to provide notice to FAA for any temporary construction structures such as cranes? If the project is approved, could copies of any applicable notices to FAA be submitted to the Council?

Construction Specifications

5. Reference the drawings included in Attachment A of the Petition. Are the areas identified in beige as "construction area" that connect the work pads essentially "new access?"
6. On page 18 of the Petition, UI notes that, "Through the construction of access roads and work pads UI intends to trim and remove vegetation, install E&S controls, flatten un-level ground and excavate areas where and when necessary." Would UI need to improve such new access with gravel? Would existing access (identified in green) need to be improved with gravel?
7. All proposed structure foundations in the Petition appear to be drilled pier design. Is that correct? To what depth below grade would the foundations extend?
8. What would be the anticipated useful life span of the 1590-kcmil conductors? Should UI investigate a larger gauge (i.e. size) conductor to obtain a longer useable life, and would such additional cost be justified?

9. On pages 7 and 8 of the Petition, UI proposes to change the gauge of the conductors from 1272-kcmil to 1590-kcmil. What is the approximate weight load on the current catenary bonnets with the current gauge? If the new conductors were installed on the current bonnets, what would be the new weight load? How much weight can the current bonnets support?

Visual Resources/Aesthetics

10. Would all of the proposed structures be galvanized steel, consistent with the Petition No. 1138 project?
11. On page 12 of the Petition, UI notes that, "No permanent noise increase will result upon completion of the Project." Thus, would the project continue to comply with DEEP Noise Control Standards, post-construction?

Coastal Resources

12. Based on page 1 and Appendix B of the Wetland Delineation and Vernal Pool Identification Report (Wetland Report), it appears that virtually all of the proposed project area, except for the easternmost section, is located outside the Coastal Area Management Zone. Thus, would the proposed project adversely impact the Connecticut Coastal Boundary as defined in Section 22a-94 of Connecticut General Statutes?

Cultural Resources

13. On page 17 of the Petition, UI notes that (at the time of filing the Petition) it had not yet received a response from the State Historic Preservation Office (SHPO). To date, has UI received a response from SHPO? If yes, provide a copy of such response.

Wildlife

14. Would the proposed project adversely impact migratory birds identified in the U.S. Fish & Wildlife Service Report (USFWS Report) in Appendix C of the Petition?
15. Page 1 of the Wetland Report notes that, "Potential habitat for the northern long-eared bat (NLEB) exists north of the railroad tracks and south of Knowlton Street where forest is present." Page 2 of the USFWS Report notes that there is no critical habitat for the NLEB in the proposed project area. However, given the vegetative clearing on the north side of the railroad tracks, would the proposed project adversely impact the NLEB? If yes, how might UI mitigate such impacts?
16. Areas suspected of being potential vernal pools were initially investigated in June 2016 (a period of moderate drought) and reinvestigated on April 24, 2017. Earlier this year, we experienced swings in precipitation and temperatures. With the swings that we experienced, was the April date appropriate for reinvestigation?

Wetland and Water Resources

17. In Appendix B of the Wetland Report, the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps are provided. Are any of the proposed structures to be located in the 100-year or 500-year flood zones? If yes, how many of each? If yes, is it necessary to locate in flood zones, e.g. due to conductor span limits? Also if yes, would such structures be designed to withstand such inundation?

18. Page 13 of the Petition note that UI would, "...cut approximately 20,150 square feet of wetlands type vegetation...to grade." How would UI facilitate the restoration or regrowth of wetland vegetation? For example, would such areas be seeded?

Soils

19. Would there be any excavation or soil disturbance within the Raymark Industries EPA Contaminated Area as identified by BL Companies in Appendix H of the Petition, e.g. in the vicinity of Structure Nos. 852N through 854N? Has CTDEEP and/or EPA provided guidance on how to manage "Raymark" waste soils? Is groundwater expected to be contacted in these areas? If so, how would the contaminated groundwater be handled?
20. On Page 7 of the Soil & Groundwater Management Plan (SGMP), Section 3.2.1, UI notes that, "Should the (natural soil) material not be able to be re-used onsite, the material will need to be transported to an approved aggregate facility." Would such materials be put back in or adjacent to the excavation areas from which they were obtained?

Construction Schedule

21. How does the timing of this transmission upgrade project fit in with the construction of the approved replacement Baird Substation (Council Docket No. 465)? Is it correct to say that the replacement Baird Substation commenced construction on or about the week of May 8, 2017? What is the most current estimated in-service date of the replacement Baird Substation?
22. In terms of the construction sequence, does UI plan to construct the new lines on monopoles first, then change over to the use of the new lines, and then remove the old lines? Explain.
23. Provide the proposed work hours for the project, e.g. Monday through Saturday, 7:00 a.m. to 5:00 p.m. Is it possible that some work might be necessary on Sundays due to inclement weather, outage schedules or unforeseen delays that may impact the critical path of the schedule?