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July 18, 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 (the “Company”), enclosed for filing with the Connecticut Siting Council (“Council”) are the following:

1. The Company’s responses to the Council’s July 11, 2023 interrogatories (Set 2);
2. The Company’s responses to BJ’s Wholesale Club’s July 11, 2023 interrogatories;
3. Affidavit of Brian Ragozzine relating to posting of hearing notice signs; and
4. The Company’s pre-hearing submission.

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

Enclosure

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Interrogatory CSC 71

The United Illuminating Company
Docket No. 516

Witness: MeeNa Sazanowicz
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Q-CSC 71: What design considerations have been explored and/or could be implemented to reduce and/or offset life cycle costs?

A-CSC 71: UI's primary goal in designing a transmission line project is to align with NESC and internal design criteria. Another main objective of project design is to construct the safest, lowest cost alternative that will resolve the system or engineering need that was found.

As a Company, UI implements designs from its standards library to provide conformity across the territory. Typically, these standards have been vetted by internal stakeholder groups (i.e. Operations, Maintenance, etc.) and take into consideration materials and technologies used which could potentially minimize long-term maintenance and O&M costs.

Interrogatory CSC 72

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
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Q-CSC 72: Per page 15 of the Council's Life Cycle Cost Analysis report dated January 5, 2023, costs to obtain permits are included in engineering costs of construction. How much did the supplemental Phase IA Cultural Resources Assessment Survey submitted on June 30, 2023 cost, and has it been factored into engineering costs for the project?

A-CSC 72: The cost for the supplemental Phase 1A Cultural Resources Assessment Survey requested by SHPO is ~\$63,000. These costs are not directly associated with engineering costs, rather they are associated with environmental costs.

Interrogatory CSC 73

The United Illuminating Company
Docket No. 516

Witness: Correne Auer
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Q-CSC 73: For a Department of Energy and Environmental Protection General Permit (GP) in the same right-of-way as a previous project, could the GP be revised or is a reapplication required? If either, are new historic preservation and Natural Diversity Database reviews required? Explain.

A-CSC 73: Assuming the question is referring to the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (GP) and the reference to the "*previous project*" is the Milvon to West River Project (Docket No. 508), UI will not revise previously submitted and approved applications to CTDEEP or other agencies under one permit. The two projects could and are anticipated to commence at different times and have different project-specific impacts. Permit applications will be submitted specifically to cover construction activities, proposed stormwater control measures and final conditions for a specific project. This approach is uniform throughout for UI on all State and Federal permits, approvals, and consultations such as, but not limited to, USACE, USFW, CTDEEP, NDDDB and CTSHPO project review.

Interrogatory CSC 74

The United Illuminating Company
Docket No. 516

Witness: David George
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Q-CSC 74: When does a Cultural Resources Assessment become outdated? How many years? Could a past assessment be used for the same facility site within that timeframe?

A-CSC 74: There is no official policy on when a Cultural Resources Assessment become outdated. The rule of thumb Heritage Consultants, LLC uses - and that has been acceptable to the State Historic Preservation Office - is that a Cultural Resources Assessment may become "outdated" in areas where many resources have been identified in the past at approximately one year from completion. After that time, it is recommended that a supplementary file review be conducted to determine if any additional resources have been identified in the vicinity of any given project.