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April 26, 2022

*Federal Express*

Connecticut Siting Council  
Ten Franklin Square  
New Britain, Connecticut 06051

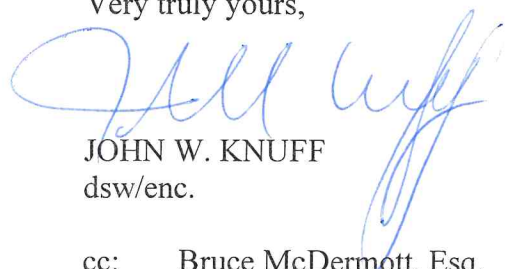
Re: DOCKET NO. 508  
THE UNITED ILLUMINATING COMPANY APPLICATION FOR A CERTIFICATE  
OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE MILVON  
TO WEST RIVER RAILROAD TRANSMISSION LINE 115-KV REBUILD PROJECT  
THAT TRAVERSES PORTIONS OF MILFORD, ORANGE, WEST HAVEN, AND  
NEW HAVEN, CONNECTICUT

Dear Siting Council Members:

For filing in regard to the above captioned matter, enclosed please an original and 15 copies of Interrogatories directed to the United Illuminating Company.

Please file accordingly. Thank you.

Very truly yours,



JOHN W. KNUFF  
dsw/enc.

cc: Bruce McDermott, Esq.  
Murtha Cullina LLP  
[bmcdermott@murthalaw.com](mailto:bmcdermott@murthalaw.com)

**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	:	APRIL 26, 2022
HAVEN, CONNECTICUT	:	

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

1. Referencing United Illuminating (“UI”) Response to Milford Recommendation 1, which requested supplemental data regarding the economic and environmental viability of rebuilding *any* portion of the transmission line between Beardsley Avenue and River Street in an underground configuration (emphasis added), please respond to the following:

- (a) Please provide the requested data with regard to alternative configurations for the referenced area, including entirely underground or entirely on rebuilt catenary structures or a combination of both, that minimize impacts to the five properties listed on the National Register of Historic Places in the City of Milford and Milford City Hall located at 70 West River Street, including P914N. In providing a comparison in any cost increases, use consistent general assumptions.
- (b) With respect to the information requested in (a) above, quantify with specificity potential impacts as to the increase in the size of work platforms and construction access areas.
- (c) With respect to the information requested in (a) above, quantify the number and duration of the “closing of parking spots within the train station” and whether there is any known shortage of commuter parking at the Milford train station.
- (d) With respect to the information requested in (a) above, quantify the number and type of additional permanent and temporary easements required.

- (e) With respect to the information requested in (a) above, identify the duration of work that would impact traffic within downtown Milford as compared to the lifespan of the proposed monopoles.
  - (f) With respect to the information requested in (a) above, identify and quantify the environmental impacts arising from the management of the additional volume of soil and groundwater that could not be mitigated through best management practices.
  - (g) With respect to the information requested in (a) above, identify existing underground utilities located in that area and the environmental impacts arising from their relocation that could not be mitigated through best management practices.
  - (h) Provide details of the visual impact of “transition stations” including their size and height as compared to the proposed monopoles.
  - (i) With respect to the information requested in (a) above, identify the number of required transition stations.
  - (j) With respect to the information requested in (a) above, provide the projected EMF levels and whether such levels are consistent with Connecticut Siting Council (“CSC”) Best Management Practices (see page 7-5 of Volume 1 of Application).
2. Referencing UI Response to CSC Interrogatory 21, provide the required height of each rebuilt catenary structure in the area identified in Interrogatory 1(a) above.
3. Referencing UI Response to CSC Interrogatory 43(d), please respond to the following:
- (a) Identify with specificity the referenced “local preservation partners.”
  - (b) Identify any known gaps in historical research of Charles Island.
  - (c) Identify all other “mitigation options” that were considered, including mitigation options that directly involved the “adversely impacted” locations in the City of Milford listed on the National Register of Historic Places.
  - (d) Identify the likely location and content of the proposed interpretive signage.
  - (e) Provide an estimate of the likely number of people who will encounter the proposed interpretive signage in a given year as compared to the number of people whose views will be impacted by the proposed monopoles from the “adversely impacted” locations in the City of Milford listed on the National Register of Historic Places.

4. With reference to Page 14 and Figure 13 of Appendix D of the Application, provide viewshed analysis of year-round and seasonal visibility for existing, proposed, option 4 (catenary) and underground for P912N – P914N.
5. Provide photo simulations of proposed option 4, and underground from the five locations listed on the National Register of History places in the City of Milford.
6. With reference to Pages 9-6 through 9-9 of the Application, provide a similarly detailed description for an underground configuration between and including P911N – P914N inclusive.
7. With reference to Page 9-5 of the Application, provide a description of the type of “social impacts” that would warrant an underground configuration.
8. With reference to Page 9-14 of the Application and UI’s outreach with “representatives of the involved municipalities,” identify the Milford representatives.
9. With reference to Page 9-17 and Table 9-2, identify which of the three options for the Milford train station would best minimize adverse impacts on historic resources.
10. With reference to Pages 9-9 and 9-10 of the Application, provide a description of an alternative for configuration in Downtown Milford in the area between P911N and P914.
11. Utilizing the various resources available to UI, provide a good faith analysis of an alternative to the proposed option that balances costs with the City’s preference to minimize adverse impacts to both historic resources and the heart of downtown Milford.

Respectfully submitted,

CITY OF MILFORD

By: \_\_\_\_\_

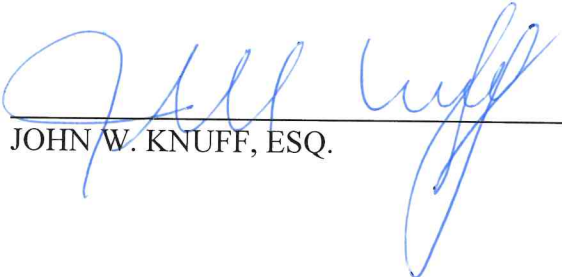
  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on April 26, 2022:

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