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July 11, 2023

VIA EMAIL ONLY
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Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06501

RE: Docket No. 516 and application submitted by The United Illuminating Company for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project that consists of the relocation and rebuild of its existing 115- kilovolt (kV) electric transmission lines from the railroad catenary structures to new steel monopole structures and related modifications along approximately 7.3 miles of the Connecticut Department of Transportation’s Metro-North Railroad corridor between Structure B648S located east of Sasco Creek in Fairfield and UI’s Congress Street Substation in Bridgeport, and the rebuild of two existing 115-kV transmission lines along 0.23 mile of existing UI right-of-way to facilitate interconnection of the rebuilt 115-kV electric transmission lines at UI’s existing Ash Creek, Resco, Pequonnock and Congress Street Substations traversing the municipalities of Bridgeport and Fairfield.

Dear Attorney Bachman:

Pursuant to a petition for party/intervenor status filed with the Connecticut Siting Council (the “Council”) on June 27, 2023, this firm represents BJ’s Wholesale Club, Inc. (“BWC”) in connection with the above-referenced application filed by The United Illuminating Company (“UI”).

BWC hereby requests that UI respond to the enclosed set of pre-hearing interrogatories prior to the first evidentiary hearing with the Council that is scheduled for July 25, 2023. A certification of service is attached to these interrogatories.

Sincerely,

CRAMER & ANDERSON LLP

By: /s/ Joseph P. Mortelliti
Joseph P. Mortelliti

CONNECTICUT SITING COUNCIL

RE:	:	DOCKET NO. 516
	:	
Application submitted by the United	:	
Illuminating Company for a Certificate of	:	
Environmental Compatibility and Public Need	:	
for the Fairfield to Congress Railroad	:	
Transmission Line 115-kV Rebuild Project that	:	
consists of the relocation and rebuild of its	:	
existing 115- kilovolt (kV) electric transmission	:	
lines from the railroad catenary structures to	:	
new steel monopole structures and related	:	
modifications along approximately 7.3	:	
miles of the Connecticut Department of	:	
Transportation’s Metro-North Railroad	:	
corridor between Structure B648S located	:	
east of Sasco Creek in Fairfield and UI’s	:	
Congress Street Substation in Bridgeport,	:	
and the rebuild of two existing 115-kV	:	
transmission lines along 0.23 mile of existing	:	
UI right-of-way to facilitate interconnection	:	
of the rebuilt 115-kV electric transmission	:	
lines at UI’s existing Ash Creek, Resco,	:	
Pequonnock and Congress Street Substations	:	
traversing the municipalities of Bridgeport	:	
and Fairfield	:	JULY 11, 2023

**BJ WHOLESALE CLUB, INC.’S PRE-HEARING INTERROGATORIES (SET ONE)
TO THE UNITED ILLUMINATING COMPANY**

The following are BJ Wholesale Club, Inc.’s (“BWC”) first set of Interrogatories to the United Illuminating Company (“UI”), dated July 11, 2023, in connection with the above-referenced application before the Connecticut Siting Council:

1. Has UI approached Feroletto Steel Co., Inc., the owner of record of certain real property located at 301 Scofield Avenue Extension, Fairfield, Connecticut, and discussed the placement of transmission poles, transmission lines and related infrastructure on the property?

Response:

2. Explain UI's position for not placing the transmission poles, transmission lines and related infrastructure on Ferroletto Steel Co., Inc.'s property.

Response:

3. Describe the full scope of UI's due diligence, investigatory efforts and overall position relative to the locating of transmission poles, transmission lines and related infrastructure on the real property known as 301 Scofield Avenue Extension, Fairfield, Connecticut.

Response:

4. Describe UI's rationale and preference for locating transmission poles, transmission lines and related infrastructure on BWC's property relative to surrounding properties.

Response:

5. Has UI approached the Metropolitan Transportation Authority ("MTA") and discussed the placement of transmission poles, transmission lines and related infrastructure on the MTA's property?

Response:

6. Please describe in detail UI's due diligence, investigatory efforts and overall position relative to locating transmission poles, transmission lines and related infrastructure on the adjacent property owned by the MTA.

Response:

7. Please describe and provide BWC with cross-sections, including the required clearances between the wires (horizontal and vertical) and other critical obstructions, to illustrate the relationship between the proposed locations of the transmission lines to the wires and fixed objects on the MTA's property.

Response:

8. Provide complete copies of the latest version of UI's proposed maintenance easement and any other easements associated with the above-referenced application.

Response:

9. With respect to UI's maintenance easement and any other easements associated with the above-referenced application, please describe the extent to which the easements will impact BWC's loading dock operations and the potential for disruptions to BWC's loading dock operations.

Response:

10. With respect to UI's maintenance easement and any other easements associated with the above-referenced application, please describe the manner, duration and time intervals in which UI vehicles, personnel, agents and machinery will be permitted and located in the easement area.

Response:

11. Describe the position and location of the second UI transmission pole on the west side of BWC's property in relation to BWC's proposed future gas station development.

Response:

12. Provide documentation and UI's analysis of all alternative sites for the location of transmission poles, transmission lines and related infrastructure, the technical suitability of each alternative site and the data generated for each site.

Response:

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was electronically mailed to the following service list on electronically on July 11, 2023:

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Dated: July 11, 2023
Danbury, CT

/s/ Joseph P. Mortelliti (440620)
Joseph P. Mortelliti