

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 : OCTOBER 3, 2023
SUBSTATIONS TRAVERSING THE :
MUNICIPALITIES OF BRIDGEPORT AND :
FAIRFIELD, CONNECTICUT :

PRE-HEARING INTERROGATORIES & REQUESTS FOR PRODUCTION (SET ONE)
DIRECTED TO THE UNITED ILLUMINATING COMPANY

1. Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of The United Illuminating Company (hereinafter “UI” or the “Applicant”).

2. Please identify the name, position and address of all persons who participated on behalf of UI to evaluate the reliability and resiliency of UI’s 115-kilovolt (kV) overhead transmission lines, and associated infrastructure, located between catenary structure B648S and the Congress Street Substation (the “Site”).

3. For any persons identified in Interrogatory No. 2, please describe the work those persons performed and provide copies of any documents/records/studies/plans that those persons produced on behalf of UI.

4. State the name, address and title of any expert UI intends to use as expert witness in support of this Docket No. 516.

5. For each witness identified in response to the preceding interrogatory, state:

(a) the qualifications of each expert witness;

(b) the subject matter on which each expert witness is expected to testify;

(c) the substance of the facts and opinions on which each expert witness is expected to testify; and

(d) a summary of the grounds for each opinion of each expert witness expected to testify.

6. Please provide the resume or curriculum vitae of any expert witness whom UI intends to use to support its application for Docket No. 516.

7. Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic communications) provided to any expert identified by UI in response to Interrogatory No. 4 which has not been submitted to the Connecticut Siting Council (CSC) as part of the record associated with this Docket No. 516.

8. State the name, address and title of any fact witness UI intends to call to testify in support of this Docket No. 516.

9. Please provide a copy of all correspondence in UI's possession (including electronic communications) between UI and any expert identified by UI in response to Interrogatory No. 4, which pertains to this Docket No. 516.

10. Please provide a copy of all correspondence (including electronic communications) between any representative of UI (legal or otherwise) and any expert identified by UI in response to Interrogatory No. 4, which pertains to this Docket No. 516.

11. (A) Please identify any agreement, written or oral, between UI and the Connecticut Department of Transportation (CT DOT) pertaining to the co-location of UI's 115-kV lines within that portion of the Site owned by CT DOT or within CT DOT's right-of-way.
(B) Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic communications) identified by UI in response to Subsection A of this Interrogatory.

12. Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and CT DOT, or any representative thereof, pertaining to UI's application associated with this Docket 516.

13. Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and the Metro-North Railroad and/or the Metropolitan Transportation Authority (MTA), or any representative thereof, pertaining to UI's application associated with this Docket 516.

14. Please identify any agreement, written or oral, between UI and the Metro-North Railroad or the MTA, including but not limited to any lease or maintenance agreement pertaining to the Site.
(B) Please provide a copy of any written agreement identified in response to Subsection A of this Interrogatory.

15. Please provide a copy of all correspondence (including written and electronic communications) between UI, or any representative thereof, and The National Railroad Passenger Corporation d/b/a Amtrak, or any representative thereof, pertaining to UI's application associated with this Docket 516.

16. Please identify the load rating of the existing transmission circuits located within the Site, including each circuit's summer and winter seasonal rating.

17. Please identify the thirty (30) minute peak load of the existing transmission circuits located within the Site that were observed within the last sixty (60) months.

18. Please provide the average daily load history for the existing transmission circuits located within the Site as calculated over the last twenty-four (24) months.

19. Please identify the projected load rating for the transmission circuits proposed by UI as part of its application associated with this Docket 516, including each proposed circuit's summer and winter seasonal rating.

20. (A) Please explain why the facilities proposed by UI in its application are designed to accept a larger wire size than what is presently being proposed in its application associated with this Docket 516. (B) Does UI anticipate a significant load increase within the next ten (10) year period? (C) If so, please quantify the projected load increase and qualify the impact of said increase on UI's proposed conductors.

21. What is the estimated date by which UI will need to replace its proposed conductors to accommodate the projected load increase.

22. What is the performance history of UI's existing facilities at the Site within the last two (2) years? (B) Specifically, please identify all unplanned outages occurring within the last two year, including the date of the outage, the cause of the outage as determined by UI, and the duration of the outage.

23. (A) Did UI receive a request or mandate from the Federal Energy Regulatory Commission (FERC) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the FERC? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the FERC which pertains to said request or mandate.

24. (A) Did UI receive a request or mandate from the North American Electric Reliability Corporation (NERC) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the NERC? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the NERC which pertains to said request or mandate.

25. (A) Did UI receive a request or mandate from the Public Utilities Regulatory Authority (PURA) requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the PURA? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the PURA which pertains to said request or mandate.

26. (A) Did UI receive a request or mandate from the CT DOT requesting or directing UI to rebuild, upgrade and/or relocate its existing 115-kV overhead transmission lines, and associated electric infrastructure, located within the Site? (B) If so, please explain the request or mandate that UI received from the CT DOT? (C) If so, please provide a copy of all correspondence in UI's possession (including electronic communications) between UI, or any representative thereof, and the CT DOT which pertains to said request or mandate.

27. Please identify and provide a copy of CT DOT's written design requirements, if any, relating to an electric utility's installation of overhead transmission lines within CT DOT's railroad right-of-way.

28. (A) Please identify any alternative designs considered, studied or analyzed by UI in connection with its proposed repair and/or replacement of the existing 115-kV transmission line, and associated infrastructure, located between catenary structure B648S and UI's Congress Street substation. (B) Please provide copies of any plans, studies or correspondence regarding any alternative designs that are identified in subsection A of this Interrogatory.

29. Did any of the alternative designs identified by UI in response to Interrogatory 28 use trapezoidal conductors for the overhead transmission circuits.

30. (A) Has UI conducted any structural analyses, studies or report of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation within the last sixty (60) months? (B) If so, please provide a copy of any responsive analysis, study or report.

31. (A) Is UI aware of, or does it possess, a structural analysis, study or plan of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation conducted by a third party within the three (3) years? (B) If so, identify the author, date and custodian? (C) Please provide a copy of any analysis, study or plan identified in response to Subsection A of this Interrogatory.

32. Please provide a copy of any document in UI's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which contain any research or analysis pertaining to the structural integrity, reliability and/or resiliency of the existing 115-kV transmission line located between catenary structure B648S and UI's Congress Street substation, and UI's associated electrical infrastructure.

33. Please identify the percentage of the structures proposed to be removed or replaced by UI which are lattice structures as opposed to the percentage of structures proposed to be removed or replaced by UI which are comprised of rolled steel sections.

34. (A) Please identify any ampacity analysis or study conducted by or on behalf of UI, which pertains to the consideration or feasibility of installing UI's proposed transmission line and/or circuits, and/or associated electrical infrastructure underground. (B) Please provide copies of any analysis or study identified in response to Subsection A of this Interrogatory.

35. (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal prepared by or on behalf of UI in association with, or in preparation for, its application associated with this Docket 516. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

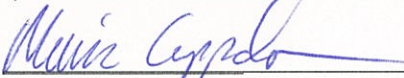
36. (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal pertaining to the feasibility of installing UI's proposed transmission facilities, including associated infrastructure, underground. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

37. (A) Please identify any analysis, internal valuation, cost estimate and/or appraisal which compares the projected cost of installing UI's proposed transmission facilities, including associated infrastructure, underground to the projected cost of replacing and rebuilding its overhead transmission facilities as proposed in the application associated with this Docket 516. (B) Please provide a copy of any analysis, internal valuation, cost estimate and/or appraisal identified in response to Subsection A of this Interrogatory.

38. Please identify any temperature readings recorded by or on behalf of UI in the vicinity of UI's existing 345-kV solid dielectric feeder (i.e., Norwalk to Middletown). (B) Please provide a copy of any documents (including electronic or via electronic transmission) that were identified in response to Section A of this Interrogatory.

39. Please provide a copy of any documents in UI's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to respond to any of these interrogatories.

**RESPECTFULLY SUBMITTED BY:
SASCO NEIGHBORHOOD ENVIRONMENTAL TRUST
INCORPORATED, STEPHEN OZYCK, KARIM MAHFOUZ,
WILLIAM DANYLKO, DAVID PARKER, 2190 POST ROAD,
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By:  _____

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CERTIFICATE OF SERVICE

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

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