

**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, WEST HAVEN, AND NEW	:	May 31, 2022
HAVEN, CONNECTICUT	:	

**PARTY CITY OF MILFORD FINAL INTERROGATORIES  
TO THE UNITED ILLUMINATING COMPANY**

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.
2. If the answer to the previous interrogatory is “no,” please explain why such information was omitted in the original application.
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.
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 mile 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.

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.
  
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. and on what dates
  - f. 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.
  - g. State whether or not the project’s adverse impact on Milford historic resources was discussed during any meeting identified in response to subsection (d).
  
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.

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
  
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.
  
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.
  
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.



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on May 31, 2022:

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*/s/ John W. Knuff* \_\_\_\_\_  
JOHN W. KNUFF, ESQ.