

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER :
COMPANY AND THE UNITED :
ILLUMINATING COMPANY APPLICATION :
FOR A CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION OF A NEW 345-KV :
ELECTRIC TRANSMISSION LINE AND :
ASSOCIATED FACILITES BETWEEN THE :
SCOVILLE ROCK SWITCHING STATION IN :
MIDDLETOWN AND THE NORWAL :
SUBSTATION IN NORWALK, INCLUDING :
THE RECONSTRUCTION OF PORTIONS :
OF EXISTING 115-KV AND 345 KV ELECTRIC :
TRANSMISSION LINES, THE CONSTRUCTION :
OF BESECK SWITCHING STATION IN :
WALLINFORD, EAST DEVON SUBSTATION :
IN MILFORD, AND SINGER SUBSTATION IN :
BRIDGEPORT, MODIFICATIONS AT :
SCOVILL ROCK SWITCHING STATION AND :
NORWALK SUBSTATION, AND THE :
RECONFIGURATION OF CERTAIN :
INTERCONNECTIONS :

DOCKET NO. 272

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CONNECTICUT
SITING COUNCIL

JANUARY 22, 2003

**ATTORNEY GENERAL'S SECOND SET OF INTERROGATORIES
TO THE CONNECTICUT LIGHT AND POWER COMPANY AND
THE UNITED ILLUMINATING COMPANY**

Richard Blumenthal, Attorney General for the State of Connecticut, hereby requests that the Connecticut Light and Power Company and the United Illuminating Company answer the following interrogatories in the above-captioned proceeding no later than February 5, 2004. In the event that the information requested herein has been provided in this proceeding, the respondents need only specifically identify where the responsive data or information is located in the record.

I. DEFINITIONS

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "concern" and "concerning" mean "relate," "relating," "refer," "referring," "reflect," "reflecting," "about," "constitute" or "constituting."

E. As used in these interrogatories, "CL&P" means the Connecticut Light and Power Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to CL&P shall be interpreted to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

F. As used in these interrogatories, "UI" means the United Illuminating Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to UI shall be interpreted to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

G. As used in these interrogatories, "Applicants" refers to CL&P and UI.

H. As used in these interrogatories, "document" means all materials and tangible forms of expression in any of the Applicants' possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, messages, bulletins, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, teletypes, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices or advertisements.

II. INTERROGATORIES

AG-14. For every facility listed in the Applicants' response to AG-01, please provide the measured and calculated electric and magnetic fields at the boundaries or location of the facilities closest to the proposed 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the "Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement," provided in Volume 6 of the Application.