



**Connecticut
Light & Power**

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February 13, 2014

Melanie Bachman
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: 2014 Revision of EMF Best Management Practices

Dear Ms. Bachman,

In your notice of potential revisions to the Council's EMF Best Management Practices (BMP), dated February 7, 2014, you note that the Council has requested the electric companies to brief the Council with respect to the current state of the Massachusetts, New York, and Florida magnetic field policies referenced in the current (2007) BMP. CL&P is pleased to report the following:

NEW YORK

There has been no change in the New York policy, which remains as described in the 2007 BMP.

FLORIDA

Florida adopted a revised policy in 2008. A copy of the revision can be found at http://www.dep.state.fl.us/siting/files/rules_statutes/62_814_emf.pdf. The existing text of the BMP may be revised to reflect the 2008 revision of the Florida policy by adding the following sentence:

In 2008, the Florida policy was revised to add a provision making the 250-mG magnetic field limit at the edge of ROW and at substation property boundaries applicable to transmission lines and substations with a nominal voltage greater than 500 kV.

Please note that the Florida limits apply at 1 meter above ground under an assumption that the transmission line is operating at its maximum continuous current rating. The current BMP make this point with respect to the New York limits, but do not indicate that the same point applies to the Florida limits as well.

MASSACHUSETTS

The description of the Massachusetts policy in the 2007 BMP is:

Since 1985, in its reviews of proposed transmission-line facilities, the Massachusetts Energy Facilities Siting Board has used an edge-of-ROW level of 85 mG as a benchmark for comparing different design alternatives. Although a ROW-edge level in excess of this value is not prohibited, it may trigger a more extensive review of alternatives.

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Massachusetts continues to regulate magnetic fields on an *ad hoc* basis, through decisions in individual facility applications. Recently, in its September 28, 2010 decision in its Docket EFSB 08-2, with respect to the Massachusetts portion of the Greater Springfield Reliability Project (GSRP) the Energy Facilities Siting Board (EFSB) adopted a prudential approach similar to that of the BMP. A copy of that decision may be accessed at: <http://www.mass.gov/eea/energy-utilities-clean-tech/energy-facilities-siting-board/efsb-decisions/transmission-lines.html>. The EMF discussion is at pages 70-73 and 84-96 of the decision. A capsule description of its provisions that could suitably substitute for the brief statement in the current BMP would be:

Massachusetts has not adopted any generally applicable standards or guidelines concerning transmission facility magnetic fields. However, since 1985, the Massachusetts Energy Facilities Siting Board has considered projected magnetic field exposures in its proceedings for approval of electric transmission lines and substations. Where a transmission line is proposed in densely populated areas and near schools, the EFSB will “require EMF mitigation which in its judgment is consistent with minimizing cost.”

The quotation above appears at page 87 of the GSRP decision.

While this level of detail would presumably be beyond the scope of the BMP, the Council may be interested to know that “no cost” (positioning the new 345-kV line in the middle of the ROW between two 115-kV lines and optimally phasing the conductors of the three lines) and “low cost” (increasing structure heights) measures were ordered by the EFSB in the GSRP docket after a detailed review of the cost and effects of multiple strategies, similar to that which the Council undertakes in accordance with its BMP.

At the time of the EFSB's decision, it was estimated that the incremental costs for the directed magnetic field reduction for the Massachusetts portion of the GSRP would total approximately \$7 million, as compared to a then-estimated Massachusetts project cost of approximately \$581 million (not including this incremental cost), or approximately 1% of project cost. The final cost figures for the magnetic field reduction measures and the total project cost were each lower.

OTHER COMMENTS

The proposed revision reflects significant care for accuracy. I do have one correction to suggest. The accurate URL reference for the updated (2010) ICNIRP standard is provided at page 4 of 13, but the reference at page 12 of 13 is to the 1998 version. The 2010 reference should be substituted or added.

Thank you for the opportunity to comment on the draft revision and to provide the above information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert E. Carberry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert E. Carberry
Project Manager, Transmission Siting

cc. Service List