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November 2, 2023

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

Re: Docket No. 516 – The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project

Dear Ms. Bachman:

On behalf of The United Illuminating Company (“UI”), enclosed please find UI’s responses to Pre-Hearing Interrogatories & Requests for Production (Set One) of Sasco Neighborhood Environmental Trust Incorporated, Stephen Ozyck, Karim Mahfouz, William Danylko, David Parker, 2190 Post Road, LLC, Invest II and International Investors dated October 3, 2023.

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

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

cc: Service List (via Electronic Mail only)

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Interrogatory SCNET 1-1

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

Q-SCNET 1-1: Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of The United Illuminating Company (hereinafter "UI" or the "Applicant")

A-SCNET 1-1: Individuals responsible for the preparation of a response to an interrogatory are identified on each response. Also refer to UI's pre-hearing submission filed on July 18, 2023 as amended on August 11, 2023.

Interrogatory SCNET 1-2

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

- Q-SCNET 1-2: Please identify by name, position and address of all persons who participated on behalf of UI to evaluate the reliability and resiliency of UI's 115-kilovolt (kV) overhead transmission lines, and associated infrastructure, located between catenary structure B648S and the Congress Street Substation (the "Site).
- A-SCNET 1-2: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-3

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-3: For any persons identified in Interrogatory No. 2, please describe the work those persons performed and provide copies of any documents/records/studies/plans that those persons produced on behalf of UI.

A-SCNET 1-3: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-4

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

Q-SCNET 1-4: State the name, address and title of any expert UI intends to use as expert witness in support of this Docket No. 516.

A-SCNET 1-4: Please see the Company's pre-hearing submission filed on July 18, 2023 as amended on August 11, 2023.

Interrogatory SCNET 1-5

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

Q-SCNET 1-5: For each witness identified in response to the preceding interrogatory, state:

- (a) the qualifications of each expert witness;
- (b) the subject matter on which each expert witness is expected to testify;
- (c) the substance of the facts and opinions on which each expert witness is expected to testify; and
- (d) a summary of the grounds for each opinion of each expert witness expected to testify.

A-SCNET 1-5: Please see UI's pre-hearing submission filed on July 18, 2023 as amended on August 11, 2023.

Interrogatory SCNET 1-6

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

Q-SCNET 1-6: Please provide the resume or curriculum vitae of any expert witness whom UI intends to use to support its application for Docket No. 516.

A-SCNET 1-6: Please see UI's pre-hearing submission filed on July 18, 2023 as amended on August 11, 2023.

Interrogatory SCNET 1-7

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

- Q-SCNET 1-7: Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic communications) provided to any expert identified by UI in response to Interrogatory No. 4 which has not been submitted to the Connecticut Siting Council (CSC) as part of the record associated with this Docket No. 516.
- A-SCNET 1-7: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-8

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

Q-SCNET 1-8: State the name, address and title of any fact witness UI intends to call to testify in support of this Docket No. 516.

A-SCNET 1-8: Please see UI's pre-hearing submission filed on July 18, 2023 as amended on August 11, 2023.

Interrogatory SCNET 1-9

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-9: Please provide a copy of all correspondence in UI's possession (including electronic communications) between UI and any expert identified by UI in response to Interrogatory No. 4, which pertains to this Docket No. 516.

A-SCNET 1-9: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-10

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-10: Please provide a copy of all correspondence (including electronic communications) between any representative of UI (legal or otherwise) and any expert identified by UI in response to Interrogatory No. 4, which pertains to this Docket No. 516.

A-SCNET 1-10: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-11

The United Illuminating Company

Witness: Annette Potasz
(part A)

Docket No. 516

Page 1 of 1

Q-SCNET 1-11: (A) Please identify any agreement, written or oral, between UI and the Connecticut Department of Transportation (CT DOT) pertaining to the co-location of UI's 115-kV lines within that portion of the Site owned by CT DOT or within CT DOT's right-of-way. (B) Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic communications) identified by UI in response to Subsection A of this Interrogatory.

A-SCNET 1-11: (A) See the Company's response to Interrogatory CSC-18.
(B) UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory CNET 1-12

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-12: Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and CT DOT, or any representative thereof, pertaining to UI's application associated with this Docket 516.

A-SCNET 1-12: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-13

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-13: Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and the Metro-North Railroad and/or the Metropolitan Transportation Authority (MTA), or any representative thereof, pertaining to UI's application associated with this Docket 516.

A-SCNET 1-13: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 14

The United Illuminating Company
Docket No. 516

Witness: Annette Potasz
Page 1 of 1

Q-SCNET 1-14: Please identify any agreement, written or oral, between UI and the Metro-North Railroad or the MTA, including but not limited to any lease or maintenance agreement pertaining to the Site. (B) Please provide a copy of any written agreement identified in response to Subsection A of this Interrogatory.

A-SCNET 1-14: There is no standing agreement with MNR that governs the maintenance of UI work activities such as the one UI currently has with CTDOT. However, on a case-by-case basis, UI works with MNR and obtains Entry Permits to perform both capital and maintenance work such as vegetation clearing, insulator replacements, splices, and structure replacements.

Interrogatory SCNET 1-15

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-15: Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and The National Railroad Passenger Corporation d/b/a Amtrak, or any representative thereof, pertaining to UI's application associated with this Docket 516.

A-SCNET 1-15: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-16

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-16: Please identify the load rating of the existing transmission circuits located within the Site, including each circuit's summer and winter seasonal rating.

A-SCNET 1-16: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the asset but rather is related to reliability concerns; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SCNET 1-17

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-17: Please identify the thirty (30) minute peak load of the existing transmission circuits located within the Site that were observed within the last sixty (60) months.

A-SCNET 1-17: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the asset but rather is related to reliability concerns; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SCNET 1-18

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-18: Please provide the average daily load history for the existing transmission circuits located within the Site as calculated over the last twenty-four (24) months.

A-SCNET 1-18: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the asset but rather is related to reliability concerns; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SNET 1-19

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-19: Please identify the projected load rating for the transmission circuits proposed by UI as part of its application associated with this Docket 516, including each proposed circuit's summer and winter seasonal rating.

A-SCNET 1-19: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the asset but rather is related to reliability concerns; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SCNET 1-20

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-20: (A) Please explain why the facilities proposed by UI in its application are designed to accept a larger wire size than what is presently being proposed in its application associated with this Docket 516. (B) Does UI anticipate a significant load increase within the next ten (10) year period? (C) If so, please quantify the projected load increase and qualify the impact of said increase on UI's proposed conductors.

A-SCNET 1-20: (A) The structures are designed to accept a larger wire size in order to allow for additional capacity (power flow) through the lines if necessary in the future without the need to rebuild or replace the transmission facilities.

(B) At this time UI does not anticipate a significant load increase in Connecticut or the region in the next 10 years.

Interrogatory SCNET 1-21

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-21: What is the estimated date by which UI will need to replace its proposed conductors to accommodate the projected load increase.

A-SCNET 1-21: The project need is based on an asset condition and not load capacity.

Interrogatory SCNET 1-22

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-22: What is the performance history of UI's existing facilities at the Site within the last two (2) years? (B) Specifically, please identify all unplanned outages occurring within the last two year, including the date of the outage, the cause of the outage as determined by UI, and the duration of the outage.

A-SCNET 1-22: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-23

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 23: (A) Did UI receive a request or mandate from the Federal Energy Regulatory Commission (FERC) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the FERC? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the FERC which pertains to said request or mandate.

A-SCNET 23: UI did not receive a request or mandate from FERC. To the best of UI's knowledge, FERC does not direct or request electric distribution companies to rebuild, upgrade and/or relocate existing transmission lines.

Interrogatory SNET 1-24

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 24: (A) Did UI receive a request or mandate from the North American Electric Reliability Corporation (NERC) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the NERC? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the NERC which pertains to said request or mandate.

A-SCNET 24: UI did not receive a request or mandate from NERC. To the best of UI knowledge, NERC does not direct or request electric distribution companies to rebuild, upgrade and/or relocate existing transmission lines.

Interrogatory SNCET 1-25

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 25: (A) Did UI receive a request or mandate from the Public Utilities Regulatory Authority (PURA) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the PURA? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the PURA which pertains to said request or mandate.

A-SCNET 25: UI did not receive a request or mandate from PURA. To the best of UI's knowledge, PURA does not direct or request electric distribution companies to rebuild, upgrade and/or relocate existing transmission lines.

Interrogatory SCNET 1-26

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
Page 1 of 1

- Q-SCNET 26: (A) Did UI receive a request or mandate from the CT DOT requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the CT DOT? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the CT DOT which pertains to said request or mandate.
- A-SCNET 26: (A) No, UI did not receive a request or mandate from CT DOT to rebuild, upgrade or relocate its existing 115-kV overhead lines.

Interrogatory SCNET 1-27

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-27: Please identify and provide a copy of CT DOT's written design requirements, if any, relating to an electric utility's installation of overhead transmission lines within CT DOT's railroad right of-way.

A-SCNET 1-27: UI is not aware of any CT DOT design requirements relating to an electric utility's installation of overhead transmission lines within the CT DOT railroad right of way. However, 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 is attached as Attachment SCNET-1-27-1. The design of overhead lines is first based on requirements in the National Electric Safety Code and UI's design criteria. Any additional requirements are discussed and resolved through design review and meetings with CT DOT and MNR throughout the detailed design process.

Interrogatory SCNET 1-28

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-28: (A) Please identify any alternative designs considered, studied or analyzed by UI in connection with its proposed repair and/or replacement of the existing 115-kV transmission line, and associated infrastructure, located between catenary structure B648S and UI's Congress Street substation. (B) Please provide copies of any plans, studies or correspondence regarding any alternative designs that are identified in subsection A of this Interrogatory.

A-SCNET 1-28: (A) Please refer to section 9 of the Application.

(B) Please see Exhibit CSC-12-1 which is part of the Company's response to Siting Council Interrogatory 12 in Docket 508.

Interrogatory SCNET 1-29

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-29: Did any of the alternative designs identified by UI in response to Interrogatory 28 use trapezoidal conductors for the overhead transmission circuits.

A-SCNET 1-29: No.

Interrogatory SCNET 1-30

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-30: (A) Has UI conducted any structural analyses, studies or report of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation within the last sixty (60) months? (B) If so, please provide a copy of any responsive analysis, study or report.

A-SCNET 1-30: Yes, please see Exhibit CSC-12-1 which is part of the Company's response to Siting Council Interrogatory 12 in Docket 508.

Interrogatory SCNET 1-31

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
Page 1 of 1

Q-SCNET 1-31: (A) Is UI aware of, or does it possess, a structural analysis, study or plan of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation conducted by a third party within the three (3) years? (B) If so, identify the author, date and custodian? (C) Please provide a copy of any analysis, study or plan identified in response to Subsection A of this Interrogatory.

A-SCNET 1-31: (A) No.

Interrogatory SCNET 1-32

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-32: Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which contain any research or analysis pertaining to the structural integrity, reliability and/or resiliency of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation, and UI's associated electrical infrastructure.

A-SCNET 1-32: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.

Interrogatory SCNET 1-33

The United Illuminating Company
Docket No. 516

Witness: Matthew Parkhurst
Page 1 of 1

Q-SCNET 1-33: Please identify the percentage of the structures proposed to be removed or replaced by UI which are lattice structures as opposed to the percentage of structures proposed to be removed or replaced by UI which are comprised of rolled steel sections.

A-SCNET 1-33:

Structure Type	% Removed
Lattice	2%
W-flange	95%
Monopole	3%

Interrogatory SCNET 1-34

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-34: (A) Please identify any ampacity analysis or study conducted by or on behalf of UI, which pertains to the consideration or feasibility of installing UI's proposed transmission line and/or circuits, and/or associated electrical infrastructure underground. (B) Please provide copies of any analysis or study identified in response to Subsection A of this Interrogatory.

A-SCNET 1-34: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the asset but rather is related to reliability concerns; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SCNET 1-35

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-35: (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal prepared by or on behalf of UI in association with, or in preparation for, its application associated with this Docket 516. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

A-SCNET 1-35: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) is confidential and proprietary information.

Interrogatory SCNET 1-36

The United Illuminating Company
Docket No. 516

Witness: Matthew Parkhurst
Page 1 of 1

Q-SCNET 1-36: (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal pertaining to the feasibility of installing UI's proposed transmission facilities, including associated infrastructure, underground. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

A-SCNET 1-36: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) is confidential and proprietary information.

Interrogatory SCNET 1-37

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-37: (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal which compares the projected cost of installing UI's proposed transmission facilities, including associated infrastructure, underground to the projected cost of replacing and rebuilding its overhead transmission facilities as proposed in the application associated with this Docket 516. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

A-SCNET 1-37: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) is confidential and proprietary information.

Interrogatory SCNET 1-38

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

- Q-SCNET 1-38: Please identify any temperature readings recorded by or on behalf of UI in the vicinity of UI's existing 345-kV solid dielectric feeder (1.e., Norwalk to Middletown). (B) Please provide a copy of any documents (including electronic or via electronic transmission) that were identified in response to Section A of this Interrogatory.
- A-SCNET 1-38: UI respectfully objects to this interrogatory because it seeks information that is (1) not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI; (2) not relevant to the need to rebuild the line based on the condition of the assets but is information regarding completely different assets at a different voltage class than the Project; and (3) confidential because it is Critical Electric Infrastructure Information.

Interrogatory SCNET 1-39

The United Illuminating Company
Docket No. 516

Witness:
Page 1 of 1

Q-SCNET 1-39: Please provide a copy of any documents in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to respond to any of these interrogatories.

A-SCNET 1-39: UI respectfully objects to this interrogatory because it seeks information that is not relevant and not likely to lead to the discovery of admissible evidence which will assist the Council's review of the project and the approval sought by UI.