



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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February 2, 2016

Julie D. Kohler, Esq.
David Ball, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604

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 Attorneys Ball and Kohler:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 16, 2016.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's pending proceedings website.

Yours very truly,

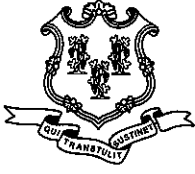
Melanie Bachman
Acting Executive Director

MB/RDM

Council Members

Enclosure

c: Service List dated January 12, 2016 (via electronic mail)
Council Members



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Connecticut Siting Council

Docket No. 461 – Greenwich Substation

Pre-hearing Interrogatories to Town of Greenwich

1. The Town's Intervenor request form filed with the Council on January 11, 2016 states that more viable alternatives exist including improvements to the current substation located at Cos Cob. In light of Kenneth Bowes Third Supplemental Direct Testimony, dated January 5, 2016, which rejects the feasibility and reliability benefits of such improvements, please provide technical and cost back-up information to justify the Town's position.
2. Referring to the First Selectman's 2013-2014 Annual Report, is it still the Town's position that a new substation is necessary for reliable energy to serve the residents and businesses of Greenwich? What other capital improvements are proposed by the Town to ensure reliable electricity to the Town?
3. Has the Town conducted any studies to document the Town's future electrical load growth? If so, please provide.
4. What would the Town project as expected electrical load growth on an annual basis to the year 2023? Please include forecast materials. How would the Town expect to meet future electrical demand?
5. On page 2 of the Town's letter dated November 23, 2015, Point One states the project "would in no way improve the restoration of electricity owing to a storm event...". Please explain. Does the Town have any suggestions to address this issue? How would the Town's proposed solutions affect traffic patterns, tree clearing, Town utilities and private property?
6. Would the Town be amenable to a GIS Substation building design that mimics the existing Pet Pantry building to the greatest extent possible? Would such a façade design retain the existing streetscape view?
7. Referring to the Town's April 6, 2015 letter to the Council, page 4, no. 12 states the Town has projects planned for many of the areas of the proposed routes. What specific Town projects are planned to occur along the proposed Preferred Route? Are such Town projects anticipated to disrupt existing traffic patterns? Is it possible to coordinate such projects with the installation of Eversource's underground cables?
8. Referring to the Town's November 23, 2015 Report, page 13, how many new Solarize CT residential installations occurred in Greenwich over the six month period referenced?
9. Referring to the Town's November 23, 2015 Report, page 13, how many commercial properties participate in the C-Pace Program in Greenwich? What are the estimated annual energy savings from these installations?
10. Please describe the Clean Energy Community Bronze level designation.
11. Referring to the Town's November 23, 2015 Report, page 18, please provide the following:
 - a) Please list the environmentally sensitive areas that would be directly impacted by the proposed underground and pipe trench routes.
 - b) What environmental function do these areas serve (e.g. habitat, watershed protection)?

12. Does the Town restrict the use of salt, sand or chemical deicer on the roads through Bruce Park? Does the Town apply fertilizers, pesticides or other substances to any areas of Bruce Park? How are these substances prevented from reaching the tidal ponds in Bruce Park during runoff events? Are commercial vehicles prevented from traversing the roads in Bruce Park?
13. Is Indian Harbor in Bruce Park classified as an impaired waterway? If so, please list current water pollution sources.
14. Referring to the Town's November 23, 2015 Report, page 19, estimate the number of trees exceeding 36 inches caliper that would be removed to construct each of the proposed routes through Bruce Park.
15. For trees lost to construction within Bruce Park, are replacement trees of the same species acceptable to the Town?
16. How many residential properties are directly impacted (i.e. through private residential properties) by the installation of the Bruce Park routes? Please list by address all residential properties for each variation.
17. Of the four proposed routes through Bruce Park (P HDD, P Open Trench, BPV1 HDD, BPV2 HDD), which route would the Town prefer?
18. What is the Town's position regarding the new proposed hybrid overhead/underground route? (referenced in Eversource's Late File Exhibit LF003 submitted on November 25, 2015, and described in the January 12, 2016 Transcript beginning on page 82)
19. Referring to the Town's November 23, 2015 Report pages 24-25 (Town's proposed route behind residential backyards), please clarify the following:
 - a) Does Town parcel mapping show the subject right-of-way inside or outside of these residential lots? If not, please submit parcel mapping that demonstrates property ownership along the subject right-of-way.
 - b) How many residential properties does the existing right-of-way traverse along Circle Drive, Circle Drive Extension, and Woodside Drive?
 - c) How much space would be required to construct the underground route in the right of way?
 - d) How would construction vehicles access the right-of-way in residential backyards?
 - e) Has the Town approached any of the adjacent property owners of the Town's suggested alternative? What was their response?
 - f) Approximately how many trees would need to be removed along the right-of-way at Circle Drive, Circle Drive Extension, and Woodside Drive to accommodate construction and operation of the Town's suggested alternative?
 - g) In regards to replacing trees that are removed on private residential property to construct the Town's suggested alternative; what tree height at planting is the Town proposing? Would this tree height be sufficient to replace lost trees that serve as a vegetative visual and noise barrier to I-95 and MNRR?
 - h) Would rock blasting and/or chipping be expected to install the suggested underground line in the residential backyards?
 - i) Why would construction of the Bruce Park route be "...noisier, dirtier..." than the Town's suggested underground route through residential backyards?
 - j) What route and installation method is the Town proposing from 147 Woodside Drive to the proposed substation? Please characterize land use along the suggested route.