

Paul A. Colbert
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Regulatory Affairs



December 13, 2016

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350

Re: Case 13-T-0585, *Application of Cricket Valley Energy Center, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the Public Service Law for Approval of a New 345kV Line From the Pleasant Valley Substation to the Cricket Valley Energy Center, LLC, and the Reconductoring of an Existing 345 kV Line, in the Town of Dover, Dutchess County; Central Hudson Gas & Electric Corporation's Reply Comments*

Dear Secretary Burgess:

Please accept for filing in the above-referenced case Central Hudson Gas & Electric Corporation's Reply Comments Regarding Cricket Valley Energy Center, LLC's Proposed Environmental Management and Construction Plan.

Please contact the undersigned at (845)486-5831 or pcolbert@cenhud.com with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Paul A. Colbert".

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**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

<i>Application of Cricket Valley Energy</i>)	
<i>Center, LLC for a Certificate of</i>)	
<i>Environmental Compatibility and Public</i>)	
<i>Need Pursuant to Article VII of the</i>)	
<i>Public Service Law for Approval of a</i>)	Case 13-T-0585
<i>New 345kV Line From the Pleasant Valley</i>)	
<i>Substation to the Cricket Valley Energy</i>)	
<i>Center, LLC, and the Reconductoring of</i>)	
<i>an Existing 345 kV Line, in the Town of</i>)	
<i>Dover, Dutchess County.</i>)	

**CENTRAL HUDSON GAS & ELECTRIC CORPORATION'S REPLY COMMENTS
REGARDING CRICKET VALLEY ENERGY CENTER, LLC'S PROPOSED
ENVIRONMENTAL MANAGEMENT AND CONSTRUCTION PLAN**

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INTRODUCTION

Central Hudson Gas & Electric Corporation ("Central Hudson") has reviewed the proposed Environmental Management and Construction Plan ("EM&CP) filed by Cricket Valley Energy Center, LLC ("Cricket Valley") and the comments filed by the Parties on October 12-13, November 22, 28-29 and December 12 2016 concerning a new 345kV line from the Pleasant Valley Substation to Cricket Valley and the reconductoring of an existing 345kV line in the Town of Dover, Dutchess County. Based on Central Hudson's review of the proposed EM&CP, comments and Reply Comments, Central Hudson offers the following Reply Comments.

COMMENTS

Central Hudson currently operates and maintains a 16" gas transmission line within a portion of the construction area, originating from the Central Hudson's gas gate station near Cricket Valley electric structure CV-13 (Plan and Profile Sht. 4 of 32) to South Ave. in the Town of Pleasant Valley (Plan and Profile Sht. 2 of 32). This high pressure gas transmission facility must be clearly delineated and identified with Central Hudson's name on the plan and profile sheets in order to provide construction personnel with knowledge and awareness of the existence of Central Hudson's facility before Cricket Valley may safely work within the existing easement.

The following list of construction requirements for the protection of the Central Hudson's gas transmission pipeline was communicated to Cricket Valley representatives. Central Hudson considers this critical information for all facets of the project construction and the information must be included in the EM&CP plan and clearly identified on the respective plan and profile drawings before the Commission permits the project to proceed.

I. Information Communicated to Cricket Valley:

Cricket Valley should relocate the northern boundary of each work/laydown area to maintain a 5' buffer between the work area and the gas transmission main.

Where the proposed access road parallels the gas main, Cricket Valley should maintain a 5' offset separated by temporary fencing. Cricket Valley should maintain this fencing throughout the construction activities.

Where the proposed access road crosses the gas main, unless otherwise specified by Central Hudson Engineering, Cricket Valley should bridge the crossing with an air-gap design Appendix S, Engineering Dr., page 19 of 25, of the EM&CP.

The following is a list of specific location requirements:

A. Structure CV-06

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road.

B. Structure CV-07

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road.

C. Structure CV-08

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road (an alternative is for Cricket Valley to access the laydown area directly from Forest Valley Road to the east without crossing the Gas Transmission main).

D. Structure CV-09

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road.

Cricket Valley should install a single air-gap bridge for crossing the gas main immediately east of the pond (1H) just east of structure CV-09. This crossing must be the full width of the proposed access road. Cricket Valley should also install temporary fencing to ensure travel within this bridged crossing.

E. Structure CV-10

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road.

Cricket Valley is required to relocate approximately 650' of the proposed access road, between CV-10 and Traver Road to the east to ensure a 5' offset to the gas main. Cricket Valley should install temporary fencing as required to ensure travel within designated areas only.

F. Structure CV-11

Cricket Valley should install a single air-gap bridge crossing for the main access road west of CV-11 (Located in NYSDEC PV-4, 2B). The crossing bridge must be the full width of the proposed access road. Cricket Valley should install temporary fencing to ensure travel within this bridged crossing.

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road.

Cricket Valley should install a single air-gap bridge crossing for the main access road east of CV-11. The crossing bridge must be the full width of the proposed access road. Cricket Valley should install temporary fencing to ensure travel within this bridged crossing.

Cricket Valley should install a single air-gap bridge crossing for the graveled access road east of CV-11. The crossing bridge must be the full width of the proposed access road. Cricket Valley should install temporary fencing to ensure travel within this bridged crossing.

From the access road crossing of the gas main near the west end of the ag field, east for approximately 1200' to the west edge of the proposed laydown area for structure CV-12, Cricket Valley is required to relocate the proposed access road, which parallels the gas main, to maintain a 5' offset to the south of the gas main. Cricket Valley should install temporary fencing as required to ensure travel outside of this offset boundary.

G. Structure CV-12

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5 foot offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing for the main access road just north of the CV-12 laydown area. The crossing bridge must be the full width of the proposed access road. Cricket Valley should install temporary fencing to ensure travel within this bridged crossing.

H. Structure CV-13

Cricket Valley should relocate approximately 900' of access road west of CV-13 to maintain a 5' offset to the south of the gas main. Cricket Valley should install two air-gap bridge crossings for the main access road one each at the east and west ends of this section of the access road.

For the north boundary of the proposed laydown area Cricket Valley should maintain a 5' offset to the gas main.

Cricket Valley should install a single air-gap bridge crossing to access the laydown area from the access road to the north (an alternate plan would be for Cricket Valley to access the laydown area directly from the access road to the east or west without crossing the gas main).

Cricket Valley should install two air-gap bridge crossings for the main access road crossings of the gas main just east of the laydown area for CV-13. The crossing bridges must be the full width of the proposed access road. Cricket Valley should install temporary fencing to ensure travel within this bridged crossing (an alternative would be for Cricket Valley to relocate the access road just east of CV-13 to the north effectively eliminating two crossings of the gas main).

Cricket Valley must accurately portray Central Hudson's gas transmission line on Plan and Profile Sheet 2 of 32; the gas transmission line crosses South Avenue and proceeds south on the west side of South Avenue.

Cricket Valley is required to clearly identify on each plan and profile sheet the need to contact DigSafelyNY (811) prior to any mechanized excavation activities as defined in 16 NYCRR Part 753.

Prior to construction Cricket Valley must verify by vacuum excavation the location of the pipeline at sufficient intervals to insure the location of any crossing protection is centered over, or a proper offset is maintained, when paralleling the gas transmission pipeline.

Cricket Valley may not place excavation spoil/slash/wood chips on or within 5' of the centerline of the gas pipeline temporarily or permanently.

Cricket Valley's excavation and landscaping activities shall not alter the current depth of cover over Central Hudson's gas pipeline.

Cricket Valley must restore any disturbed soil over and within 5' of the pipeline centerline with native low growing grasses or sedges which can tolerate annual mowing.

Respectfully submitted,



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