STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE: Eversource Energy Application for a : Docket # 461

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. : August 2, 2015

Applicant

INTERROGATORIES OF PET PANTRY SUPER DISCOUNT STORES LLC (PP)

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- 2. Has Eversource received any permissions or authorization from either the Federal or State government for the construction and laying of lines or by I-95 highway?
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 - e. Would not the areas be much wider than initially disclosed because of the size or the machines used to excavate and the need for the machines to get around the trenches?
- 4. Does Eversource have any studies which indicates the decibel levels of its construction sites and the potential sounds caused by such construction and have those been submitted? Why have those studies not been disclosed as part of the record?
- 5. As Eversource has indicated, it has not yet engaged any contractors for the proposed improvements, how can it predict how long it will take to complete the project?

- 6. Is it not true that construction of the Project may be delayed because certain unknown factors in the composition of soil such as ledge, bedrock and other impediments not yet foreseen by Eversource in their preliminary review?
- 7. Is it not true that no full studies have yet been undertaken to assess the full impact of the construction because Eversource cannot determine the extent of the variations in the composition of the soil in the various areas?
- 8. What type of covering on excavations will be used to insure the protection and safety of the public? How big will it be?
- 9. Has Eversource conducted any traffic studies of the areas in which construction, excavation and or demolition will occur and have those studies been disclosed?
- 10. How will traffic be redirected around the proposed substation and how long will that take?
- 11. Has Eversource conducted studies of the impact its construction, excavation and demolition, if any on each potential site and why haven't those detailed studies not been disclosed?
- 12. Will any of the transmission/distribution lines be laid be active (live) during the Project? Explain. If any of the lines are active or alive what security precautionsc are to be taken to protect the public?
- 13. Has a study (studies) been conducted that show the impact of how Greenwich town services will be impacted should there been emergencies such as a fire at the potential substations?
- 14. Out of any current or potential substation, which lot is the largest of all? By what percentage in comparison with all other sites?
- 15. Will the current operating substation still be in operation after the Project?
- 16. What is the amount of proposed impervious surface in relationship to open space for each potential substation location?
- 17. What is the current percentage of commercial users and the amount of service use by commercial users as opposed to residential?

- a. Who are the top ten users of such electrical service and their percentage use as opposed to residents in Greenwich?
- b. Who will be the specific beneficiaries of the new substation and lines other than businesses and residents of Greenwich? Who else will the new system benefit?
- c. Is not the actual need for more load capacity and distribution for the benefit of customers outside of Greenwich? By how much?
- d. Is this for electricity outside the area or only for use in Greenwich, and how would we monitor that, or know that to be true?
- 18. Could not a new substation be located in the Stamford area and not the Greenwich area which could re-distribute electrical transmission more efficiently and reduce any need for additional service for Greenwich?
- 19. Why couldn't the Substation located at 330 Railroad be brought current to address the potential needs of customers and use the vacant land owned by it for supplemental use?
- 20. Why was the market study for evaluating potential sites for substations not submitted as evidence for the record?
- 21. Is not the current plan too speculative at this time and highly dependent on obtaining permissions from other agencies to be submitted at this time?
- 22. Who are the commercial users in Stamford and how much do they use? Is this the reason for putting the sub-station in Greenwich and expanding Cos Cob?
- 23. Has Eversource conducted any studies on how the market value of real estate will be effected during the construction period?
- 24. What injurious impact the substations can have on public health? Have you submitted any studies? If so, please indicate to which report that the public may refer to?
- 25. How much will this Project cost to the ratepayers?
- 26. Have all studies been submitted on the use of chemicals used to break on rocks that Eversource intends to use on the Project been disclosed to the Public? Please

indicate which report/study has been submitted? Does this study disclose the nature of the chemicals it will use and its toxicity or caustic nature in relationship to the environment it will be using it in and the potential danger caused by seepage or leakage to surrounding areas.

- 27. Has Eversource conducted an independent study to find out whether that putting in another substation would not be injurious to everyone's health?
- 28. How is the Project going to affect the residents in Rye.
- 29. In what manner is Eversource going to drill through wetland areas?
- 30. Is Eversource going to designate the Pole Site for a future-designated substation?
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- 32. What will the actual cost be not estimated cost at \$140 million? Could the actual costs be much greater than the estimates and under what conditions would the costs increase? Who is going to pay for that?
- 33. Has Eversource ever embarked on a project of this size without a substantial cost overrun? What makes this Project different from all other that overruns will not occur?
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- 36. How will the building of the new substation impact the Assessor's office in Greenwich in evaluating the properties that are in close proximity to this monolithic structure?
- 37. Were not the actual load values been reduced in 2014 and are actually going down because of more efficient ways of reducing load levels rather than by putting in a new substation?

- 38. What information was determined in evaluating other potential or alterate substation sites? Were any of the studies conducted by sources other than Eversource? Who conducted them and when were they conducted?
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- 48. Is system proposed at the Railroad St. site a generation system or distribution system?
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- 54. Eversource claims both Cos Cob and Greenwich with the new substation would have a total of 269 NVA creating a major of 133 .2 which would be sufficient for reliable service for 30 years". Why would margin be so high?
- 55. On Page 5 of Eversource's letter of March 19th there is projected Greenwich customer demand in 2017 under certain contingency events. Once again, isn't this all based on what might happen, not what is in fact happening?
- 56. Page 6 of Eversource's letter of March 19th, Eversource states that the project would achieve reduced dependents on heavily loaded Cos Cob which they forecast to exceed it permissible load reading.
 - a. Why would it exceed it?
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 - c. They also say this project will reduce dependence on the heavily loaded 9 transmission Prospect substation.
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- 57. Eversource also claims that the project would provide increased reliability for Greenwich customers by providing an independent separate source for distribution fees. That in turn, they claim significantly reduces the risk that one system interruption would create additional outages. Is Eversource guaranteeing there won't be outages if this goes in?
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- center greatest customer demand. What benefit do they get and how does this increase their earning capacity and by how much?
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: September 22, 2015

Applicant

INTERROGATORIES OF PET PANTRY SUPER DISCOUNT STORES LLC (PP) TO EVERSOURCE

The following interrogatories are submitted to the Siting Council for Responses by the Applicant:

PP:

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PET PANTRY SUPER DISCOUNT STORES LLC Intervenor

s/ Mark L. Bergamo
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proposed substation and the existing Cos Cob Substation,

Greenwich, Connecticut, and related substation : improvements. : September 22, 2015

Applicant

CERTIFICATION

I hereby certify that on September 22, 2015, a copy of the foregoing Interrogatories was filed electronically and the original and 15 copies was served to all known parties, applicant and intervenors to: by U.S. Mail first class postage prepaid and by electronic mailing to:

The Connecticut Siting Council Ten Franklin Square New Britain, CT 06051 Sitingcouncil@po.state.ct.us

See Attached Service List

Pet Pantry Super Discount Stores LLC Intervenor

By <u>s/Mark L. Bergamo</u>
Mark L. Bergamo
The Marcus Law Firm
Its Attorneys
275 Branford Road

North Branford, CT 06471

Tel. 203-481-3330

mbergamo@marcuslawfirm.com

CT Bar Number 035870

Date: September 18, 2015

Docket No. 461 Page 1 of 3

LIST OF PARTIES AND INTERVENORS $\underline{SERVICE\ LIST}$

	Document	Status Holder	Representative
Status Granted	Service		
Applicant	Service E-Mail	Eversource Energy	Jacqueline Gardell Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 jacqueline.gardell@eversource.com John Morissette Project Manager-Transmission Siting-CT Eversource Energy 56 Prospect Street Hartford, CT 06103 john.morissette@eversource.com Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 jeffery.cochran@eversource.com Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702
Party	⊠ E-Mail	Office of Consumer Counsel	mdubuque@carmodylaw.com Lauren Henault Bidra, Esq.
Approved on July 23, 2015			Staff Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Lauren.bidra@ct.gov Joseph A. Rosenthal, Esq. Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Joseph.rosenthal@ct.gov

			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	⊠ 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	⊠ 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	⊠ E-Mail	Christine Edwards 111 Bible Street Cos Cob, CT 06807 SeeEdwards@aol.com	
Intervenor Approved on September 1, 2015	⊠ E-Mail	Richard Granoff, AIA, LEED AP Granoff Architects 30 West Putnam Avenue Greenwich, CT 06830 rg@granoffarchitects.com	

Date: September 18, 2015

Docket No. 461 Page 3 of 3

Intervenor Approved on September 1, 2015	⊠ E-Mail	Anthony Crudele Bella Nonna Restaurant & Pizzeria 280 Railroad Avenue Greenwich, CT 06830 bellanonnagreenwich@gmail.com	
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Intervenor Approved on September 1, 2015	⊠ E-Mail	Dr. Danielle Luzzo Greenwich Chiropractic & Nutrition 282 Railroad Avenue Greenwich, CT 06830 drdanielleluzzo@gmail.com	
Intervenor Approved on September 17, 2015	⊠ E-Mail	Joel Paul Berger 4208 Bell Boulevard Flushing, NY 11361 communityrealty@msn.com	