

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
	:	DOCKET NO. 508
THE UNITED ILLUMINATING COMPANY	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE MILVON TO	:	
WEST RIVER RAILROAD	:	
TRANSMISSION LINE 115-KV REBUILD	:	
PROJECT THAT TRAVERSES	:	
PORTIONS OF MILFORD, ORANGE,	:	May 17, 2022
WEST HAVEN, AND NEW HAVEN,	:	
CONNECTICUT	:	

**PRE-HEARING SUBMISSION
OF CITY OF MILFORD**

The City of Milford (“City”), a party to this proceeding, submits the following pre-hearing information to the Connecticut Siting Council:

A. List of Witnesses

The following individuals will appear before the Council to testify on behalf of the City in this proceeding:

- 1) Marguerite Carnell, Archaeological and Historical Services Inc., 569 Middle Turnpike, Storrs, Connecticut, 06268. Ms. Carnell will provide information concerning the City’s historic resources, anticipated adverse impacts resulting from the project, and mitigation measures related thereto. A copy of Ms. Carnell’s curriculum vitae is provided as Attachment A to her pre-filed testimony, submitted herewith.

- 2) Bill Silver, Silver Petrucelli & Associates, 3190 Whitney Ave., Building 2, Hamden, Connecticut, 06518. Mr. Silver will provide information concerning the City’s historic resources, anticipated adverse impacts resulting from the project, and mitigation measures related thereto. A copy of Mr. Silver’s curriculum vitae is provided as Attachment A to his pre-filed testimony, submitted herewith.

B. Pre-Filed Testimony

The direct testimony of those witnesses testifying on behalf of the City (listed above) is being submitted simultaneously with this filing.

C. Documents to be Administratively Noticed

In addition to those documents listed on the Council's Administrative Notice List, the City asks that the Council take administrative notice of the following additional documents:

1. SHPO Electronic Database for State Register of Historic Places; *available at* https://portal.ct.gov/DECD/Content/Historic-Preservation/03_Technical_Assistance_Research/Research/Historic-Property-Database
2. Historic Preservation Council, Meeting Minutes dated July 11, 2018; available at https://portal.ct.gov/-/media/DECD/Historic-Preservation/HistoricPresCouncil_AgendasMinutes/2018/HPCMMMinutesApproved7112018.pdf
3. Historic Preservation Council, Meeting Minutes dated August 1, 2018; available at https://portal.ct.gov/-/media/DECD/Historic-Preservation/HistoricPresCouncil_AgendasMinutes/2018/HPCMMMinutesApproved812018.pdf

D. Exhibits to Be Offered

1. UI's Responses to City of Milford Interrogatories dated April 26, 2022
2. UI's Responses to City of Milford Interrogatories dated May 9, 2022
3. UI's Responses to CSC Interrogatories dated April 1, 2022
4. UI's Responses to City of Milford Recommendations dated March 17, 2022
5. Federal Energy Regulatory Commission Guidelines for the Protection of Natural, Historic, Scenic and Recreational Values in the Design and Location of Rights-of-Way and Transmission Facilities (UI Attachment MIL 2-4-1)
6. SHPO Electronic Database for State Register of Historic Places¹
7. State Register Nomination for the Milford Green, Broad Street, Milford
8. Historic Preservation Council, Meeting Minutes dated July 11, 2018²
9. Historic Preservation Council, Meeting Minutes dated August 1, 2018³

¹ https://portal.ct.gov/DECD/Content/Historic-Preservation/03_Technical_Assistance_Research/Research/Historic-Property-Database

² https://portal.ct.gov/-/media/DECD/Historic-Preservation/HistoricPresCouncil_AgendasMinutes/2018/HPCMMMinutesApproved7112018.pdf

³ https://portal.ct.gov/-/media/DECD/Historic-Preservation/HistoricPresCouncil_AgendasMinutes/2018/HPCMMMinutesApproved812018.pdf

The City reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CITY OF MILFORD

By: /s/ John W. Knuff

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed
to the following service list on May 17, 2022

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