

September 14, 2023

Via Federal Express and Electronic Mail

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 (UI) 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, Pequonnock and Congress Street Substations traversing the municipalities of Bridgeport and Fairfield, Connecticut**

Dear Attorney Bachman:

Enclosed please find the original and fifteen (15) copies of Fairfield Station Lofts, LLC’s first set of interrogatories to the United Illuminating Company (“UI”), in connection with the Docket No. 516

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

Enclosure

Melanie A. Bachman, Esq.
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Copy to:

Bruce McDermott, Esq.
Daniel E. Casagrande, Esq.
Joseph P. Mortelliti, Esq.
Michael P. Burdo, Esq.
Christopher B. Russo, Esq.
Timothy M. Herbst, Esq.

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 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, : SEPTEMBER 14, 2023
 PEQUONNOCK AND CONGRESS STREET :
 SUBSTATIONS TRAVERSING THE :
 MUNICIPALITIES OF BRIDGEPORT AND :
 FAIRFIELD, CONNECTICUT. :

**FAIRFIELD STATION LOFTS, LLC’S
PRE-HEARING INTERROGATORIES (SET ONE)
TO THE UNITED ILLUMINATING COMPANY**

The following are Fairfield Station Lofts, LLC’s (“FSL”) 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 property SAS-1754 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).

2. In preparation of the Application in this Docket, did UI modify the location of Tower P689S or the associated electric transmission lines once it became aware of that SAS-1754 contained a five-story multi-family apartment building approved pursuant to Conn. Gen. Stat. § 8-30g, Connecticut's affordable housing statute (the "Fairfield Apartment Building")? If so, describe any modifications in detail.
3. Provide the precise location for proposed Tower P689S, including the precise location depicted on a survey with sufficient detail to understand the proximity of the proposed Tower P689S to property SAS-1754 and the actual distance from Tower P689S to the nearest portion of the Fairfield Apartment Building.
4. What is the distance between the existing catenary structure closest to the location of proposed Tower P689S and the western property line for property SAS-1754? Does UI currently have an easement and access rights to that area?
5. When deciding on the location of proposed Tower P689S, did UI consider if the location would impede access to the westerly side of the Fairfield Apartment Building for, among other things, emergency services? If so, how did that impact the proposed location of Tower P689S?
6. When deciding on the location for proposed Tower P689S and the associated electric transmission line connecting to the proposed Tower P690S, did UI take into consideration the relocation of electric distribution pole P3745 in 2022 and the reasons for that relocation discussed in the December 8, 2021, Decision of the Public Utilities Regulatory Authority in Docket No. 21-06-18?
7. Will the electric transmission lines between proposed Towers P689S and P690S travel over property SAS-1754? If so, how far will the lines encroach onto or over property SAS-1754?
8. What is minimum height that an electric transmission lines will hang between proposed Towers P689S and P690S?
9. What is the closest distance between an electric transmission line and the highest point of the Fairfield Apartment Building on property SAS-1754?
10. Is UI aware that a portion of the westerly side of the Fairfield Apartment Building is located less than 6" from the property boundary with the Metro North Railroad property and the remainder of the westerly side of the Fairfield Apartment Building is located less than 6 feet from the same property boundary?
11. Does the distance between (i) proposed Tower P689S and all electric transmission lines to be located between proposed Towers P689S and P690S and (ii) all parts of the Fairfield Apartment Building 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?

12. As discussed in its August 28, 2023 Petition to Intervene, FSL referenced comments it received during the zoning approval process from the Fairfield Fire Department regarding the importance of maintaining access to the westerly side of the Fairfield Apartment Building. Those concerns were reiterated in PURA Docket 21-06-18, including the ability to access the westerly side of the Fairfield Apartment Building and any rooftop amenities during an emergency, especially the ability to maintain ladder access. In connection with the Project, did UI consult with the Fairfield Fire Department about its prior concerns for access to the Fairfield Apartment Building? Whether or not UI consulted with the Fairfield Fire Department, did UI otherwise evaluate these concerns as part the planning for the Project?
13. Relevant to Exponent's May 30, 2023, report:
 - a. Why did Exponent only evaluate one redesign option for the Fairfield Apartment Building?
 - b. Did Exponent's evaluation of magnetic field levels take into consideration exposure to individuals who may be enjoying the roof-top amenities at the Fairfield Apartment Building? If so, provide a reference to the record where this evaluation can be found or provide copy of this evaluation.
 - c. Did Exponent evaluate the potential impact of magnetic field levels on the solar photovoltaic panels on the roof of the Fairfield Apartment Building, either under the originally proposed or revised configuration. If so, provide a reference to the record where this evaluation can be found or provide copy of this evaluation.
14. 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.
15. 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.
16. In connection with the proposed work pad related to proposed Tower P689S:
 - a. 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 (e.g., the Fairfield Apartment Building) as a result of the activities in and around the work pad area.
 - b. Does this work pad extend onto property SAS-1754? If so, where and for what purpose?
 - c. Will this work pad be secured with fencing or other perimeter control measures?

- d. Can this work pad be reduced in size or moved away from the Fairfield Apartment Building to avoid impacting the SAS-1754 parcel and building?
 - e. When designing this work pad, including its location and size, did UI evaluate whether the location and size of the work pad would impede residents' access to the Fairfield Apartment Building or the ability of emergency services to access the westerly side of the Fairfield Apartment Building?
17. According to UI's Application, UI intends to obtain a permanent easement over a portion of property SAS-1754. What are the dimensions of this permanent easement over property SAS-1754?
18. Describe in detail the nature of the permanent easement UI intends to obtain over the western portion of property SAS-1754, including but not limited to the purpose of the permanent easement and any and all restrictions that such permanent easement will impose on property SAS-1754.
19. Is it UI's practice to obtain permanent easements over existing buildings or structures?
20. Can the proposed Project be constructed without obtaining any permanent easement over property SAS-1754?
21. Can the proposed permanent easement over property SAS-1754 be reduced in size or scope?

Respectfully submitted,

FAIRFIELD STATION LOFTS, LLC

By 

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Kenneth C. Baldwin, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of September 2023, a copy of the foregoing was sent,
via electronic mail, to:

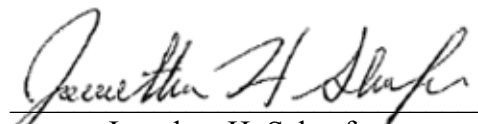
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