



John W. Knuff, Esq. JKnuff@hssklaw.com LAW OFFICES 147 North Broad Street Milford, CT 06460 T: 203.877.8000 F: 203.878.9800 hssklaw.com

May 9, 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 find an original and 15 copies of additional 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

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:	:	
		DOCKET NO. 508
THE UNITED ILLUMINATING COMPANY	1	
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 9, 2022
HAVEN, CONNECTICUT	:	

PARTY CITY OF MILFORD SUPPLEMENTAL INTERROGATORIES TO THE UNITED ILLUMINATING COMPANY

1. With reference to that letter, dated December 22, 2021, from Jonathan Kinney, State Historic Preservation Office (SHPO), to David R. George, Heritage Consultants, specify with particularity all forms of mitigation of the adverse visual impacts to historic resources that were submitted, proposed, or discussed by and between UI and its employees and consultants and the State Historic Preservation Office. Please identify all parties who participated in the meeting between the "project proponent" and SHPO and the date of that meeting.

2. With reference to Interrogatory 1, did UI, its employees, or consultants submit or propose a mitigation strategy of rebuilding the catenary structures in lieu of the proposed monopoles where such monopoles would be visible from the adversely impacted historic resources? If so, specify with particularity how and when such mitigation was submitted or proposed.

3. With respect to each route and/or configuration alternative identified in Section 9 of Volume 1, describe with particularity whether each alternative would mitigate adverse visual impacts to any of the five National Register listed resources identified in the December 22, 2021 letter from SHPO.

4. Referencing UI Response to CSC Interrogatory 44, please provide a copy of the 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.

5. Referencing the letter from SHPO dated December 22, 2021, which identifies the railway corridor itself as a historic resource eligible for listing on the National Register, identify with particularity all 19th and 20th century structures, electrical wires, and/or equipment that will be removed as a result of the Project.

6. Identify all properties/districts in the City of Milford that are listed on the State Register of Historic Places (SRHP) and located within the vicinity of the CT DOT corridor.

7. Referencing the information provided in response to Interrogatory 6, identify the nearest proposed monopole to each property/district located within 0.15 mile of the CT DOT corridor.

Respectfully submitted,

CITY OF MILFORD

By:

John W. Knuff, Esq. Sara A. Sharp, Esq. Hurwitz, Sagarin, Slossberg & Knuff, LLC 147 North Broad Street Milford, CT 06460 Telephone: (203) 877-8000 Fax: (203) 878-9800 jknuff@hssklaw.com ssharp@hssklaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the

following service list on May 9, 2022:

Connecticut Siting Council Ten Franklin Square New Britain, CT 06051 siting.council@ct.gov

Bruce McDermott, Esq. Murtha Cullina LLP One Century Tower 265 Church Street, 9th floor New Haven, CT 06510 T: 203-772-7787 bmcdermott@murthalaw.com

JOHN W. KNUFF, ESQ.