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June 8, 2022

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

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

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") are The United Illuminating Company's responses to the City of Milford's final interrogatories dated May 31, 2022 ("Set 3").

An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

cc: Service List

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Interrogatory Milford 3-1

The United Illuminating Company
Docket No. 508

Witness: Correne Auer
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Q-MIL 3-1: Referencing United Illuminating (“UI”) Response to Milford Interrogatories 2-6 and 2-7 (as revised), were any resources not listed on the National Register of Historic Places (“NRHP”) identified in UI’s application? If so, please identify where such information was provided.

A-MIL 3-1: Any resources listed on NRHP are identified in Appendix D of UI’s Application.

UI’s Application did not specifically define the State Register of Historic Places (SRHP) structures listed in UI’s response to Q-MIL 2-7. However, the Phase IA Cultural Resources Assessment Survey of the Project describes the historical development of the Project area along the railroad corridor, including in the City of Milford, and includes both historical maps and aerial photography of the area. The Phase IA report also identifies and describes the NRHP properties recorded in the immediate vicinity of the CT DOT railroad corridor, noting that the information about the NRHP districts was compiled from a review of the Connecticut State Historical Preservation Office (SHPO) files as available. Since the filing of the Application, Heritage Consultants has continued to consult with the SHPO, and known SRHP resources within 0.15 miles of the Project corridor were identified and considered. To the best of UI’s knowledge, the inclusion and consideration of SRHP resources has not altered the SHPO’s decision on potential indirect visual impacts to historical resources.

Interrogatory Milford 3-2

The United Illuminating Company
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Witness: Correne Auer
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Q-MIL 3-2: If the answer to the previous interrogatory is “no,” please explain why such information was omitted in the original application.

A-MIL 3-2: See response to Milford 3-1.

Interrogatory Milford 3-3

The United Illuminating Company
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Witnesses: Mike Libertine & David George
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Q-MIL 3-3: With respect to the historic resources identified in UI’s response to Milford Interrogatories 2-6 and 2-7 (as revised), please provide a viewshed map that identifies the locations of all listed resources, including any “contributing properties” within identified historic districts.

A-MIL 3-3: The table below lists the contributing properties/landscape elements associated with the historical resources identified within the City of Milford. These consist of buildings in the River Park Historic District (NRHP), structures within the Academy of Our Lady of Mercy, Lauralton Hall property (NRHP), objects and landscape elements on the Milford Green (SRHP), and buildings in the South of the Green Historic District (SRHP). The items in the table below also include individual structures listed in the NRHP and SRHP. Of these, two SRHP-listed buildings formerly located at the intersection of Clark and Hill Streets have been demolished but not removed from the SRHP. There is no formal procedure for removing properties from the SRHP and the Project will have no effect on them. These data points were gathered from NRHP and SRHP nomination forms.

NRHP/SRHP Name	Contributing Elements/Landscape Elements
Residence to the south of Clark and Hill Street	None; Building demolished
Residence to the south of Clark and Hill Street	None; Building demolished
49 Clark Road	Residence
Academy of Our Lady of Mercy, Lauralton Hall	Mansion (Island View/Lauralton Hall), School Building (St. Joseph Hall), Administration Building (Sacred Heart/Mercy Hall), Carriage House, Water Tower, Boiler Room / Laundry, Carousel, Grotto
Milford Green	Cast Iron/Barrett Fountain, Town Historical Plaque, World War II Monument, Firefighter’s Memorial, Firefighter’s Bell, War Memorial Flagpole, Armed Services Memorial, Ford Memorial Fountain, Soldier’s Monument, Korea-Vietnam Monument, Bandstand, and Landscape (Hardscape and Plant Materials)
South of the Green Historic District	Map 44, Block 402, Parcels 1B, 27-30; Block 403, Parcels 15-18; Block 404, Parcels 1, 3-12, 14-18, 18A; Block 405, Parcels 1-12, 22-25; Block 406, Parcels 1-20; Block 407, Parcels 1-11, 11A, 12, 13; Block 408, Parcels 1-10, 10A, 10B, 11, 12; Block 410, Parcels 1-6, 6A, 7-12, 13A, 14-21, 21A, 22, 23; Block 412, Parcels 14-23; and Map 54, Block 402, Parcels 24-26; Block 403, Parcels 1-5, 5A, 6, 7, 7A, 12, 13.

Interrogatory Milford 3-3

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St. Peter's Episcopal Church	Church, Parish Hall
River Park Historical District	<p>801 Boston Post Road, 94 Buick Avenue, 100 Buick Avenue, 11 Cherry Street, 13-15 Cherry Street, 14 Cherry Street, 17-19 Cherry Street, 28 Cherry Street, 31 Cherry Street, 35-37 Cherry Street, 47 Cherry Street, 50 Cherry Street, 51 Cherry Street, 55 Cherry Street, 58 Cherry Street, 61 Cherry Street, 64 Cherry Street, 69 Cherry Street, 70 Cherry Street, 77-79 Cherry Street, 81 Cherry Street, 83 Cherry Street, 86 Cherry Street, 91 Cherry Street, 92 Cherry Street, 95 Cherry Street, 99 Cherry Street, 102 Cherry Street, 105 Cherry Street, 111 Cherry Street, 12 Governor's Avenue, 20-22 Governor's Avenue, 30 Governor's Avenue, 31 Governor's Avenue, 34 Governor's Avenue, 38 Governor's Avenue, 43 Governor's Avenue, 44 Governor's Avenue, 51 Governor's Avenue, 52 Governor's Avenue, 55 Governor's Avenue, 58 Governor's Avenue, 61 Governor's Avenue, 64 Governor's Avenue, 65 Governor's Avenue, 71 Governor's Avenue, 79 Governor's Avenue, 85 Governor's Avenue, 90 Governor's Avenue, 91 Governor's Avenue, 9 Housatonic Street, 7 Maple Street, 15 Maple Street, 17 Maple Street, 21 Maple Street, 8 North Street, 18 North Street, 24 North Street, 33 North Street (Corner of Plymouth Place), 38 North Street, 41 North Street, 44 North Street, 47 North Street, 61 North Street, 73 North Street, 79 North Street, 87 North Street, 97 North Street, 105 North Street, 111-113 North Street, 117 North Street, 124 North Street, 125 North Street, 132 North Street, 133 North Street, 138 North Street, 139 North Street, 146 North Street, 147 North Street, 155 North Street, 3-5 Orange Street, 9 Plymouth Court, 10 Plymouth Court, 13 Plymouth Court, 14 Plymouth Court, 17 Plymouth Court, 18 Plymouth Court, 21 Plymouth Court, 24 Plymouth Court, 25 Plymouth Court, 28 Plymouth Court, 32 Plymouth Court, I Plymouth Place, 3 Plymouth Place, 5 Plymouth Place, 7 Plymouth Place, II Plymouth Place, 23 Prospect Street, 35 Prospect Street, 38 Prospect Street, 40 Prospect Street, 44-46 Prospect Street, 47 Prospect Street, 52 Prospect Street, 58 Prospect Street, 67 Prospect Street, 81 Prospect Street, 85 Prospect Street, 15 West Main Street, ?? West Main Street (Corner of West River Street), 36-38 West Main Street, 46 West Main Street, 52 West Main Street, 56 West Main Street, 62 West Main Street, 68-70 West Main Street, 74 West Main Street, 84 West Main Street, 88 West Main Street, 96 West Main Street, 100 West Main Street, 108-116 West Main Street, West River Street Courthouse, West River Street Milford City Hall, West River Street Old Milford High School, West River Street Old Central Grammar School, 100 West River Street, 104 West River Street, 110 West River Street, 120 West River Street, 130 West River Street, 144 West River Street, 191 West River Street, 192 West River Street, 195 West River Street, 198 West River Street, 218 West River Street, 223-225 West River Street, 230 West River Street, 231 West River Street, 232 West River Street, Corner of West River and River Streets, 16 Winthrop Court, 17 Winthrop Court, 19 Winthrop Court, 20 Winthrop Court, 23 Winthrop Court, 27 Winthrop Court, 28 Winthrop Court, 31 Winthrop Court, 32 Winthrop Court, 35-37 Winthrop Court, 36 Winthrop Court, 40 Winthrop Court, 41 Winthrop Court, 44 Winthrop Court, 47 Winthrop Court, 48 Winthrop Court, 53 Winthrop Court, 54 Winthrop Court</p>
US Main Post Office	Post Office building

Interrogatory Milford 3-3

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The Viewshed Analysis Map (Map Sheet 1 of 3) in Application Volume 1, Appendix C, has been amended to include Milford's historic resources and is provided herein. For clarity, the attached, amended viewshed map sheet has been projected at a smaller scale of 1:14,000 (i.e., 1" = 1,167'); the original viewshed map sheet scale was 1:21,000 (1" = 1,750'). Please refer to Exhibit MIL 3-3-1.

Interrogatory Milford 3-4

The United Illuminating Company
Docket No. 508

Witness: David George
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Q-MIL 3-4: Referencing the historic resources identified in UI’s response to Milford Interrogatories 2-6 and 2-7 (as revised), please provide the following:

- a) Identify the closest monopole(s) to each historic resource. For historic districts, identify the monopole(s) nearest to the boundary of said district and any monopole(s) within 0.15 miles of any contributing property within said district.
- b) For each monopole identified in response to subsection (a) provide the approximate distance between the relevant monopole and nearest historic resource.

A-MIL 3-4: The following table lists the historic properties within 0.15 miles of the CT DOT corridor and the nearest proposed monopole.

Property Name	Property Address	Status/Notes	Closest UI Proposed Monopole and Height	Distance from Closest Monopole to Subject Property
Residence	South Corner of Hill St. & Clark Street	SRHP-Demolished	P900N (105') & P901N (105')	Approximately 650'-700'
Residence	Corner of Hill & Clark St	SRHP-Demolished	P900N (105') & P901N (105')	Approximately 650'-700'
Milford Residence	49 Clark Street	Good Condition	P900N (105') & P901N (105')	Approximately 300'
The Academy of Our Lady of Mercy – Lauralton Hall	200 High Street	SRHP/NRHP	P908N (135')	Approximately 500'
Milford Green	Broad Street, South Broad Street	SRHP	P906N (120'), P908N (135'), P910N (140') & P912N (130')	P906N- 375'; P908N- 450'; P910N- 500'; P912N- 440'

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Milford Historic District No. 2 South of the Green	High Street, Green Street, Pond Street, Lafayette Street, Reed Street, Center Street, Center Avenue	SRHP	P906N (120'), P908N (135'), & P910N (140')	P906N- 750'; P908N- 830'; P910N- 800'
Taylor Memorial Library	5 Broad Street	SRHP/NRHP	P912N (130')	Approximately 350'
Milford Train Station- East Side	Depot Station	Fair Condition	P912N (130')	Approximately 145'
Milford Train Station- West Side	Depot Station	Fair Condition	P910N (140')	Approximately 215'
St. Peter's Episcopal Church	61, 71, and 81 River Street	SRHP/NRHP	P914N (135')	Approximately 300'
River Park Historic District	Between Boston Post Road and Milford Harbor (south of the CT DOT corridor)	SRHP/NRHP	P914N (135'), P915N (145') & P916N (135')	P914N- Approximately 35'; P915N- On Southern Border of Historic District; P916N- Approximately 25'
US Post Office – Milford Main	6 West Street	SRHP/NRHP	P912N (130')	Approximately 380'

Interrogatory Milford 3-5

The United Illuminating Company
Docket No. 508

Witness: David George
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Q-MIL 3-5: Referencing that letter, dated December 22, 2021, from Jonathan Kinney, State Historic Preservation Office (SHPO), to David R. George, Heritage Consultants, please respond to the following:

- a) Identify the date that UI met with SHPO “to consider mitigation measures to resolve the adverse impact.”
- b) State whether or not any historic resources, other than those listed on the NRHP, were identified or discussed in any correspondence or meeting with SHPO in connection with this project.

A-MIL 3-5:

- a) Heritage Consultants – on behalf of UI – participated in the teleconference with Marena Wisniewski of the SHPO on December 14, 2021 to discuss the Project and potential mitigation measures.
- b) The December 14, 2021 meeting focused on potential options to compensate for the indirect visual effects on the NRHP-listed resources in UI’s Application. No other historical resources were discussed on December 14, 2021. However, UI and Heritage Consultants have continued to consult with the SHPO regarding potential indirect visual impacts to the previously identified NRHP districts/properties, as well as those SRHP districts/properties located in Milford. The SHPO has not provided any information that it has revised or changed its determination of effect for the Project as a result of ongoing consultation.

Interrogatory Milford 3-6

The United Illuminating Company
Docket No. 508

Witness: Correne Auer
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Q-MIL 3-6: Referencing UI's response to Milford Interrogatory 1-3(a), UI "identify with specificity" the "local preservation partners" referenced in "UI response to CSC Interrogatory 43(d)," please respond to the following:

- a) Identify the specific individuals or groups consulted. UI's prior response to Milford Interrogatory 1-3(a), which simply identifies "the City of Milford," is insufficient.
- b) Please state whether or not the "local preservation partners" referenced included any individuals or groups other than David Sulkis, MaryRose Palumbo, and Chris Saley. If so, please explain.
- c) If the answer to subsection (b) is "yes," please identify any other individuals or groups consulted
- d) Identify all meetings between UI and the referenced "local preservation partners" occurred, including meeting date(s) and participants for each.
- e) Please identify the individuals from UI that attended any meeting with the referenced "local preservation partners," including any meeting with David Sulkis, MaryRose Palumbo, and Chris Saley.
- f) State whether or not the project's adverse impact on Milford historic resources was discussed during any meeting identified in response to subsection (d).

A-MIL 3-6:

- a) Heritage Consultants – on behalf of UI – consulted with Marena Wisniewski of SHPO regarding mitigation options that were considered appropriate in type and scale to the indirect visual impact of the Project. It is UI's understanding that the SHPO has ongoing consultations with local preservation partners, which includes various individuals from CTDEEP and relevant organizations within the City of Milford, regarding multiple cultural resources in Milford associated with many projects and is familiar with mitigation needs.

UI did meet with City of Milford representatives to discuss multiple resource category interactions and land use planning intentions through Milford.

Interrogatory Milford 3-6

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Witness: Correne Auer
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Meetings were held on October 14, 2020, February 18, 2021, and January 5, 2022.

During the course of UI's due diligence related to cultural resources (Project Notification Form to the SHPO and the Phase 1A Survey), no such questions were raised prior to completion of Heritage's work or the SHPO's review and comment on the survey.

- b) Yes. It is UI's understanding that the SHPO has had ongoing discussions with various individuals from City of Milford organizations regarding cultural resources.
- c) It is UI's understanding that the SHPO has had discussions with the Milford Historic Commission and Milford Preservation Trust.
- d) No project specific meetings regarding mitigation options were requested from any relevant parties, prior to SHPO making their decision for a suitable mitigation for indirect impacts to historical resources in the City.
- e) UI individuals that attended meetings with David Sulkis, MaryRose Palumbo, and Chris Saley were Elizabeth Gandza, Leslie Downey, Todd Berman and Kate Brennan.
- f) As part of continual engagement with City of Milford, the meeting on October 14, 2020 discussed certain cultural resources and resulting indirect visual impacts. In addition the Phase IA Cultural Resources Assessment Survey also outlined the Project's indirect visual impacts.

Interrogatory Milford 3-7

The United Illuminating Company
Docket No. 508

Witness: David George & Correne Auer
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Q-MIL 3-7: With reference to that letter dated May 13, 2022 from Jonathan Kinney, SHPO, to David R. George, Heritage Consultants, please respond to the following:

- a) State whether or not UI has responded to SHPO's letter dated May 13, 2022 and, if so, provide copies of any response correspondence and/or documentation provided to SHPO.
- b) If UI has not responded or provided the additional information requested by SHPO, please state whether or not UI intends to respond and, if so, on what date.
- c) Please state whether or not there have been any further meetings or discussions between UI and SHPO in connection with this project or the SHPO letter dated May 13, 2022.
- d) If the answer to subsection (c) is "yes," please identify the date(s) of any such meeting or discussion and the individuals that participated.

A-MIL 3-7:

- a) UI responded to the May 13, 2022 letter from Mr. Jonathan Kinney of the SHPO to David R. George of Heritage Consultants, LLC on May 25, 2022. In that response, UI provided additional information requested by SHPO. No reply to the May 25, 2022 letter has been made to date.
- b) See response to MIL 3-7(a).
- c) Yes.
- d) On May 5, 2022, UI and Mr. George met with Marena Wisniewski of the SHPO to discuss recent inquiries from the City regarding the Project. UI was represented by Shawn Crosbie, Todd Berman and Correne Auer.

Interrogatory Milford 3-7

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Witness: David George & Correne Auer
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In addition, on May 17, 2022, David George consulted with Marena Wisniewski of the SHPO and relayed that the Siting Council requested an expansion of the search area for SRHP properties located within 0.15 miles of Project corridor. He noted that the Milford Train Station (East and West) and a house at 45 Clark Street are within 0.15 miles of the Project corridor. Mr. George asked Ms. Wisniewski if there were any other SRHP properties located within 0.15 miles of the Project corridor. Ms. Wisniewski replied that she believed the Milford Green and the South of the Green Historic District were within the extended search area.

Interrogatory Milford 3-8

The United Illuminating Company
Docket No. 508

Witness: Mike Libertine
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Q-MIL 3-8: State whether or not any monopole(s), including but not limited to the monopole identified as P910N, will be visible from any portion of the following historic resources:

- a) The Milford Green
- b) Milford Historic District No. 2

A-MIL 3-8:

- a) The Milford Green – Similar to current conditions associated with existing transmission infrastructure on top of the railroad catenary structures, views of portions of select monopoles (P905N through P912N) may be achieved from some locations on the Milford Green above/between intervening buildings and trees, depending upon where an observer is standing.
- b) Milford Historic District No. 2 – Referencing the amended viewshed map (Exhibit MIL 3-3-1), some portions of new monopoles may be visible year-round from commercial properties on the northern edge of this District (at distances of 500 to 600 feet from the railroad ROW, immediately south of Broad Street). Central and southern locations within the District may have intermittent views of monopoles seasonally when the leaves are off the deciduous trees. However, any potential views would be obstructed by intervening homes, vegetation and/or existing overhead utilities.

Interrogatory Milford 3-9

The United Illuminating Company
Docket No. 508

Witness: Mike Libertine
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Q-MIL 3-9: Please provide photo simulations of the Project as proposed from the following locations:

- a) All historic resources listed in response to Milford Interrogatory 2-6 and 2-7 (as revised); and
- b) Any other contributing resource to identified historic district(s) within 0.15 mile of any new proposed monopole.
- c) To the extent UI has previously provided photo simulation(s) of alternative proposals in view of the identified historic resources (e.g., Attachment MIL 1-4-1), please provide photo simulation(s) of the proposed Project from a consistent vantage point.

A-MIL 3-9:

- a) Photo-simulations from the NRHP/SRHP locations listed in the table in A-MIL 3-3 are provided in Exhibit MIL 3-9-1. The number of contributing resources within these areas are substantial, and if any contributing element of a district/property is deemed to have indirect visual impacts by an undertaking, then a similar determination is provided for the entire district.
- b) Due to the volume of “contributing properties” representative locations were selected for photo-simulations within the districts and Lauralton Hall. The representative locations chosen are those that maximize the nature of the indirect visual impacts.
- c) The provided photo-simulations from vantage points are consistent with previously presented locations.

Interrogatory Milford 3-10

The United Illuminating Company
Docket No. 508

Witness: MeeNa Sazanowica
Page 1 of 2

Q-MIL 3-10: Referencing UI Response to Milford Interrogatory 1-1(a), which states that “Keeping UI’s electrical equipment located on structures owned by another entity does not meet the core project objectives of enhancing reliability of UI’s system,” please explain and quantify the alleged diminution in reliability of lines rebuilt on catenary structures vs. new monopoles.

A-MIL 3-10: The aim of increasing infrastructure resiliency is to mitigate impacts, and aid in recovery from “unconventional stresses”^[1]. Because the characteristics of these unconventional stresses are difficult to predict, it is hard to accurately quantify the diminution of the resiliency from rebuilding the UI and CTDOT/MNR facilities on new catenary structures. However, some qualitative discussion about the benefits of separating the UI and CTDOT/MNR infrastructure is possible.

Separation of the UI and CTDOT/MNR facilities allows for normal and emergency maintenance work to be completed without extensive coordination and/or disruption to neighboring facilities. If the UI and CTDOT/MNR facilities are rebuilt on new catenary structures, it may not always be feasible for one or more of UI’s transmission lines to be taken out of service to perform emergency repair work on CT DOT/MNR facilities without risking the integrity of the transmission system; particularly during periods of heavy electric demand.

Rebuilding the 115-kV transmission lines on top of the railroad catenaries would fail to achieve UI’s core Project objective (as well as UI’s overall objective when rebuilding transmission infrastructure) which is to add resiliency to the overall transmission system by engineering and constructing infrastructure to adhere to more stringent design criteria. The proposed Project is designed to upgrade the transmission infrastructure to avoid or minimize the potential for transmission line impacts associated with weather or other events that can cause disruptions to the State and regional transmission grid and that can potentially lead to longer customer outages.

^[1] <https://www.dhs.gov/topics/resilience>

Interrogatory Milford 3-10

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Witness: MeeNa Sazanowicz
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For example, based on experience from climate events in the recent past, UI's proposed Project is designed to withstand Hurricane Category 3 winds and heavy ice loading, as well as to minimize the potential for broken wire conditions. Further, the Project is designed in full accordance with updated electric transmission industry standards and UI standards. The rebuilt 115-kV lines, located on independent monopoles, will be designed to better withstand extreme weather events. Moreover, in the unfortunate instance of damage to the lines, UI will be able to respond promptly to rectify the issue, without having to first arrange outages on the MNR tracks, as is the case with the locations of the 115-kV lines overbuilt on the railroad catenary structures. In these respects, the proposed Project will enhance the overall resiliency of UI's system.

In sum, separation of the UI infrastructure from the CTDOT/MNR catenaries will allow both UI and CTDOT/MNR to work on their facilities (either in the case of emergencies or for regular maintenance) without extensive coordination (e.g., outage planning, track outages, required special work hours, etc.). Separation of the UI wires off of the catenaries also eliminates safety concerns and train disruption in the event that one of the UI wires were to fall.

Interrogatory Milford 3-11

The United Illuminating Company
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Witness: Correne Auer
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Q-MIL 3-11: With respect to Alternative 4—i.e., locating lines on existing or rebuilt catenary structures, please respond to the following.

- a) As compared to the currently proposed configuration, whether locating lines on existing or rebuilt catenary structures will reduce the project's impact to wetlands and watercourses within the area of downtown Milford. Explain
- b) As compared to the currently proposed configuration, whether locating lines on existing or rebuilt catenary structures will reduce the need for new easements within the area of downtown Milford. Explain
- c) As compared to the currently proposed configuration, whether locating lines on existing or rebuilt catenary structures will reduce tree clearing within the area of downtown Milford. Explain.

A-MIL 3-11: Based on the engineering assessment done in 2018, UI's facilities (i.e., bonnets) were determined to be structurally impacted and a solution was needed. Therefore, UI began the course of conceptually designing the solution. If UI was to rebuild the catenaries additional analysis would need to be performed on the catenary structures to rebuild the CTDOT/MNR owned facilities. However, if UI was ordered by the CSC – and CTDOT/MNR grants permission to rebuild the catenaries – the answers to the above question are as follows:

- a) For the catenary rebuild Alternative 4, derived from UI's Application Section 9.3 in Downtown Milford (structures P905N through P914N-Wepawaug), no impacts to wetlands or watercourses will occur, similar to the current proposed design within this same area.
- b) It is expected that if the lines were to be located on rebuilt catenary structures that there will be an increased need for temporary easements during construction.
- c) For the catenary rebuild Alternative 4, tree clearing for rebuilding on the catenaries versus the current proposed configuration would be approximately the same.

Interrogatory Milford 3-12

The United Illuminating Company
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Witness: MeeNa Sazanowicz & Correne Auer
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Q-MIL 3-12: With respect to the use of an underground configuration within the area of downtown Milford, please respond to the following:

- a) Whether an underground configuration will reduce the project's impact to wetlands and watercourses as compared to the currently proposed configuration. Explain.
- b) Whether an underground configuration will reduce the project's need for new easements as compared to the currently proposed configuration. Explain.
- c) Whether an underground configuration will reduce tree clearing as compared to the currently proposed configuration. Explain.

A-MIL 3-12

- a) For an underground alignment in Downtown Milford (Structures P905N through P914N Wepawaug River) no impacts to wetlands or watercourses are anticipated, consistent with our current proposed design within this same area.

b)

	Temporary Easement (acres)	Permanent Easement (acres)
Proposed Overhead Design	0.03	0.2
Conceptual Underground Design (RR ROW)	~2	~1.5
Conceptual Underground Design (Public Streets)	Unknown – Based on final line route	At a minimum 0.75-1 acre – Based on final line route**

*For installation only. Removals will be equal for all options.

**Line is aligned along State Route 162 – Splice chambers will be installed off the roadway based on CTDOT standards for construction.

Interrogatory Milford 3-12

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Witness: MeeNa Sazanowicz & Correne Auer
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The underground installations will include one transition station (~0.25 acres) with two riser poles at the western end of the underground section and two riser poles on the eastern end of the underground section. The transition station will include a fenced in area with two riser poles to connect the underground cables to the overhead wires and a control enclosure (30' L x 15' W x 12' H) containing protection and control devices to provide safe operation of the cable system in the event of a cable fault. This aids in determining location the fault within the line and limits the physical damage to the cable system which allows for quicker cable system repair restoration.

Underground lines will traverse a private property that is parallel and directly abutting the railroad ROW on the north side of the tracks.

- c) For an underground alignment within Downtown Milford (structures P905N through P914N-Wepawaug River), tree clearing for an underground configuration in the public roads versus the current proposed configuration will increase based on the proposed location of the transition station around structure P905N. Refer to the CSC-LF-3-Notes and Assumptions Document, which accompanied the Cost Table, for Option H for a figure showing this location.

Interrogatory Milford 3-13

The United Illuminating Company
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Witness: Shawn Crosbie
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Q-MIL 3-13: Describe the process for obtaining DOT approval for locating new lines on existing or rebuilt catenary structures and identify any individuals or divisions within DOT responsible for reviewing or approving such request.

A-MIL 3-13: UI does not own the catenary structures. They are owned by CTDOT and maintained and operated by MetroNorth. UI does own the bunnets located on the top of the catenaries. A clear depiction of this ownership can be seen on Figure ES-2 on page ES-2 within UI's Application. That said, UI would need consent from CTDOT and MNR that the undertaking of extensive engineering and rebuilding of their facilities by UI was acceptable. The entities would also need to come to an agreement regarding ownership, including rights to access and maintain the new equipment, and cost allocation between them for both the engineering and construction of the catenary bridges and bunnets. Communication with CTDOT suggests that these types of permissions will not be forthcoming.

Coordination efforts with CTDOT would include but are not limited to the following divisions: Office of Rail and Utility Division and Metro-North Railroad.

Interrogatory Milford 3-14

The United Illuminating Company
Docket No. 508

Witness: David George
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Q-MIL 3-14: Referencing UI Response to Milford Interrogatory 1-3(c), please respond to the following:

- a) State whether any mitigation strategies that would reduce or eliminate visual impacts to historic resources were discussed with or presented to SHPO. If so, please explain.
- b) State whether any mitigation strategies directly tied to impacted NRHP or SRHP resources within the City of Milford were discussed with or presented to SHPO. If so, please explain.

A-MIL 3-14:

- a) Heritage Consultants supplied mapping and aerial imagery regarding the Project as designed to the SHPO. The SHPO reviewed the information and the Project configuration, and determined that indirect visual impacts to historic resources could not be avoided. Therefore, mitigation strategies were discussed in collaboration with SHPO.
- b) Several mitigation options were discussed with the SHPO. These initially included possible updates to the existing documentation of historical resources in the vicinity of the Project in downtown Milford or installation of signage on the Milford Green describing its role and history in the City. SHPO was not receptive to both options, indicating that the documentation packages for the various historical resources in Milford were satisfactory in their current state and that the installation of signage on the Milford Green would serve to alter the landscape of the Green.

Interrogatory Milford 3-15

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Witness: MeeNa Sazanowicz
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Q-MIL 3-15: Referencing the Cost Table provided by CSC on May 25, 2022, provide the same cost data requested for a Project Component consisting of new lines on existing or rebuilt catenary structures from monopole location 905N to 914N.

A-MIL 3-15: If UI was ordered by the CSC and CTDOT/MNR were to grant permission to rebuild the catenaries the answer is:

The table below shows the cost of the entire Project between Milvon Substation and West River Substation with the portion between monopole location 905N and 914N located on rebuilt catenary structures. In the section between 905N and 914N, the southern circuit would be required to cross the tracks twice, once at 905N and once at 914N. The track crossings would have to be supported by monopoles on both sides of the tracks. Thus, this configuration would only decrease the number of installed monopoles by a quantity of two. The cost delta below includes the cost to rebuild the catenary structures in this section and the cost of two additional track crossings, less the reduction of the quantity of monopoles being installed.

Interrogatory Milford 3-15

The United Illuminating Company
 Docket No. 508

Witness: MeeNa Sazanowicz
 Page 2 of 2

Project Component	Section Length in Linear Miles	Transmission Costs	Distribution Costs	Substation Costs	Transition Station Costs	HDD Costs	Jack & Bore Costs	Misc. Costs (i.e. Bonnet Removals)	Catenary Rebuild Portion	Total Cost Estimate	Proposed Project Cost for this section or alternative	Cost Delta
Overhead Transmission Line, North Side of RR ROW, Shifted to Rebuilt Catenary Structures from 905N to 914N	9.5	\$225,125,000	\$1,250,000	\$3,850,000	\$0	\$0	\$0	\$65,825,000	\$39,290,000	\$335,340,000	\$295,000,000	\$40,340,000

**Please see June 8, 2022 late-filed exhibit.

Per ISO-NE PP4, Appendix D, these are “Project Initiation” type estimates (-50%/+200% accuracy)



Legend

- Proposed Structure
- Project Transmission Line
- Year-Round Visibility
- Areas of Potential Seasonal Visibility
- Study Area (1 Mile Radius)
- Half Mile Radius
- Municipal Boundary
- National Register Historic Property
- State Register Historic Property
- National Register Historic District
- State Register Historic District
- Scenic Highway*
- Trail*
- DEEP Boat Launches*
- Municipal and Private Open Space Property
- State Forest/Park
- Protected Open Space Property**
- Federal*
- Land Trust*
- Municipal*
- Private*
- State*

Scale: 1,000 500 0 1,000 Feet

Limitations

This map depicts areas where proposed infrastructure may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy, and existing structures. This analysis is based on a combination of computer modeling, incorporating the DSM, and 2019 digital aerial photographs. This analysis does not necessarily depict all locations where views may occur. It is intended to provide a representation of those areas where at least a portion of the new facilities may be seen, but may actually over-predict visibility in some locations.

Physical Geography / Background Data

Study area encompasses a 1-mile radius surrounding the proposed structures and includes 14,015 acres. A digital surface model (DSM) was created from the State of Connecticut 2016 LIDAR LAS data points. The DSM captures the natural and built features on the Earth's surface. Forest canopy height derived from LIDAR data.

Map Sources

*Not all data layers appear on map sheet.
 Ortho Base Map: State of Connecticut 2019 aerial imagery (CTECO Map Service)
 CTDEEP's data library (<http://www.ct.gov/deep>)
 Data layers are maintained and updated by CTDEEP and represent the most recent publications.
 Scenic Roads: CTDOT State Scenic Highways (2015)
 Connecticut Forest and Parks Association, Connecticut Walk Books East and West

Map Date: June 06, 2022

Docket 508
Response to Q-MIL-3
Viewshed Analysis Map With Historic Resources
Milwon-West River Railroad Transmission
Line 115-kV Rebuild Project

Milford, CT

UI

ALL-POINTS
 TECHNOLOGY CORPORATION



The United Illuminating Company

City of Milford

**MILVON-WEST RIVER
RAILROAD TRANSMISSION LINE 115-KV REBUILD PROJECT**



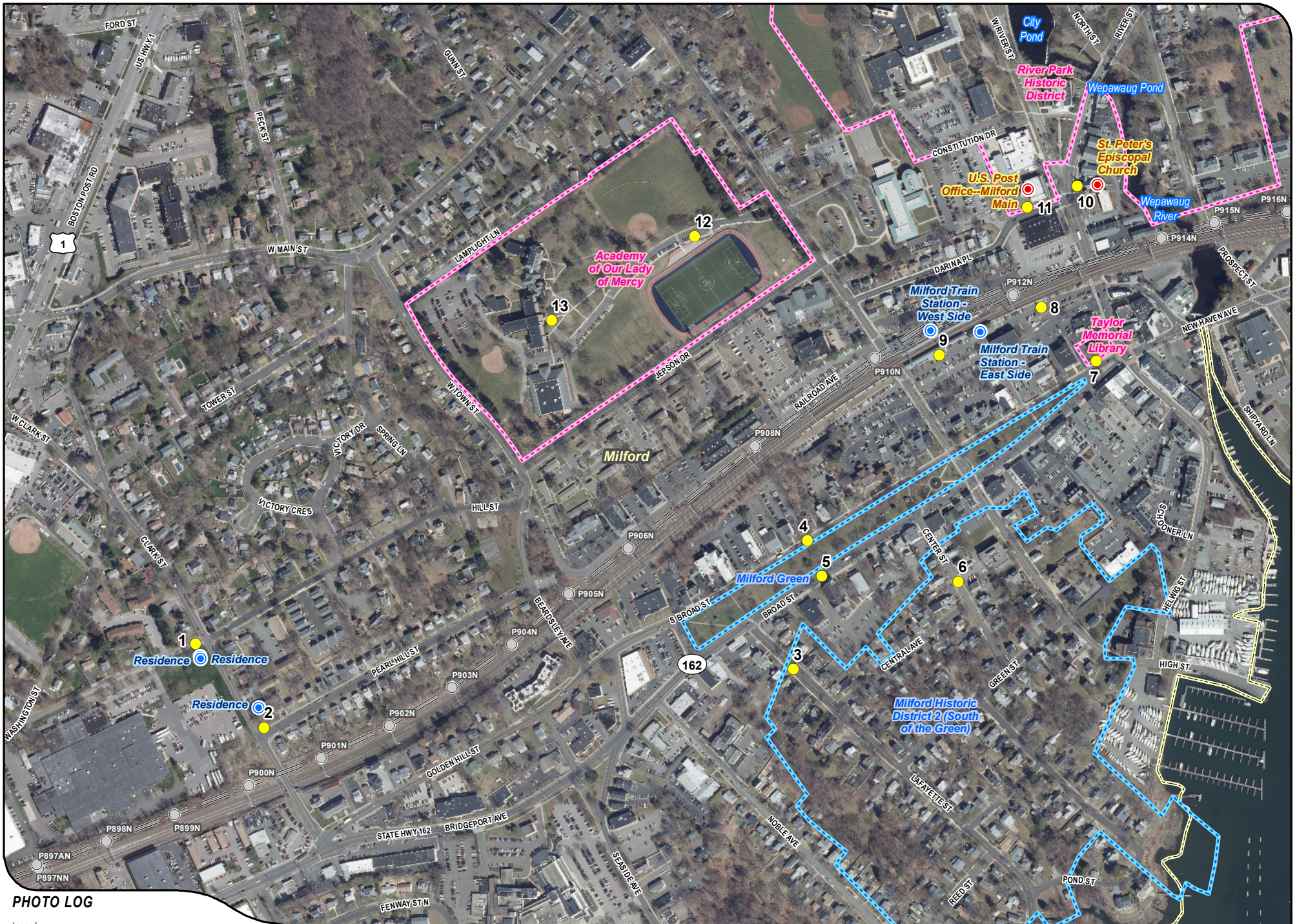
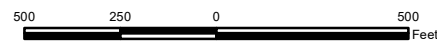


PHOTO LOG

Legend

- Photographic Location
- National Register Historic Property
- State Register Historic Property
- Proposed Structure
- Project Transmission Line
- National Register Historic District
- State Register Historic District
- Municipal Boundary





PHOTOGRAPHED ON 6/2/2022

EXISTING

PHOTO

1

LOCATION

VIEW FROM CORNER OF HILL STREET AND CLARK STREET

ORIENTATION

SOUTH



PROPOSED

PHOTO

1

LOCATION

VIEW FROM CORNER OF HILL STREET AND CLARK STREET

ORIENTATION

SOUTH



PHOTOGRAPHED ON 4/5/2021

EXISTING

PHOTO

2

LOCATION

VIEW FROM 49 CLARK STREET

ORIENTATION

SOUTH





PROPOSED

PHOTO

2

LOCATION

VIEW FROM 49 CLARK STREET

ORIENTATION

SOUTH



PHOTOGRAPHED ON 6/2/2022

EXISTING

PHOTO

3

LOCATION

VIEW FROM MILFORD HISTORIC DISTRICT NO. 2 - LAFAYETTE STREET

ORIENTATION

NORTHWEST



PROPOSED

PHOTO

3

LOCATION

VIEW FROM MILFORD HISTORIC DISTRICT NO. 2 - LAFAYETTE STREET

ORIENTATION

NORTHWEST



PHOTOGRAPHED ON 11/24/2021

EXISTING

PHOTO

4

LOCATION

MILFORD GREEN - VIEW FROM BROAD STREET

ORIENTATION

NORTHWEST



PROPOSED

PHOTO

4

LOCATION

MILFORD GREEN - VIEW FROM BROAD STREET

ORIENTATION

NORTHWEST



PHOTOGRAPHED ON 4/5/2021

EXISTING

PHOTO

5

LOCATION

VIEW FROM MILFORD GREEN - SOUTH BROAD STREET

ORIENTATION

NORTH



PROPOSED

PHOTO

5

LOCATION

VIEW FROM MILFORD GREEN - SOUTH BROAD STREET

ORIENTATION

NORTH



PHOTOGRAPHED ON 6/2/2022

EXISTING

PHOTO

6

LOCATION

VIEW FROM MILFORD HISTORIC DISTRICT NO 2 - CENTER STREET

ORIENTATION

NORTHWEST





PROPOSED

PHOTO

6

LOCATION

VIEW FROM MILFORD HISTORIC DISTRICT NO 2 - CENTER STREET

ORIENTATION

NORTHWEST



EXISTING

PHOTO

7

LOCATION

VIEW FROM TAYLOR MEMORIAL LIBRARY

ORIENTATION

NORTHWEST



PROPOSED

PHOTO

7

LOCATION

VIEW FROM TAYLOR MEMORIAL LIBRARY

ORIENTATION

NORTHWEST



EXISTING

PHOTO

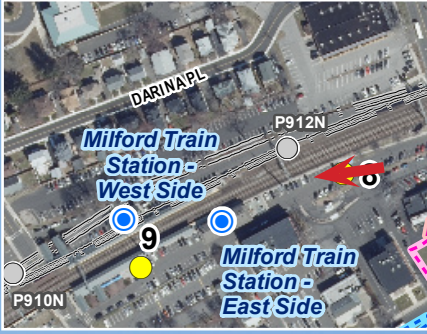
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LOCATION

VIEW FROM MILFORD TRAIN STATION - EAST SIDE

ORIENTATION

WEST



PROPOSED

PHOTO

8

LOCATION

VIEW FROM MILFORD TRAIN STATION - EAST SIDE

ORIENTATION

WEST



PHOTOGRAPHED ON 4/5/2021

EXISTING

PHOTO

9

LOCATION

VIEW FROM MILFORD TRAIN STATION - WEST SIDE

ORIENTATION

NORTHEAST



PROPOSED

PHOTO

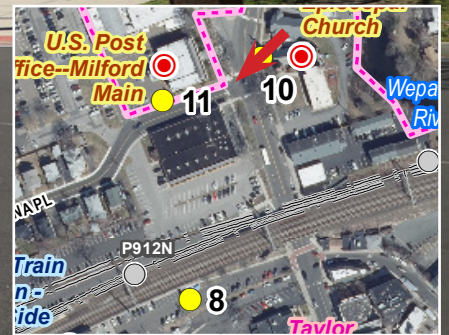
9

LOCATION

VIEW FROM MILFORD TRAIN STATION - WEST SIDE

ORIENTATION

NORTHEAST



PHOTOGRAPHED ON 5/9/2022

EXISTING

PHOTO

10

LOCATION

VIEW FROM ST. PETER'S EPISCOPAL CHURCH

ORIENTATION

SOUTHWEST



PROPOSED

PHOTO

10

LOCATION

VIEW FROM ST. PETER'S EPISCOPAL CHURCH

ORIENTATION

SOUTHWEST



EXISTING

PHOTO

11

LOCATION

VIEW FROM MILFORD POST OFFICE

ORIENTATION

SOUTH



PROPOSED

PHOTO

11

LOCATION

VIEW FROM MILFORD POST OFFICE

ORIENTATION

SOUTH



EXISTING

PHOTO

12

LOCATION

VIEW FROM THE ACADEMY OF OUR LADY OF MERCY - LAURELTON HALL

ORIENTATION

SOUTHEAST



PROPOSED

PHOTO

12

LOCATION

VIEW FROM THE ACADEMY OF OUR LADY OF MERCY - LAURELTON HALL

ORIENTATION

SOUTHEAST



PHOTOGRAPHED ON 6/2/2022

EXISTING

PHOTO

13

LOCATION

VIEW FROM THE ACADEMY OF OUR LADY OF MERCY - LAURELTON HALL

ORIENTATION

SOUTHEAST





PROPOSED

PHOTO

13

LOCATION

VIEW FROM THE ACADEMY OF OUR LADY OF MERCY - LAURELTON HALL

ORIENTATION

SOUTHEAST