

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
THE UNITED ILLUMINATING COMPANY (UI) : DOCKET NO. 516
APPLICATION 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, : OCTOBER 12, 2023
PEQUONNOCK AND CONGRESS STREET :
SUBSTATIONS TRAVERSING THE :
MUNICIPALITIES OF BRIDGEPORT AND :
FAIRFIELD, CONNECTICUT. :

**THE GROUPED LLC INTERVENORS
PRE-HEARING INTERROGATORIES (SET ONE)
TO THE UNITED ILLUMINATING COMPANY**

The following are the Grouped LLC Intervenor’s first set of interrogatories to the United Illuminating Company (“UI”), in connection with the Docket No. 516 proceeding:

1. In connection with the design of the proposed Project in this Docket, did anyone from UI conduct an in-person field visit to the vicinity of the following properties, identified by their property address or as noted on the Applicant’s submitted plans, after October 2022? If so, provide a date(s) and the names of any UI personnel, consultants, or contractors present and any written reports or analyses based on such visit(s).
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596

- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

2. Provide the precise location for the proposed following structures, including the precise location depicted on a survey with sufficient detail to understand the proximity of the proposed structure to the specified property and the actual distance from the proposed structure to the nearest portion of the building on the property indicated.
 - a. Structure P659S to SAS-1574
 - b. Structure P664S to SAS-1596
 - c. Structure P737N to ARN-1829

3. When deciding on the location of proposed work pads in proximity to SAS-1574 and 96 Station Street in Southport, CT, did UI consider if the location would impede access to these properties for, among other things, emergency services and patron access? If so, how did that impact the proposed location of those proposed work pads? Has UI considered staggering the timing of use of those work pads? Why was the work pad placed directly in front of the business located at 96 Station Street, Southport, Connecticut rather than to the west?

4. Will electric transmission lines travel over the following properties? If so, how far will the lines encroach onto or over those properties?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945

5. Will permanent easements travel over the following properties? If so, how far will the easements encroach onto or over those properties?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945

6. What is minimum height that an electric transmission lines will hang over the following properties?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT

- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

7. What is the closest distance between an electric transmission line and the highest point of the existing buildings on the following properties?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

8. Does the distance between (i) proposed structures and all electric transmission lines to located on and over the following properties meet or exceed current National Electrical Safety Code standards and UI's electrical safety standards? If not, provide a list of standards not met, as well as what modifications to the Project will be required to meet or exceed these standards?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

9. Did UI evaluate the feasibility of rerouting the electric transmission lines to a double-circuit configuration north of the CT DOT corridor? If not, describe in detail why this option was not evaluated. If so, provide all written reports and analyses where this alternative is discussed.
10. Did UI evaluate the feasibility of installing the electric transmission lines in an underground duct bank north or south of the CT DOT corridor? If not, describe in detail why this option was not evaluated. If so, provide all written reports and analyses where this alternative is discussed.
11. In connection with the proposed work pad in proximity to the following properties, please (i) Describe in detail the nature of this work pad, including the activities that will take place in the work pad area, expected duration of this work pad area, and any restrictions that will impact adjacent areas and roadways as a result of the activities in and around the work pad area; (ii) does this work pad extend onto the following properties, and if so, where and for what purpose; (iii) will this work pad be secured with fencing or other perimeter control measures; (iv) can this work pad be reduced in size or moved away from existing buildings, building entrances and abutting roadway to avoid impacting the following properties; and (v) when designing this work pad, including its location and size, did UI evaluate whether the location and size of the work pad would impede access to the buildings, the ability of emergency services to access the buildings and parking areas and the safety of vehicles utilizing reduced and reconfigured parking areas?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945

12. According to UI's Application, UI intends to obtain a permanent easement over a portion of the following properties. What are the dimensions of these permanent easements?

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

13. Describe in detail the nature of the permanent easement UI intends to obtain over the following properties, including but not limited to the purpose of the permanent easement and any and all restrictions that such permanent easement will impose on the following properties.

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

14. If UI's proposed structures can reach a height of 150' and the proposed transmission lines are depicted over existing buildings, why does the permanent easement requested by UI prevent the construction of any building within the proposed easements when local municipal zoning regulations contain maximum height standards far below the possible height of the transmission lines? Could a permanent easement permit the construction of buildings within the easement area while restricting certain construction techniques that could interfere with the transmission lines and UI structures, i.e. prohibit the use of cranes?
15. Under the relevant municipal zoning regulations, does the proposed UI permanent easement reduce the lot area as calculated by said zoning regulations of the following properties? If so, what is the size of the reduction in lot area and what is the remaining lot area of the following properties? Are any of the following properties rendered nonconforming as to lot area under said zoning regulations?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945
16. Is it UI's practice to obtain permanent easements over existing buildings or structures?
17. Can the proposed Project be constructed without obtaining any permanent easement over the following properties?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729
 - g. ARN-1829
 - h. RPS-1944
 - i. RPS-1945
18. Can the proposed permanent easement over the following properties be reduced in size or scope?
 - a. SAS-1574
 - b. 96 Station Street, Southport, CT
 - c. SAS-1595
 - d. SAS-1596
 - e. SAS-1598
 - f. SAS-1729

- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

19. Is UI aware of the presence of Bald Eagles along Mill River? Has UI analyzed the impact of the Project on Bald Eagles? Has UI analyzed the presence of Bald Eagle nests in proximity to Mill River? Does any part of the Project violate the Bald and Golden Eagle Protection Act or the Migratory Bird Treaty Act?

20. Has UI analyzed the approvals will be needed from municipal inland wetlands and watercourses commissions? Will UI need any approvals from municipal inland wetlands and watercourses commissions for work proposed on the following properties? Does UI have a plan if a violation is caused under municipal inland wetlands and watercourses regulations? If so, please share said plan.

- a. SAS-1574
- b. 96 Station Street, Southport, CT
- c. SAS-1595
- d. SAS-1596
- e. SAS-1598
- f. SAS-1729
- g. ARN-1829
- h. RPS-1944
- i. RPS-1945

21. For the property identified as SAS-1596, did UI analyze the impact on the parking area of said property by the proposed work pad? Did UI intend to block access to all on-site parking?

22. Did UI analyze any historical information regarding properties or historic districts in its design of the Project? What measures did UI take to mitigate the impact to historical resources? Did UI consider burying lines solely in areas designated as historic? If so, why did UI not pursue this alternative?

Respectfully submitted,

GROUPED LLC INTERVENORS

By



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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October 2023, a copy of the foregoing was sent, via electronic mail, to:

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