

**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 23, 2006

**INTERROGATORY RESPONSE TO APPLICANT FROM
WILDFLOWER COALITION**

The Wildflower Coalition submits the following responses to the interrogatories from The United Illuminating Company in connection with the above captioned Docket.

Q1. Identify all the potential sites for the substation that the WCP intend to present to the Connecticut Siting Council ("Council") as an alternative to the Wildflower Lane site. Provide any maps, drawings and figures showing the alternate sites.

A1. The Wildflower Coalition ("Coalition") has supported two (2) alternative sites – Site 6D on property owned by the Town of Trumbull (known as Rocky Ridge Road) and Site 11 (known as Quarry Road). The Coalition would be receptive to any location in which the proposed substation was not located in such close proximity to residences. The Coalition is not in possession of any maps, drawings or figures not already submitted by the Applicant as part of the Application or municipal consultation.

Q2. For each site, provide information concerning ownership, including but not limited to, name, address, telephone number and nature of ownership of the site.

A2. As both sites were properties considered by the Applicant in its site search process, the information requested is already in its possession.

Q3. Provide copies of all communications, including but not limited to email correspondence, with any owners of the potential sites which communications discuss the use of the site for an electric substation.

A3. There has been no correspondence between the Coalition and owner of Site 11 of which we are aware. There has been communication with Town representatives and the public, including Coalition members, but as the Town has withdrawn the site – the correspondence is moot.

Q4. Identify any person or entity who consulted with or provided information to the WCP on issues relating to the identification of environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site.

A4. The Coalition conducted an initial consultation with Cough Harbour & Associates ("CHA") regarding the proposed substation and alternate sites but did not engage them to prepare an analysis.

Q5. Please provide all documents (including without limitation all memos, maps, reports, notes, field notes, surveys, studies, drafts, correspondence) of any of the persons or entities identified in response to Question 4 above concerning the proposed or alternative sites.

A5. CHA produced no documents concerning the proposed or alternative sites.

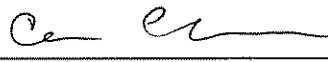
Q6. Identify each person who you expect to call as an expert witness at the hearings before the Siting Council in connection with the identification of and impact on environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site. With respect to each such witness:

- (a) state the subject matter on which the expert is expected to testify;
- (b) state his or her qualifications as an expert with respect to the identified subject matter, including a list of all publications authored by the witness within the preceding ten years, and provide a copy of his or her curriculum vitae;
- (c) provide a complete statement of all opinions to be expressed and the basis and reasons therefor;
- (d) identify the data or other information considered by the witness in forming his or her opinions;

- (e) identify any exhibits to be used as a summary of or as support for the opinions;
- (f) identify all cases or administrative hearings during which the witness testified as an expert within the preceding four years.

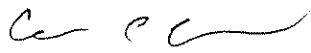
A6. The Coalition does not expect to call any expert witnesses at the hearings in this Docket. The witnesses it intends to call have been disclosed in its filing of October 19, 2006.

Respectfully submitted,

By 
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Certification

This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.


Carrie L. Larson