



**VIA ELECTRONIC MAIL AND FEDEX**

December 7, 2018

Melanie Bachman, Esq.  
Executive Director/Staff Attorney  
The Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

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 Stratford 115-kV Transmission Line Upgrade Project consisting of the removal and relocation of the northern and southern sections of the existing 115-kV transmission line structures from Connecticut Department of Transportation (ConnDOT) catenary structures within the Metro-North Railroad corridor to new 115-kV transmission structures to be located within the existing ConnDOT right of way and upgrade of 115kV 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 – **Request for Modification**

Dear Melanie Bachman,

The United Illuminating Company ("UI") submits this Request for Modification pursuant to Order No. 1 of the Connecticut Siting Council's ("Council") July 24, 2017 decision in the above captioned Petition.

The location of structure 836N and structure 837N (collectively, the "Structures") is represented on pages 20-21 in Attachment A to the Petition. The Town of Stratford has constructed and installed a new drainage culvert adjacent to the Metro-North Railroad corridor, which impacts the proposed location of the Structures. To accommodate the drainage culvert structure 836N will be shifted northeast by approximately 78' and structure 837N will be shifted northeast approximately 82'. UI is providing a new Attachment A for the Council's convenience.

To accommodate the pole shifts, certain access roads were adjusted and the data sheets updated to present temporary wetland impacts, and the cutting of wetland type vegetation as presented in Table 1 on page 14 of the Petition. The updated values demonstrate less temporary impacts and clearing, and are presented in the table below.

Project Activity	Original (sq. ft.)			Updated (sq. ft.)		
	Temporary Impact	Permanent Impact	Vegetation Clearing	Temporary Impact	Permanent Impact	Vegetation Clearing
Construction Pads and Access Roads	7,400	0	20,150	6,800	0	13,700
Structures	0	0	0			

In addition, certain access routes have been improved to reflect more efficient, safer and lower impact paths. Specifically:

- Access off of Route 1 will utilize existing paved areas to structures 849S – 856S and have been improved for safer access. This is represented on page 12 of updated Attachment A.
- Additional access off of West Broad Street utilizing existing paved areas has been added to improve safe access to structures 827N – 834N. This is represented on page 22 of updated Attachment A.
- Additional access eastbound off of the work pad for structure 842N has been added to improve safe access to structures 843N – 846N. This is represented on page 24 of updated Attachment A.

In addition, this request is intended to alert the Council to the possibility of a future modification request associated with access road alignment adjacent to structure 859N. U.S. Environmental Protection Agency (“U.S. EPA”) and the U.S. Army Corp of Engineers (“U.S. ACE”) may be working on OU-4 for the Raymark Superfund site coterminous with UI. On November 16, 2018, representatives from UI, the Town of Stratford, the Connecticut Department of Energy & Environmental Protection (“CT DEEP”), U.S. EPA, and the U.S. ACE met to discuss this potential. UI may submit an additional request that if approved would enable more efficient access and a lower impact for all parties.

Please do not hesitate to contact me with any questions or concerns regarding this request at (203) 499-2996. Thank you for your consideration.

Sincerely,

*Nicholas J. Cicale*

Nicholas J. Cicale  
 Attorney  
 UIL Holdings Corporation  
 As Agent for The United Illuminating Company

Enclosures

cc: Amy Hicks, Outreach Specialist, The United Illuminating Company