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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 the Town of Fairfield’s Interrogatories and Requests for Production dated October 12, 2023. Please note that no response to Interrogatory Fairfield 8 is being filed today. A request for an extension for the filing of that response will be filed separately.

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 Fairfield 1

The United Illuminating Company
Docket No. 516

Witness: Shawn Crosbie
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Q-Fairfield 1: Please identify by name, position or title, address, any person answering or assisting in the answering of these interrogatories and requests for production on behalf of UI.

A-Fairfield 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 Fairfield 2

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
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Q-Fairfield 2: Please provide copies of all National Electrical Safety Codes (NESC) which substantiate UI's position that the 115-kV transmission lines must be rebuilt on new monopoles.

A-Fairfield 2: Please refer to the Company's response to Interrogatory SCNET 2-2.

Interrogatory Fairfield 3

The United Illuminating Company
Docket No. 516

Witness: Meena Sazanowicz
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Q-Fairfield 3: Please identify all Eversource transmission lines located within one mile of UI's proposed project.

A-Fairfield 3: Please refer to the Company's response to Interrogatory SCNET 2-3.

Interrogatory Fairfield 4

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
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Q-Fairfield 4: Please describe the steps taken by UI to identify properties and structures located within the proposed right-of-way ("ROW") which are either eligible for state and/or federal- historic designation, locally designated, or which otherwise contribute architecturally, historically or culturally to Southport, the Town of Fairfield and the City of Bridgeport.

A-Fairfield 4: Please refer to the Company's response to Interrogatory SCNET 2-4.

Interrogatory Fairfield 5

The United Illuminating Company
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Witnesses: Correne Auer
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Q-Fairfield 5: Please list all properties identified in UI's application which are not listed on the National Register of Historic Places but are either eligible for state and/or federal designation, are locally designated, or otherwise contribute architecturally, historically or culturally to Southport, the Town of Fairfield or the City of Bridgeport.

A-Fairfield 5: Please refer to the Company's response to Interrogatory SCNET 2-5.

Interrogatory Fairfield 6

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
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Q-Fairfield 6: If the answer to interrogatory 5 is “none,” please explain why such resources were omitted in the original application.

A-Fairfield 6: Please refer to the Company’s responses to SCNET 2-4 and SCNET 2-5.

Interrogatory Fairfield 7

The United Illuminating Company

Witnesses: Correne Auer/

Meena Sazanowicz

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Q-Fairfield 7: For any property or structure identified in response to Interrogatory No. 5, please respond to the following:

a. Please qualify with specificity the potential impact of UIs proposed project on said property or structure and identify the nearest proposed monopole.

b. Please identify any alternative configurations or designs, including entirely underground or entirely on rebuilt catenary structures or a combination of both, that would minimize the impact of UI's proposed project on said property or structure.

c. Please provide a cost comparison for any alternative configuration or design identified in response to Interrogatory 7(b). In providing a comparison in any cost increases, use consistent general assumptions.

A-Fairfield 7: Please refer to the Company's responses to SCNET 2-4 and SCNET 2-5.

Interrogatory Fairfield 9

The United Illuminating Company

Witnesses: Annette Potasz/

Matt Parkhurst

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Q-Fairfield 9: For each privately owned land identified in your answer to Interrogatory 8, state whether UI intends to acquire an easement from that property's owner.

A-Fairfield 9: If there is privately owned land upon which a structure will be located, UI intends to acquire an easement from the property owner.

Interrogatory Fairfield 10

The United Illuminating Company
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Witness: Annette Potasz
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Q-Fairfield 10: For each private property owner that UI proposes to acquire a new easement from, did UI assess whether a new easement will render that property a non-conforming lot under applicable local zoning regulations.

A-Fairfield 10: Yes, based on UI's evaluation of the local zoning regulations, four properties will be non-compliant based on new permanent easements needed for UI's Project.

Interrogatory Fairfield 11

The United Illuminating Company
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Witnesses: Annette Potasz
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Q-Fairfield 11: How many of the private properties that UI proposes to acquire a new easement on will be rendered a non-conforming lot under applicable local zoning regulations because of a new easement acquired by UI.

A-Fairfield 11: See A-Fairfield 10.

Interrogatory Fairfield 12
(Set One)

The United Illuminating Company
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Witnesses: Annette Potasz
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Q-Fairfield 12: Please produce a copy of UI “standard permanent easements” as referenced in footnote 16 of UI’s Application for a Certificate of Environmental Compatibility and Public Need to the Connecticut Siting Council for Fairfield to Congress Railroad Transmission Line 115-kv Rebuild Project Volume 1: Description of Proposed Project.

A-Fairfield 12: Please refer to the Company’s response to FSL-18.

Interrogatory Fairfield 13

The United Illuminating Company

Witnesses: Matt Parkhurst/
Annette Potasz

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Q-Fairfield 13: On how many of the properties that UI proposes to obtain an easement on will the private property owner have to remove an existing structure in order to accommodate the construction of the project?

A-Fairfield 13: No existing permanent structures (i.e., buildings or other affixed structures) will need to be removed to accommodate the construction of the Project.

Various fences, bollards, and guardrails will be removed as needed by UI's construction contractor to accommodate the Project work. However, these facilities will be replaced like for like upon completion of construction.

On one property, where an easement is required, existing trash dumpsters and an associated fence enclosure will have to be temporarily moved or relocated by the private property owner.

UI will also request the private property owner for all areas designated as 'work pads' to be made clear of temporary non-fixed items in order to accommodate the construction of the project. Temporary non-fixed items could include staged vehicles, staged materials, and other miscellaneous items such as conex boxes and roll-off containers.

Interrogatory Fairfield 14

The United Illuminating Company
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Witnesses: Annette Potasz
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Q-Fairfield 14: Please describe in greater detail any and all future land uses within the new easements that will be restricted and/or prohibited in order for the property subject to the new easement to be compatible with overhead transmission line operations.

A-Fairfield 14: UI's easement will include restrictions against excavation, fill, grade changes and construction of permanent structures as well as vegetation that creates a hazard to the electric facilities or access and maintenance thereof.

Interrogatory Fairfield 15

The United Illuminating Company
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Witnesses: Annette Potasz
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Q-Fairfield 15: Please describe in greater detail all construction prohibitions under UI standard permanent easements.

A-Fairfield 15: See A-Fairfield 14.

Interrogatory Fairfield 16

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Witness: Shawn Crosbie
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Q-Fairfield 16: Of the estimated cost for the project, how much money has been estimated and/or allocated for UI's acquisition of new easements?

A-Fairfield 16: UI has estimated and/or allocated approximately \$30 million for the acquisition of new easements for the Project.

Interrogatory Fairfield 17

The United Illuminating Company

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Witnesses: Annette Potasz/
Meena Sazanowicz
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Q-Fairfield 17: Please identify the name, position or title, and address of all persons who participated or were involved with evaluating the estimated cost to acquire the new easements?

A-Fairfield 17: Annette Potasz and Meena Sazanowicz. Upon Project approval, UI, through its Energy Land Management department will engage with a CT State License Appraiser to determine the fair market value of each of the proposed easements.

Interrogatory Fairfield 18

The United Illuminating Company
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Witness: Annette Potasz
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Q-Fairfield 18: Please produce all documents UI relied upon to arrive at the estimated cost for acquiring the new easements.

A-Fairfield 18: During the Project planning phase, a high level estimate is used to ascertain the magnitude of expenses the company could incur to acquire all required land rights and payments to private property owners. There is no property specific research done since the Project is not approved.

Interrogatory Fairfield 19

The United Illuminating Company
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Witness: Annette Potasz
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Q-Fairfield 19: Did UI research the effect new easements will have on each property's fair market value and valuation by the Town for purposes of its Grand List?

A Fairfield 19: No.

Interrogatory Fairfield 20

The United Illuminating Company
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Witnesses:
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Q-Fairfield 20: If your answer to Interrogatory 19 is yes, then please describe UI's research and produce all documents relating to that research.

A-Fairfield 20:

Interrogatory Fairfield 21

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Witnesses: Annette Potasz
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Q-Fairfield 21: In estimating the cost for the project, did UI include the loss of value the easements will cause to each property and to the Town's Grand List?

A-Fairfield 21: See A-Fairfield 18.

Interrogatory Fairfield 22

The United Illuminating Company
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Witness: Annette Potasz
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Q-Fairfield 22: If your answer to Interrogatory 21 is yes, then please produce all documents relied upon by UI for estimating the loss of value the easements will cause to each property and to the Town's Grand List.

A-Fairfield 22: See A-Fairfield18.

Interrogatory Fairfield 23

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Witnesses: Annette Potasz
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Q-Fairfield 23: Has UI consulted with any appraiser on the estimated cost for acquiring the proposed new easements?

A-Fairfield 23: UI has not consulted with an appraiser on the estimated cost for acquiring easements.

Interrogatory Fairfield 24

The United Illuminating Company
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Witness: Annette Potasz
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Q-Fairfield 24: If your answer to Interrogatory 23 is yes, please identify the name and address of all appraisers UI has consulted with and produce all communications by and between each appraiser identified in your answer.

A-Fairfield 24: See A-Fairfield 23.