

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**Re:**

**The United Illuminating Company Application  
For a Certificate of Environmental Compatibility  
and Public Need for the Construction, Maintenance  
and Operation of a Proposed 115 kV/13 kV Electric  
Substation and Associated Facilities Located  
at 3-7 Wildflower Lane, Trumbull, Connecticut**

**Docket No. 317**

**October 12, 2006**

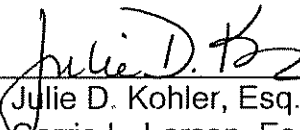
**OBJECTION TO REQUESTS OF UNITED ILLUMINATING COMPANY TO  
WILDFLOWER COALITION PETITIONERS**

The Wildflower Coalition hereby objects to the United Illuminating Company's Requests to the Wildflower Coalition Petitioners and the Town of Trumbull dated October 10, 2006 ("Requests"), insofar as such Requests relate to the Wildflower Coalition. The bases for this objection are as follows:

1. The Wildflower Coalition was instructed to have all interrogatory requests provided to the United Illuminating Company ("Applicant") no later than close of business on Friday, October 5, 2006 so that the Applicant would have a full two (2) weeks in which to answer (by October 19, 2006). The Wildflower Coalition complied with this filing date and short of some exigent circumstance, the Applicant should have done the same.
2. None of the subject matter raised in the interrogatories is based on recent developments. The Coalition has been a party since August 31, 2006 and therefore there is no apparent reason that these Requests could not have been made by the exchange deadline, allowing the Coalition at least the same two (2) week response period.
3. Counsel for the Coalition has not yet received a copy of the Requests and happened to discover them while reviewing a Docket No. 317 filing on the Council's web site. Delayed receipt of the Requests resulted in the Coalition having even less time to respond.

4. The Requests seek information that may be provided as part of the October 19, 2006 pre-filing of exhibits and experts. To the extent it does not, the Applicant has the ability to ask for the information in the context of testimony during the hearing.

Respectfully submitted,

By   
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**Certification**

This is to certify that a copy of the foregoing has been sent via electronic mail and first class mail, this date to all parties and intervenors of record.

  
Julie D. Kohler