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November 9, 2023

Via Hand Delivery and E-mail

Melanie A. Bachman, Esq.
Executive Director
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 Executive Director Bachman:

This firm represents Intervenor Town of Fairfield (“Town”) in the above referenced matter. Enclosed for filing please find an original and fifteen (15) copies of the following:

1. The Town’s supplemental pre-hearing submission; and
2. The Town’s pre-filed testimony of Ray Awad with accompanying exhibits.

Should there be any questions about this filing, please do not hesitate to contact the undersigned.

Thank you for your time and consideration.

Respectfully submitted,



Owen T. Weaver

OTW/otw
Enc.
Cc: Service List

CONNECTICUT SITING COUNCIL

IN RE:

THE UNITED ILLUMINATING COMPANY (UI)	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND PUBLIC	:	DOCKET NO. 516
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 MILES 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	:	NOVEMBER 9, 2023

INTERVENOR TOWN OF FAIRFIELD’S AMENDED PRE-HEARING SUBMISSION

Intervenor Town of Fairfield (“Town”) hereby makes this amended submission pursuant to the June 21, 2023, memorandum by the Connecticut Siting Council (“Council”) and decision of November 2, 2023, with respect to the above-referenced application filed by The United Illuminating Company (“UI”).

A. List of Witnesses

1. Brenda Kupchick, First Selectwoman of the Town of Fairfield;

2. Timothy Bishop, Conservation Director of the Town of Fairfield;
3. Adam Klyver, Chairman of the Town of Fairfield Historic District Commission
4. Matthew Schweisberg, Senior Professional Wetland Scientist and Principal Wetland Strategies and Solutions, LLC
5. Peter Vimini, Principal of Vimini Valuation Services, LLC
6. Ray Awad, P.Eng.
7. Wes Haynes, Merritt Parkway Conservancy

B. List of Documents to be Administratively Noticed

None at this time.

C. Copies of any Available Exhibits to be Offered at the Public Hearing

1. With Mr. Bishop's Pre-Filed Testimony
 - a. Exhibit A: Conservation Easement, Vol. 3331, Page 154; and Conservation and Drainage Easement, Vol. 3331, Page 157.
2. With Mr. Schweisberg's Pre-Filed Testimony:
 - a. Exhibit A: Mr. Schweisberg's Curriculum vitae
 - b. Exhibit B: "A Report for the Town of Fairfield, CT United Illuminating (UI) Company – Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project Anticipated Adverse Impacts to Wetlands and other Waters," dated October 31, 2023
3. With Mr. Vimini's Pre-Filed Testimony:
 - a. Exhibit A: Mr. Vimini's Curriculum vitae
 - b. Exhibit B: Overall Market Data
4. With Wes Haynes's Pre-Filed Testimony

- a. Exhibit A: Mr. Hayes's Curriculum vitae.
 - b. Exhibit B: Review of Docket # 516 "Appendix D: Phase IA Cultural Resources Assessment Survey of the Proposed Fairfield to Congress Railroad Transmission Line 115-Kv Rebuild Project"
5. With Ray Awad's Pre-Filed Testimony:
- a. Exhibit A: Mr. Awad's Curriculum vitae.
 - b. Exhibit B: Report to respond to the initialization cost estimates submitted by United Illuminating, CT for the Fairfield to Congress Railroad Transmission line 115 kV rebuild project in the Town of Fairfield and the City of Bridgeport, CT

D. Reservations

The Town reserves the right to offer additional or supplemental exhibits, testimony, witnesses and administratively noticed materials during the course of these proceedings to address new information or any late-filed exhibits.

Respectfully submitted,

**INTERVENOR,
THE TOWN OF FAIRFIELD**



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ITS ATTORNEYS

CERTIFICATE OF SERVICE

This is to certify that on the above date a true copy of the foregoing has been sent via electronic mail and U.S. Mail, first-class, postage pre-paid, to the following parties of record:

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