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May 6, 2016

VIA E-MAIL AND HAND DELIVERY

Attorney Melanie Bachman
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: **DOCKET NO. 461** - Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.

Dear Attorney Bachman:

In connection with the above-referenced Docket No. 461, enclosed please find an original plus fifteen (15) copies of the following:

- (a) Comments of The Connecticut Light and Power Company Doing Business as Eversource Energy Regarding the Draft Findings of Fact Dated April 22, 2016 of the Connecticut Siting Council; and
- (b) Additional Comments of The Connecticut Light and Power Company Doing Business as Eversource Energy Regarding the Draft Findings of Fact Dated April 22, 2016 of the Connecticut Siting Council.

Very truly yours,


Marianne Barbino Dubuque

MBD/mkw
Enclosures

cc: Service List dated February 1, 2016 attached (with enclosures)

{W2680727}

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-Mail	Eversource Energy	<p>Jacqueline Gardell Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 jacqueline.gardell@eversource.com</p> <p>John Morissette Project Manager-Transmission Siting-CT Eversource Energy 56 Prospect Street Hartford, CT 06103 john.morissette@eversource.com</p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 jeffery.cochran@eversource.com</p> <p>Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702 mdubuque@carmodylaw.com</p>
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			Margaret Bain Associate Rate Specialist Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Margaret.bain@ct.gov
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Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Pet Pantry Super Discount Stores LLC	Mark L. Bergamo, Esq. Edward L. Marcus, Esq. The Marcus Law Firm 275 Branford Road North Branford, CT 06471 mbergamo@marcuslawfirm.com emarcus@marcuslawfirm.com
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Field Point Estate Townhouses, Inc.	Carissa Depetris Dwight Ueda Field Point Estate Townhouses 172 Field Point Road, #10 Greenwich, CT 06830 carissa.depetris@gmail.com d_ueda@yahoo.com
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Christine Edwards 111 Bible Street Cos Cob, CT 06807 SeeEdwards@aol.com	
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Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Anthony Crudele Bella Nonna Restaurant & Pizzeria 280 Railroad Avenue Greenwich, CT 06830 bellanonnagreenwich@gmail.com	
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Party Approved on January 12, 2016	<input checked="" type="checkbox"/> E-Mail	The Honorable Peter J. Tesei First Selectman Town of Greenwich 101 Field Point Road Greenwich, CT 06830 ptesei@greenwichct.org	Julie D. Kohler, Esq. David A. Ball, Esq. Cohen and Wolf, P.C. P.O. Box 1821 Bridgeport, CT 06601 jkohler@cohenandwolf.com dball@cohenandwolf.com

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

DOCKET NO. 461 – Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.	<p style="text-align:center">DOCKET NO. 461</p> <p style="text-align:center">May 6, 2016</p>
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**COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY
DOING BUSINESS AS EVERSOURCE ENERGY REGARDING
THE DRAFT FINDINGS OF FACT DATED APRIL 22, 2016 OF
THE CONNECTICUT SITING COUNCIL**

The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) files these comments regarding the Draft Findings of Fact issued by the Connecticut Siting Council (the “Council”) dated April 22, 2016 (“DFOF”).

I. **Material Omissions**

Eversource requests that the Council consider incorporating the following findings of fact, which were included in Eversource’s Proposed Findings of Fact (“PFOF”) filed with the Council on April 11, 2016. Eversource has included a brief explanation of its rationale for its request below each proposed addition.

A) Add PFOF #17, following DFOF #7:

On September 18, 2015, Eversource notified abutters to the Preferred or Alternate Sites and Cos Cob Substation of the Council's continuation of the evidentiary hearing to be held on October 6, 2015 at the Council's office and the opportunities to participate in the Council's process.

(Eversource 25, pp. 15-16)

Comment: This finding reflects notice to abutters.

B) Add PFOF #67, as the first part of DFOF #90:

The table below reflects the actual peak demand at Cos Cob Substation.

Cos Cob 27.6-kV System LOAD [MVA]						
Transformers	Actual Peak Demand					
	2010 MVA	2011 MVA	2012 MVA	2013 MVA	2014 MVA	2015 MVA
11R-1X	19.1	24.3	30.4	26.8	22.4	24.2
11R2X+3X	100.6	97.5	97.8	103.7	85.3	90.6
Total MVA	119.7	121.8	128.2	130.5	107.7	114.8

Comment: This finding provides data that is relevant to DFOF #90, which includes only the projected peak demand for the Cos Cob transformers.

C) Add PFOF #149, following DFOF #115:

Under the proposed design, Cos Cob Substation would feed the Greenwich secondary network (five 27.6-kV feeders), the North Greenwich Substation (two Cos Cob Substation 27.6-kV feeders and one Prospect 27.6-kV feeder) and several Prospect commercial customers at 27.6 kV.

- For failure of the two 27.6-kV Cos Cob Substation feeders to North Greenwich, the proposed Greenwich Substation would back up the entire North Greenwich load through automatic 13.2-kV loop schemes in conjunction with the Prospect Substation 27.6-kV feeder. No customers would be impacted.
- For loss of three of four Cos Cob Substation 27.6-kV feeders that feed Prospect Substation, North Greenwich Substation would feed the commercial customers via the 27.6-kV Prospect Substation feeder. North Greenwich Substation transformers would be off-loaded via the proposed Greenwich Substation's 13.2-kV feeder loop schemes. No customers would be impacted.
- The proposed Greenwich Substation would have automatic loop scheme ties with North Greenwich Substation feeders and automatic loop scheme ties between proposed Greenwich Substation feeders that would be fed by different substation

buses, different substations' transformers and different substation transmission lines. The proposed Greenwich Substation feeders will have redundant backup between themselves. The only vulnerability would [be] if both transmission lines from Cos Cob Substation to the proposed Greenwich Substation were lost. In this scenario, North Greenwich Substation would back up most of the load of Greenwich Substation feeders via the 13.2-kV system.

(Eversource 36, Q-OCC-058)

Comment: This finding provides context for DFOF #115 and the benefits to customers normally served by the North Greenwich Substation from the Project.

D) Add PFOF #160 to DFOF #60.

The graph below reflects 2014 kWh sales to towns served by Eversource.

CL&P dba Eversource Energy 2014 kWh Sales by Town	
Town	Total kWh
STAMFORD	1,387,706,218
HARTFORD	1,140,616,182
GREENWICH	869,829,569
WATERBURY	807,157,464
DANBURY	715,078,553
NORWALK/EAST NORWALK/S NORWALK	566,618,937
BRISTOL/FORESTVILLE	518,066,074
MANCHESTER / BUCKLAND	466,375,240
NEW BRITAIN	426,186,933
WEST HARTFORD	422,091,034
Source: Sales and Load Forecasting	

(Eversource 42, Q-OCC-64)

Comment: This finding shows the ten Connecticut municipalities in Eversource's service territory with the highest kWh usage and provides the data and context to support DFOF #60.

E) Add PFOF #188 after DFOF #203:

Greenwich residents receive energy efficiency solutions messaging throughout the year via a variety of advertising mediums:

- Radio: In 2015, 4 radio campaigns executed that included ads on WEBS-FM, WEZN-FM, WFOX-FM and Pandora Radio – all cover Greenwich.
- Targeted Digital Display Advertising (throughout the year): Greenwich Zip codes are included in the advertising purchase.

- Display advertising on www.nbcconnecticut.com: This NBC CT affiliate website has the largest reach into Fairfield County, including Greenwich customers.
 - Television: April-June campaign included Fairfield County media buy on Comcast and News 12 (reaches Greenwich audience).
- (Eversource 24, Q-OCC-26)

Comment: This finding describes Eversource's energy efficiency efforts in Greenwich.

F) Add PFOF #189 after DFOF #203:

Greenwich businesses primarily receive information via the Eversource energy efficiency sales team and dedicated account executives. Account executives have individually contacted 66 commercial and industrial customers served by the Cos Cob Substation within the last two years to promote energy efficiency and demand reduction services. Additionally, small businesses in Greenwich are targeted through a digital display advertising campaign and also were an audience for the television campaign. Greenwich residents were sent Direct Mail energy efficiency letters in August 2015. (Eversource 24, Q-OCC-026; Eversource 30, Q-LF-006)

Comment: This finding describes Eversource's energy efficiency efforts in Greenwich.

G) Add PFOF #212 after DFOF #365:

No wetlands or watercourses exist on or are proximate to the Proposed Site, nor do any residential properties abut the Proposed Site. (Eversource 1, p. H-6 – 7, H-12; Eversource 25, p. 3)

Comment: This finding reflects important facts concerning environmental and social effects of the substation.

H) Add the following findings of the PFOF to the Hybrid section of the DFOF:

256. Eversource evaluated four overhead routes, which were considered early in its route evaluation; namely, the Overhead South Route, the Overhead Central Route, the Overhead North Route, and the Overhead MNRR Corridor Route (with variations) [designated the North Easement, the South Easement and the Middle Easement]. (Eversource 1, pp. H-18 – H-20)
260. **The Overhead Metro-North Railroad Corridor Route (the "North Easement")** would occupy a portion of the existing MNRR ROW as well as adjacent private properties. Eversource anticipated that several properties would have to be acquired due to the extent of the ROW needed on those properties. Further, construction would require the removal of existing vegetative buffers for those homes to the north of the ROW. The MNRR has also indicated that limited work hours would be imposed on Eversource in order to avoid conflicts with the rail line's active use, adding substantial time to the construction schedule. (Eversource 1, p. H-19)

262. In 2015, CTDOT determined that all three of the proposed Overhead MNRR Corridor Routes were not desirable; thus, such overhead options were removed from further consideration. (Eversource 1, p. H-20; Eversource 9, pp. 23-24)
263. By letter dated January 23, 2015, CTDOT commented on the three Overhead MNRR Corridor Routes, concluding that the *“North Easements would have a serious detrimental impact to the Department and Metro-North Railroad. . . . Both the Middle Easement and South Easement are undesirable since they would prevent the Department from making improvements to I-95.”* (Eversource 1, App. E)

Comment: These findings provide context for the original overhead routes, including the MNRR corridor routes, and CTDOT’s reaction to those corridor routes.

I) Add PFOF #291 to the Hybrid section:

Eversource met with CTDOT and presented overhead routes for its review. CTDOT advised Eversource that it cannot support placement of any structures between the railroad and I-95 that would be within the CTDOT highway taking line because that would conflict with CTDOT’s Utility Accommodation Manual (which does not allow a longitudinal use of the I-95 corridor) and would jeopardize CTDOT federal funding, unless there were no other viable alternatives to use of such locations. CTDOT also informed Eversource that it is planning to expand I-95 in that area. CTDOT provided Eversource with design criteria to work with, and has supported what Eversource is trying to accomplish. It has seen Eversource’s design alternatives. (Eversource 34, Q-LF-003; Transcript 3, pp. 43, 93; Transcript 4, pp. 128-129)

Comment: This finding reflects CTDOT’s consideration of the Hybrid Route.

J) Add PFOF #302 to the Hybrid section:

At the Council’s request, Eversource reviewed a design to install structures on both sides of the railroad ROW from the transition structures in the MNRR parking lot just north of Cos Cob Substation to the transition structures near Steamboat Road. The route would exit the railroad ROW near Steamboat Road along two separate paths. The path along the north side of the railroad would exit by crossing through private property to Railroad Avenue which would require an easement. The path along the south side would exit onto Steamboat Road.

- The transmission line design for the south side of the railroad is different from the design for the north side. This is due to the constraints on the south side between the I-95 taking line and the railroad catenary supply lines. Some of the spans on the south side of the railroad would be longer than spans on the north side. These longer spans do not create a concern with blowout because this section is between the railroad and I-95 where ample clearances would exist.
- The line along the north side of the railroad would require 22 structures. The line along the south side would require 18 structures. The split design would require clearing on both sides of the railroad, including the removal of vegetation that

currently provides a buffer between the residential properties on Bruce Park Avenue and Circle Drive and the railroad to the south.

- Construction of the transmission line using the split design would require approximately 50 permanent easements.
- The estimated cost for the split design option would be \$57.9 million, which is \$8.7 million more than the Hybrid Route along only the south side of the railroad.

(Eversource 44, Q-LF-015)

Comment: This finding reflects consideration of a feasible alternative with higher costs.

K) Add a new Cost section, which includes, at a minimum, DFOF #389:

The estimated capital costs for the engineering, design and construction of the Project, including the Greenwich Substation, transmission lines and Cos Cob Substation modifications is approximately \$140 million. Of this amount, the transmission lines account for \$72 million and the new Substation and distribution modifications to Cos Cob Substation account for \$68 million. (Eversource 1, p. ES-11, G-23; Eversource 9, pp. 29, 57)

Comment: This finding provides the estimated costs for the Project as proposed in the Application, along the Preferred Route and with the Proposed Site. The Council must make a finding as to the cost of the proposed Project.

L) In addition, the Cost section should include the following findings of the PFOF:

393. The estimated cost difference between the proposed façade in the Project application and Eversource's original concrete panel design is approximately \$340,000. (Eversource 15, Q-OCC-003)
398. The estimated cost for this hybrid transmission line route would be approximately \$50 million, or approximately \$22 million less than the estimated cost of the transmission lines along the Preferred Route. (Eversource 34, Q-LF-003)
399. The lowest cost route from the Hybrid Solution would include Segment 1A, Segment 2B, Segment 3B and Segment 4B, at a total estimated cost of \$49.2 million. (Eversource 34, Q-LF-003)

Comment: These findings provide cost information of various route options presented to the Council, which is relevant to the Council's deliberations.

II. Unsubstantiated Findings

The following findings of the DFOF should be deleted or revised because they are not supported by evidence in the record.

- A) DFOF #134: Comment: The Town's suggestion [upgrades would avoid need for project] is not based on any expertise. The Town admitted it had no engineering or planning expertise. Therefore, Eversource requests that DFOF #134 be deleted or expanded to reflect that the Town did not present any qualified engineer or planner to support this suggestion.
- B) DFOF #165: Comment: This finding [larger transformers at Cos Cob] is based on incomplete information, hearsay and is fundamentally unfair to all participants in this Docket. The Town admitted that information that might have had a bearing on the drawings, such as Mr. Bowes' testimony and the need for a tap load changer, was not provided. The Town could not identify the drafters of the drawings nor did the Town produce the drafters as witnesses. The Council members as well as all of the other participants in this Docket did not have an opportunity to cross-examine the drafters, which violates the procedural due process rights of the applicant as well as all of the other participants. In contrast, Eversource's evidence on this subject was sworn to by qualified witnesses, who were available for cross-examination. Eversource requests that this DFOF be deleted.

III. Clarifications


The following comments respond to questions raised by Council members during their review of the DFOF:

- A) DFOF #2: This finding is accurately stated.
- B) DFOF #30: This finding is accurately stated.
- C) DFOF #38: The reference to "concept" new substation and line in the 2012/2013 FLR is accurately stated.
- D) DFOF #40: The Chair expressed a concern that the terms resiliency and capacity are used interchangeably. They are not. Resiliency and capacity are distinct but related terms. As used in this finding, capacity refers to the amount of power that a transformer is capable of stepping down to a lower voltage. Resiliency refers to the ability of the electric transmission or distribution system to withstand contingency events. GSLP would address the need for additional resiliency by providing additional transformer capacity at the new substation that will avoid overloads on transformers at Cos Cob Substation and by avoiding overloading feeders by removing load from them.

Respectfully submitted,

**THE CONNECTICUT LIGHT AND
POWER DOING BUSINESS AS
EVERSOURCE ENERGY**

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NOTICE OF SERVICE

I hereby affirm that a copy of these Comments was sent to each Party and Intervenor on the service list dated February 1, 2016, with method of service to each party and intervenor listed via e-mail and U.S. mail on May 6, 2016.

Dated: May 6, 2016


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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

DOCKET NO. 461 – Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.	<p style="text-align:center">DOCKET NO. 461</p> <p style="text-align:center">May 6, 2016</p>
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**ADDITIONAL COMMENTS OF THE CONNECTICUT LIGHT AND POWER
COMPANY DOING BUSINESS AS EVERSOURCE ENERGY REGARDING
THE DRAFT FINDINGS OF FACT DATED APRIL 22, 2016 OF
THE CONNECTICUT SITING COUNCIL**

The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) files these editorial comments regarding the Draft Findings of Fact issued by the Connecticut Siting Council (the “Council”) dated April 22, 2016 (“DFOF”).

I. Recommended Text Corrections/Additions

DFOF #7: . . . Eversource received 24 return receipts and two undeliverable **receipts** . . .

DFOF #21: Copies of the filing were placed in the Greenwich Library, as well as the Byram, **Shubert** and Cos Cob Library Branches, **the First Selectman’s Office, the Planning and Zoning Commission and the Inland Wetlands and Watercourses Agency.**

Add to the cite: **Eversource 1, pp. ES-10, A-1**

DFOF #24: a) If the Council determines that 290 Railroad Avenue is the appropriate

location for the new substation, that the site be designed by **an architect who considers and strongly respects the prominence of the intersection, the surrounding neighborhood, and creates an architectural statement that relates to context, scale and pedestrian use;**

- b) Further exploration of the location and pre- and post-construction considerations **for the transmission lines;** . . .

DFOF #64: b) Byram Substation – upgrade equipment, **install** two reclosers; . . .
f) Underground Distribution Cables – replace underground **distribution** cable . . .

DFOF #130: As a result of **its** analysis

DFOF #132: c. Adding to the distribution **duct** bank system . . .

DFOF #133: . . . it **would require** acquisition of a commercial building . . . and bringing a reliable power supply **source** to the center of customer demand.

DFOF #141: Tomac Substation is too far **east** from the center

DFOF #146: . . . expansion of the substation and new duct banks is approximately **\$190** million

DFOF #178: . . . require larger footprints than natural gas-**fueled** generation at **much** higher capital costs

DFOF #181: . . . which have a baseload **capability** and a thermal capability

DFOF #196: . . . only activated during ISO-NE Operating Procedure No. 4 – **Action 6**

DFOF #203: Greenwich has the lowest participation rate for Residential Program Participation at 5.8% and the **third** lowest participation rate for Business and Municipal Program

Delete: . . . *and Residential Rebate* . . .

DFOF #221: . . . enclosed in a 32-foot **wide** by 121-foot long by **31**-foot high building . . .

DFOF #280: . . . acquisition of private property **easements**.

DFOF #282: It contains two separate underground segments and **two** overhead segments

DFOF #291: **For segment 3A**, the overhead portion . . . varying in height from **80-150** feet.

DFOF #297: **Eversource considered the Underground Central Route**, an underground route from Cos Cob Substation

DFOF #298: **Eversource also considered an underground route from Cos Cob following . . . easements and 6 or more properties would need to be acquired.**

DFOF #327: . . . simultaneously **jacks** or pushes . . .

DFOF #364: Add after the 2nd sentence: **No municipal land, open space, recreation areas or parks are located proximate to the Proposed Site [290 Railroad Avenue].**

II. Recommended Editorial Corrections

DFOF #45: Delete: . . . , in the southeast area of town, . . .

The citation does not include this information.

DFOF #73: Move the last sentence to create a new FOF: “Operating equipment beyond . . .”

Change the cite: Tr. 3, pp. 53-54

Delete the cite: Eversource 27, R. 57

Add these cites to the new FOF: Eversource 36, R. 42; Eversource 38, R. 9

This is a more general point, not exclusively related to the July 2015 incident.

DFOF #78: Delete: “MVA” at end of first sentence.

DFOF #246: The heading immediately before this DFOF incorrectly lists the Alternate Site address; this should be revised to 281 **Railroad** Avenue.

DFOF #350: Clause should be combined with prior sentence: An additional work center is located in Stamford, if additional personnel and/or equipment is necessary.

DFOF #354: Delete: “. . . that deters unauthorized access. . .”

The phrase is duplicative.

DFOF #417: “Construction of GSLP **would** not affect”

DFOF #432: Delete “occur”: “. . . to retain intact archeological deposits in the Sound **Shore** Drive area . . .”

III. Recommended Corrections/Additions To References To Citations

DFOF #3: Transcript, September 1, 2015, 3:00 p.m. [Tr. 1], pp. 4-8; Transcript, January 12, 2016, 11:00 a.m. [Tr. 5] **p. 5; Service List, February 1, 2016**

DFOF #52: Replace with: Eversource 1, p. **E-3**

DFOF #130: Eversource **31**, R. 35

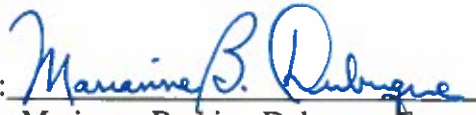
DFOF #288: Tr. 4, pp. **128-129**


DFOF #294: Tr. 7, pp. **105-106**

DFOF #384: Tr. 7, **pp.** 121-122

Respectfully submitted,

**THE CONNECTICUT LIGHT AND
POWER DOING BUSINESS AS
EVERSOURCE ENERGY**

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NOTICE OF SERVICE

I hereby affirm that a copy of these Additional Comments was sent to each Party and Intervenor on the service list dated February 1, 2016, with method of service to each party and intervenor listed via e-mail and U.S. mail on May 6, 2016.

Dated: May 6, 2016


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