



October 19, 2018

Chairman Robert Stein
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Dear Chairman Stein:

Enclosed please find an original plus fifteen (15) copies of The United Illuminating Company's ("UI") petition to the Connecticut Siting Council requesting a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is necessary for the proposed modifications to UI's Seaview Tap Substation (the "Project"). The Project forms a grounding initiative that consists of burying 4/0 copper grounding conductor and ground rods outside the Seaview fence line, and replacing 139 linear feet of fence which abuts the fence enclosing Seaview, 60 linear feet of such will consist of isolation fence sections. This Project is necessary to protect UI's substation equipment, the electrical system, and most importantly, the public by eliminating the risk of hazardous step and touch potentials in the vicinity of Seaview that exist during certain electrical ground fault conditions at Seaview.

Pursuant to the Regulations of Connecticut State Agencies § 16-50j-40, all required parties, including the appropriate municipal and governmental agencies and officials and all abutting property owners, are being notified contemporaneously with this submittal.

Should you have any questions, please contact me at 203-499-2586.

A check in the amount of \$625 for the required filing fee is also attached.

Very truly yours,

Outreach Specialist
The United Illuminating Company

Enclosures

CONNECTICUT SITING COUNCIL

**PETITION OF THE UNITED
ILLUMINATING COMPANY
FOR A DECLARATORY RULING
THAT NO CERTIFICATE OF
ENVIRONMENTAL
COMPATIBILITY AND PUBLIC
NEED IS REQUIRED FOR
PROPOSED MODIFICATIONS TO
THE SEAVIEW TAP SUBSTATION**

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PETITION NO. _____

October 19, 2018

PETITION FOR DECLARATORY RULING

This petition is filed pursuant to Section 16-50k of the Connecticut General Statutes and Section 16-50j-39 of the Regulations of Connecticut State Agencies requesting a determination from the Connecticut Siting Council (the “Council”) that no Certificate of Environmental Compatibility and Public Need (“Certificate”) is necessary for The United Illuminating Company’s (“UI”) proposed modifications (the “Project”) to the Seaview Tap Substation (“Seaview”), located at 1677 Seaview Avenue in Bridgeport, Connecticut (the “Site”).

The Project forms a grounding initiative that consists of burying 4/0 copper grounding conductor and ground rods outside the Seaview fence line, and replacing 139 linear feet of fence which abuts the fence enclosing Seaview, 60 linear feet of such will consist of isolation fence sections. This Project is necessary to protect UI’s substation equipment, the electrical system, and most importantly, the public by eliminating the risk of hazardous step and touch potentials¹ in the vicinity of Seaview that exist during certain electrical ground fault conditions at Seaview.

¹ Touch potential is the potential difference between the ground potential rise and the surface potential at the point where a person is standing while at the same time having a hand in contact with a grounded structure. Step potential is the difference in surface potential experienced by a person bridging a distance of one meter with his or her feet without contacting any grounded object.

As the Project will not have a substantial adverse environmental effect, UI respectfully requests the Council determine that the Project does not require a Certificate.

2. PETITIONER

UI is an electric utility company organized and operating under the laws of the State of Connecticut, with its principal place of business in Orange, Connecticut. UI is a wholly-owned subsidiary of UIL Holdings Corporation and a wholly-owned indirect subsidiary of Avangrid, Inc., and is engaged in the purchase, transmission, distribution, and sale of electricity for residential, commercial, and industrial customers in a service area of approximately 335 square miles in the southwestern part of Connecticut. UI will lead the proposed construction activities.

Please address all correspondence and/or communications regarding this petition to Petitioner's counsel:

Nicholas J. Cicale
Attorney
UIL Holdings Corporation
180 Marsh Hill Road
Orange, CT 06477
203.499.2996
nicholas.cicale@uinet.com

Bruce L. McDermott
Murtha Cullina, LLP
265 Church Street
New Haven, CT 06510
203.772.7787
bmcdermott@murthalaw.com

Please also provide a copy of all such correspondence and/or communications to UI's

Project Manager:

S. MeeNa Cullen-Corson
The United Illuminating Company
180 Marsh Hill Road
Orange, CT 06477
203.926.4772
sara.cullen-corson@uinet.com

1. PURPOSE OF THE PROJECT

1.1 AN OVERVIEW OF SUBSTATION GROUNDING

According to the Institute of Electrical and Electronic Engineers, the safe grounding of substations is critical to (i) provide a means to direct electrical currents from equipment into the earth under both normal and fault conditions without exceeding any operational limits or adversely affecting electrical service; and (ii) prevent the exposure of persons in the vicinity of the substation to the dangers associated with critical electric shock.² Based on a recent engineering study completed by UI, changes in the transmission system topography, and the evolution of industry standards surrounding substation grounding, UI recognizes the need to undertake this Project.

1.2 PROPERTY DESCRIPTION

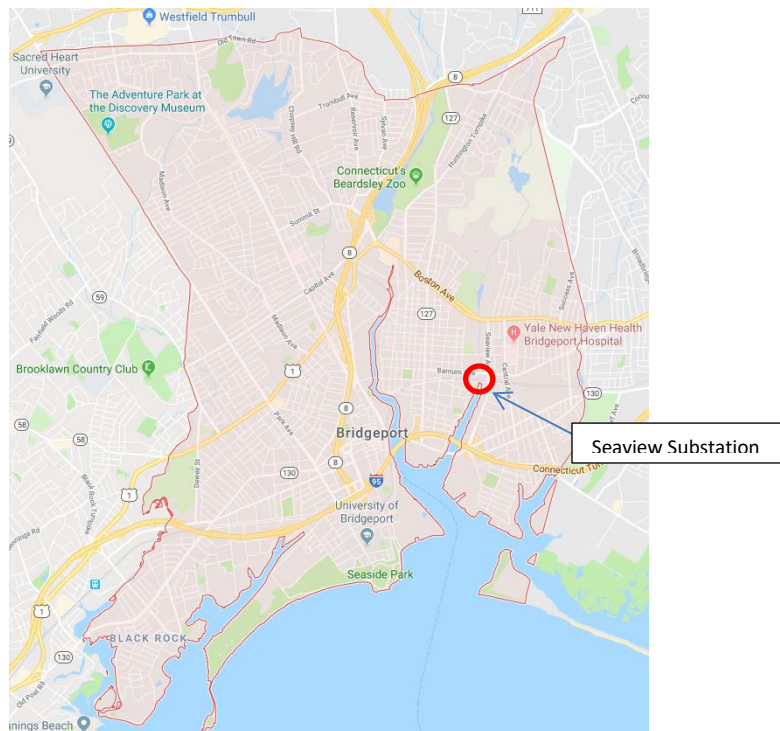
The Site is located within the City of Bridgeport. It is bounded to the north by Barnum Avenue, to the west by land owned by Remgrit Reality, Inc., to the south by Crescent Avenue and the Metro-North Railroad, and to the east by property owned by General Electric Company (GE). The site is also adjacent (to the east) to the creek running from Stillman Pond to the north and Yellow Mill Channel to the south.

UI constructed Seaview in the 1960s and has operated it continuously since then. The Site and its immediate surroundings are heavily industrialized and for that reason, in addition to the very limited scope of the Project, as discussed in greater detail below, the Project will not have a substantial adverse environmental impact. Additionally, UI will mitigate any potential construction related impact through careful planning and diligent oversight.

² Institute of Electrical and Electronic Engineers, IEEE Guide for Safety in AC Substation Grounding, January 30, 2000, at 8.

Although the Seaview Site is wholly owned by UI, it will install portions of the Project on adjacent property owned by GE (as depicted, in part, in Drawing No. 24203-400, contained within Attachment II).³ An engineering study performed by UI's contractor has determined that there are additional grounding installations required outside of Seaview's fence line to control the touch and step potentials in these areas per the IEEE standard 80 guidelines. UI has entered into an agreement with GE to undertake this Project and will work closely with both GE and the City of Bridgeport to minimize any potential disturbances during Project construction.

Figure 1 – Project Location



Google Maps – Accessed October 3, 2018 (Map Data 2018)

³ The Petitioner will also install an isolation fence on GE's property, as Depicted in Attachment III – *Site Pictures* at 1.

Figure 2 – Site Location



Google Maps – Accessed October 3, 2018 (Map Data 2018)

1.3 PROJECT DESCRIPTION

To meet current industry standards at the Site, UI will install grounding conductor, crushed rock, and an isolation fence.⁴ Each of the grounding elements discussed in greater detail below are depicted in Attachment II, *Construction Drawings*.

- i. Grounding Conductor: UI will install approximately 750 feet of 4/0 copper grounding conductor outside of Seaview's eastern fence line. During installation, UI will utilize standard small scale trenching techniques to install the copper grounding conductor below grade.

Figure 3 – Example of Conductor Trenching



Pentair – Application of ERICO CU-Bond Round Conductor

- ii. Isolation Fence: Two sections of linear fence, which currently abut the Site, and surround the neighboring property, will be replaced with fence isolation sections. UI will install 139 linear feet of new fence in the same location as the existing

⁴ See IEEE Standard 80, 2000.

fence. However, the new fence sections will contain two thirty foot isolation panels on the fence posts and UI will isolate the fence posts throughout the section, capping them with polyvinyl chloride (“PVC”) sleeves in the foundation.

Figure 4 – Location of Isolation Fence





Figure 5: Location of isolation fence section 1



Figure 6: Location of isolation fence section 2

2. POTENTIAL ENVIRONMENTAL EFFECTS

As with all projects proposed by UI, the overarching goal is to design a project that meets or exceeds operational criteria in the most environmentally compatible way possible.

- If contaminated soil is discovered during excavation, UI will categorize and dispose of such contaminated soil according to all potentially applicable statutes and regulations.
- There are no Connecticut listed species within the Project footprint. Further, the Project will not destroy or materially alter any habitat suitable for wildlife.
- There will be no activities in areas of regulated wetlands.
 - The Site is outside the Federal Emergency Management Agency's (FEMA) flagged floodway zone (AE)⁵
 - The wetland boundary was confirmed with wetlands flagging. The area will be checked for flagging and reflagged as needed prior to construction.
 - UI does not anticipate that civil construction will reach the current depth of the groundwater.
 - UI does not anticipate the erosion of existing features during construction activities. However, to mitigate any potential erosion, UI will utilize sediment controls, including but not limited to: silt fences, hay bales, compost filter socks, and anti-tracking pads consistent with the State of Connecticut Guidelines for Soil Erosion and Sediment Control, (2002).
- The Project will not interfere with radio or television signals.

⁵ See <https://www.fema.gov/zone-ae-and-a1-30>, last visited, Oct. 2, 2018 at 2:26 p.m. (Areas subject to inundation by the 1-percent-annual-chance of a flood event).

- The Project will have no impact on electric and magnetic fields because the modifications will in no way modify or increase the voltage of the electricity flowing through Seaview.
- The Project will comply with state and local noise ordinances, and construction activities will take place, except in limited exceptional or emergency circumstances, during normal working hours (7 AM to 4 PM) Monday through Friday.
- The Project will not impact the scenic values of the Site in any way as the vast majority of the Project will take place below grade or at grade. The replacement isolation fence will appear nearly identical but nicely improved (2 inch chain link) compared to the existing fence.
- Project construction will occur at the Site of an existing substation and thus, will not impact any historic or cultural values.

3. PUBLIC HEALTH AND SAFETY

Overall, the Project will meet or exceed all health and safety requirements. Each employee working onsite will:

- Receive required general and site-specific health and safety training;
- Comply with all health and safety controls as directed by local, state, and federal requirements;
- Understand and employ the site health and safety plan;
- Know the location of local emergency care facilities, travel times, ingress and egress routes; and
- Immediately report all unsafe conditions to the construction manager.

During construction, oversized vehicles and heavy equipment must have access to the Site during normal working hours. Such vehicles will access Seaview via a paved access road or by way of the State of Connecticut's parking area when work is required beyond the Seaview fence line. Limited staging is required and UI will store Project equipment and materials within the Seaview fence line.

4. CONCLUSION

Based on the foregoing, UI submits that the proposed Project will not have a substantial adverse environmental impact and does not warrant submission of a full Certificate Application to the Council. Accordingly, UI respectfully requests that the Council declare that the proposed Project described herein will not have a substantial adverse environmental effect and, therefore, that no Certificate of Environmental Compatibility and Public Need is required.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

By: *Bruce L. McDermott*

Bruce L. McDermott
Murtha Cullina, LLP
265 Church Street
New Haven, CT 06510

By: *Nicholas J. Cicale*

Nicholas J. Cicale
Attorney
UIL Holdings Corporation
180 Marsh Hill Road
Orange, CT 06477
Phone: 203-499-2996
E-mail: nicholas.cicale@uinet.com

CERTIFICATION

This is to certify that on this 19th day of October, 2018, an original and fifteen (15) copies of the foregoing was delivered by hand to the Connecticut Siting Council, 10 Franklin Square, New Britain, CT, and prior to such, notice of this filing was sent to all required entities, in accordance with § 16-50j-40 of the Regulations of Connecticut State Agencies.

By: _____

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott", is written over a horizontal line.

Bruce L. McDermott
Murtha Cullina, LLP
265 Church Street
New Haven, CT 06510

NAME	ADDRESS
City of Bridgeport	45 Lyon Terrace Bridgeport CT 06604
General Electric Company C/O PWC Property Tax Group	PO Box 4900 Scottsdale, AZ 85261-4900
Lacey Manufacturing Holding Company LLC	1146 Barnum Avenue Bridgeport, CT 06610
State of CT Office of Rails	50 Union Avenue New Haven, CT 06510

OFFICIAL/AGENCY	NAME/ADDRESS
City of New Haven Chief Elected Official	Toni N. Harp Mayor City of New Haven 165 Church Street New Haven, CT. 06510
City of New Haven Deputy Director of Zoning Staff to Board of Zoning Appeals Staff to Historic District Commission	Thomas Talbot Deputy Director of Zoning 165 Church Street, 5th Floor New Haven, CT 06510
City of New Haven Building Official	James Turcio Building Official 200 Orange St Room 501 New Haven, CT 06510
City of New Haven City Clerk	Jessica Rios City Clerk The City of New Haven 165 Church Street, New Haven, CT 06510
City of New Haven Deputy Economic Development Administrator	Michael Piscitelli Deputy Economic Development Administrator City Plan 165 Church Street, 5th Floor New Haven, CT 06510
City of New Haven Legal Counsel	John Rose Jr., Esq. Corporation Counsel City of New Haven 165 Church St. New Haven, CT
New Haven State Senator	The Honorable Martin M. Looney State Representative, District 11 Legislative Office Building Room 3300 Hartford, CT 06106-1591
New Haven State Representative	The Honorable Juan R. Candelaria Connecticut House District 95 Connecticut House Democrats Legislative Office Building, Room 4013 Hartford, CT 06106-1591
Connecticut Attorney General	George Jepsen, Attorney General Office of the Attorney General 55 Elm Street Hartford, CT 06106
Connecticut Assistant Attorney General	Assistant Attorney General Erik T. Lohr Office of the Attorney General 55 Elm Street Hartford, CT 06106

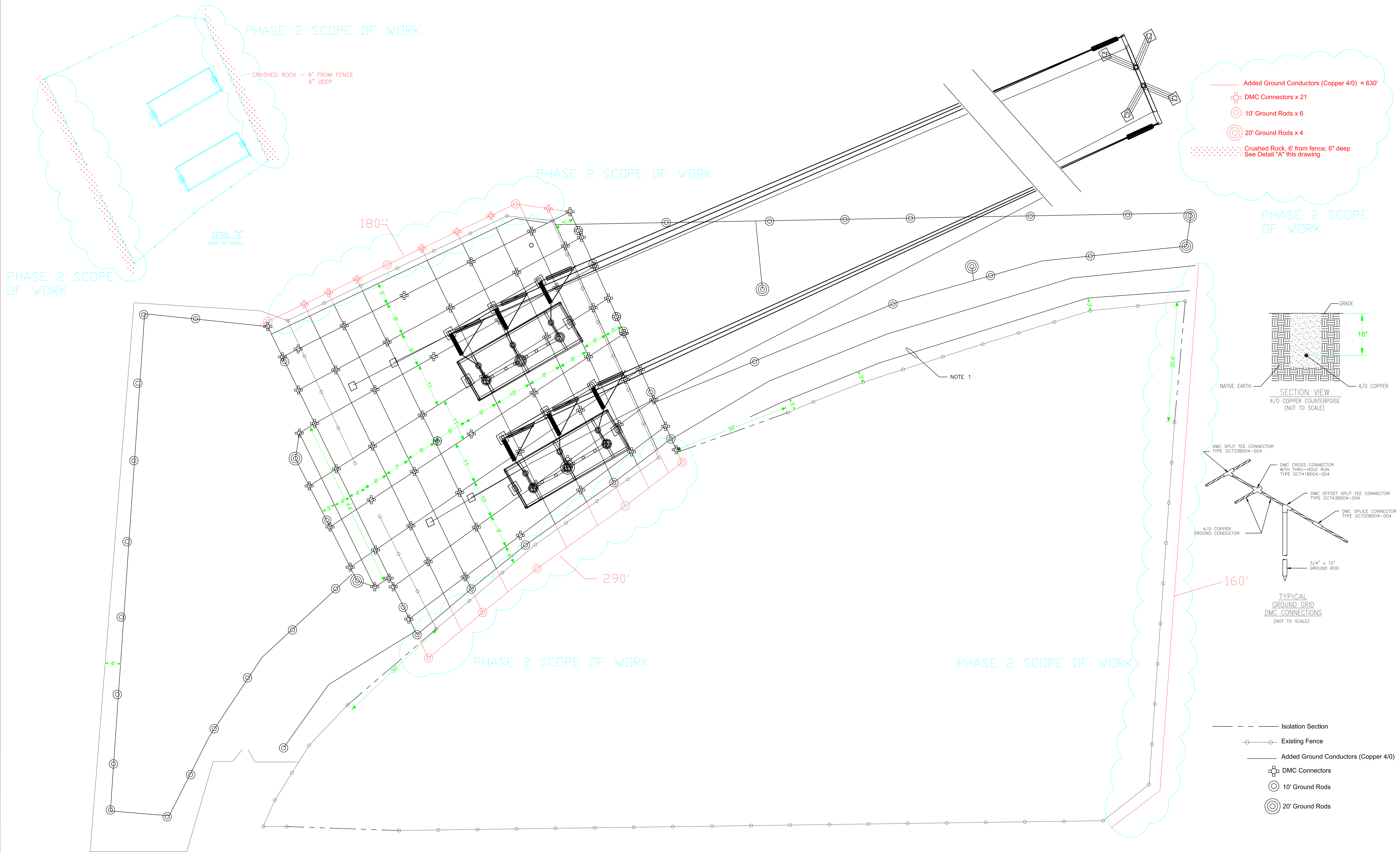
Economic & Community Development Department	Catherine Smith, Commissioner Economic & Community Development Department 450 Columbus Boulevard Hartford, CT 06103
Department of Agriculture	Steven K. Reviczky, Commissioner Department of Agriculture 165 Capitol Avenue Hartford, CT 06106
Office of Consumer Counsel	Elin Swanson Katz, Esq Consumer Counsel. Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051-2605
Department of Energy and Environmental Protection	Robert Klee, Commissioner Department of Energy and Environmental Protection 79 Elm Street Hartford, CT 06106-5127
Public Utilities Regulatory Authority	Katie Scharf Dykes, Chair Public Utilities Regulatory Authority Ten Franklin Square New Britain, CT 06051
Department of Public Health	Dr. Raul Pino, Commissioner Department of Public Health 410 Capitol Ave. Hartford CT, 06134
Council on Environmental Quality	Susan D. Merrow, Chair Connecticut Council on Environmental Quality 79 Elm Street Hartford, CT 06106
Office of Policy and Management	Benjamin Barnes, Secretary Office of Policy and Management 450 Capitol Avenue Hartford, CT 06106
Department of Economic and Community Development	Commissioner Catherine Smith Office of the Commissioner Department of Economic and Community Development 505 Hudson Street Hartford, CT 06106-7106
Department of Transportation	Commissioner James P. Redeker Office of the Commissioner Department of Transportation P.O. Box 317546 2800 Berlin Turnpike Newington, CT 06131-7546

State Historic Preservation Officer of the Connecticut Department of Economic and Community Development, Commission on Culture and Tourism	Mary Dunne State Historic Preservation Officer 450 Columbus Blvd. Suite 5 Hartford, CT 06103
Department of Emergency Services and Public Protection	Commissioner Dora Schriro Office of the Commissioner Department of Emergency Services and Public Protection 1111 Country Club Road Middletown, CT 06457
Connecticut Metropolitan Council of Governments	Matt Fulda Executive Director 1000 Lafayette Blvd Bridgeport, CT 06604
U.S. Fish and Wildlife Service	Supervisor Tom Chapman U.S. Fish & Wildlife Service New England Office 70 Commercial Street Concord, NH 03301-5087
U.S. Army Corps of Engineers	U.S. Army Corps of Engineers New England District, Regulatory Division 696 Virginia Avenue Concord, MA 01742-2751 Attn: Permit Project Manager

Attachments

Attachment A	Site Plans
Attachment B	Abutters Map Abutters List Certified Letter Cards

Attachment A



DOES NOT CONTAIN
CRITICAL ENERGY INFRASTRUCTURE INFORMATION
DATE OF REVIEW 3/2016 BY MCC

No	Date	Revision	By	Chkd.	Engr.	Supv.
2A	10/2018	GROUND GRID ENHANCEMENT PROJECT- PHASE 2 - ADDED SECTION VIEW	VJP	MCC	MCC	--
2	7/2018	GROUND GRID ENHANCEMENT PROJECT- PHASE 2	VJP	MCC	MCC	--
1	1/17/2018	GROUND GRID ENHANCEMENT PROJECT	VJP	MCC	MCC	--



Drawn	VJP	Date	3/28/2016	Scale:	NONE
Chkd.	MCC	Design Engr.	MCC	Design Supv.	RSA

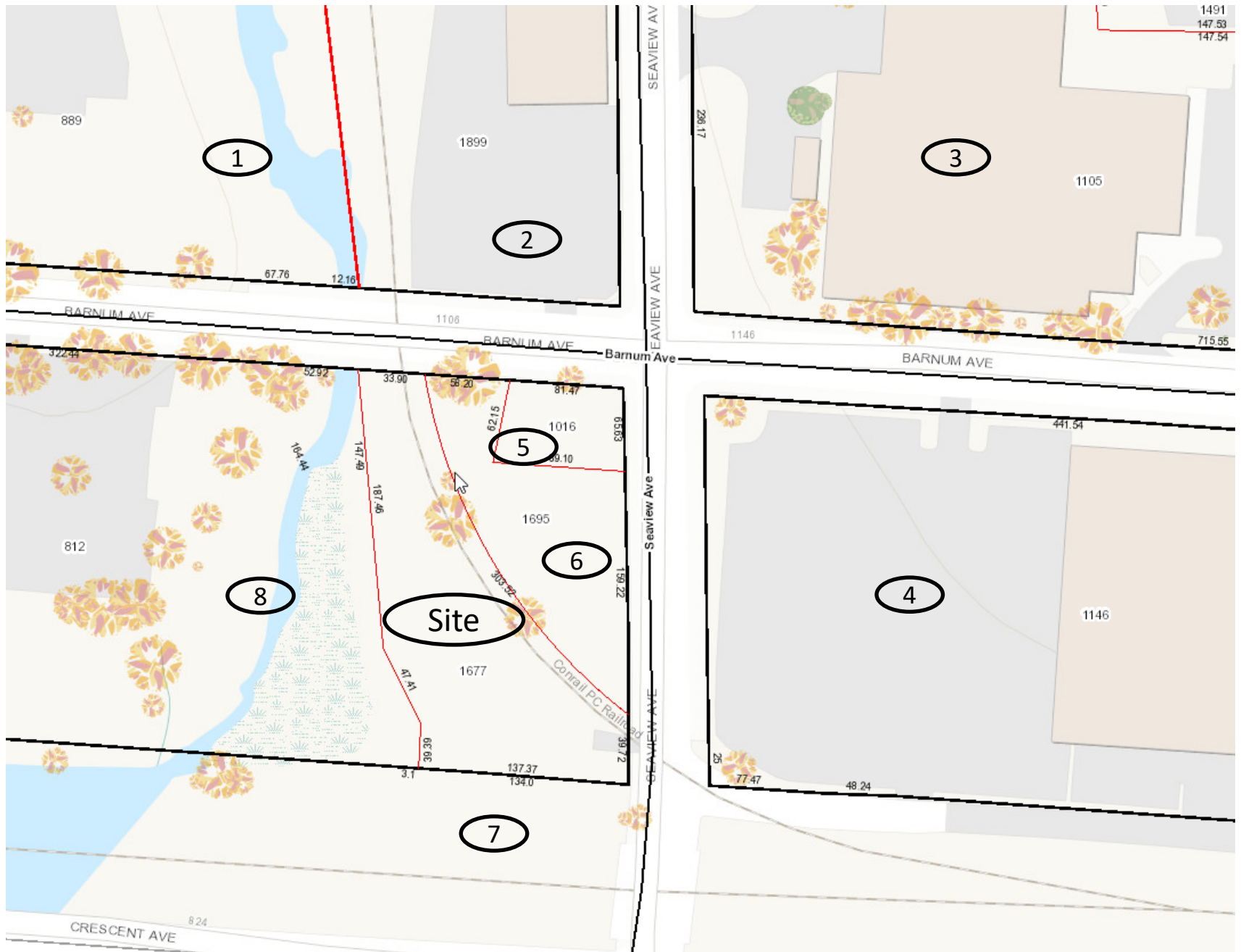
GROUNDING PLAN

SEA VIEW TAP

CAD FILE NAME	SEQUENCE No.	DRAWING NUMBER
	089303	24203-400

Attachment B

Seaview Tap – 1677 Barnum Avenue Bridgeport Adjacent Owners



Seaview Tap - 1677 Barnum Avenue Bridgeport Adjacent Owners

<u>ID</u>	<u>Address</u>	<u>Owner Name</u>	<u>Mailing Address</u>
1	889 Barnum Avenue	City of Bridgeport	45 Lyon Terrace Bridgeport CT 06604
2	1899 Seaview Avenue	General Electric Company C/O PWC Property Tax Group	PO Box 4900 Scottsdale, AZ 85261-4900
3	1105 Barnum Avenue	Lacey Manufacturing Holding Company LLC	1146 Barnum Avenue Bridgeport, CT 06610
4	1146 Barnum Avenue	Lacey Manufacturing Holding Company LLC	1146 Barnum Avenue Bridgeport, CT 06610
5	1016 Barnum Avenue	General Electric Company C/O PWC Property Tax Group	PO Box 4900 Scottsdale, AZ 85261-4900
6	1695 Seaview Avenue	General Electric Company C/O PWC Property Tax Group	PO Box 4900 Scottsdale, AZ 85261-4900
7	Railway ROW	State of CT Office of Rails	50 Union Avenue New Haven, CT 06510
8	812 Barnum Avenue	City of Bridgeport	45 Lyon Terrace Bridgeport CT 06604
Site	1677 Seaview Avenue	The United Illuminating Company ATTN: Annette Potasz	180 Marsh Hill Road Orange, CT 06477

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Bridgeport
45 Lyon Terrace
Bridgeport, CT 06604



9590 9403 0976 5223 8766 31

2. Article Number (Transfer from service label)

7015 0640 0001 0705 9195

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐
- Agent
-
- ☐
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐
- Adult Signature
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- ☐
- Adult Signature Restricted Delivery
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- ☐
- Certified Mail®
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- ☐
- Certified Mail Restricted Delivery
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- ☐
- Collect on Delivery
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- ☐
- Collect on Delivery Restricted Delivery

- ☐
- Priority Mail Express®
-
- ☐
- Registered Mail™
-
- ☐
- Registered Mail Restricted Delivery
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- ☐
- Return Receipt for Merchandise
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- ☐
- Signature Confirmation™
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- ☐
- Signature Confirmation Restricted Delivery

Mail
Restricted Delivery
(over 500)

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

General Electric Company
C/O PWC Property Tax Group
PO Box 4900
Scottsdale, AZ 85261-4900



9590 9403 0976 5223 8766 17

2. Article Number (Transfer from service label)

7015 0640 0001 0705 9171

PS Form 3811, July 2015 PSN 7530-02-000-9053

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- Certified Mail Restricted Delivery
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- Collect on Delivery
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- ☐
- Collect on Delivery Restricted Delivery

- ☐
- Priority Mail Express®
-
- ☐
- Registered Mail™
-
- ☐
- Registered Mail Restricted Delivery
-
- ☐
- Return Receipt for Merchandise
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- ☐
- Signature Confirmation™
-
- ☐
- Signature Confirmation Restricted Delivery

Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lacey Manufacturing Holding
Company LLC
1146 Barnum Avenue
Bridgeport, CT 06610



9590 9403 0976 5223 8766 24

2. Article Number (Transfer from service label)

7015 0640 0001 0705 9188

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- Collect on Delivery
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- Collect on Delivery Restricted Delivery

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- Priority Mail Express®
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- ☐
- Registered Mail™
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- ☐
- Registered Mail Restricted Delivery
-
- ☐
- Return Receipt for Merchandise
-
- ☐
- Signature Confirmation™
-
- ☐
- Signature Confirmation Restricted Delivery

Mail
Restricted Delivery
(over 500)

Domestic Return Receipt

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1. Article Addressed to:

State of CT
Office of Rails
50 Union Avenue
New Haven, CT 06510



9590 9403 0976 5223 8766 48

2. Article Number (Transfer from service label)

7015 0640 0001 0705 9201

PS Form 3811, July 2015 PSN 7530-02-000-9053

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- Addressee

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- Collect on Delivery Restricted Delivery

- ☐
- Priority Mail Express®
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- ☐
- Registered Mail™
-
- ☐
- Registered Mail Restricted Delivery
-
- ☐
- Return Receipt for Merchandise
-
- ☐
- Signature Confirmation™
-
- ☐
- Signature Confirmation Restricted Delivery

all
Mail Restricted Delivery

Domestic Return Receipt