Counsellors at Law

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VIA ELECTRONIC MAIL AND HAND DELIVERY

October 22, 2010

Honorable Daniel Caruso Chairman Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket No. 406 – Application of The United Illuminating Company for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance, and Operation of a Wireless Telecommunications Facility in Orange, Connecticut

Dear Chairman Caruso,

I enclose an original and 20 copies of The United Illuminating Company's responses to the Siting Council's interrogatories.

Please do not hesitate to call me should you have any questions concerning this filing.

Very truly yours,

Bruse L. McDermott

Enclosures

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The United Illuminating Company Docket No. 406

Witness: Kathleen Shanley

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Q: Of the letters sent to abutting property owners, how many certified mail receipts did UI receive? If any receipts were not returned, which owners did not receive their notice? Did UI make additional attempts to contact those property owners?

A: UI received 30 certified mail receipts of the 33 letters sent. The 33 letters included both abutting property owners as well as owners whose properties are located in the vicinity of the site, but not necessarily adjacent to the site, who UI thought might be interested in the Council's review of the tower application.

The three letters returned to UI indicated that the Postal Service had attempted delivery multiple times without success. Upon return receipt of these letters, UI re-sent the letters to the property owners via first class mail. None were returned.

The following are the property owners to whom delivery was made via first class mail:

Michelle A. and Keith Dalling 107 Indian River Road Orange, CT 06477 (Abutting property owner)

Mary E. McNiff 36 Indian River Road Orange, CT 06477 (Neighboring property owner)

Dominick F. Farina, Trustee 99 Marsh Hill Road Orange, CT 06477 (Neighboring property owner)

The United Illuminating Company Docket No. 406

Witness: Steve Shingara

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Q: What would be the latitude and longitude of the location of the proposed tower? What would the ground elevation at this location?

A: The proposed tower coordinates are as follows:

latitude: 41°15'11.00"N longitude: 73° 0'8.68"W

The ground elevation is 104.9 feet.

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Witness: Steve Shingara

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Q: To what engineering standard would the proposed tower be built?

A: TIA/EIA-222-F, Structural Standards for Steel Antenna Towers and Antenna Supporting Structures.

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Witness: Steve Shingara

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Q: Would the area immediately around the proposed tower and equipment shelter be fenced in addition to the fence around UI's Operations Center property?

A: Additional fencing around the base of the proposed tower and equipment shelter is not part of the current design.

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Witness: Page 1 of 1

Q: Provide bulk-filed copies of the Cultural Resources Assessment Survey prepared for SHPO.

A: Three copies of the Cultural Resources Assessment Survey are enclosed.

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Witness: Kathleen Shanley

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Q: Did UI receive any comments regarding the possible presence of the Eastern Box Turtle from DEP's Wildlife Division? If so, provide copies of these comments.

A: Attachment 17 of the Application contains a copy of a November 3, 2008 letter to Edward Belinsky of Milone & MacBroom from Dawn McKay of the DEP Wildlife Division referencing the potential for the Eastern Box Turtle to be present within the vicinity of the "project site." However, in this context, "project site" refers to the entire proposed Central Facility construction, which encompasses two sites; 100 Marsh Hill Road, which is the site of UI's Operations Center and the proposed telecommunications tower that is the subject of this Application, and 114 Marsh Hill Road, which is the site of UI's Office Building. The location of the possible area of State Special Concern for the Eastern Box Turtle was actually at the 114 Marsh Hill Road property. No further response was received by DEP regarding the 100 Marsh Hill Road site.

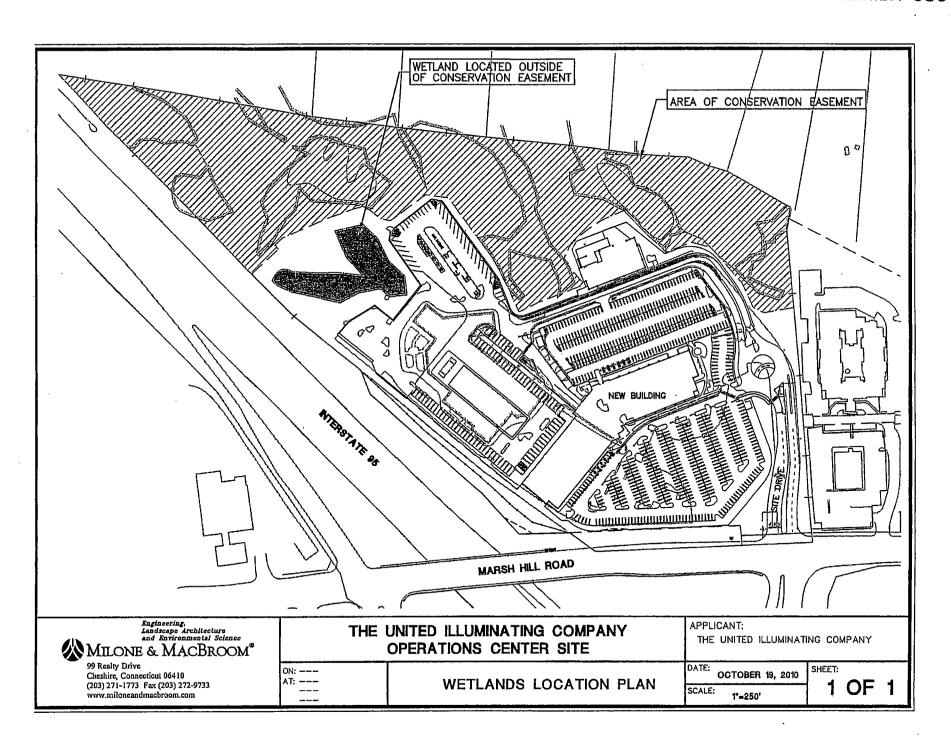
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Witness: Kathleen Shanley

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Q: What is the location of the one wetland area that is not within the Conservation Easement?

A: The wetland not located within the Conservation Easement area is located to the rear of the proposed Operations Center development, but not within the development area. Please see the attached drawing (Exhibit CSC-7) depicting the location of this wetland.



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Witness: Steve Shingara

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Q: Would the proposed tower enable UI to cover parts of its service area that are currently not covered by UI's existing antenna installations? If so, provide descriptions and estimates of the size of these uncovered areas.

A: Based on operational experience, nearly all of UI's service territory is covered by its existing antenna installations. However, there are areas throughout the UI service territory where dead spots exist. The proposed tower has been designed to provide the identical coverage as the existing installations because the dead spots represent an extremely small percentage of the overall service territory and do not create communication difficulties. The elimination of some dead spots in the area of the tower is possible with an increase in the height of the tower. UI does not believe that the communication difficulties created by the dead spots justify an increased height.

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Witness: Steve Shingara

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Q: How would utilities for the tower facility be provided?

A: Power is being provided from the electrical distribution system and communication circuits will be provided from the Telcom demark, both located in the Central Facility Operation Center.

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Witness: Steve Shingara Page 1 of 1

Would any blasting be required to develop the tower site? Q:

A: No.

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Witness: Michael Libertine

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Q: Page 12 of the application states that the nearest residence to the proposed tower is located 650 feet to the west. The photomap in Attachment 10 shows the nearest residence as being located 942 feet to the west. Which of these is correct?

A: The nearest residence is 942 feet to the west of the proposed tower (85 Indian River Road).

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Witness: Kathleen Shanley

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Q: Is the site of UI's proposed tower within the coastal boundary as defined by the Connecticut Coastal Management Act (CCMA)? Would any coastal resources be affected by UI's proposed tower?

A: No.

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Witness: Kathleen Shanley Page 1 of 1

Q: Is the proposed site within an "Important Bird Area" as designated by the National Audubon Society?

A: No.

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Witness: Kathleen Shanley

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Q: Would Ul's proposed facility comply with recommended guidelines of the United States Fish and Wildlife Service for minimizing the potential for telecommunications towers to impact bird species?

A: Yes. UI spoke with a representative from USFW and confirmed the proposed facility's compliance with the agency's guidelines.