

STATE OF CONNECTICUT

SITING COUNCIL

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| <p>The Connecticut Light & Power Company Application for a Certificate of Environmental Compatibility and Public Need for the Connecticut Portion of the Interstate Reliability Project that traverses the municipalities of Lebanon, Columbia, Coventry, Mansfield, Chaplin, Hampton, Brooklyn, Pomfret, Killingly, Putnam, Thompson, and Windham, which consists of (a) new overhead 345-kV electric transmission lines and associated facilities extending between CL&P's Card Street Substation in the Town of Lebanon, Lake Road Switching Station in the Town of Killingly, and the Connecticut/Rhode Island border in the Town of Thompson; and (b) related additions at CL&P's existing Card Street Substation, Lake Road Switching Station, and Killingly Substation.</p> | <p>Docket No. 424</p> <p>December 6, 2012</p> |
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**COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY
REGARDING THE DRAFT FINDINGS OF FACT DATED NOVEMBER 23, 2012
OF THE CONNECTICUT SITING COUNCIL**

The Connecticut Light and Power Company ("CL&P") files these comments regarding the draft findings of fact issued by the Connecticut Siting Council dated November 23, 2012. Unless otherwise stated, the changes or corrections suggested to a designated Finding of Fact (FOF) are supported by the citations in the November 23, 2002 draft.

A. Substantive Corrections

FOF #8:

Draft Finding: (in relevant part) In June of 2008, CL&P submitted its Municipal Consultation Filing for Interstate, stated it expected to file an application with the Council by the end of the year. Meanwhile, however, ISO-NE began re-analyzing the project and would not support the application under that circumstance.

Comment: The Application reflects that it was CL&P's recognition that ISO-NE would not support siting the project, not ISO-NE's determination, as is implied by FOF #8.

Recommended Change: Meanwhile, however, ISO-NE began re-analyzing the project and *CL&P recognized that ISO-NE would not support any of the projects in siting until it had completed its reassessment.*

FOF #49:

Draft Finding: ISO-NE produces a yearly Regional System Plan (RSP), using it to announce the need for system improvements for reliability, when necessary. If the market does not respond with a viable project to address the reliability need, transmission owners such as CL&P and National Grid are required to construct the improvements. (CL&P 16, p. 4)

Comment: ISO-NE's ability to require transmission owners to construct improvements is subject to transmission owners obtaining required state approvals.

Recommended Change: Add at the end of the second sentence: "*subject to obtaining required state approvals.*"

FOF #74:

Draft Finding: Interstate resolves the criteria violations that could lead to a voltage collapse of the Rhode Island system by providing two new 345-kV lines into the West Farnum Substation. (CL&P 32, p. 41; Tr. 10, pp. 117-118)

Comment: Since this Finding is on the subject of "Needs in the Region and in Connecticut," it should be expanded to reflect the Connecticut-specific benefit of the referenced improvement.

Recommended Change: Interstate resolves the criteria violations that could lead to a voltage collapse of the Rhode Island system, *which could easily propagate into Connecticut*, by providing two new 345-kV lines into the West Farnum Substation. (CL&P 32, p. 41; Tr. 10, pp. 112, 117-118)

FOF #165:

Draft Finding: (in relevant part) Staging and storage sites would be identified during the D&M Plan for the proposed project.

Comment: Staging and storage sites may not be identified at the time of the D&M filing; therefore, CL&P also indicated in its Application that, in the alternative, it would submit such sites separately to the Council for its prior approval.

Recommended Change: Add at the end of the above-referenced sentence: “*or CL&P would submit them separately to the Council for approval prior to use.*”

FOF #224:

Draft Finding: The wetlands located near the proposed route account for approximately 271 acres (19%) of the total 1,397 acres contained within the limits of the existing CL&P ROWs. (CL&P 1, Vol. 1, p. 5-18)

Comment: FOF #224 is only correct for the original proposed route with an 11-acre expansion on federal lands.

Recommended Change: For clarity, modify the sentence: “*Wetlands* account for approximately 271 acres (19%) of the total 1,397 acres contained within the limits of CL&P’s existing ROWs *assuming an 11-acre ROW expansion on federal lands.*”

or

Modify FOF with new acreage numbers for the Minimal ROW Expansion: “*Wetlands* account for approximately 270 acres (19%) of the total 1,391 acres contained within the limits of CL&P’s existing ROWs *assuming the approximately 5-acre Minimal ROW Expansion on federal lands.*” (CL&P 18, p. 15, Table LFM-3 (revised))

FOF #329

Draft Finding: The proposed route would not be adjacent to any resources listed on or eligible for the National Register of Historic Places (NRHP) or the State Register of Historic Places (SRHP). (CL&P 1, Vol. 1, p. 5-87)

Comment: Archaeological investigations and consultations with Native American representatives and the SHPO are ongoing and CL&P’s cultural resource consultants are in the process of assessing whether any of the archaeological sites found along the Project ROWs could be eligible for the NRHP / SRHP. Detailed information regarding cultural resources is not made available to the public in order to protect the resources. (refer to CL&P 18, pp. 25-26, 49).

Recommended Change: CL&P commissioned cultural resource consultants to perform research regarding recorded historic and archaeological resources in the project vicinity; to identify the sensitivity of the project ROWs for finding unrecorded sites; and to conduct field investigations of the project ROWs. Field reconnaissance was coordinated with

representatives of Native American Tribes. CL&P will continue to coordinate with the State Historic Preservation Office (SHPO) and to conduct studies to assess whether any sites found within the ROWs are potentially eligible for the National Register of Historic Places (NRHP) or the State Register of Historic Places (SRHP) (CL&P 1, Vol. 1, pp. 5-85 to 5-92, 6-68-6-71, Vol. 3; CL&P 18, pp. 25-26, 49)

FOF #363:

Draft Finding: The proposed route would be near a school and day care facilities:

- a. Mount Hope Montessori School, Bassetts Bridge Road, Mansfield (within 500 feet)
 - b. Green Dragon Day Care, Bassetts Bridge Road, Mansfield (within 500 feet)
 - c. A residential day care, Hickory Lane, Brooklyn (625 feet)
- (CL&P 1, Vol. 1, p. 5-70; Tr. 7, p. 13)

Comment: The finding is incomplete and includes an error of fact. A third children's day care facility, Jacqueline Ben in Brooklyn, has closed, per the Transcript citation. The Hickory Lane day care is 497 feet from the east-to-west section of right-of-way to its south and 625 feet from the south-to-north section of right-of-way to its east. The closing of yet another children's day care facility is covered by a separate finding, #539.

Recommended Change: The first sentence should read: "The proposed route would be near one private school and one children's day care facility. A second children's day care facility has closed." The parenthetical expression at the end of item c should be changed to "(within 500 feet)". A reference for this last change is CL&P, Vol. 1, page 7B-21. Also, consider expanding this finding to note the closing of the Come Play With Me day care in Mansfield.

FOF #371 & #372:

Draft Finding #371: The system was modeled in 2015, which is the expected last year before the project would be operational, referred to as pre-Interstate. This modeling would include changes to the system previously approved by ISO-NE with in-service dates prior to 2015. The post-Interstate calculations were modeled for 2020, with all lines in service, referred to as post-NEEWS. The 2020 post-NEEWS calculations include the Rhode Island Reliability Project, the Greater Springfield Reliability Project, the Manchester to Meekville Junction Project, Interstate, and a potential future Central Connecticut Reliability Project. (CL&P 1, Vol. 1, pp. 7-11, 7-12; CL&P 15, R. 34)

Draft Finding #372: The calculations are run using: annual peak load (APL), from ISO-NE's 90/10 system peak loads in 2012 and estimated peak loads for 2020 using ISO-NE's projected 90/10 level in 2019 to 2020; peak daily average loads (PDAL) for a 24-hour period at 80% of the hourly peak load; and annual average loads (AAL) at 60% of the annual load factor for the New England Transmission System. (CL&P 1, Vol. 1, pp. 7-12, 7-13)

Comment: The concepts of "calculations" of magnetic fields and "modeling" of the system power flows are mixed up in these findings.

Recommended Change to #371: "...This modeling included changes to the system previously approved by ISO-NE with in-service dates prior to 2015. The post-Interstate calculations of magnetic fields relied on system modeling of power flows for 2020 with all lines in service, referred to as post-NEEWS. The 2020 post-NEEWS model included the Rhode Island Reliability Project, ..."

Recommended Change to #372: "...The power-flow models yielding currents for magnetic field calculations are run using: annual peak load (APL), from ISO-NE's projected 90/10 system peak loads in 2015 and estimated peak loads for 2020 using ISO-NE's projected 90/10 level in 2019 scaled to 2020; peak daily average loads (PDAL) for a 24-hour period, assumed at 80% of the system's hourly peak load; and annual average load (AAL) using a 60% annual load factor for the New England transmission system, each reduced by an amount of forecasted passive demand resources.

FOF #376:

Draft Finding: The estimated capital cost of the Connecticut portion of the proposed project, including substation costs, is \$213.7 million, assuming a base-line design. Per the Council's EMF BMPs CL&P calculated that 4 percent of the total project cost is \$8.5 million. Therefore \$8.5 million is the budget for CL&P to spend on low-cost magnetic field mitigation for the proposed project. (CL&P 1, Vol. 1, Appendix 7B, p. 7B-2)

Comment: The cited cost for the base line design reflects the original 11-acre ROW expansion design in Mansfield Hollow, not the now-proposed 5-acre ROW expansion design.

Recommended Change: Add a new final sentence as follows: "*The estimated capital cost for the base line design would be \$215 million assuming the 5-acre Minimal ROW Expansion Option in Mansfield Hollow.*"

FOF #380, #384, #393, #398 & #402:

Draft Finding #380: [AAL MF and cost calculations – Focus Area A table]

Draft Finding #384: [AAL MF and cost calculations – Focus Area B table]

Draft Finding #393: [AAL MF and cost calculations – Focus Area C table]

Draft Finding #398: [AAL MF and cost calculations – Focus Area D table]

Draft Finding #402: [AAL MF and cost calculations – Focus Area E table]

Comment/Recommended Change: The citations to the Record do not include references to the portion of the Record that provides calculations of pre-Project AAL MF. Therefore, in FOF #380, #384, #393 and #398, the reference to p. 7B-16 should be added to the citation. In #398, the split phase cost of 1-mile section is \$9,686,516. In FOF #384, #393 and #398, the % cost increase column should match the respective % cost increases on p. 7B-18 (B, C) and p. 7B-19 (D). In FOF #402, the reference to p. 7B-22 should be added to the citation, the

pre-Project AAL MF should be 36.1, and the vertical for existing and proposed MF% change – south edge should be +80%.

FOF #391:

Draft Finding: The approximately \$1.8 million incremental cost of the Hawthorne Lane Alternative would include outages of the existing line and erection and use of temporary structures. Due to the existing line layout, the alternative could be accomplished with minor additional steps during the construction process, rather than a complex process with extended line outages. (CL&P 1, Vol. 1, Appendix 7B, p. 7B-28; CL&P 17, p. 30; Tr. 10, p. 132)

Comment: The first sentence can be read to falsely imply that any uneconomic generation costs incurred during outages of the existing line are included in the \$1.8 million incremental cost estimate.

Recommended Change: Change to “The Hawthorne Lane Alternative has an estimated incremental cost of \$1.8 million. Outages of the existing line and temporary line structures are needed to construct it. Due to...”

FOF #418:

Draft Finding: In XS-3, the proposed 345-kV line would be constructed on vertical structures to the west/north of the existing transmission lines. Calculations at the proposed edges of the ROW assumed a 175-foot wide ROW. AAL MF calculations at the proposed edges of the ROW are:

| | West/North edge of ROW | East/South Edge of ROW |
|------------------|------------------------|------------------------|
| XS-3 (2015 case) | 21.9 mG | 24.7 mG |
| XS-3 (2020 case) | 38.1 mG | 26.4 mG |

(CL&P 1, Vol. 1, p. 7-24)

Comment: There is only one existing transmission line in XS-3, and the second sentence requires a clarifying addition.

Recommended Change: At the end of the first sentence, change “lines” to “line”. Change “on vertical structures” to “in a vertical configuration” (see Finding #422). Change the second sentence to “Calculations at the edges of ROW assumed a 150-foot-wide ROW in 2015 and a 175-foot-wide ROW in 2020, with all of the expansion on the north side.” The correct citation for the data in the table is CL&P 1, Vol. 1, p. 10-36.

FOF #617:

Draft Finding: [cost table]

Comment: The table has errors in the far-right column.

Recommended Change: A note should be added to the header of the far-right column to explain that for the Willimantic South variations, “base design” reflects the originally proposed 11-acre ROW expansion in Mansfield Hollow, the XS-2 BMP design in Focus Area B, and no Hawthorne Lane Alternative. And in the column of data, change \$5.4 million to \$59.6 million, \$16.9 million to \$10.5 million, \$8.2 million to \$73.8 million, \$18.4 million to \$17 million, and \$266.5 million to \$265.1 million to match the data at the cited page references. The citation should also include *pp. 15-139, 15-171*.

Appendix A: XS-12 BMP Elvira Heights in CL&P 1, Vol. 1, p. 3A-16 should be added to Appendix A for completeness.

B. Editorial Corrections

FOF #6: The Bozrah Light and Power Company sent its *Lebanon* customers bill inserts. CL&P sent bill inserts to CL&P’s customers in all 11 towns. The citation should also include *p. FR-8*.

FOF #7: The citation should also include *Table 9-3, pp. 9-8, 9-9*.

FOF #8: “June” should be changed to “*August*” (Note that the CL&P 16 stated the date incorrectly; however, the MCF is in the Record). The citation should also include *CL&P 1, Bulk Filing 2*. (MCF)

FOF #13: “five” should be changed to “*four*”. Insert “*and*” after “process”. “Structure Visibility” should be changed to “*structure design and photosimulations*”.

FOF #27: “chosen” should be changed to “*thoroughly investigated*”.

FOF #30: “supports” should be changed to “*on behalf of the EDC*”.

FOF #34: In the first sentence, insert “*Agent, Marla Butts,*” after “Commission”. In the second sentence, “Commission” should be changed to “*Agent*”. In c., insert “*Agent*” after “Commission”.

FOF #36: “*North*” should be inserted before “Smithfield, RI”.

FOF #39: To be consistent with FOF #4, “*wholly-*” should be inserted before “owned” and “*subsidiaries of*” should follow “owned”. The citation should also include *p. 1-1*.

FOF #41: In the first sentence, “line” should be replaced in two places with “*lines*”.

FOF #50: “*binding tariff provisions of*” should be inserted in place of “ISO-NE”.

FOF #53: The citation should be changed to add “#33, FOF” after “Notice”.

FOF #54: The citation should be changed from “FOF #34” to “*FOF #35*”.

FOF #55: “outages” should be changed to “*contingencies*”.

FOF #58: “violations” should be changed to “*overloads*”.

FOF #61: The citation should also include *Council Admin. Notice 33, FOF #38, #39.*

FOF #63: The citation should also include p. *14.*

FOF #64: The citation should also include pp. *43, 44.*

FOF #74: The citation should also include p. *119.*

FOF #79: The citation should also include *CL&P 1, Vol. 1, pp. 2-13 to 2-16.*

FOF #81: “*large*” should be inserted before “net importer” in the third line.

FOF #102: The citation should also include p. *13-3.*

FOF #105: “high” should be replaced with “*higher*”.

FOF #106: The citation should also include p. *13-8.*

FOF #107: “*based on cost and relative inflexibility*” should be added after “C-2”. The citation should also include p. *13-9.*

FOF #118: “*energy efficiency measures and*” should be inserted after “include”.

FOF #121: “*attempt to*” should be inserted before “address”.

FOF #124: The citation should also include pp. *1-2 and 3-3.*

FOF #126: “*Hill*” should be inserted between “Babcock” and “Junction”.

FOF #128: Above the 341 Line from Lake Road Switching Station to the Connecticut/Rhode Island border, there will be *one* overhead lightning shield wire and *one* optical glass fiber installed.

FOF #130: The reference to 80 feet in the range of heights for the proposed supports should be deleted because it is not mentioned in the citation.

FOF #132: For near Danielson Airport, the FAA issued NPHs for *seven existing structures*, as well as ten proposed structures.

FOF #136: The reference in line two to five “substations” should be “*segments*”.

FOF #144: “*Junction*” should be inserted in the first sentence (second line) after “Day Street”.

FOF #146: The citation should also include *p. 3-16*.

FOF #155: For Figure 9, the citation should also include *Ex. 1*.

FOF #156: In the fifth line, replace “and” before “new partial bay” with “*a*”.

FOF #158: “southwest” should be changed to “*southeast*”.

FOF #160: For Figure 10, the citation should also include *Ex. 2*.

FOF #164: For Figure 11, the citation should also include *Ex. 3*.

FOF #165: The citation should also include *p. 4-7*.

FOF #170: The citation should also include *p. 4-7*.

FOF #172: The citation should also include *p. 4-8*.

FOF #174 & #197: “CL&P” should be replaced with “*a certified blasting contractor*”.

FOF #185: The citation should also include *p. 4-12*.

FOF #186: “*undesirable*” should be inserted before “tall-growing”.

FOF #188: The citation should also include *p. 4-17*.

FOF #191: “*and permanent*” should be inserted after “temporary”.

FOF #194: For clarity, modify the beginning of the sentence: “Land uses *in the region traversed by the proposed route....*”

FOF #195: For clarity, modify the sentence: “The existing *CL&P* ROWs where the proposed new *345-kV* transmission lines would be built *includes existing 345-kV transmission lines* that were developed in the early 1970s.

FOF #197: The citation should also include *CL&P 1, Vol. 1, pp. 4-32 and 6-7*.

FOF #198: To clarify the distinction between permanent vs. temporary changes in elevation as a result of the Project, modify the FOF: Construction of the proposed *345-kV transmission lines* would result in minor, localized changes in elevation at locations where grading and filling is required, for example at crane pad locations or along *access roads that must be improved or developed* to allow the *safe passage and operation* of construction equipment.

Elevation changes at crane pad locations are typically temporary as crane pads are removed following construction. *Similarly, temporary access roads would be removed and restored, representing a short-term change in grade.* However, in locations where permanent access roads *must be maintained for construction and operation of the transmission lines*, long-term but localized elevation changes *would result*. Details will be included at the D&M phase if the project is approved. (CL&P 1; Vol. 1, pp.4-21, 4-25, 4-26, 6-1, 6-4; CL&P 18, pp. 29-30)

FOF #199: The reference to the proposed line in the first line should be the proposed “*project*”. The citation should also include p. 6-1.

FOF #201: Delete the citation to Tr. 5 (June 5), p. 91 (does not include definition of prime or important farmlands)

FOF #202: The citation should also include *Tr. 5, pp. 90-100*.

FOF # 203: The citation should also include *Tr. 5, p. 101*.

FOF #209: The citation should also include *CL&P 1, Vol. 1 p. 5-12*.

FOF #210: The correct citation is *pp. 6-12 to 6-14*.

FOF #222: The citation to p. 5-19 should be deleted.

FOF #223: For clarity, modify the second sentence: *Connecticut wetlands are defined solely on the basis of hydric, alluvial or floodplain soils: hydric soils also are one of the three parameters used to define federal jurisdictional wetlands.*

FOF #226: The correct citation is *p. 5-18*.

FOF #229: For clarity, at the end: *Of the 88 vernal pools, six are located off the CL&P ROWs. (CL&P 18, p. 19)*

FOF #237 & #238: The citation should also include *CL&P 18, pp. 34-35*.

FOF #238: The citation should also include *CL&P 18, pp. 34-35*.

FOF #241: Update to incorporate Minimal ROW Expansion: change 1,397 acres to *1,391* acres; 504 acres to *498* acres. The citation should also include *CL&P 18, p. 15*.

FOF #242: The citation should also include *CL&P 1, Vol. 1, pp. 4-11 to 4-15*.

FOF #243: Change 51 acres to *50* acres to account for Minimal ROW Expansion. The citation should also include *CL&P 18, p. 38*.

FOF #244: The citation should also include *CL&P 1, Vol. 1, p. 4-14*.

FOF #247: The citation should also include *CL&P 23*.

FOF #249: CT DEEP comment, p. 2 identifies 273 acres of forested habitat conversion.

FOF #252: For clarity, modify sentence: Perennial streams would be culverted *or spanned with temporary bridges*, as described...

FOF #257: The citation should also include *CL&P 15, R. 30*.

FOF #258: The citation should also include *pp. 5-36 to 5-38*.

FOF #259: In the second sentence, delete “would” after ROWs. The citation should also include *pp. 5-36 to 5-37*.

FOF #262: The citation should also include *pp. 5-39 to 5-40*.

FOF #263: To clarify CT DEEP NDDB consultations (per CL&P 18), add the following: “*Based on additional information obtained using CL&P’s recent (January 2012) data-sharing agreement with CT DEEP, fewer of these state-listed species may inhabit areas that overlap with the proposed route.*” The citation should also include *CL&P 18, pp. 20 to 22*.

FOF #269: Modify sentence to add survey dates: “*During 2008 to 2009,*” The citation should also include *p. 5-44*.

FOF #271: For clarity, add: “*The construction of the project and management of the ROWs in shrubland would benefit Lepidoptera, most of which are found in shrubland areas similar to those on the managed portions of CL&P’s ROWs.*”

FOF #272: For clarity, add “*...host-plant communities...*”

FOF #275: The citation should also include *p. 6-50*.

FOF #277: The citation should also include *p. 5-52*.

FOF #282: For clarity, add sentence: “*The project would not involve any in-water work in aquatic snail habitat and thus would not directly affect the snail. However, the species could...*”

FOF #284: The citation should also include *pp. 5-92 to 5-96*.

FOF #292: The citation should also include *pp. 5-71 to 5-73*.

FOF #294: The citation should also include *CL&P 1, Vol. 1, p. 6-63*.

FOF # 299: The citation should also include *CL&P Vol. 1, p. 5-72*.

FOF #301: Add sentence at end to clarify the proposed Minimal ROW Expansion: “*Across the approximately one mile of federally-owned land, CL&P proposes to acquire additional easement from the USACE to expand the ROW by 25 feet (2.6 acres) to allow the development of the new 345-kV transmission line adjacent to the existing 330 Line.*” (CL&P 18, p. 23, Table LFM-3 revised)

FOF #307: To the second sentence, clarify location of federal land by adding:...”...would cross *approximately 0.5 mile of federal land in the Mansfield Hollow WMA, the Natchaug State Forest...*”. In addition, add sentence that clarifies the alignment of the proposed route across the federal lands: “*Across the 0.5 mile of federally-owned land, CL&P proposes to acquire additional easement from the USAE to expand the ROW by 35 feet (2.2 acres) to allow the development of the new 345-kV transmission line adjacent to the existing 330 Line.*” (CL&P 18, p. 23, Table LFM-3 revised)

FOF #308: For clarity, add sentence regarding WMA: “*Across the WMA in Chaplin, the proposed transmission line structures and wider vegetatively managed ROW would not be visible to the general public since there is no easy public access to this area.*” CL&P 1, Vol. 1, p. 6-65)

FOF #325: The heading for *Thompson* should be prior to this FOF.

FOF #326: Clarify sentence by adding... “*CL&P’s ROW traverses a portion of Barker Preserve....*”

FOF #333: Modify first sentence for clarity and combine with FOF #334: “*Field investigations that CL&P conducted along the project ROWs in 2010 identified approximately 115 Native American archaeological sites, seven Euro-American sites, and five unidentified human-built stone piles, walls, or rings. Delete “are throughout the sensitive areas identified by CL&P’s assessment.”*”

FOF #335: Because this FOF is superseded by field studies conducted in 2011 (which involved field investigations of 36.8 miles of project ROWs) and reported in CL&P 18, pp. 25-26, it should be deleted.

FOF #336: The citation should also include *CL&P 18, pp. 25-26, 49.*

FOF #337: The citation should also include *CL&P 18, p. 49.*

FOF #338: For clarity, add sentence: “*Card Street Substation occupies 10 acres of a 150-acre site owned by CL&P in the Town of Lebanon.*” (CL&P Vol. 1, p. 5-100)

FOF #339: For clarity, add: “*Three wetlands exist on CL&P’s Card Street Substation property, the nearest of which is 100 feet from the existing substation fence line.*” The citation should also include pp. 4-36, 6-75.

FOF #340: The citation should also include *p. 5-103*.

FOF #342: Add following sentence: “*The Lake Road Switching Station is located on an approximately 3-acre site within the Lake Road Generating Station.*” (CL&P Vol. 1, p. 5-103)

FOF #346: Delete extra cite to CL&P 1, Vol. 1, p. 5-108.

FOF #348: Correct spelling of Tracey Road Trail; modify sentence for clarity: “*Tracey Road Trail, which is a one-mile paved walking/biking trail, is located on the east...*”

FOF #349: Clarify that work at Killingly substation would not affect archaeological sites by adding sentence: “*The modifications to Killingly Substation would be on previously disturbed, developed portions of the site that are not sensitive for the location of archaeological resources.*” (CL&P 1, Vol. 1, p. 5-110)

FOF #352: The citation should also include *p. 6-74*.

FOF #353: The correct citation is *p. 6-75* only.

FOF #357 & #358: Delete “For the purpose of engineering projects”.

FOF #359: The correct second citation is *CL&P, Vol. 1, Appendix 7A*.

FOF #360: Add the *IEEE International Committee for Electromagnetic Safety* to the list of agencies in the first sentence.

FOF #361: Change “associate” to “*associated*”, and “eight” to “*eight or nine different*” in the first sentence. Change the beginning of the second sentence to “*Recent studies do not provide evidence to alter...*” The citation should also include *CL&P, Vol. 1, Appendix 7D*.

FOF #362: The citation should also include *p. 5-70*.

FOF #364: Change “near” to “*adjacent to*”.

FOF #365: The citation should also include *CL&P, Vol. 1, pp. 7B-4 to 7B-7*.

FOF #366: Delete the words “statutory facilities or near” in the last sentence.

FOF #367: Change to: “Consistent with the Council’s EMF BMPs, CL&P’s low-cost design *recommendation* aimed to reduce magnetic field levels at the edges of the ROWs along the proposed route by more than 15%, while spending no more than four percent of the *estimated* project cost *using* the *base line* design.”

FOF #368: Change the last sentence to: “For the section of the *project* between Card Street Substation and Lake Road Switching Station, *the currents on the proposed 345-kV line will be very similar to the currents on the existing 345-kV line.*”

FOF #369: Delete “and can be predicted simply” from the first sentence. The citation should also include *p. 7-11.*

FOF #370: The correct citation is *p. 7B-13.*

FOF #373: Change the first sentence to: “CL&P’s proposed transmission line *uses* an H-frame base design configuration, except along four segments of the route. Then change the second sentence as follows: “...and *in* three of the five focus areas CL&P proposes other 345-kV line configurations to comply...”

FOF #379: Change “three” in both places to “*five*”. The citation should also include *CL&P 28b, p. 7.*

FOF #389: Change the last sentence to “The proposed *line* constructed on H-frame structures would also result in lower MF levels *at these statutory facilities by comparison to the 2015 Pre-Interstate condition.*”

FOF #395: Change the third sentence to “Due to property owner requests, CL&P *nonetheless* investigated a shift of the ROW to the south over Hawthorne Lane and designing the proposed *and existing* lines in vertical configurations.”

FOF #396: Change “line” in the header above the second column of the table to “*ROW*”.

FOF #397: The citation should also include *Tr.7, p. 13.*

FOF #399: The correct citation is *p. 7B-21.*

FOF #404: Change the first sentence to “CL&P prefers not to shift *line alignments on the ROW.*”

FOF #408: Change “at 4 Scalise Drive” to “*near* 4 Scalise Drive”.

FOF #412: Change the first sentence to “...would be constructed on steel-*pole structures* with...” The correct citation is *p. 7-19.*

FOF #414: The citation should also include *CL&P 17, p. 74.*

FOF #423: Add as a second sentence to “*Calculations at the edges of ROW assumed a 150-foot-wide ROW in 2015 and a 185-foot-wide ROW in 2020, with all of the expansion on the north side.*” The correct citation for the data in the table is *CL&P 1, Vol. 1., p. 10-36.*

FOF #426: The citation should also include *Tr. 7, p. 13.*

FOF #427: The correct citation is *p. 7-30*.

FOF #433: Change “structures” to “*lines*” and “structure” to “*line*” in the first sentence.

FOF #435: Change “line” to “*lines*” in each of the first two sentences.

FOF #442: Change “residents” to “*residences*” in the fourth sentence.

FOF #444: Change the first sentence to “*CL&P’s EMF BMP preference includes reconstructing the existing...*”

FOF #448: The citation should also include *CL&P 1, Vol. 1, p. 10-5*.

FOF #450: For clarity, add to the end of the first sentence: “...new transmission line adjacent to the existing line with proper conductor separation.” (CL&P 1, Vol. 1, p. 1-11) The cites to CL&P 1, Vol. 1, pp. 3-4 and 3-10 relate to the 11-Acre ROW Expansion cross-sections. For the use of the Minimal ROW Expansion, cites should be to CL&P 1, Vol. 1, pp. 10-27 to 10-29, Appendix 10B. The citation should also include *CL&P 17, pp. 26-27*.

FOF #453: The citation should also include *CL&P 17, p 27 to 28*.

FOF #459: The correct citation is *pp. 10-13 to 10-15*.

FOF #460: The correct citation is *pp. 10-14 to 10-15*.

FOF #462: For clarity, add to the first sentence: “Construction of the proposed 345-kV line and reconstruction of the existing 330 Line would involve detailed construction sequencing and would...” The citation should also include *CL&P 1, Vol. 1, pp. 10-16 to 10-17 and Appendix 10A*.

FOF #465: The correct citation is *pp. 10-25, 10-27*.

FOF #469: The correct citation is *CL&P 18, Table LFM-3 (revised)*.

FOF #470: The correct citation is *CL&P 18, Table LFM-3 (revised)*.

FOF #471: For clarity, add to beginning of sentence: “Taking into consideration field constructability reviews and assumptions performed in 2012, along Segment 2 in Chaplin the Minimal.....” Cite is to CL&P 18 pp. 54-55

FOF #472: For clarity, change 39 to 43 and 60 feet to 59 feet. Cite is CL&P 18, LFM-3 revised.

FOF #473: The citation should also include *CL&P 15, R. 38*.

FOF #475: Change “allows” to “*would allow*” for consistency with other FOFs.

FOF #475: The correct citation is *p. 10-38*.

FOF #476: The citation should also include *CL&P 18, Table LFM-3 revised*.

FOF #478: Change 4.1 acres to 4.3 acres. The citation should also include *CL&P 18, Table LFM-3 revised*.

FOF #479: The correct citation is *pp. 10-25, 10-27*.

FOF #480: The correct citation is *CL&P 17, Attachment 6*.

FOF #482: For clarity, add to end of first sentence “*new 345-kV transmission*” lines. “line” in the second sentence should be changed to “*lines*”. The citation should also include *pp. 14-10 to 14-12*.

FOF #483: The citation should also include *p. 14-12*.

FOF #492: For clarity, modify last portion of first sentence: “multiple underground cables must be installed to obtain the equivalent *power-transfer capacity of a single overhead transmission line*.”

FOF #497: For clarity, add the following to the end of the FOF: “...urban environments, *which characteristically are in proximity to strong electrical sources such as generation facilities or multiple transmission lines*.”

FOF #501: The citation should also include *p. 14-24 (Table 14-3) and CL&P 1, Vol. 1A, Appendix 15A, pp. 15A-6 to 15A-23*. Delete citation to *p. 15-29*.

FOF #504: For clarity, in first sentence, the cost of an underground cable system is five to 10 times greater.... Add a sentence stating that cost to Connecticut consumers for a 345-kV underground cable system is even greater, compared to an overhead line, due to federal tariff provisions. The citation should also include *p. 14-26*.

FOF #505: For clarity, modify second sentence as follows: “*If a new ROW could be acquired in a straight line between Card Street Substation, Lake Road Switching Station, and the National Grid facilities at the Rhode Island border (a distance of about 28 miles), approximately 136 acres...*”

FOF #508: For clarity, add explanatory sentence to beginning of FOF: “*Aligning a 38.6-mile underground cable system within CL&P’s existing ROWs between Card Street Substation, Lake Road Switching Station, and the Rhode Island border would present construction difficulties and cause significant environmental impacts.*”

FOF #512: The citation should also include *pp. 14-48 to 14-50*.

FOF # 515: The correct citation is *pp. 14-50 to 14-51*.

FOF #522: For clarity, change the first sentence: “CL&P *identified and evaluated six line-route variations.*” The citation should also include *pp. 15-1 to 15-6; CL&P 17, p. 69*.

FOF #523: The citation should also include *CL&P 17, p. 73*

FOF #527: For clarity, add to the first sentence: “The *0.7-mile underground cable system* would be constructed in a 40-foot-wide construction workspace *on CL&P’s ROW* and would require clearing of approximately 3.6 acres....”

FOF #528: For clarity, modify sentence to read: “*An access road, for use during both construction and operation,* would be 20 feet wide....”

FOF #537: For clarity, modify the first part: “The *1.1-mile Mount Hope Underground Variation would be located in the southeastern portion of Mansfield along CL&P’s ROW because the ROW is near the Mount Hope Montessori School. The variation was identified as a potential alternative to the alignment of the new overhead 345-kV line within the ROW* Also modify last phrase: “...Come Play with me Day Care, which was *located adjacent to the west side of Storrs Road.* The citation should also include *CL&P 17, p. 74*

FOF #540: Add: “*CL&P would have to purchase up to 6 acres of land for the transition stations.*” The citation should also include *p. 15-42*

FOF #549: The citation should also include *p. 15-45 (Table 15-9, Soils)*

FOF #551: Delete “327” at beginning. Last sentence, replace “proposed overhead project” with “proposed overhead *transmission line*”.

FOF #552: For clarity, modify this FOF: Two additional wetland systems *would be affected along the Civies’ 0.3-mile extension of this underground variation.* These wetland systems (*wetlands W20-58 and W20-59*) are between.....which is where the transition station *proposed by the Civies* would be located.... The citation should also include *CL&P 23, Corrected Mount Hope Underground Variation Mapsheets and Tr. 10, pp. 146, 147.*

FOF #554: For clarity, revise last sentence: “Further *archaeological reconnaissance would be needed to determine the potential effects of the underground variation on these identified sites and to assess the archaeological sensitivity of the off-ROW line transition station sites.*”

FOF #559: For clarity, change first part of first sentence: “*CL&P’s proposed base design for the new overhead transmission line in Brooklyn is....*”

FOF #560: Delete “335” from beginning of FOF

FOF #565: Last phrase, change “54.2 uplands disturbed” to “54.4 acres of uplands/highway ROW disturbed.”

FOF #570: The citation should also include *pp. 15-66, 15-81 to 15-83*

FOF #571: Add: “*Up to 4 acres of privately-owned land would have to be acquired for the western transition station and CL&P would have to acquire underground easement rights within the overhead line ROW.*” The citation should also include *p. 15-85 and CL&P 17, p. 75*

FOF #574: “*for*” should be inserted after “one” in the first sentence.

FOF #578: Add sentence to clarify that testing would be required at transition station sites: “*Additional surveys would be required to assess the archaeological sensitivity of the transition station sites.*” The citation should also include *p. 15-94.*

FOF #579: The citation should also include *15-66* and *15-85* should be *15-86.*

FOF #587: The citation should also include *p. 15-122 (Table 15-34)*

FOF #588: Modify first sentence: “*The variation would traverse 22 wetlands, encompassing approximately 29 acres within the route variation ROW. Of these 29 acres, approximately 26.8 acres would be affected by the development of the route variation.*”

FOF #594: The citation should also include *p. 15-128*

FOF #597: The citation should also include *pp. 15-110, 15-139, 15-142.* Delete cites to *pp. 10-26 and 10-29*

FOF #598: Modify first sentence for clarity: “*The Willimantic South Underground Variation would involve the development of an approximately 10.7-mile underground cable system through....*”

FOF #601: Modify for clarity: change “beneath roads” to “*along road ROWs*”. (Cable systems may not be able to be installed beneath pavement; route variation presumes use of highway easements in general, which would include road shoulders, etc.). Add sentence for clarity: “*Splice vaults and portions of the cable duct bank would likely have to be located on private property adjacent to the road ROWs.*”

FOF #602: The citation should also include *p. 15-145*

FOF #603: The citation should also include *p. 15-151 (Table 15-46)*

FOF #606: The citation should also include “*...2.7 acres of open field / shrub land upland....*”

FOF #616: The citation should also include p. 15-171

FOF #617: The cost for the Brooklyn OH Variation should be \$27.4 million to correspond with FOF #570.

FOF #620: The citation should also include *Tr. 6, pp. 111-118 and Tr. 8, p. 17 (specific to Interstate – FOF cites GSRP)*.

Appendix A, Figure 6A: The correct citation is p. 3A-6.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER
COMPANY

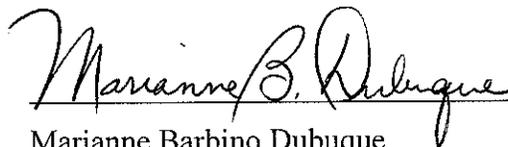
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NOTICE OF SERVICE

I hereby affirm that a copy of the Comments of The Connecticut Light and Power Company Regarding the Draft Findings of Fact Dated November 23, 2012 of the Connecticut Siting Council was sent to each Party and Intervenor on the service list dated October 4, 2012, with method of service to each party and intervenor listed via e-mail and U.S. mail on December 6, 2012.

Dated: December 6, 2012



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