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October 23, 2008

VIA HAND DELIVERY

Daniel F. Caruso, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

RE: **DOCKET NO. 364** The Connecticut Light and Power Company application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a proposed substation located at 325 Waterford Parkway North, Waterford, Connecticut

Dear Chairman Caruso:

In connection with Docket No. 364, enclosed please find the original and twenty (20) copies of CL&P's Memorandum in Support of Application.

Very truly yours,

Robert S. Golden, Jr.

Enclosures
cc: Service List

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

NORTHEAST UTILITIES SERVICE COMPANY, ON BEHALF OF THE CONNECTICUT LIGHT AND POWER COMPANY CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A PROPOSED SUBSTATION LOCATED AT 325 WATERFORD PARKWAY NORTH, WATERFORD, CONNECTICUT	:	DOCKET NO. 364
	:	OCTOBER 23, 2008

THE CONNECTICUT LIGHT AND POWER COMPANY'S
MEMORANDUM IN SUPPORT OF APPLICATION

I. INTRODUCTION

The Connecticut Light and Power Company ("CL&P") filed an application for a Certificate of Environmental Compatibility and Public Need for the Waterford Substation with the Connecticut Siting Council ("Council") on June 6, 2008. In its application, CL&P proposes to construct a new substation to be called the Waterford Substation (the "Substation"). The Substation would be located at 325 Waterford Parkway North (the "Property"), on property owned by CL&P. The Substation will add needed distribution capacity to serve the growing electric power demands in the Town of Waterford, a town that does not currently have its own bulk-power substation source, as well as portions of adjacent towns. (CL&P 1, Vol. 1, Sec. A)

The proposed project (the "Project") will include the construction of the Substation, a new bulk-power 115- to 23-kV substation, which will be accomplished by connecting two 60-Megavolt-Ampere ("MVA") power transformers to an existing 115-kV transmission line. (CL&P 1, Vol. 1, Sec. F) The Substation will be strategically positioned to facilitate connection to the existing 115-kV circuit that lies just north of the Property. CL&P has located and designed the Substation in a manner that minimizes potential visual effects and has incorporated measures to ensure the protection of existing resources during construction and operation of the Substation facilities. (CL&P 1, Vol. 1, Sec. L)

Based on the existing conditions of the Property and the Substation's design, the construction and operation of the Substation is not expected to have any significant permanent adverse effects on the environment. CL&P has incorporated measures into all phases of Substation development and operation to ensure that the environment is protected in accordance with federal, state and where possible, taking into account local requirements. (CL&P 1, Vol. 1, Sec. L)

(a) Statutory Criteria

The criteria for issuing a certificate for an electric power substation or switchyard, as described in CGS §16-50i(a)(4) i.e., one designed to change or regulate the voltage of electricity at 69-kV or higher or to connect two or more circuits at such voltage, which may have substantial environmental effect, is found chiefly in CGS §16-50p(a)(3)(A) – (C). Such criteria include public need for the facility and the basis for that need, the nature of the environmental impact alone, and cumulatively with other existing facilities, and why the adverse effects are not sufficient reasons to deny the application.

(b) CL&P Met All Filing Prerequisites

Pursuant to CGS §16-50*l*(e), beginning on April 4, 2008, which was at least 60 days before filing the application with the Council, CL&P undertook a detailed and formal Municipal Consultation with Waterford. (CL&P 1, Vol. 1, Sec. O) During the period prior to filing the application with the Council, CL&P also consulted with the Waterford Conservation Commission ("WCC") and the Waterford Planning and Zoning Commission ("P&Z"), and filed substation "Location Review" submissions with each commission. (CL&P 1, Vol. 1, Sec. O) Both land-use agencies issued comments, which have been addressed by CL&P. (CL&P 1, Vol. 1, Sec. O)

Notices were provided to abutting and nearby property owners and Notice of the application was published in the New London Day in accordance with CGS §16-50*l*(b). (CL&P 1, Vol. 1, Sec. Q; CL&P 1, Vol. 2, Exh. 9; CL&P 4) Service of the application was made on all state and local officials and agencies described in CGS §16-50*l*(b). (CL&P 1, Vol. 1, Sec. Q) A duly noticed hearing was held by the Council in the Waterford Town Hall Auditorium, 15 Rope Ferry Road, Waterford, Connecticut, on September 23, 2008 at 3:00 p.m. and 7:00 p.m. (Tr. 1; Tr. 2) The Council and its staff inspected the Property on September 23, 2008, beginning at 2:00 p.m.

II. PROJECT DESCRIPTION

CL&P acquired the Property in 2007 for the purpose of building a bulk-power substation. The Property is approximately 5 acres in area and has historically been undeveloped. (CL&P 1, Vol. 1, Sec. F). Originally, the Property was part of a larger 50 acre parcel that was primarily located within a General Industrial Zone. (Tr. 2, p. 44) Currently, the Property is zoned Rural Residential, RU-120 and the Town of Waterford Zoning Regulations permit substations in all residential zones by special permit. (CL&P 1, Vol. 1, Sec. H; Tr. 2). Because of its size, configuration, location and proximity to existing electrical transmission infrastructure, the Property was identified by CL&P as an ideal location for a substation. (CL&P 1, Vol. 1, Sec. F)

The Substation would occupy an area measuring approximately 200 feet by 245 feet. This area would be covered with a trap rock surface and secured by a seven-foot high chain-link fence with one foot of barbed wire (three strands). Access to the Property would be provided via a gravel driveway from Waterford Parkway North. (CL&P 1, Vol. 1, Sec. F)

Once constructed, the Substation would connect into one of two existing 115-kV-overhead transmission line circuits (the 1605 transmission line circuit), which is the southernmost of the two transmission circuits on the existing right-of-way ("ROW") that crosses the northwest corner of the Property. (CL&P 1, Vol. 1, Sec. F) The existing circuits located on the ROW are supported by common steel poles. In order to connect the 1605 transmission circuit to the Substation, two additional single-circuit steel poles will be installed. Within the Substation bus, a 115-kV circuit breaker will be installed to separate the existing 1605 circuit into two circuits. Note that one circuit will retain the 1605 circuit designation and the other will be designated circuit 1617. (CL&P 1, Vol. 1, Sec. F)

The 115-kV interconnections between the Substation and the new transmission line poles would be accomplished by installing two new line-terminal structures within the Substation, each of which would also support a line-disconnect switch. (CL&P 1, Vol. 1, Sec. F) The Substation would also be outfitted with two transmission line circuit switchers, two 60-MVA power transformers to step down the voltage from 115-kV to 23-kV, four transformer disconnect

switches and three transformer circuit switchers. (CL&P 1, Vol. 1, Sec. F) A transformer disconnect switch and circuit switcher will be in the supply path to each of the two 60-MVA power transformers. The third transformer disconnect would provide for a future 60-MVA power transformer, if needed. An additional transformer disconnect switch and circuit switcher could be used for a mobile transformer connection, when necessary to perform maintenance or to replace a failed transformer.

Two metal-clad switchgear enclosures will be installed to provide the switching equipment for seven 23-kV distribution feeders, of which four will be activated initially. Cables for each distribution feeder will exit the Substation via underground conduits, and rise above ground on wood poles. There will be a total of four overhead distribution feeders exiting the Substation. (CL&P 1, Vol. 1, Sec. F) Finally, in addition to the two switchgear enclosures, a protective relay and control equipment enclosure and battery enclosure will be installed within the Substation compound.

III. NEED

(a) Existing Service Area Conditions

Currently, electric load in Waterford is primarily served by two bulk-power substations (Flanders Substation and Williams Street Substation). This current configuration, which relies

on the sharing of Waterford's load by distribution feeders from these two substations, is not a viable long-term option for reliably meeting Waterford's growing peak-load demands. (CL&P 1, Vol. 1, Sec. G) As the area experiences increased growth, the demands placed on these existing substations will require relief to meet this growing need and maintain service reliability. The challenges of load growth in this geographic region have been recognized and strategies have been employed as interim measures to delay the need for a new facility. (CL&P 1, Vol. 1, Sec. G) For instance, the load on the Flanders Substation reached the substation's permissible load rating of 75 MVA in 2006. To alleviate the immediate need, a Forced Load Transfer ("FLT") scheme was instituted. The FLT scheme allows the transfer of approximately 9 MVA of load off of Flanders Substation (to Judd Brook Substation in Colchester and Bokum Substation in Old Saybrook), thus increasing the permissible load rating of this substation by 9 MVA and providing the necessary time window to construct the Waterford Substation for operation beginning in 2010. (CL&P 1, Vol. 1, Sec. G)

In addition, Williams Street Substation is projected to exceed its permissible load rating of 69 MVA in 2008. In 2006 the actual load was 67.4 MVA, a 6.8% increase from 2005. Finally, other area substations cannot provide adequate relief due to the limited capacity of the existing distribution lines. (CL&P 1, Vol. 1, Sec. G)

(b) Waterford's Need

Peak electric demand continues to increase in the Waterford area. Electric power supplied by the Flanders and Williams Street Substations from 2004 to 2006 increased from 129.6 MVA to 143.7 MVA (approximately a 5% increase per year). (CL&P 1, Vol. 1, Sec. G) Much of this increase is associated with growth in the Town of Waterford and surrounding areas. In addition to Waterford's recent growth, there is significant potential for additional industrial/commercial development and expansion in the near and long term. (CL&P 1, Vol. 1, Sec. G) For example, CL&P was advised by Waterford's Town Planner that there is a new Circuit City, Jared's Jewelry Store, Eastern Mountain Sports Store, Red Robin Restaurant, and another 47,000 square feet of retail space coming to Waterford[1]. In addition, an 80-unit condo complex has been approved and is in the planning stage. (CL&P 8, p. 10; Tr. 2)

(c) System Alternatives

CL&P has explored system alternatives, including participating in several conservation and demand side management programs as well as system modifications to existing substations.

(i) Non-Facility Based Alternatives

The load reductions provided by the conservation and demand side programs will not relieve the need for the Substation. (CL&P 1, Vol. 1, Sec. G; CL&P 8) CL&P manages energy

[1] In the transcript, Tr.2, p. 49, the jewelry store is referred to as "Gerald's Jewelry Store." The store that is planned for Waterford is "Jared's Jewelry Store."

efficiency and Demand Side Management ("DSM") programs through the Connecticut Energy Efficiency Fund ("CEEF").

Despite this success, CL&P determined that these customer-side programs will not preclude the need for the Substation. (CL&P 8) There are six customer side projects, totaling 5,200 kW, that have been approved by the DPUC for the Waterford area. Four of the six projects have been completed (two emergency generation projects (875 kW) and two distributed generation projects (575 kW) but CL&P does not expect any more significant customer side energy projects in the future. (CL&P 8; Tr. 1). The breakdown for 2007 was: CEEF 2,608 kW, Demand Response 2,350 kW and DG 575 kW for a total of 5,533 kW. (CL&P 8, p. 13; Tr.1, pp. 27-28) With Waterford's and the surrounding areas' projected annual growth rate of 3% a year and the planned commercial and residential growth in Waterford, the customer side programs would not provide enough relief for the Waterford area even if all of the approved projects were completed and operational. (CL&P 1, Vol. 1, Sec. G)

(ii) Facility Based Alternatives

CL&P considered modifying existing substations serving the Waterford load and determined that none of those substations could be modified to meet the growing Waterford load demand. (CL&P 1, Vol. 1, Sec. G)

Expansion of the Flanders Substation in East Lyme proved to be an impractical solution. The Flanders Substation cannot be expanded to meet the load requirements for the Town of Waterford. (CL&P 1, Vol. 1, Sec. G; CL&P 8; Tr. 2) Replacing the two existing power transformers at the Flanders Substation with larger transformers would not produce the net capacity increase that would be provided by the Waterford Substation. (CL&P 1, Vol. 1, Sec. G; CL&P 8) Furthermore, a third transformer connection is not possible at the Flanders Substation because of the insurmountable space constraints. (CL&P 1, Vol. 1, Sec. G; CL&P 8; Tr. 2) Finally, the Waterford load is located on the opposite side of the Niantic River from the Flanders Substation. The additional feeders needed to supply Waterford would have to cross the Niantic River. The engineering and environmental obstacles to crossing the Niantic River with additional feeders from the Flanders Substation make improvements at the Flanders Substation impractical. (CL&P 1, Vol. 1, Sec. G; CL&P 8)

Improvements at the Williams Street Substation in New London are not possible to meet Waterford's load. Replacement of the existing power transformers with larger transformers or the installation of a third transformer at the Williams Street Substation is not viable. The Williams Street Substation is located outside of the Waterford load pocket, its feeders are at their capacity limits under peak load and there is no opportunity to install new feeders in the same

duck bank system. Further, the addition of another transformer and new feeders would require extensive and costly underground distribution work. (CL&P 1, Vol. 1, Sec. G; CL&P 8)

Finally, the option of using the Uncasville Substation to relieve load in Waterford is impractical and not as reliable as the Waterford Substation. The Uncasville Substation is projected to overload in the year 2013, it produces incompatible voltage and new feeders would have to travel six miles to reach the Waterford load area. (CL&P 1, Vol. 1, Sec. G; CL&P 8)

(d) Site Alternatives

Alternative sites were evaluated to meet Waterford's growing load but they were all found to be inadequate. Overall, CL&P examined six sites, five sites and the Property. None of the five alternative sites could provide the reliability and flexibility necessary to meet Waterford's increasing electrical need. (CL&P 1, Vol. 1, Sec. G; Tr. 2)

Selecting an appropriate site for a substation is a careful and multi-faceted process. CL&P's criteria for evaluating a substation site's viability include:

- proximity to distribution load area and existing feeders;
- proximity to existing transmission circuits;
- ease of access;
- earthwork requirements;
- sufficient size and shape;

- zoning and adjacent land-use constraints;
- environmental considerations; and
- proximity to public water-supply watershed and/or aquifer areas.

(CL&P 1, Vol. 1, p. I-2)

A total of six sites were evaluated:

- Waterford Parkway North ("Location 1") the subject site;
- 994 Route 85 Hartford Turnpike ("Location 2");
- Southeast of No. 969 Petroleum Station – 85 Hartford Turnpike ("Location 3");
- North of 813 Vauxhall Street – Cohanzie Junction ("Location 4");
- Northwest of 130 Old Colchester Road ("Location 5"); and
- North Bloomingdale Road ("Location 6").

(CL&P 1, Vol. 1, Sec. I)

CL&P determined that the Property, Location 1, best satisfies the site evaluation criteria. Development of the Property would have minimal environmental effects. (CL&P 1, Vol. 1, Sec. I) The Property is proximate to distribution load area and existing feeders. A substation at the Property allows for easy connection to an adjacent 115-kV transmission circuit. (CL&P 1, Vol. 1, Sec. I) The Property has direct access from Waterford Parkway North and development of the Property involves minimal earthwork due to the Property being lightly wooded and

generally level. Finally, the Property is located in a RU-120 Rural Residential Zone, where substations are permitted with a special permit. (CL&P 1, Vol. 1, Sec. I-4; Tr. 2)

Location 2 (994 Route 85 Hartford Turnpike) is unsuitable because the interconnection of the 115-kV transmission circuit is 800 feet away and there are limited connection possibilities to existing 23-kV distribution circuits. Location 2 would require at least six new pole structures at 85 feet high. This location would also require a right-of-way acquisition and additional development that CL&P estimates would cost between 9.5 and 9.9 Million Dollars more than the cost to develop the Property. (CL&P 1, Vol. 1, Sec. I; Tr. 2) Moreover, development of Location 2 would impact wetland resources. (CL&P 1, Vol. 1, Sec. I)

The other locations also fail to meet the evaluation criteria when compared to the Property. Location 3 was rejected since it provides limited connection possibilities to 23-kV distribution feeders, would require extensive distribution line work and substantial earthwork due to its topography. (CL&P 1, Vol. 1, Sec. I) Location 4 was rejected because it is located farther away from the existing load center, offers poor connection possibilities to existing 23-kV distribution feeders, would require extensive distribution line work and offers minimal buffer to surrounding residences. (CL&P 1, Vol. 1, Sec. I) Location 5 was also rejected since it provides poor connection possibilities to existing 23-kV distribution feeders, would require extensive distribution line work and significant vegetative clearing. (CL&P 1, Vol. 1, Sec. I) Location 6

was not selected as it is located farther away from the existing load area, offers poor connection possibilities to existing 23-kV distribution feeders, and would require extensive distribution line work and major vegetative clearing. A substation at this location would also be visible from several nearby homes. (CL&P 1, Vol. 1, Sec. I)

IV. ENVIRONMENTAL EFFECTS

(a) Electric and Magnetic Fields

All alternating current devices produce Electric and Magnetic Fields ("EMF"), which some suspect might cause adverse health effects, particularly for long-term exposures to above-background magnetic field levels; however, there is no credible evidence of a causal link between such long-term exposures and adverse health effects. For many years, the focus of concern has been on magnetic fields ("MF") and not on the electric fields. With the proposed Substation, the dominant source of MF on and beyond the property boundaries would not be from the Substation but would continue to be from the existing transmission power lines (the 115-kV circuits numbered 1500 and 1605) and distribution power lines. (CL&P Vol. 1, Sec. M) MF exposure from the Substation equipment beyond the fence line around the Substation would quickly fall to very low background levels. (CL&P Vol. 1, Sec. M) Likewise, any MF levels from the transmission lines and distribution lines would also fall to background levels over short

distances because MF decreases as the distance increases from the source. Many locations along the Property line, particularly on its southwest, eastern and southerly sides, are at relatively long distances from the transmission circuits where EMF levels from these circuits are at negligible levels. (CL&P 1, Sec. M)

The Substation will have no effect on existing MF at the nearest residence, which is located 619 feet northeast of the center of the Substation footprint. (CL&P 2, Q. 13) This residence is located approximately 150 feet from the existing double circuit 115-kV line from Cohanzie Junction to Flanders Substation. Project-related changes to this line, including the reverse phasing of its two circuits, will reduce the MF produced by this line on and off the ROW, including at this residence. (CL&P 2, Q. 13)

(b) The Natural Environment and Wildlife

The natural environment will remain substantially unaffected by the development of the Substation. There are two wetlands areas on the Property. (CL&P 1, Vol. 1, Sec. K) Development of the Substation would not result in any temporary or permanent impact to these wetland areas. (CL&P 1, Vol. 1, Sec. K) However, limited work is anticipated within a small 1,241 ± square foot portion of the 100-foot upland review area of the unnamed perennial watercourse located on the Property. (CL&P 1, Vol. 1, Sec. K and O)

After construction is complete, the Project will have no permanent adverse effects on the environment. (CL&P 1, Vol. 1, Sec. K) CL&P would implement its Construction Best Management Practices to minimize or eliminate potential adverse environmental effects during the construction phase of the Project. CL&P's Development and Management ("D&M") Plan for the Substation would also incorporate the mitigation measures outlined in the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control.* (CL&P 1, Vol. 1, Sec. L)

The present site plan is a result of extensive discussions with Waterford land-use officials. The land-use officials have three primary concerns: (1) that the location of substation avoid wetlands; (2) that the construction of the substation have minimal impact on the upland review area; and (3) that sight line for motor vehicle traffic approaching the intersection of Waterford Parkway North and Oil Mill Road be improved. The Substation configuration is designed to accommodate these concerns, though the configuration will require removing the small berm at the corner of Waterford Parkway North and Oil Mill Road. (Tr.1, pp. 75-76)

The present site plan also allows for a temporary lay-down area and construction vehicle parking that avoids the upland review area. Since the Connecticut Department of Transportation ("CDOT") maintains an unpaved parking area directly across from the site, Council member Ashton inquired whether CL&P could negotiate temporary use of the CDOT property for a lay-down area. CL&P committed to pursuing the use of the CDOT property for the lay-down area and other

construction uses. (Tr. 1, pp. 75-76) CL&P will also consider creating space for additional landscaping between the Substation fence line and Oil Mill Road, while taking into account the concerns of the Conservation Commission. (Tr. 1, pp. 79-81) CL&P will address both of these issues in more detail in its D&M Plan.

(c) Waterford Substation Would Not Adversely Affect Wildlife in the Area

Construction of the Substation would not have significant adverse effects on vegetation, wildlife or habitat values. The majority of the Substation site would occupy what is currently upland forest. Sufficient habitat of similar nature (in excess of 50 acres) exists to the east across the perennial stream. In addition, there are similar habitats located in the immediate proximity of the Substation footprint that would allow for the natural relocation of potential wildlife from the construction zone. (CL&P 1, Vol. 1, Sec. K; CL&P 9)

Based on current Connecticut Department of Environmental Protection ("CTDEP") Natural Diversity Data Base ("NDDB") review criteria, the Substation does not present a potential conflict with a listed species or significant natural community. Moreover, CL&P received confirmation on January 28, 2008 from the CTDEP that no extant populations of federal or state listed Endangered, Threatened and Special Concern species occur at the Property. (CL&P 1, Vol. 1, Sec K; CL&P 1, Vol. 2, Exh. 5)

(d) No Effect On Nearby Resources

The development of the Substation would not have significant long-term adverse effects on the scenic, historic or recreational values of the surrounding area. (CL&P 1, Vol. 1, Sec. K) The Connecticut SHPO reviewed the Project and indicated that there was potential for the Property to yield subsurface cultural deposits. At the request of SHPO, Phase I and Phase IB cultural resources surveys were conducted at the Property by Heritage Consultants, LLC. Prior to the initiation of subsurface testing, a pre-fieldwork archaeological assessment was completed by reviewing previous archaeological studies and resources recorded in the region, historic maps, and aerial images depicting the Property. Fieldwork for this investigation consisted of pedestrian survey, systematic subsurface testing, mapping, and photo-documentation. During the Phase IB cultural resources reconnaissance survey, 62 shovel test pits were completed on the Property in a grid pattern of points spaced approximately 50 feet apart. In several instances, mottled soil stratigraphy was encountered indicating the presence of prior disturbances throughout the Property. These disturbances included tree throws, mechanical earth movement, and the excavation of percolation tests. The pedestrian survey of the southwestern corner of the Property revealed the effects of previous gravel operations, which consisted of substantial erosion and the removal of the topsoil in that area. Based on the results of the Phase IB survey, the construction of the Substation would not impact any significant cultural resources. The SHPO concurred with

this finding and provided a "No Adverse Effect" letter to CL&P on May 13, 2008. (CL&P 1, Vol. 1, Sec. K; CL&P 1, Vol. 2, Exh. 6)

Heritage Consultants, LLC also investigated a claim from a local resident that a portion of the Property was the location of a small cemetery. This investigation included research of historical records, additional fieldwork and subsurface testing. From this investigation Heritage Consultants, LLC concluded that the local resident either incorrectly remembered the location of the former cemetery or that it has already been removed by graveling operations and/or construction of the nearby road intersection. (CL&P 1, Vol. 2, Exh. 6; Tr. 2, pp. 39-40) Nevertheless, Heritage Consultants, LLC has developed an Unanticipated Discoveries Plan in the unlikely event that material related to a human burial(s), that either were not recorded historically or could not be identified in the field (e.g., buried under layers of fill), are uncovered during construction. (CL&P 1, Vol. 2, Exh. 6)

(e) No Adverse Effect On Public Health And Safety

Overall, the main source of noise in the area is traffic noise from I-95 and I-395. The increase in Property line sound pressure levels due to the addition of the Substation would be negligible, ranging from 0 to 0.2 dBA. Due to the existing elevated background levels, the projected noise levels generated by the Substation at the Property boundaries would be below applicable noise regulations. (CL&P 1, Vol. 1, Sec. K)

During construction, some large construction equipment will be in use and activities conducted that will generate noise. To the largest extent possible, general site construction hours would be limited to 7 a.m. to 5 p.m., Monday through Friday. Because of the difficulty of scheduling outages for interconnecting to the transmission system, there could be relatively short periods when some work will need to take place on a weekend or hours beyond the 7 a.m. to 5 p.m. period. (CL&P 1, Vol. 1, Secs. K and H)

The Substation would have low-level lighting for safety and security purposes. Outdoor lighting would be provided in the Substation for general illumination during periods of occupancy at night or during inclement weather. These lights will not be on all the time. Lighting would be manually controlled and generally directed downward. During periods of nighttime inspections and response to emergencies, temporary lighting could be used where necessary to illuminate specific task areas. (CL&P 1, Vol. 1, Sec. K; Tr. 2)

The power transformers within the Substation would contain insulating fluid. CL&P would install sumps to serve as oil-spill containment reservoirs around the power transformers. The sumps would be sized with sufficient capacity to contain a spill in the event of an inadvertent release of oil. CL&P plans to install an Imbiber Beads Drain Protection System® for the sump, similar to containment systems installed at many other CL&P substations, including Shunock Substation in North Stonington. (CL&P 1, Vol. 1, Sec. J)

The closest public water-supply wells are part of the Groton Pond Wellfield (a State-designated Preliminary Aquifer Protection Area), located approximately 2.1 miles southwest of the Substation. Based on design considerations and the physical distance of the water-supply wells to the Substation, the Project would have no adverse environmental effect on the aquifer. (CL&P 1, Vol. 1, Sec. K)

(f) CL&P's Application Should Not Be Denied

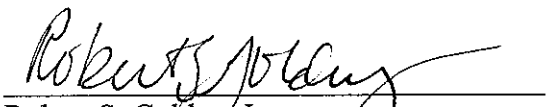
Based on the documents in the Record, the proposed Substation would have a minimal effect on the present environment. More importantly, the Project would meet the present vital electric reliability need that will only intensify as Waterford's load continues to grow. The extensive mitigation measures, participation of the local land-use agencies, and the thoughtful design and careful location of the proposed facility meet and exceed all the requirements for a Certificate of Environmental Compatibility and Need.

V. CONCLUSION

The Connecticut legislature has entrusted the Council with balancing the need for adequate and reliable public utility services with protection of the environment and ecology of the State. CL&P's application in this docket is based on a demonstrated need for a new and larger bulk power substation in Waterford where the distribution system is nearing its limit. CL&P's proposal addresses that need in a manner that minimally affects the environment and ecology of the State and minimizes damage to those resources. Accordingly, CL&P respectfully requests that its Application for a Certificate of Environmental Compatibility and Public Need for the Waterford Substation be approved.

Respectfully submitted,

APPLICANT,
THE CONNECTICUT LIGHT AND POWER COMPANY

BY: 

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