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P.O. Box 270
Hartford, CT 06103

John Morissette
Project Manager – Transmission Siting
Tel: (860) 728-4532

April 30, 2015

Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Improvements to Comply With NERC Reliability Standards

Dear Chairman Stein:

Attached are an original and fifteen (15) copies of a petition on behalf The Connecticut Light and Power Company doing business as Eversource Energy and The United Illuminating Company (collectively, the Companies) requesting a determination that no Certificate of Environmental Compatibility and Public Need is required for all transmission substation remediation activities to comply with the North American Electric Reliability Corporation (NERC) reliability standards.

A check in the amount of \$625 for the required filing fee is also attached.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Morissette".

John Morissette
Eversource Energy
Project Manager – Transmission Siting – CT

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott, Esq.".

Bruce L. McDermott, Esq.
Managing Counsel – Operations
UIL Holdings Corporation
As Agent for The United Illuminating Company

Attachment: Petition

II. Background

NERC is a regulatory authority whose mission is “to ensure the reliability of the bulk power system” in North America. On July 20, 2006, the Federal Energy Regulatory Commission (FERC) certified NERC as the Electric Reliability Organization, as part of FERC’s efforts to maintain the reliability of the electric transmission grid. As of June 18, 2007, NERC was granted the legal authority by FERC to enforce reliability standards with respect to all U.S. users, owners and operators of the bulk power system.

Compliance with NERC’s reliability standards is mandatory for the Companies as owners and operators of bulk transmission facilities; non-compliance can result in penalties, including monetary penalties of up to \$1,000,000 per day, sanctions or mandated remedial actions.¹ Consistent with its reliability oversight responsibilities, NERC requires the protection of the physical security of certain substations.

III. NERC’s Reliability Standards

On March 7, 2014, FERC issued an order entitled *Reliability Standards for Physical Security Measures*, 146 FERC ¶ 61, 166 (2014). This order required NERC to develop reliability standards for the identification and protection of facilities that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation or cascading within an interconnection. As a result, NERC filed a petition for approval of proposed Reliability Standard, Critical Infrastructure Protection (CIP)-014-1, on May 23, 2014. On November 20, 2014, FERC approved Reliability Standard CIP-014-1.

CIP-014-1 requires transmission owners to conduct assessments of potential threats and vulnerabilities of a physical attack on certain substations. Once the

¹ Sources: www.nerc.com; www.ferc.com

assessments are completed, the transmission owners must develop and implement security plans to protect such substations from physical attacks. Accordingly, pursuant to CIP-014-1, the Companies are required to assess certain substations and to perform physical security improvements, where needed, to protect certain substations from physical attacks.

IV. Planned Improvements

To comply with CIP-014-1, the Companies plan to identify and propose appropriate improvements to protect the physical security of certain substations. Improvements may include, but are not limited to, installation or enhancement of intruder detection systems, placement of asset specific ballistic barriers around equipment, control house ballistic protection, installation of vehicle barriers (anti-vehicle bollards, operable barrier gates, or fixed concrete barriers), and replacement of substation perimeter fence to increase the height of the perimeter fencing (but not to an elevation higher than other substation equipment) and obscure direct line of sight into the substation. In some cases, the fence line may shift out slightly (less than ten feet).

V. Conduct of Improvements

Because the improvements will directly impact the reliability of the bulk power system, the Companies plan to undertake such improvements as quickly as possible. Given the limited nature of the improvements and the likelihood that subject sites will be scattered throughout Connecticut, the Companies request that the Council provide a determination that a Certificate is not required because the Companies' improvements on a project-wide basis will have no "substantial adverse environmental effect" and

therefore would not require a Certificate pursuant to Connecticut General Statutes Section 16-50k.

VI. No Substantial Adverse Environmental Effect

The Companies' proposed improvements would have no substantial adverse environmental effect based on the following factors:

1. No private property right-of-way - work to occur on the Companies' owned or easement property;
2. Environmental effects will be limited and temporary;
3. No increase in noise from any of the upgrades; and
4. No changes to electric and magnetic field levels are anticipated.

In addition, to the extent that any environmental effects would occur, the Companies will mitigate such effects as follows:

1. Use of Erosion and Sediment Controls
 - Erosion and sediment controls will be employed in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*.
 - The Companies' contractors will install, inspect and maintain erosion-control measures. Inspections will occur each work day and within twenty-four hours after each storm event. Accumulated sediments will be removed to upland areas and spread such that there is no potential for them to encroach into any regulated areas.
 - The Companies' contractors will be fully responsible to manage construction activities such that the movement of soils or sediments, caused by the wind or rainfall coming into contact with exposed soils, will not impact any adjacent regulated areas.
 - The Companies' contractors will perform construction sequencing such that earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
2. Access
 - The Companies' plan to use existing access to the substations.

- During construction, where necessary, anti-tracking mats will be installed at road intersections to prevent tracking of soil onto local streets.
3. Vegetation Removal
- The Companies will limit clearing of vegetation to the minimum amount necessary for the proposed improvements.
4. Rehabilitation of Disturbed Areas
- Upon completion of construction activities, any disturbed/exposed areas outside the substation fence line will be restored (dressed with topsoil, landscaped and/or seeded).
 - Erosion-controls measures will remain in place until final site stabilization is achieved.

VII. Notices and Reports to the Council

To provide the Council with notice of the proposed improvements on a site-specific basis, the Companies propose to file a sub-petition in substantially the form attached as Appendix A. Given the nature of the improvements and the sensitivity of the selected substations, the Companies request critical energy infrastructure information (“CEII”) treatment for the proposed improvements and for the identity of the particular substations designated as critical. CEII is defined as:

Specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transportation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the [Federal] Freedom of Information Act; and
4. Gives strategic information beyond the location of the critic infrastructure.

18 CFR § 388.113(c)(1). In turn, “critical energy infrastructure” is defined as:

Existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.

18 CFR § 388.113(c)(2).

In particular, information as to certain substations could be useful to a person planning an attack on critical infrastructure. Protective orders will be necessary in some circumstances to comply with FERC Orders, including Order 630, 68 Fed. Reg. 9857 (2003), as amended by Order 630-A, 68 Fed. Reg. 46460 (2003), Order 649, 69 Fed. Reg. 48391, (2004); Order 662, 70 Fed. Reg. 37036 (2005); Order 683, 71 Fed. Reg. 58276 (2006); Order 702, 72 Fed. Reg. 63985 (2007); Order 890, 72 Fed. Reg. 12266 (2007). The Companies will submit sub-petitions pursuant to the Council’s *Procedures for Filing Proprietary Information Under Protective Order* and requests advance permission from the Council to file sub-petitions in their entirety under these procedures. As to such sub-petitions, the Companies requests that the Council not require notice to the Town and the property owner of record, given the nature of the improvements and the sensitivity of the selected substations.

VIII. Conclusion

Under Connecticut General Statutes Section 16-50k (a), a Certificate is not required because the Companies’ proposed improvements will not result in any substantial adverse environmental effect.

IX. Notices

Communications to Eversource regarding this Petition for a Declaratory Ruling should be directed to:

Mr. John R. Morissette
Project Manager, Transmission Siting - CT
Eversource Energy
P.O. Box 270
Hartford, CT 06141-0270
Telephone: (860) 728-4532
Email: john.morissette@eversource.com

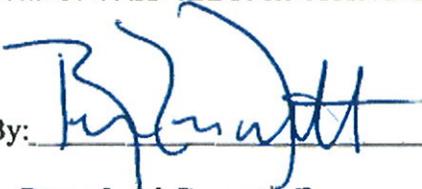
Communications to UI regarding this Petition for a Declaratory Ruling should be directed to:

Mr. James M. Yeske
Project Manager Transmission
180 Marsh Hill Road
Orange, CT 06477-3629
Telephone: (203) 499-4845
Email: Jim.Yeske@uinet.com

THE CONNECTICUT LIGHT AND
POWER COMPANY DOING
BUSINESS AS EVERSOURCE ENERGY

By: _____
John R. Morissette
Project Manager, Transmission Siting - CT

THE UNITED ILLUMINATING COMPANY

By:  _____
Bruce L. McDermott, Esq.
Managing Counsel – Operations
UIL Holdings Corporation
As Agent for The United Illuminating
Company

IX. Notices

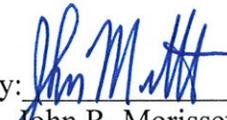
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P.O. Box 270
Hartford, CT 06141-0270
Telephone: (860) 728-4532
Email: john.morissette@eversource.com

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THE CONNECTICUT LIGHT AND
POWER COMPANY DOING
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By: 
John R. Morissette
Project Manager, Transmission Siting - CT

THE UNITED ILLUMINATING COMPANY

By: _____

Bruce L. McDermott, Esq.
Managing Counsel – Operations
UIL Holdings Corporation
As Agent for The United Illuminating
Company

Appendix A-1

[Form of Sub-Petition to Siting Council for Eversource]

Confidential Critical Energy Infrastructure Information (CEII) and or Physical Security Information (PSI) Subject to Protective Order and/or Non Disclosure Agreement. Do Not Copy or Provide to Unauthorized Persons

**THE CONNECTICUT LIGHT AND POWER COMPANY
DOING BUSINESS AS EVERSOURCE ENERGY**

Sub-Petition
CONNECTICUT SITING COUNCIL – PETITION NO. _____
NERC STANDARDS
RELIABILITY IMPROVEMENTS

Town: _____ Sub-Petition No. _____

I. Introduction:

In accordance with the ruling of the Connecticut Siting Council (the “Council”) (as set forth in the Council’s _____ letter) regarding Petition No. _____ (“CSC Ruling”), The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) submits this Sub-Petition.

II. Description of Reliability Improvements:

Eversource plans to conduct the following reliability improvements (“Improvements”) in accordance with North American Electric Reliability Corporation (“NERC”) standards:

III. No Substantial Adverse Environmental Effect:

Eversource respectfully submits that the proposed Improvements would have no “substantial adverse environmental effect” pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

[EXPLAIN]

Confidential Critical Energy Infrastructure Information (CEII) and or Physical Security Information (PSI) Subject to Protective Order and/or Non Disclosure Agreement. Do Not Copy or Provide to Unauthorized Persons

IV. Mitigation

To the extent that any temporary environmental effects would occur, those effects would be mitigated as follows:

1. Erosion and sediment controls (“E&S”) would be employed in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*.
2. Eversource’s contractor would perform construction sequencing such that earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
3. During construction, where necessary, anti-tracking mats would be installed at construction entrances onto roads to prevent tracking of soil onto local streets.
4. Upon completion of construction and establishment of permanent ground cover, Eversource’s contractor would remove and dispose of all E&S measures, and remove sediment and debris from areas where such measures were used.
5. Upon completion of Improvements, all disturbed/exposed areas would be stabilized and revegetated. These areas would be dressed with topsoil, landscaped and/or seeded.

V. Access:

[EXPLAIN]

THE CONNECTICUT LIGHT AND
POWER COMPANY DOING
BUSINESS AS EVERSOURCE ENERGY

By: _____
John R. Morissette
Project Manager, Transmission Siting - CT

Appendix A-2

[Form of Sub-Petition to Siting Council for UI]

Confidential Critical Energy Infrastructure Information (CEII) and or Physical Security Information (PSI) Subject to Protective Order and/or Non Disclosure Agreement. Do Not Copy or Provide to Unauthorized Persons

THE UNITED ILLUMINATING COMPANY

Sub-Petition
CONNECTICUT SITING COUNCIL – PETITION NO. _____
NERC STANDARDS
RELIABILITY IMPROVEMENTS

Town: _____ Sub-Petition No. _____

I. Introduction:

In accordance with the ruling of the Connecticut Siting Council (the “Council”) (as set forth in the Council’s _____ letter) regarding Petition No. _____ (“CSC Ruling”), The United Illuminating Company submits this Sub-Petition.

II. Description of Reliability Improvements:

UI plans to conduct the following reliability improvements (“Improvements”) in accordance with North American Electric Reliability Corporation (“NERC”) standards:

III. No Substantial Adverse Environmental Effect:

UI respectfully submits that the proposed Improvements would have no “substantial adverse environmental effect” pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

[EXPLAIN]

Confidential Critical Energy Infrastructure Information (CEII) and or Physical Security Information (PSI) Subject to Protective Order and/or Non Disclosure Agreement. Do Not Copy or Provide to Unauthorized Persons

IV. Mitigation

To the extent that any temporary environmental effects would occur, those effects would be mitigated as follows:

1. Erosion and sediment controls (“E&S”) would be employed in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*.
2. UI’s contractor would perform construction sequencing such that earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
3. During construction, where necessary, anti-tracking mats would be installed at construction entrances onto roads to prevent tracking of soil onto local streets.
4. Upon completion of construction and establishment of permanent ground cover, UI’s contractor would remove and dispose of all E&S measures, and remove sediment and debris from areas where such measures were used.
5. Upon completion of Improvements, all disturbed/exposed areas would be stabilized and revegetated. These areas would be dressed with topsoil, landscaped and/or seeded.

V. Access:

[EXPLAIN]

THE UNITED ILLUMINATING COMPANY

By: _____
James M. Yeske
Project Manager, Project Manager
Transmission

