

**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

November 16, 2006

**INTERROGATORY REQUEST TO APPLICANT FROM
WILDFLOWER COALITION AND THE TOWN OF TRUMBULL**

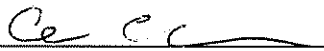
The Wildflower Coalition and the Town of Trumbull jointly submit the following interrogatories to The United Illuminating Company ("UI") in connection with the above captioned Docket and requests responses on or before November 29, 2006.

1. What plans or projections has UI made for this area of the transmission system as it relates to the future size or the load switching/carrying capability of the proposed facility? Provide this information for increments of one year, 5 year and 10 year planning purposes, and provide copies of all written documentation evidencing same.
2. Please explain how the proposed substation conforms to a long-range plan for expansion of the electric power grid serving the state and interconnected utility systems.
3. Identify all correspondence and provide copies of all written communications with any regulatory or government agency regarding UI's future planning for any expansion, upgrades or improvements that would affect this proposed facility.
4. Is the proposed substation being constructed with room for adequate room for expansion or is future additional expansion of the substation compound area possible?
5. If the substation was an open air substation:
 - a. How far on the property could it be shifted to the:
 - i. north; and
 - ii. east
 - b. What would the resulting EMF levels be at the three closest residential property lines to the south at this new location?

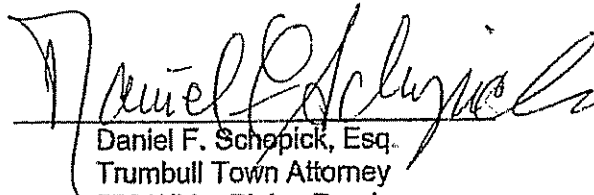
- c. What would the resulting noise levels be:
 - i. With mitigation and
 - ii. Without mitigation
- 6. If the substation was an gas insulated substation:
 - a. How far on the property could it be shifted to the:
 - i. north; and
 - ii. east
 - b. What would the resulting EMF levels be at the three closest residential property lines to the south at this new location?
 - c. What would the resulting noise levels be:
 - i. With mitigation and
 - ii. Without mitigation
- 7. Please identify examples of UI substations that are sited in dense residential areas similar to Wildflower Lane.
- 8. Does UI believe the siting and growth of electric infrastructure of this size is better suited for a dense residential area or an industrial area?
- 9. If the proposed substation were located at the Quarry Road (Site 11) identify if any of the following would result:
 - a. Wetlands impacts;
 - b. Historic impacts;
 - c. Scenic impacts;
 - d. Mature tree/vegetation removal;
 - e. Residential impact within a radius of 750 feet;
 - f. Proximate noise impacts; and
 - g. Proximate residential EMF impacts.
- 10. If the proposed substation is approved for the Quarry Road site is it technically feasible to relocate the switching station to Quarry Road? Are there technical benefits or efficiencies to doing so?
- 11. If the proposed substation was approved for Quarry Road, is the undergrounding that UI has described and provided cost estimates for the only way to provide transmission or are there alternatives?
 - a. If this is the only method available, please explain why.
 - b. If alternatives are available, please detail what methods are possible?
- 12. Does UI have an easement for access to the proposed substation site over a DOT right of way?

13. Is there any reason why that access cannot be used for the substation?
14. What would the construction cost be to create a suitable grade for access to the site over the DOT easement?
15. Refer to Application Exhibit L.
 - a. Identify who owns the parcel(s) of property that comprise the triangular section of property at the junction of and to the east of the UI right of way and the south of the CL&P right of way.
 - b. Confirm the aggregate size of all of the size of the parcels comprising the triangle.
 - c. Identify whether UI ever considered this site as a possible location for the substation, particularly since it already had access rights to the property.
 - d. Confirm whether UI ever did any studies, test or analysis on this site
 - e. As this site is at the same junction of the UI and CL&P transmission lines, doesn't it offer the claimed technical benefits as the Wildflower Lane site?
16. In its responses to CEAB, UI represents this substation will result in an anticipated savings of \$226,000 in transmission costs. Has the cost of the project been credited in an amount equal to this savings?
17. Confirm the following UI substations are fed by CL&P 115 kV lines: Hawthorne, Old Town, Trap Falls, Indian Well, Ansonia, and June Street.
 - a. Explain why the proposed substation at Quarry Road could not similarly be fed by the existing CL&P transmission lines at Quarry Road.
 - b. Confirm how the predicted transmission costs would be impacted if the proposed substation was fed by the existing CL&P transmission lines at Quarry Road

Respectfully submitted,




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Certification

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


Carrie L. Larson