STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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.

DOCKET NO. 461

DATE: APRIL 11, 2016

PROPOSED FINDINGS OF FACT OF THE TOWN OF GREENWICH

The Town of Greenwich ("Town") submits the following proposed findings of fact in this proceeding.

I. Eversource has failed to establish the need for this project.

A. Eversource overprojected the future peak load levels on the transformers at the Cos Cob Substation.

1. Eversource claims that the need for this project is due in part to the risk of the transformers at the Cos Cob Substation being overloaded. *Eversource Application at E-5.*

2. The short term emergency load limit for the Cos Cob transformers is 135 MVA. *Eversource Application at E-5; Eversource Response to OCC-83.*

3. Eversource claims that the need for this project is in part based on its projections of Summer peak load levels on the Cos Cob transformers, as depicted in Table E-1. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 91.*

4. According to Eversource's projections as depicted in Table E-1, the capacity of the Cos Cob transformers will be reached as soon as 2017. *Eversource Application at Table E-1.*

5. Eversource based its projections as depicted in Table E-1 off of actual peak load data from 2013, in which the peak load on the Cos Cob transformers was 130.5 MVA. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 91.*

6. Eversource did not utilize actual peak load data on the Cos Cob transformers for 2014 or 2015. Rather, Eversource made projections of anticipated peak load on the Cos Cob transformers for 2014 and 2015, assuming a 1% growth rate, working off of the actual peak load data for 2013. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 91-92.*

7. Eversource projected a peak load on the Cos Cob transformers for 2014 of 131.8 MVA. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 92.*

8. The actual peak load on the Cos Cob transformers in 2014 was 107.7 MVA, a decline of 17.5% from actual peak load in 2013. *Tr. 3-10-16 at 92; Eversource Response to OCC-22.*

9. Eversource overprojected the peak load on the Cos Cob transformers for 2014 by 24.1 MVA, an overprojection of 18.3%. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 92.*

10. Eversource projected a peak load on the Cos Cob transformers for 2015 of 133.1 MVA. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 93.*

11. The actual peak load on the Cos Cob transformers in 2015 was 114.8 MVA, a decline of 12% from actual peak load in 2013. *Tr. 3-10-16 at 93; Eversource Response to OCC-22.*

12. Eversource overprojected the peak load on the Cos Cob transformers for 2015 by 18.3 MVA, an overprojection of 13.7%. *Eversource Application at Table E-1*; *Tr. 3-10-16 at 93*.

13. Even though the actual load data on the Cos Cob transformers for 2014 and 2015 is now available, Eversource has not updated the projections contained in Table E-1, upon which it bases its claim for the need for this project. *Tr. 3-10-16 at 96*.

B. If approved, Eversource's Project would result in significant overcapacity on the transformers serving Greenwich, under the most far-reaching projections.

14. Eversource proposes a new Greenwich Substation with new transformers containing a short term emergency load limit of 144 MVA. *Eversource Response to OCC-83*.

15. These new transformers would be added to the existing transformers at the Cos Cob Substation containing a short term emergency load limit of 135 MVA. *Eversource Response to OCC-83*.

16. Once the new transformers are installed, Eversource indicates that it would remove transformers from service at the Prospect (54 MVA short term emergency load limit) and Byram (16 MVA short term emergency load limit) Substations, resulting in a total retirement of 70 MVA of transformer capacity. *Eversource Response to OCC-81*.

17. Accordingly, if Eversource's project is approved, transformers with short term emergency load limits of **209 MVA** would be active between the Cos Cob and new Greenwich Substations (144 MVA at Greenwich Substation, plus 135 MVA at Cos Cob Substation, less retirement of capacity of 70 MVA). *Eversource Responses to OCC-81, 83; Tr. 3-10-16 at 98-99*.

18. Even accepting Eversource's projections as depicted on Table E-1 of the Application, which are based on actual load data for the Cos Cob transformers for 2013, but not for 2014 or 2015, if Eversource's project is approved, there will be overcapacity on these transformers. *Tr. 3-10-16 at 99.*

19. According to Table E-1 of the Application, the farthest into the future that Eversource projects peak load levels at the Cos Cob Substation is 2023. Even accepting Eversource's projections as depicted on Table E-1, which are based on actual load data for the Cos Cob transformers for 2013, but not for 2014 or 2015, the total peak load level on the transformers in 2023 is projected to be 144.2 MVA. *Eversource Application at Table E-1.*

20. If Eversource's project is approved and transformers with short term emergency load limits totaling 209 MVA are installed at the Cos Cob and new Greenwich Substations, in 2023 there will be an overcapacity of 64.8 MVA between the two substations, based on Eversource's most far-reaching projections. *Eversource Application at Table E-1.*

C. Higher capacity transformers can be installed within the space limitations of the Cos Cob Substation.

21. In his Third Supplemental Direct Testimony dated January 5, 2016, Kenneth Bowes stated that installing higher capacity transformers at the Cos Cob Substation could not be done because of space limitations at the Cos Cob Substation. *Third Supplemental Direct Testimony of Kenneth Bowes at 3.*

22. The Director of Planning and Zoning for the Town of Greenwich, Katie DeLuca, e-mailed multiple transformer manufacturers with a copy of the drawings of the Cos Cob Substation prepared by Eversource in response to OCC-062. Ms. DeLuca inquired as to whether higher capacity transformers could be installed within the space limitations of the Cos Cob Substation. Two manufacturers, Toshiba and WEG, replied with plans demonstrating that in fact, their higher capacity transformers with a total capacity of 160

MVA could be installed within the dimensions of the Cos Cob Substation. *Town of Greenwich Responses to CSC-1.*

D. Eversource overprojected the future peak load levels on the transformers at the Prospect Substation.

23. In his Third Supplemental Direct Testimony dated January 5, 2016, Kenneth Bowes stated that even if higher capacity transformers could be installed at the Cos Cob Substation, this would not address the risk of potential distribution feeder overloads or overloads on the transformers at the Prospect Substation. *Third Supplemental Direct Testimony of Kenneth Bowes at 4.*

24. The permissible load rating for the four Prospect Substation transformers is 55 MVA. *Eversource Application at E-8, n.9.*

25. Eversource claims that the need for this project is in part based on its projections of Summer peak load levels on the Prospect Substation transformers, as depicted in Table E-2. *Eversource Application at Table E-2.*

26. According to Eversource's projections as depicted in Table E-2, the capacity of the Prospect Substation transformers will be reached by 2021. *Eversource Application at Table E-2.*

27. Eversource based its projections as depicted in Table E-2 off of actual peak load data from 2013, in which the peak load on the Prospect Substation transformers was 51.2 MVA. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 94.*

28. Eversource did not utilize actual peak load data on the Prospect Substation transformers for 2014 or 2015. Rather, Eversource made projections of anticipated peak load on the Prospect Substation transformers for 2014 and 2015, working off of the actual peak load data for 2013. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 94.*

29. Eversource projected a peak load on the Prospect Substation transformers for 2014 of 51.7 MVA. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 94*.

30. The actual peak load on the Prospect Substation transformers in 2014 was 44 MVA. *Tr. 3-10-16 at 94-95; Eversource Response to OCC-49*.

31. Eversource overprojected the peak load on the Prospect Substation transformers for 2014 by 7.7 MVA, an overprojection of 14.9%. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 95*.

32. Eversource projected a peak load on the Prospect Substation transformers for 2015 of 52.2 MVA. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 94-96*.

33. The actual peak load on the Prospect Substation transformers in 2015 was 47 MVA. *Tr. 3-10-16 at 95-96; Eversource Response to OCC-49*.

34. Eversource overprojected the peak load on the Prospect Substation transformers for 2015 by 5.2 MVA, an overprojection of 10%. *Eversource Application at Table E-2*; *Tr. 3-10-16 at 95-96*.

35. Even though the actual load data on the Prospect Substation transformers for 2014 and 2015 is now available, Eversource has not updated the projections contained in Table E-2, upon which it bases its claim for the need for this project. *Tr. 3-10-16 at 96*.

36. The North Greenwich Substation transformers have additional available capacity. *Eversource Response to OCC-57*. One method of reducing load on the Prospect Substation transformers would be to shift load away from the Prospect Substation to the North Greenwich Substation.

37. Even after the proposed Project would be built, if both of the 115-kV lines between Stamford and the Cos Cob Substation failed, all of the customers fed by the Cos Cob and North Greenwich Substations would be impacted. *Eversource Response to OCC-58(b).* Accordingly, because the Project is a transmission-based solution addressed to a distribution problem, Greenwich residents would still be exposed to outages if there is a failure in the transmission system.

38. The cost for Eversource's proposed Project, which is based on the overprojections contained in Tables E-1 and E-2, is $140 million. *Eversource Application at G-23.*

II. The Preferred Route would result in significant environmental harm.

A. The installation of the proposed 115 kV transmission line along the Preferred Route or alternative routes identified in the Application will result in significant environmental impacts.

39. Bruce Park is the Town's oldest park, having been established in 1908, and given its unique historic qualities should be protected. *Town's Exhibit 8, Response to CSC-11 Supplemental, at 6, Exhibit D-1.*

40. Bruce Park is subject to a deed restriction which provides that the property shall be used for the purpose of a public park and "shall be devoted to no other use or purpose" (except the continued rental of a building on one of the tracts that comprises the park land.) *Town's Exhibit 4, 11-23-15, attached deed Vol 123, Book 165.*

41. Historic mill ponds, now functioning as tidal ponds, bisect the 60 acres, providing a prominent water feature that serves as the centerpiece of the Bruce Park landscape. *Town's Exhibit 6, Response to CSC – 11 Supplemental, 02-22-16, at 6, Exhibit D-1.*

42. Bruce Park includes an urban forest landscape with ornamental trees, lawns and gardens, a bowling green, tennis courts, picnic area and a softball field. The large amount of tree coverage, together with the shrubby habitat and water features, provides an excellent habitat for migrating birds and other fauna that visit the park. *Town's Exhibit 6, Response to CSC – 11, Tr. 2-16-16 at 1.*

43. As an urban forest, Bruce Park also has a social and economic value and is important to the health and well being of the community. *Town's Exhibit 6, Response to CSC – 11, Tr. 2-16-16 at 2.*

44. Any construction within Bruce Park would severely impact the urban forest which includes trees and shrubs of various sizes. *Town's Exhibit 6, Response to CSC -15, Tr. 2-16-16 at 1.*

45. Existing trees and landscaping have been identified in the Project Area, with larger stands of trees found particularly in and around Bruce Park. *Eversource Application at I.1.3*

46. If a transmission line was constructed through Bruce Park, tree removal would take place in the Park, thus jeopardizing the Town's plans for the Bruce Park Arboretum. *Applicant's Response to CSC – 2 (CSC-2), Tr. 9-09-15 at 1. Town's Exhibit 8, Response to CSC-15, at 11, Exhibit I-1.*

47. The Town recently planted a "Zen Garden" within Bruce Park, a multi thousand square foot area featuring deciduous and evergreen specimens not often seen in Fairfield County. *Town's Exhibit 6, Response to CSC -12, Tr. 2-16-16 at 2.*

48. There are a number of trees in the Park whose size is such that the roadway curves around them. Several of these curves make Kinsman Lane inaccessible to tractor trailer traffic. *Town's Exhibit 6, Response to CSC -14, Tr. 2-16-16 at 1.*

49. If a transmission line was constructed through Bruce Park, it is estimated that 8 trees greater than or equal to 36 inches in diameter may be removed or seriously damaged by the proposed construction activities. However many more trees in Bruce Park will be lost in diameters ranging from 2 inches to 36 inches. *Town's Exhibit 6, Response to CSC -14, Tr. 2-16-16 at 1.*

50. Bruce Park is the one area in the Project Area that possesses wildlife habitat. *Eversource Application at I.1.4*

51. Bruce Park is a migratory area and there are likely to be impacts to the waterfowl that rely on Bruce Park as a wintering area, and impacts to the great egrets and snowy egrets (both characterized with threatened status in Connecticut) and osprey that rely on Bruce Park as a summer foraging area. *Town's Exhibit 6, Response to CSC -11, Tr. 2-16-16 at 3, Exhibit G.*

52. Portions of the Project Area lie within the 100 year and 500 year flood boundaries. *Eversource Application* at *I.1.2.2*

53. Portions of the Project Area lie within the Coastal Boundary. *Eversource Application* at *I.1.2.3*

54. Several inland and tidal wetlands, some with tidal marsh or estuarine qualities, have been identified in the Project Area. *Eversource Application, at I.1.2.4*

55. Estuaries are regarded as some of the most important habitats in the world as they provide feeding, breeding, nesting and nursery areas for many animals. *Town's Exhibit 6, Response to CSC-11, Tr. 2-16-16 at 2.*

56. If a transmission line was constructed through Bruce Park, the tidal basins and Habitats would be disturbed as a result of the transmission line installation. "The proposed project will temporarily affect the tidal basins and their associated fish and wildlife habitat." *Eversource Response to CSC-1, (CSC-2) Tr. 9-09-15 at 4.*

57. If a transmission line was constructed through Bruce Park, the disturbed habitats would require a full growing season to recover from this impact. "It is estimated that the disturbed areas within the tidal wetland and surrounding areas will resume original habitat function one growing season after construction restoration." *Eversource Response to CSC-1, Tr. 9-09-15 at 4.*

58. If a transmission line was constructed through Bruce Park, also at risk would be the carefully protected shellfish beds, which are an important aspect of the ecosystem. *Town's Exhibit 6, Response to CSC – 11, Tr. 2-16-16 at 3, Exhibit H.*

59. Bruce Park is recognized by the State of Connecticut as a salt marsh migration area. Areas recognized as having the potential for salt marsh restoration are very limited, significantly increasing the ecological value of this area. *Town's Exhibit 6, Response to CSC -11, Tr. 2-16-16 at 3*

60. Prior to its establishment as a park in 1908, the Bruce Park land was used during colonial times as a tide mill for grinding grain. Given the availability of food sources it is feasible that Native Americans also frequented the area. The Town is in the process of conducting historical and archaeological inventories. *Town's Exhibit 6, Response to CSC -11, Tr. 2-16-16 at 3*

61. The recreational facilities at Bruce Park will be impacted, specifically the ball field. *Tr. 2-23-16 at 29 – 31*

62. In at least one routing permutation (Orange Route), Bruce Park would be subject to blasting. *Eversource Response to OCC-55 (OCC-4),11-17-15 at 1.*

63. The underground feeder routes included in the Application would be installed through a heavily treed area and likely require "clear cutting" in order to support the proposed directional drilling operation. *Town's Exhibit 6, Response to CSC -14, Tr. 2-16-16 at 1.*

64. At least 114 residential properties would be directly impacted by the installation by any route that traverses Bruce Park. *Town's Exhibit 6, Response to CSC -16, Tr. 2-16-16 at 1.*

B. Alternatively, all of these environmental impacts could be avoided by locating the proposed 115kV transmission line along the Metro North Railroad hybrid route ("MNRR Hybrid Route") depicted by Eversource in LFE-003.

65. Eversource conceded that the MNRR Hybrid Route "avoids some of the sensitive areas that the Town of Greenwich is concerned about in Bruce Park. It addresses some of the concerns of the OCC with the cost of the project." *Tr. 1-12-16 at 83-84.*

66. Bruce Park has historic qualities and the potential long term impact to the historic qualities of Bruce Park would be avoided by avoiding an overhead route through the Park. *Tr. 3-10-16 at 115.*

67. Avoiding disruption in Bruce Park would help mitigate concerns regarding the potential impact to the habitat of the species of special concern, specifically the river herring. *Tr. 3-10-16 at 116.*

68. If Bruce Park can be avoided, then any potential impacts to species and or landscape would be mitigated. *Tr. 3-10-16 at 116-117.*

69. It would be a full growing season for the tidal pond habitat to be restored after the trenching required by the project. Mr. Bowes agreed that this impact to the tidal ponds and associated fish and wildlife could be avoided by siting the proposed transmission line along the MNRR. *Tr. 3-10-16 at 118.*

70. Eversource's witnesses agreed that the environmental impacts identified in the Application are avoided by using the MNRR Hybrid Route. *Tr. 3-10-16 at 119.*

71. Further, the Town has numerous projects scheduled to occur along the Preferred Route, and the location of the transmission line along the MNRR Hybrid Route would avoid interference with these projects. *Town's Exhibit 6, Response to CSC-7, Tr. 2-16-16 at 1.*

C. The siting of a transmission line along the MNRR Hybrid Route will not impact Cos Cob recreational areas, and Eversource will address the Cos Cob Substation exit during the Development and Management phase.

72. Eversource confirmed that the siting of a transmission line along the MNRR Hybrid Route will not impact any Cos Cob Park recreational areas. *Tr. 3-10-16 at 122.*

73. Eversource does not know whether an easement for the proposed exit from the Cos Cob Substation designated as "1A" is required. *Tr. 3-10-16 at 119.*

74. Eversource is aware that Cos Cob Park is a brownfield remediation site. *Tr. 3-10-16 at 121.*

75. To the extent that the access road at Cos Cob Park is disturbed, Eversource would address it during the Development and Management stage. *Tr. 3-10-16 at 121.*

76. There are provisions in the Connecticut remediation standards to lift this type of environmental land use restriction. *Tr. 3-10-16 at 122.*

77. Eversource represented that it has successfully dealt with contaminated soils and contaminated sites in the past. *Tr. 3-10-16 at 121.*

III. Safety concerns concerning the new Greenwich Substation.

78. In the event of a substation fire, firefighters have to wait for access to the substation to be provided by a CL&P employee. *Tr. 10-06-15 at 22-23.*

79. When posed a question about the fire at the Cos Cob Substation Eversource reported that it burned for three hours. *Eversource Response to Pet Pantry-02 (Data Request 2).*

80. According to Eversource, the first responders for substation events in Greenwich would be based out of the Stamford or Norwalk area work centers and would be dispatched directly from their field work locations by the Operations Center. For after hour events, Eversource generally requires the responder to be within 30 minutes of the area work center location. *Eversource Response to OCC-68.*

81. The CL&P employee who responded to the Cos Cob Substation fire was dispatched to Greenwich from Milford. *Tr. 10-06-15 at 25.*

82. An abutting neighbor of the proposed Greenwich Substation is Airgas, Inc. *Tr. 3-10-16 at 33.*

83. As a result of the 03/01/16 Motion of Dwight Ueda for the Intervenor, Field Point Estate Townhouses, Administrative Notice was taken of Mr. Ueda's photographs that show canisters labeled as oxygen stored at Airgas, and a sign that reads, "DANGER, No smoking or open flame in this area."

84. The Town's Director of Planning and Zoning testified that there is a propane filling station next door to the proposed Greenwich Substation site. *Tr. 2-23--16 at 145.*

85. Eversource's was not aware that any of these types of materials were stored in such close proximity to the proposed Greenwich substation site. *Tr. 3-10-16 at 33-34.*

IV. Aesthetic concerns concerning the new Greenwich Substation.

86. The Town has concerns about the aesthetic design of the proposed Greenwich Substation. *Tr. 3-10-16 at 124.*

87. Eversource's witness testified that it was feasible to change the design of the façade. "(t)he additions that we've been asked from the Council and from the Town have provided a positive aesthetic benefit and the costs have been relatively nominal at this point. So I don't think it's been overly burdensome at this point to change the design or outlook of the façade of the facility." *Tr. 10-06-15 at 144.*

88. Eversource was also willing to consider design alternatives. "(W)e're certainly open to a more pleasing appearance of the facility." *Tr. 12-01-15 at 174.* Mr. Bowes subsequently reiterated his commitment to that concept. *Tr. 3-10-16 at 124.*

89. On August 26, 2015, a proposed substation design was submitted by Richard Granoff – Exhibit Roman Numeral VIII. B.1. The Applicant is aware that the Town supports this design. *Tr. 3-10-16 at 125.*

90. It is technically feasible to design the substation in accordance with the design proffered by Richard Granoff, with slight modifications. *Tr. 3-10-16 at 125.*

91. It is technically feasible to include fencing in this design similar to that on the adjacent property, 330 Railroad Avenue. Fencing design shown in *Town Response to CSC -6, Exhibit C; Tr. 3-10-16 at 126.*

92. It is technically feasible to face the walls of the transformers with material that matches the façade of the substation building. *Id.* The cost to implement such a design would be minimal. *Tr. 3-10-16 at 126.*

93. It is technically feasible to plant vegetative screening in planters around the outside of the substation to provide visual mitigation. *Tr. 3-10-16 at 126.*

94. Eversource agreed to cooperate and work with the Town during the D&M phase to adopt these improvements. *Tr. 3-10-16 at 126.*

V. If the Council determines that Eversource has met is burden of showing the need for the project, the only route that should be considered is the Metro-North Railroad hybrid route depicted in LFE-003.

95. If the Council concludes that Eversource has met its burden of proving the need for this project, then the Town is supportive of routing the transmission line along the MNRR Hybrid Route, as depicted in LFE-003. *LFE-003; Tr. 3-10-16 at 102.*

96. The MNRR Hybrid Route consists of four segments, three of which include variations where portions of the transmission line would be buried. *LFE-003.*

97. In Segment 1 of the MNRR Hybrid Route, the proposed transmission line transitions from underground at the Cos Cob Substation to overhead, without the need to construct a splice vault. *LFE-003; Tr. 12-1-15 at 129-130.*

98. In Segment 2 of the MNRR Hybrid Route, Eversource presented three variations: variation 2A, an overhead line north of the Metro-North Railroad ("MNRR") tracks; variation 2B, an overhead line south of the MNRR tracks; and variation 2C, an underground line beneath Circle Drive. *LFE-003; Tr. 3-10-16 at 102-103.*

99. Regardless of which of the three variations in Segment 2 of the MNRR Hybrid Route might be approved, in each instance the transmission line would be reliable. *Tr. 3-10-16 at 103.*

100. Regardless of which of the three variations in Segment 2 of the MNRR Hybrid Route might be approved, in each instance the installation of the transmission line in accordance with LFE-003 would cost less than the Preferred Route in the Application. *Tr. 3-10-16 at 103-104.*

101. In the route depicted in variation 2B in LFE-003, the Town maintains a force main that conveys flow from the Old Greenwich, Riverside, Cos Cob and North Mianus areas. *Tr. 3-10-16 at 104-105.*

102. The Town is currently under a federal consent decree requiring it to replace and upgrade the force main. *Tr. 3-10-16 at 105.*

103. Eversource testified that if the transmission line is approved overhead along variation 2B in LFE-003, to the south of the MNRR tracks, Eversource would be able to construct the line in a way that would allow the Town to replace and upgrade the force main in accordance with the federal consent decree. *Tr. 3-10-16 at 106.*

104. Eversource testified that if the transmission line is approved overhead along variation 2B in LFE-003, to the south of the MNRR tracks, Eversource would be able to construct the line to ensure that in the future the Town would be able to access the force main to perform work that may be needed. *Tr. 3-10-16 at 106.*

105. Eversource testified that if the Council approves the siting of the transmission line overhead along variation 2B in LFE-003, to the south of the MNRR tracks, Eversource will not come back to the Siting Council after the D&M phase indicating that it could not construct the line, and it will not ask that the line be sited through Bruce Park. *Tr. 3-10-16 at 109.*

106. In the route depicted in variation 2C in LFE-003, Eversource is able to construct the line beneath Circle Drive without the need for a splice vault. *LFE-003; Tr. 12-1-15 at 136.*

107. In Segment 4 of LFE-003, a portion of the transmission line is proposed to be buried in variation 4B, heading into the proposed new Greenwich Substation. *LFE-003; Tr. 3-10-16 at 109.*

108. The burying of the transmission line in Segment 4 is proposed to transition from overhead to underground at the intersection of Greenwich and Railroad Avenues. *LFE-025, p. 3 of 17; Tr. 3-10-16 at 110.*

109. The depiction in this intersection where the transmission line converts from overhead to underground shows a 119 foot, 8 inch pole in the intersection. *LFE-025, p. 3 of 17; Tr. 3-10-16 at 111.*

110. The intersection of Greenwich and Railroad Avenues as depicted in LFE-025, p. 3 of 17, is situated at the bottom of the main business district in the Town, and is one of the most heavily-travelled intersections in Greenwich. *LFE-025, p. 3 of 17; Tr. 2-23-16 at 166; Tr. 3-10-16 at 110.*

111. Eversource is investigating the extension of the burying of the line by at least an additional 100 feet, in order to accommodate the Town's request that the 119 foot, 8 inch pole be moved Eastward towards structure 2 depicted in LFE-025, p. 3 of 17. Eversource will attempt to design this accommodation during the D&M phase. *LFE-025, p. 3 of 17; Tr. 3-10-16 at 112.*

112. Extending the undergrounding at this intersection by at least 100 feet would not affect the reliability of the transmission line. *Tr. 3-10-16 at 112-113.*

113. Extending the undergrounding at this intersection by at least 100 feet would reduce the visibility of the 119 foot, 8 inch pole in the intersection, depicted in LFE-025, p. 3 of 17. *Tr. 3-10-16 at 113.*

114. Eversource has confirmed with the Connecticut Department of Transportation that the MNRR Hybrid Route is a viable construction solution. *Tr. 1-12-16 at 83.*

115. The estimated cost for the MNRR Hybrid Route depicted in LFE-003 is approximately $22 million less than the estimated cost of the Preferred Route in the Application. *LFE-003; Tr. 1-12-16 at 83-84.*

116. The MNRR Hybrid Route depicted in LFE-003 would be constructed in less than two years. *Tr. 1-12-16 at 66.*

117. The MNRR Hybrid Route depicted in LFE-003 is a viable route option. *Tr. 1-12-16 at 83-84.*

Respectfully submitted,

Town of Greenwich

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CERTIFICATE OF SERVICE

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