

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company d/b/a Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the Frost Bridge to Campville 115-kilvolt (kV) electric transmission line project that traverses the municipalities of Watertown, Thomaston, Litchfield, and Harwinton, which consists of (a) construction, maintenance and operation of a new 115-kV overhead electric transmission line entirely within existing Eversource right-of-way and associated facilities extending approximately 10.4 miles between Eversource's existing Frost Bridge Substation in the Town of Watertown and existing Campville Substation in the Town of Harwinton; (b) related modifications to Frost Bridge Substation and Campville Substation; and (c) reconfiguration of a 0.4-mile segment of two existing 115-kV electric transmission lines across the Naugatuck River in the towns of Litchfield and Harwinton within the same existing right-of-way as the new 115-kV transmission line.

DOCKET NO. 466

April 7, 2016

Applicant's Comments on Draft Findings of Fact

The Applicant, The Connecticut Light and Power Company d/b/a Eversource Energy, respectfully submits these comments on the Draft Findings of Fact dated March 23, 2016 (DFOF). In general, the DFOF provide a thorough, accurate, and cogent summary of the Record. The Applicant has only the following minor corrections and additions:

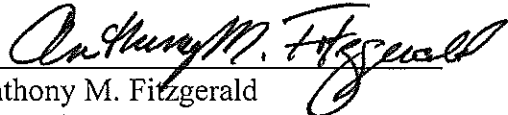
DFOF #	Comment
53	<p>The Proposed Project was not formerly listed in any forecast as a planned 345-kV project from Frost Bridge to Bloomfield. That 345-kV project, the CCRP component of NEEWS, was a different project, which has been replaced not by this Project but by a yet-to-be proposed 115-kV project between Newington and Southwest Hartford currently called the Greater Hartford Central Connecticut Reliability Project (GHCCRP). Eversource’s 2015 Forecast of Loads and Resources (<i>Administrative Notice Item 43</i>) lists the Proposed Project as a Frost Bridge to Campville 10.4 mile 115-kV line. (<i>Id.</i>, p.22). That forecast also lists the Frost Bridge to North Bloomfield 345-kV project, while noting that it was expected to be replaced by a GHCC project. Draft paragraph 53 may be corrected by deletion as follows:</p> <p>The proposed Project was listed in CL&P’s 2012 Forecast of Loads and Resources for the Period 2012-2021 as a planned 345-kV transmission line from Frost Bridge to Bloomfield, in CL&P’s 2013 Forecast of Loads and Resources for the Period 2013-2022 as a planned 345-kV transmission line from Frost Bridge to Bloomfield, in Eversource’s 2014 Forecast of Loads and Resources for the Period 2014-2023 as a planned 345-kV transmission line from Frost Bridge to Bloomfield, and in Eversource’s 2015 Forecast of Loads and Resources for the Period 2015-2024 as a proposed 115-kV transmission line from Frost Bridge to Campville. (Eversource Administrative Notice Items 40–43 – Eversource Forecast Reports)</p>
59	<p>The finding should be that “Connecticut accounts for approximately 25% of New England load; therefore, Connecticut consumers would bear approximately 25% of the Project cost included in regional rates.”</p> <p>The 25% figure is correctly stated in the Application, Eversource 1, Vol. 1, p. 11-16. The Connecticut load share was incorrectly stated to be 36% in Eversource’s pre-filed testimony. That figure was meant to be stated in the testimony as 26% - a more current estimate than the 25% stated in the application. However, by a typographical error it was stated as 36%.</p>

DFOF #	Comment
66	<p>A sentence should be added to this cost paragraph concerning the life-cycle costs of the overhead and underground alternatives. See Eversource’s proposed FOF # 86:</p> <p>In accordance with the Council’s “Life-Cycle Cost Studies for Overhead and Underground Transmission Lines” (2012), Eversource performed a present-value analysis of capital and operating costs over the economic life of the Project, as “compared to those of the all-underground alternative. It determined the life-cycle cost for the proposed Project is approximately \$76 million, whereas that of the all-underground alternative is approximately \$432 million. (Eversource 1, Vol. 1, pp. 3-23,)</p>
72	The height of the transition structure should be stated as 76, ’ as shown in Eversource I, Vol. 5, Appendix 4B.
79	Since not every pole will be directly embedded, this paragraph should add “typically” The references cited are consistent with this change.
94, 101	The new structures will be south of Line 1191, and the“new monopole structures typically in a delta configuration.” Some of the structures will be vertical. This change is consistent with the cited references.
104	The height of the existing steel lattice towers is 155. ’ (15’ is a typo) Consider additional cites of pp. 3-12, 3-13 and Table 3-2 (revised)
105	As correctly stated in DFOF #27, the date of receipt of the DEEP letter was March 1, 2016. However, it is mis-stated here and in subsequent cites as March 1, 2015.
117	Eversource proposes to maintain the erosion and sedimentation controls around areas of planned disturbance until they are stabilized, not “for the duration of the project.” Eversource I, Vol. 1, sec. 4.4.5, p. 4-36.
133	Add “majority of” after “along” in the first sentence. There are some portions of the ROW that do not have existing access roads. This change is consistent with the cited references.
154	The DFOF refers to a Traffic Management Plan. Eversource proposes to work with representatives of the four affected towns and ConnDOT, as stated in the DFOF and at p. 4-22 of Eversource I, vol. 1, but not to prepare a traffic Management Plan, unless required by ConnDOT. See Eversource I, vol. 1, p. 4-22, which does not mention a Traffic Management Plan

DFOF #	Comment
173	<p>The description of state vs federal wetlands along the transmission line route is not fully accurate. Consider substituting Eversource's Proposed FOF #126:</p> <p>The ROW encompasses 91 federal and state jurisdictional wetlands. In addition, four wetlands were delineated along off-ROW access roads that Eversource proposes to use during Project construction. The boundaries of these federal and state jurisdictional wetlands coincide in all but two locations, both along the Naugatuck River floodplain (wetlands FB-1 [Watertown] and F-9 [Litchfield]). The wetlands within this floodplain qualify as state wetlands, but do not meet the criteria for federal jurisdiction. Neither of these state-only wetlands will be affected by the Project. (Eversource 1, Vol. 1, pp. 5-7 and 5-9; Vol 2; Vol. 5, Appendix 2B, pp. 1 and 31 of 35; Eversource 4, p. 15)</p>
185	<p>This finding discusses procedures if groundwater is encountered. The citing references are to the underground construction section. With respect to the Proposed Project, the issue is discussed in the Application, Eversource 1, Vol. 1 at p. 4-34</p>
202	<p>Consider adding a citation to Eversource 1, Vol. 3, Ex. 5 (the visual report)</p>
209	<p>The reference to an additional 7.8 acres of vegetation clearing is incorrect, and was incorrectly stated at page 12-11 of the Application, which is cited. This value was corrected by Mr. Davidson in live testimony at the hearing to "approximately 1 acre." (Tr. March 1, p.30)</p>
211	<p>This paragraph concerns construction noise. The only cite is to page 6-46, which concerns noise from substation construction. Consider expanding cites to include pp. 6-40 and 6-41, which refer to transmission line construction noise impacts and hours.</p>

Respectfully submitted,

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CERTIFICATION

I hereby certify that a copy of the foregoing Applicant's Comments on Draft Findings of Fact has been electronically mailed / sent by U.S. Mail on this 7th day of April, 2016 upon all parties and intervenors as referenced in the Connecticut Siting Council's Service List dated January 21, 2016.

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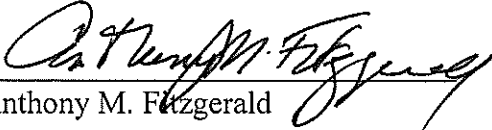
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