Mr. Robert Stein Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket No. 461 - CSC 461 Greenwich Substation and Line Project

Dear Mr. Stein:

This letter provides the response to requests for the information listed below.

 $\frac{Response\ to\ CSC-01\ Interrogatories\ dated\ 07/30/2015}{CSC-014-SP01}$ 

 $\frac{Response\ to\ FPET-01\ Interrogatories\ dated\ 08/20/2015}{FPET-001,\ 002,\ 003,\ 004,\ 005,\ 006,\ 007,\ 008,\ 009}$ 

Very truly yours,

John Morissette Project Manager Siting As Agent for CL&P dba EversourceEnergy

cc: Service List

The Connecticut Light and Power Company Docket No. 461

Data Request CSC -01 Dated: 07/30/2015 Q-CSC-014-SP01 Page 1 of 1

Witness:

Witness Panel

Request from:

Connecticut Siting Council

#### Question:

What were the results of Eversource's notice to abutting property owners? If mail receipts were not returned, did Eversource make any additional attempts to contact these property owners?

#### Response:

The table below includes the additional notices Eversource sent by Certified Mail on August 24, 2015 to the following abutting property owners whose names were added in place of the prior owners due to a change in ownership or whose addresses were changed due to a new mailing address.

First Name	Last Name	Mailing Address	Mailing Town	Mailing State	Zip Code	Site Address	Site Town
NICHOLAS	GRANITTO	34 CLIFFDALE ROAD	GREENWICH	СТ	06831	191 FIELD POINT ROAD	GREENWICH
JOSEPH	GRANITTO	434 RIVERSVILLE ROAD	GREENWICH	СТ	06831	187 FIELD POINT ROAD	GREENWICH
ROBERT H, JR & ROSLIE	CLARK	521 FIFTH AVENUE - 36TH FLOOR	NEW YORK	NY	10175	4 SOUND SHORE DRIVE, UNIT 9	GREENWICH
THOMAS	CIRILLO	4 SOUND SHORE DRIVE, UNIT 14	GREENWICH	СТ	06830	4 SOUND SHORE DRIVE, UNIT 14	GREENWICH
212 WATERFORD LLC	C/O PASCARELLA	675 STEAMBOAT ROAD	GREENWICH	СТ	06830	4 SOUND SHORE DRIVE, UNIT 21	GREENWICH
DONALD CAMP	SHROPSHIRE	4 SOUND SHORE DRIVE, UNIT 24	GREENWICH	СТ	06830	4 SOUND SHORE DRIVE, UNIT 24	GREENWICH

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-001 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Roads/Traffic) Was a traffic study conducted of the proposed project's impact on downtown Greenwich's major intersections on Arch Street, Railroad Ave, 195, and Horseneck Road? What were the results?

#### **Response:**

We have not done a traffic study on either the location of the proposed substation or along the preferred route for the transmission lines. However, if approved, we anticipate working with municipal officials and the Connecticut Department of Transportation to develop a traffic management plan for construction.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-002 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

### Question:

(Easements) For each transmission line path, identify by name and address the owner(s) of each property through which the path would run, and the name and address of each lessee (if any) of such property. Note: The list shall include (though not be limited to) the Town of Greenwich, if the path would run through any Town-owned property.

#### **Response:**

Please see Appendix H - Abutters Maps in the Application, which lists record owners of abutting properties. The Company is not proposing any other path than the Preferred Route; accordingly, it has not compiled abutting property owner information concerning other transmission line routes. The Company does not have name and address information concerning any lessees of properties through which the Preferred Route passes.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-003 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

### Question:

(Easements) For each property listed in your answer to B. above, state whether Eversource already has, with respect to such property, an easement sufficient to entitle Eversource to route the proposed cable through such property. For each case where the answer is "yes", furnish a copy of the legal document in which the easement was granted. For each case where the answer is "no", provide a copy of the legal document that you intend to propose be used for the granting of the easement.

## **Response:**

The Company objects to this question because it seeks information that is not relevant to, and is not likely to lead to the discovery of, admissible evidence concerning any issue in this proceeding. Determination of sufficiency of pre-existing property rights is not within the scope of this proceeding under the Public Utility Environmental Standards Act nor is such information necessary or required for the Council's decision as to whether to issue a Certificate of Environmental Compatibility and Public Need.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-004 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Concerning the property owner of 290 Railroad Avenue) What the 290 Railroad Ave property owner's position on selling to Eversource?

## **Response:**

The Company cannot speak for the owner of 290 Railroad Avenue. However, as stated in the February 23, 1981 Supplemental Notice of Lease, which was executed by the owner and the Company and recorded in volume 1210, page 316 of the Greenwich Land Records, the Company has the option to purchase the property in 2021 at the end of the term of its lease of the property from the owner.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-005 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Concerning the property owner of 290 Railroad Avenue) How does the property owner feel about selling to Pet Pantry Warehouse instead?

# **Response:**

The Company cannot speak for the owner of 290 Railroad Avenue.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-006 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Concerning the property owner of 290 Railroad Avenue) Is the purchase option perpetual? Concerning 330 Railroad Avenue

# **Response:**

The purchase option is not perpetual. Under the option, the Company has the right to purchase the property in 2021.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-007 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Concerning 330 Railroad Avenue) Why did Eversource subdivide and sell part of its property on 330 Railroad Ave?

## **Response:**

While the Company has an executed agreement for the sale of the property at 330 Railroad Avenue, the sale has not yet closed. Except for the portions used for prospect Substation, this property was determined to be excess property that is no longer needed for the Company's business.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-008 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

## Question:

(Concerning 330 Railroad Avenue) Why did Eversource do so while it was proposing to build a downtown substation?

## **Response:**

The Company's site selection analysis determined that the selected site, 290 Railroad Avenue, and also the Alternate Site, 281 Railroad Avenue, would be better sites for the proposed substation than the 330 Railroad Avenue property. See Section H.1 and H.2 of the Application and the Company's response to Q-FPET-007.

Data Request FPET-01 Dated: 08/20/2015 Q-FPET-009 Page 1 of 1

Witness: Witness Panel

Request from: Field Point Estate Townhouses, Inc.

### Question:

(Concerning 330 Railroad Avenue) Why does Eversouce plan on reducing step down transformer capacity at 330 Railroad Ave and the Byram substation (Eversource Application, Table E-6), when it claims that Greenwich needs more capacity?

#### **Response:**

The new transformer capacity of 180 MVA for the proposed Greenwich Substation will allow the company to retire the entire transformer capacity of Prospect Substation of 55 MVA and Byram Substation of 25 MVA, therefore reducing load on the Cos Cob Substation transformers and distribution feeders. Note the transformer capacity is different than the substation's permissible load rating as the substation's rating accounts for the largest contingency or loss of the largest transformer/system element and use of emergency equipment ratings for the remaining equipment. The new Greenwich Substation will eliminate the need for transformation at these two distribution substations, and will increase the capacity to serve the 13.2-kV system.