

January 26, 2018

VIA E-MAIL AND HAND-DELIVERY

Attorney Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: DOCKET NO. 474 - The Connecticut Light & Power Company d/b/a Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the Greater Hartford-Central Connecticut Reliability Project that traverses the municipalities of Hartford, West Hartford, and Newington, which consists of (a) construction, maintenance and operation of a new 115-kilovolt (kV) electric transmission line within existing Eversource, Amtrak and public road rights-of-way and associated facilities extending overhead approximately 2.4 miles and underground approximately 1.3 miles between Eversource's existing Newington Substation in the Town of Newington and existing Southwest Hartford Substation in the City of Hartford; (b) modifications to a .01 mile section within existing Eversource right-of-way of the existing overhead 115-kV electric transmission line connection to the Newington Substation (Newington Tap); and (c) related modifications to Newington Substation and Southwest Hartford Substation.

Dear Attorney Bachman:

I am writing in connection with the draft Findings of Fact for the above-referenced docket that were reviewed at the Siting Council's meeting held on January 18, 2018. The Applicant, The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource), has no substantive comments with regard to the draft Findings of Fact, but has some suggested minor edits and corrections. Enclosed are an original and fifteen (15) copies of Eversource's comments. Please note that these comments are in addition to the revisions discussed at the Council's January 18th meeting.

Very truly yours,


Anthony M. Fitzgerald

Enclosures
cc: Service List dated June 9, 2017 attached (w/encls.)

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-Mail	The Connecticut Light and Power Company d/b/a Eversource Energy	<p>Kenneth Roberts Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 (860) 728-4826 kenneth.roberts@eversource.com</p> <p>Kathleen M. Shanley Manager, Transmission Siting Eversource Energy 56 Prospect Street Hartford, CT 06103 (860) 728-4527 kathleen.shanley@eversource.com</p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 (860) 665-3548 jeffery.cochran@eversource.com</p> <p>Anthony M. Fitzgerald, Esq. Carmody Torrance Sandak & Hennessey LLP 195 Church Street P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com</p>

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 Greater Hartford-Central Connecticut Reliability Project that traverses the municipalities of Hartford, West Hartford, and Newington, which consists of (a) construction, maintenance and operation of a new 115-kilovolt (kV) electric transmission line within existing Eversource, Amtrak and public road rights-of-way and associated facilities extending overhead approximately 2.4 miles and underground approximately 1.3 miles between Eversource's existing Newington Substation in the Town of Newington and existing Southwest Hartford Substation in the City of Hartford; (b) modifications to a .01 mile section within existing Eversource right-of-way of the existing overhead 115-kV electric transmission line connection to the Newington Substation (Newington Tap); and (c) related modifications to Newington Substation and Southwest Hartford Substation

DOCKET NO. 474

January 26, 2018

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 January 11, 2018 (DFOF). In general, the DFOF provide a thorough, accurate, and cogent summary of the Record. The Applicant has suggested minor edits and corrections, as set forth in the table on the following pages. These suggested edits are in addition to the revisions discussed at the Siting Council's meeting held on January 18, 2018.

DFOF #	Comment
1	The Applicant applied to the Siting Council for a Certificate of Environmental Compatibility and Public Need for this Project on June 7, 2017 , not July 7, 2017. The first line of this Finding should be changed accordingly.
5	The first sentence of the Finding should read: Pursuant to C.G.S. § 16-50(b), Eversource provided legal service and legal notice of the application.
6	The Finding should specifically identify the referenced substations: On or before June 5, 2017, Eversource notified property owners abutting both substations- Newington Substation and Southwest Substation through certified mailings.
19	The first sentence of the Finding should be edited as follows: A link to the MCF was posted on Eversource’s website and the MCF was also made available in the respective municipal libraries.
28(h)	The first sentence of this section should be edited as follows: DOT enclosed signal plans for two signalized intersections in proximity to the proposed overhead crossing of New Britain Avenue ...
29(c)	This section of the Finding should be edited as follows: Eversource has designed the Project with no splice vaults within the State ROW and would make every effort to sueh maintain such design to avoid vaults within the State ROW;
29(d)	This section of the Finding should be edited as follows: Eversource would revise the burial depth to a 36-inch minimum for the 0.14-mile segment of the underground cable system planned for location within the State highway ROW;
29(f)	This section of the Finding should be edited as follows: Eversource would coordinate with DOT District 1 Maintenance for allowable work hours within the DOT ROW;
51	The Finding should be edited as follows: Even taking into account the most up to date 2017 ISO-NE Capacity, Energy, Loads, and Transmission (CELT) Forecast data, Connecticut’s peak loads would be still be well above the thermal and voltage critical load levels . . .
68	The life-cycle cost for the transmission portion of the Project is an approximate figure, and should be reflected as such in the Finding by inserting “approximate” before “\$80.5 million”.

DFOF #	Comment
70	<p>The first sentence of this Finding should be edited as follows:</p> <p>A “no-action” alternative would not improve the reliability of the electric system in the Greater Hartford sub-area, subjecting the area to continued risk of electric outages as well as undermining ISO-NE’s and Eversource’s long-range plan for providing reliable transmission service throughout Connecticut.</p>
72	<p>“IRP” is not previously defined in the Findings, and should be spelled out: Integrated Resource Plan for Connecticut.</p>
75	<p>A cite to Eversource 1, Vol. 1, p. 11-49 should be added for completeness. The alternative is referred to in the Application as the All-Underground Route Alternative. A similar correction should be made to references to this alternative in FOF #77 and FOF #79.</p>
84(e)	<p>“Lighting” should be corrected to “lightning”.</p>
92	<p>The first sentence of this Finding should be edited as follows:</p> <p>The first proposed 115-kV underground cable segment (located in Newington) would exit the west side of Newington Substation, loop around the north side of the substation, and proceed west east along Eversource’s property and within an existing Eversource distribution line ROW . . .</p>
93	<p>The second sentence of this Finding should be edited as follows:</p> <p>From the transition structure, the underground cable would traverse west for approximately 0.1 mile near across the northern portion of the paved parking lot of the Bow-Tie Cinema . . .</p>
101	<p>The description of the conductors is unclear. They should be described as “three phase conductors, each comprised of one 1,272-kcmil ACSS”.</p>
103	<p>The Finding should be edited as follows:</p> <p>The new overhead line would be protected by one overhead lightning shield wire. The lightning shield wire would contain optical glass fibers . . .</p>
104	<p>The Finding should reference FOF #212, not 211</p>
108	<p>The Finding should indicate that the proposed Structure No. 46 would be installed adjacent to the railroad corridor in the Town of West Hartford, south of Flatbush Avenue.</p>
109 & 210	<p>The correct spelling of the busway is CT <i>fastrack</i>.</p>
130	<p>The proper citation for this Finding is Eversource 1, Vol. 1, p. 3-17.</p>

DFOF #	Comment
135	<p>For clarification purposes, the Finding should be revised as follows:</p> <p>Along the cable segment within the Eversource ROW, any open portions of trench would be covered with plywood or steel plates after work hours to prevent fall hazards. Within paved roads, during non-work hours temporary cover (steel plates) would be installed over the open trench to maintain safety and traffic flow over the work area.</p>
163	The proper citation for this Finding is Eversource 1, Vol. 1, p. 6-13 .
184	The following citation should be added for this Finding: Eversource 1, Vol. 1, pp. 5-13 – 5-14.
196	<p>The last sentence of this Finding should be edited as follows:</p> <p>In addition, the Project would result in the conversion of approximately 1.9 acres . . .</p>
212	<p>The first sentence of this Finding should be edited as follows:</p> <p>The maximum worst-case structure height would be approximately 140 feet for Structure Nos. 47 and 48 to be located at the new railroad station to be constructed at Flatbush Avenue in West Hartford to be constructed.</p>
233	The table also reflects the calculated electric field levels.
248	Reference to the Campville Substation should be removed and replaced with “ two substations ”.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER
COMPANY d/b/a EVERSOURCE ENERGY

By: Anthony M. Fitzgerald (bh)
Anthony M. Fitzgerald
Carmody Torrance Sandak &
Hennessey LLP
195 Church Street, 18th Floor
P.O. Box 1950
New Haven, CT 06509-1950
T: (203) 777-5501

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 26th day of January, 2018 upon all parties as referenced in the Connecticut Siting Council's Service List dated June 9, 2017.

Kenneth P. Roberts
Project Manager
Eversource Energy
56 Prospect Street
Hartford, CT 06103
kenneth.roberts@eversource.com

Kathleen M. Shanley
Manager-Transmission Siting
Eversource Energy
56 Prospect Street
Hartford, CT 06103
kathleen.shanley@eversource.com

Jeffery Cochran, Esq.
Senior Counsel, Legal Department
Eversource Energy
107 Selden Street
Berlin, CT 06037
jeffery.cochran@eversource.com

Anthony M. Fitzgerald
Carmody Torrance Sandak & Hennessey LLP
195 Church Street
New Haven, CT 06509
afitzgerald@carmodylaw.com


Anthony M. Fitzgerald