

Jim Cole Vice President of Projects Avangrid, Inc./United Illuminating 180 Marsh Hill Road Orange, CT 06477

July 14, 2025

Andrea and Steve Ozyck Sasco Creek Neighbors Environmental Trust Inc. (SCNETI) info@empoweringfairfield.org

Dear Mrs. Andrea Ozyck, Mr. Steve Ozyck, and SCNETI:

I write regarding your recent opinion piece published in the *CT Examiner* (June 28, "<u>Setting the Record</u> <u>Straight on Fairfield-Bridgeport Transmission Lines</u>"). First, let me say that we are always ready and willing to engage with any of our stakeholders on any project: because we are a regulated company, we invite open and transparent dialogue at the local, state, and federal level.

However, we are deeply disappointed with the false and misleading information that you continue to advance. As an outspoken member of your community, we are concerned that this misinformation is overly divisive, inflammatory, and at points, verges on defamatory. The intent of this letter is to clarify some of the more egregious statements you have recently made so that both you and all our customers have accurate and correct information about this project moving forward.

Easements

First, the information you continue to share about easements, calling them "property seizures" and "land acquisition" that "would be controlled by a foreign-owned company in Spain" is false. Easements are not property seizures: they are a bilateral, negotiated agreement in which one party (UI) can use a specific area that belongs to another party for a specific use for just compensation. You also claim UI can use an easement "differently" later, but easements are legal public records; they cannot be amended after the fact without establishing a new easement.

It is UI, not Avangrid or Iberdrola, that manages our easements. Avangrid is UI's only shareholder, and Iberdrola is Avangrid's: just as shareholders do not manage easements for companies in which they own shares, nor does Avangrid or Iberdrola manage UI's.

Cost Estimates

You spend a great deal of time discussing our cost estimates for overhead and underground alternatives. Given the attention on the cost differentials between these alternatives, and how increased costs would



be borne by ratepayers all over the state, this is unsurprising. But no one could thoughtfully consider an underground project and genuinely believe it would be more cost-efficient than overhead. Underground projects are inherently less efficient due to the heavier copper cables required by the heating effects of being buried underground, and they have significantly more environmental impacts and waste materials that will end up in landfills. For Fairfield to Congress, navigating water crossings, other underground utility infrastructure, and the MetroNorth railroad add several additional miles of complexity – and cost.

You point to a <u>2022 Connecticut Siting Council study</u> that found the average cost of undergrounding in Connecticut to be \$23 million/mile. Fairfield to Congress does not represent "average" project due to the specific characteristics I mentioned above. You also omit any comparison as context: in the same study, the Siting Council found the average cost of an overhead solution is less than \$5 million/mile. This means that underground solutions for normal projects are on average 4.5x as costly.

In your op-ed, you also make a series of false and misleading statements regarding cost estimates:

- You say we did not provide "accompanying details" on how we arrived at our cost estimate. As you will recall, the Siting Council decided that forcing us to reveal these details would disrupt the competitive bidding process with our vendors and contractors, which ensures our customers receive the best price for needed investments.
- 2. You claim say that we "padded" our cost estimate with interest, even though any project costing hundreds of billions of dollars will require interest: borrowing money comes with a cost.
- 3. You say we assumed a 10-year "construction timeline." This is a mischaracterization. UI did not assume a 10-year *construction* timeline but a 10-year *project* timeline, one that includes siting and design through restoration. That timeline began three years ago, the timeline on which the independent experts you cite say an entire project can be completed.
- 4. You say UI did not seek federal funding for this project. This is incorrect. At UI, we routinely examine and apply for federal funding opportunities when our projects qualify. Unfortunately, undergrounding a transmission project based on visual impact and aesthetics in just two municipalities would virtually never qualify for federal taxpayer funding.
- 5. You claim that UI hasn't "figured out" how to underground cost-effectively. On the contrary, just last month, UI finished rerouting three underground transmission lines as part of the <u>Pequonnock Substation Rebuild Project</u> in Bridgeport. We are always ready to underground a project when it is a cost-effective option. This is not the case in Fairfield to Congress.

UI would never propose subjecting Connecticut ratepayers to a more expensive project when there are less expensive alternatives that achieve our reliability objectives. For us to do otherwise would be unethical and run counter to our core obligations.

Capacity Increases and Infrastructure Replacement

Statements you have made calling into question the need for this project are deeply concerning. First, you say the project unnecessarily "nearly doubles the [lines'] current capacity," even as you omit the fact that the Independent System Operator of New England projected that in 25 years, electricity demands are <u>expected to double</u>. As you know from the age of our current infrastructure (i.e., 60 years), we build



assets that last for far longer than 25 years. The transmission system is only as strong as its weakest link, and as this section has been designed with the same capacity requirements as other UI phases and transmission projects regionally, we cannot have the "weakest link" be in Bridgeport and Fairfield.

Contending that the "increased transmission capacity is designed to sell power to New York" is an outrageous claim. UI has not sold power since the late 1990s. Our company makes a return on investments in the *infrastructure* that distributes the electricity; we have no interest, financial or otherwise, in electricity supply. Furthermore, New York is not part of the same ISO as Connecticut, meaning New York does not benefit from this project any more than Michigan or Pennsylvania.

Your claim that we "admitted on the record" to this misinformation verges on defamatory. I do not know where this inaccurate and incoherent rumor began, but I must tell you that continuing to amplify an impossibility as "fact" is weakening any legitimacy in your position.

Finally, you bring up CTDOT, falsely implying they are neutral on the placement of the transmission lines. On the contrary, <u>CTDOT wrote</u> that they "concur[red] with [UI]'s proposal to remove the existing 115-kV lines" from the railroad, as "maintaining the 115-kV lines on the railroad catenary structures would be inconsistent with CTDOT's current plans to improve railroad service." Whether you agree or not, CTDOT clearly believes it is in their stakeholders' interest to untangle their infrastructure from ours.

Conclusion

Throughout your op-ed, you omit that this project is simply the last phase of a 25-mile rebuild that UI has been undertaking for the past decade. With each of those phases – in New Haven, West Haven, Milford, and Stratford – approved by the Siting Council as overhead designs, on what grounds should Fairfield get special treatment, and why should costs be covered by millions of ratepayers all over the state?

The need for electricity is only increasing, and that means all electricity users – residents and businesses, in the Northeast and beyond – need a modern, resilient transmission system capable of delivering safe, reliable power. No matter where this project ends up, no matter how long it's fought at the Council or in court, UI will continue to serve the Town of Fairfield with electricity. Your inaccurate and misleading rhetoric is making that obligation more challenging as we work to implement critical energy programs and solutions across the state. Therefore, we ask you to stick to the facts – not the false and divisive claims you continue to employ.

Sincerely,

Jim Cole

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