Date Filed: October 20, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:
(ENVIRONMENTAL REMEDIATION) Provide the following information regarding remediation associated with leaking or compromised underground storage tanks (USTs):

a. A narrative description of the requirements of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.;
b. Records of installation, maintenance, inspection, and repair for each UST or associated component suspected of causing remediation costs;
c. The cost for each site resulting from the need to remediate pollution from the USTs;
d. A description of why the USTs failed, leaked or were otherwise compromised;
e. A description of how the Company routinely assesses the integrity of its USTs;
f. Whether the Company's insurance policies cover any amount of the costs resulting from compromised UST and the amount of insurance proceeds; and
g. Whether the Company has at any time been in violation of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.

Response:

a. The Connecticut underground storage tank (UST) regulations have been in effect since 1985 and have had significant updates at least every 10 years, with the most recent updates being in 2025. The requirements include and go beyond those required at the federal level. The following is a summary of the current regulations under RCSA §22a-44(d)-1. RCSA § 22a-449(d)-1 et seq. establishes requirements for the registration, installation, operation, maintenance, release detection, closure, and corrective action associated with underground storage tank systems containing petroleum and certain other regulated substances. The regulations establish standards intended to prevent releases from underground storage tank systems and require owners and operators to maintain applicable tank and piping systems, conduct required release detection and inspections, report suspected or confirmed releases to the Connecticut Department of Energy and Environmental Protection (CT DEEP) and undertake investigation and corrective action when releases occur. The regulations also establish requirements for tank closure, recordkeeping, and financial responsibility, as applicable.

b.

Site	Response
RS#8 Torrington Former MGP	Available electronic records for the 4,000-gallon diesel UST and 10,000-gallon gasoline UST, both removed in 1988, are included in RSR-038, Attachment 1. Additional paper records may be available at off-site storage but are not accessible given the requested deadline.
RS#66 East Hampton	Several USTs were abandoned in place and removed from the site from 1984 to 2008 (see RSR-038, Attachment 2). However, the remediation costs during the rate case period (2017 through 2025) are only associated with a release from the former 10,000-gallon unleaded gasoline UST installed in 1980. The 10,000-gallon unleaded gasoline UST installed in 1980 was tightness tested in 1984 (see RSR-038, Attachment 3); it was determined to have a fuel supply line leak and was taken out of service. Follow up groundwater testing identified gasoline and gasoline constituents in the groundwater and Consent Orders were issued by DEEP. In response to this, the gasoline UST in this area and the associated fuel pumps and petroleum impacted soils were removed to the extent feasible due to the presence of the Garage Building foundation. In addition, new water supply wells, interceptor wells and a pump/treat groundwater treatment system were installed and continually operated for over 30 years.
RS#67 Madison AWC (closed December 2025-adjustments January 2026)	The Site is comprised of an active electrical operations Area Work Center (AWC). In the late 1980's, petroleum impacts associated with USTs and a fueling island were identified. In response to this, the USTs, fuel pumps and petroleum impacted soils were removed, and an active pump/treat groundwater treatment system was installed as part of the remediation of this area of the Site. The treatment system was continuously operated for approximately 30 years; however, hydrocarbon impacts remained in the subsurface. In May 2020, Eversource requested our consultant (GES) provide an opinion on the remedial options for the Site. GES recommended a phased excavation approach to remove source soil to achieve regulatory compliance at the Site. See provided historical reports included in RSR-038, Attachment 4.
RS#117 Berlin Campus	One former 2,000-gallon gasoline UST, Tank J11, has associated remediation costs during this rate period. Historical records of previous installation, maintenance, inspection, and repair of Tank J11 may be available and stored off premises but are not readily available

	electronically. We are not able to get these files within the due date specified. In September 2023, an environmental reserve was established to evaluate and address remaining contamination associated with a gasoline release from the Tank J11 UST located adjacent to the Berlin Campus Central Maintenance Service Building. Tank J11 was abandoned in place sometime before 1980. The tank and immediately surrounding soils were removed from the ground in 1997 when approximately 2 gallons of gasoline was discovered pooled within the top of the tank during construction activities to improve the parking lot. NUSCO later advanced several test borings and installed monitoring wells to define the extent of gasoline-impacted soil and groundwater. Based on characterization findings and limited gasoline recovery efforts, NUSCO installed a soil vapor extraction and air sparge system to address the plume which operated between 2004 and 2024

c.

Site	**Response**
RS#8 Torrington Former MGP	Site-wide environmental investigation was conducted during the rate case period. Estimated environmental investigation costs directly related to the 4,000-gallon diesel UST and/or 10,000-gallon gasoline UST during this rate case period (2017 through 2025) are approximately $11,000. Remediation of areas impacted by these USTs did not occur during the rate case period.
RS#66 East Hampton	While full accounting records are not available an internal Memo from 1985 indicates that over a million dollars was estimated to be spent in the remainder of 1985 ($900,000 to expense and $250,000 for capital) to install the infrastructure needed to address the gasoline leak and that $30,000 per year was estimated for future operation, maintenance and monitoring of the groundwater treatment system. The Reserve for the site was not established until Q4 2012 and was set at $110,000 for a three-year period. Spend during the Rate Case period for on-going treatment system operation, maintenance, monitoring and additional groundwater and soil investigation following treatment system shut down in 2021 to determine current site conditions totaled $384,751.05.

RS#67 Madison AWC (closed December 2025-adjustments January 2026)	The cost to remediate pollution from the USTs during this rate case period is $2,721,763.97.
RS#117 Berlin Campus	In Q3 2023, an environmental consultant provided a remedial cost to closure estimate which became the basis for the reserve funding. The estimate included the following remaining remedial tasks and costs associated with the J11 release: o Initial Review, Evaluation, Findings and Opinion Report, Cost to Closure Estimate = $20,246.75 o Site Characterization = $197,767 o Remediation = $49,410 o Remedial Action Plan and Monitored Natural Attenuation Post-Remediation Field Activities = $48,600 The cost to remediate pollution from the USTs during this rate case period is $280,638.58.

d.

Site	**Response**
RS#8 Torrington Former MGP	Upon removal, the 4,000-gallon diesel UST was observed to be severely corroded with dime sized holes. The 10,000-gallon leaded gasoline UST was observed to be corroded and pitted but no obvious holes were identified at the time of removal. UST removal documentation indicates that gasoline impacts were observed during the removal of the 4,000-gallon diesel UST in March 1988. As a result, the adjacent 10,000-gallon gasoline UST was removed in April 1988.
RS#66 East Hampton	The 10,000-gallon fiberglass reinforced plastic tank, that was installed in 1980 and tightness tested in 1984, was determined to have a fuel supply line leak at a coupling on top of the tank, which was opined to be an installation error, and the tank was taken out of service. There are no USTs currently located at this site; the last tank was removed from the site in 2008.
RS#67 Madison AWC (closed December 2025-	The age of the UST system was the suspected reason for failure.

adjustments January 2026)	
RS#117 Berlin Campus	The tank was not observed to be in poor condition when it was removed. The cause of the leak/release is unknown.

e. The Company has assessed the integrity of previous USTs in accordance with RCSA § 22a-449(d)-1 et seq. It should be noted that the Company has no known USTs that remain in service and all known USTs have been removed/permanently closed.

f. The insurers exclude underground infrastructure under the Companies current insurance policies therefore the Company is unable to recovery insurance proceeds.

g.

Site	**Response**
RS#8 Torrington Former MGP	No violations are known relating to these USTs.
RS#66 East Hampton	No violations are known relating to these USTs.
RS#67 Madison AWC (closed December 2025-adjustments January 2026)	No violations are known relating to these USTs.
RS#117 Berlin Campus	No violations are known relating to this UST.

RS#5 Rockville MGP

Not applicable. There are no known USTs on-site. Two former below ground gas holders with tar impacted material remain and will be remediated as part of a site-wide remedial action plan. These holders appear to be intact.

RS #9 Winsted Former MGP

Not applicable. Two gasoline USTs were removed from the site in 1986. It is noted that signs of release were not observed at the time of removal. No remediation costs are associated with a release from USTs at the site.

RS#23 Ridgefield Rail Trail

Not applicable. This site is a former railroad bed. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#27 Portland, CT ROW#2

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#52 Williams St 9L

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#55 Hunts Brook Fly Ash Site

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#56 Historic Transformers (Capewell)

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS #58 Former Enfield AWC

Not applicable. One gasoline and one diesel UST were removed from the site in 1993. It is noted that no evidence of a release was observed at the time of removal. No remediation costs associated with the release from these USTs were accrued during this rate case period.

RS#63 Berlin Settling Basin

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#64 Property Transfer Wethersfield

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS #68 Former Simsbury AWC

Not applicable. Several USTs were removed from the site or abandoned in place from 1979 to 2001. No remediation costs during the rate case period (2017 through 2025) are associated with a release from USTs at this site.

RS#103 Parsons Lane Durham

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#118 2 Main Street Enfield CT

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS #119 Windsor Operations Center

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS #121 Bartholomew 18

Not applicable. The initial Ph I Environmental Site Assessment activities have just begun, and there have been no USTs identified on this site to date.