

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

NORTHEAST UTILITIES SERVICE
COMPANY APPLICATION TO THE
CONNECTICUT SITING COUNCIL
FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED ("CERTIFICATE")
FOR THE CONSTRUCTION OF A
NEW 345-KV ELECTRIC TRANSMISSION
LINE FACILITY AND ASSOCIATED
FACILITIES BETWEEN SCOVILL
ROCK SWITCHING STATION IN
MIDDLETOWN AND NORWALK
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
WALLINGFORD, 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

MAY 17, 2004

THE TOWNS OF BETHANY, CHESHIRE, DURHAM, EASTON, FAIRFIELD,
HAMDEN, MIDDLEFIELD, MILFORD, NORTH HAVEN, NORWALK, ORANGE,
WALLINGFORD, WESTON, WESTPORT, WILTON, AND WOODBRIDGE

SEVENTH SET OF INTERROGATORIES
TO THE CONNECTICUT LIGHT AND POWER COMPANY
AND THE UNITED ILLUMINATING COMPANY

The above-captioned towns (collectively, the "Towns"), each a party in the above-captioned proceeding, hereby request that The Connecticut Light & Power

Company ("CL&P") and The United Illuminating Company ("UI") answer the following interrogatories. CL&P and UI are sometimes hereinafter referred to collectively as the "Applicants."¹ The interrogatories are addressed to both of the Applicants; the Towns request that the Applicants provide responses to the interrogatories on or before June 8, 2004.

If there are objections to any of the interrogatories, or if providing responses to particular interrogatories (or portions thereof) would be unduly burdensome, the Towns request that the Applicants contact the undersigned as soon as possible.

In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, the Applicants 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, "CL&P" means The Connecticut Light & 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 deemed to include any, all, or any grouping or subgrouping of persons

¹ The undersigned represents solely the Town of Orange in this proceeding. The undersigned has been authorized to proffer the instant interrogatories on behalf of the Town.

and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

E. 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 deemed 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 "identify each structure" means: (i) state the town in which each structure is located; (ii) provide the Assessor's map, block and lot number for which each structure is located; and (iii) state whether such structure is (a) a single family residence, (b) a multi-family residence; (c) a private or public school building, (d) building housing a licensed child day care facility (d) a community center, place of worship, sports facility, recreational center or other facility in which people, including children congregate, (e) a commercial, industrial or office building, or (f) an outbuilding or other structure such as a garage or storage shed.

G. As used in these Interrogatories "park" means a park, recreation area, public or private school grounds, grounds of a licensed day care facility, grounds of a place of worship, outdoor sports facility, youth or other camp, public playground, campground or other facility where people, including children, congregate for outdoor recreation, sport or other activities.

H. As used in these Interrogatories "identify each park" means state: (i) the town in which the park is located; (ii) the Assessor's map, block, and lot number; (iii) the name of the park; and (iv) its purpose or use.

SEVENTH SET OF TOWNS INTERROGATORIES TO CL&P/UI

1. Identify each structure referenced in Exhibit 79, Structures Within 3 and 6 mG EMF dated May 7, 2004, which are between 3mG and 6mG at average (15 GW) system loading.
2. Identify each structure referenced in Exhibit 79, Structures Which are 6mG EMF or greater dated May 7, 2004, at average (15 GW) system loading.
3. Identify each structure on properties adjoining the proposed overhead right-of-way that are calculated to be located within magnetic field between 3mG and 6mG at peak (27.7GW) system loading based on typical cross section configurations.

4. Identify each structure on properties adjoining the proposed overhead right-of-way that are calculated to be located within magnetic fields 6mG or greater at peak (27.7GW) system loading based on typical cross section configurations.
5. Identify each park on properties adjoining the proposed overhead right-of-way that are calculated to have all or a portion of such park in magnetic fields between 3mG and 6mG at peak (27.7 GW) system loading based on typical cross section configurations.
6. With respect to each park identified in the answer to Interrogatory number 5, provide the area in square footage of each such park, which is subject to such levels of electromagnetic field.
7. Identify each park on properties adjoining the proposed overhead right-of-way that are calculated to have all or a portion of such park within magnetic fields 6mG or greater at peak (27.7 GW) system loading based on typical cross section configurations.
8. With respect to each park identified in the answer to Interrogatory number 7, provide the area in square footage of each such park which is subject to such levels of electromagnetic field.
9. Identify each park on properties adjoining the proposed overhead right-of-way that are calculated to have all or a portion of such park within magnetic fields between 3mG and 6mG at average (15 GW) system loading based on typical cross section configurations.
10. With respect to each park identified in the answer to Interrogatory number 9, provide the area in square footage of each such park which is subject to such levels of electromagnetic field.
11. Identify each park on properties adjoining the proposed overhead right-of-way that are calculated to have all or a portion of such park within magnetic fields 6mG or greater at average (15 GW) system loading based on typical cross section configurations.
12. With respect to each park identified in the answer to Interrogatory number 11, provide the area in square footage of each such park which is subject to such levels of electromagnetic field.
13. Identify each structure and identify each park not otherwise identified in Interrogatories 1 through 12 on properties adjoining the proposed overhead right-of-way that are calculated to be within the area of magnetic fields in excess of background levels at peak (27.7GW) system loading based on typical cross section configurations.
14. Identify each structure and identify each park not otherwise identified in Interrogatories 1 through 12 on properties adjoining the proposed overhead right-of-way

that are calculated to be within the area of magnetic fields in excess of background levels at average (15 GW) system loading based on typical cross section configurations.

15. Identify each structure and each park not otherwise identified in Interrogatories 1 through 14, which are within 300 feet of the proposed power lines.
16. Provide the responses to Interrogatories 3 through 14 based upon a split phase design for the proposed overhead right-of-way.
17. Provide responses to Interrogatories 3 through 14 for any alternatives in addition to split phase design proposed by the Applicant for the purpose of reducing electromagnetic fields.
18. Identify each structure within the proposed right-of-way.
19. Identify each park within the proposed right-of-way.
20. Provide projections of average load and peak load in gigawatts (GW) for the years 2003, 2010, 2020, 2030 and 2040 using the same assumptions utilized in arriving at average and peak loads of 15GW and 27.7GW, respectively.
21. With respect to the calculations provided in Interrogatory 20, provide the number of hours during each such year that the load is projected to be, (i) 90% of the peak; (ii) 75% of the peak; (iii) 50% of the peak; and (iv) 25% of the peak.
22. Provide responses to Interrogatories 3 through 14 for each average load and peak load calculation requested in Interrogatory 20.
23. With respect to each structure and park identified in Interrogatories 1-5, 7, 9, 11, 13, and 14 provide the site specific EMF in mG calculated at average (15GW) load and at peak (27.7 KW) load.
24. With respect to each structure and park identified in Interrogatory 22 provide the site specific EMF in mG at each projected average and peak load for each of the requested years.
25. Will the frequency on the proposed 345 Kv line ever vary from 60 Hz?
26. If the answer to Question 25 is yes, provide the frequencies in Hz and the number of hours calculated during each of the years 2003, 2010, 2020, 2030, 2040 and 2050 that such frequencies on the proposed 345 kv line shall be achieved.
27. With respect to each projected occurring frequency in excess of 60 Hz provided for in Interrogatory 26 provide the responses to interrogatories 3-14.

28. Provide the assumptions and describe the methodology used to calculate the responses to Interrogatories 21-27.

Respectfully submitted,

THE TOWNS OF BETHANY,
CHESHIRE, DURHAM, EASTON,
FAIRFIELD, HAMDEN,
MIDDLEFIELD, MILFORD,
NORTH HAVEN, NORWALK,
ORANGE, WALLINGFORD,
WESTON, WESTPORT, WILTON,
AND WOODBRIDGE

BY _____

Brian M. Stone
Sousa, Stone & D'Agosto
375 Bridgeport Avenue
Tel: (203)929-8283
Fax: (203)929-8347
Their Attorneys

Certification

I hereby certify that a copy of the foregoing has been mailed, e-mailed and/or hand-delivered to all known parties and intervenors of record this 24th day of May, 2004.

Northeast Utilities Service Company
Anthony M. Fitzgerald, Esq.
Brian T. Henebry, Esq.
Carmody & Torrance LLP
50 Leavenworth Street
PO Box 1110
Waterbury, CT 06721

Linda L. Randell, Esq.
Bruce L. McDermott, Esq.
Wiggin & Dana, LLP
One Century Tower
New Haven, CT 06508-1832

Norwalk Association of Silvermine
Homeowners
c/o Leigh Grant
99 Comstock Hill Road
Norwalk, CT 06850

Honorable Robert W. Megna
State Representative
97th District
40 Foxon Hill Road, #54
New Haven, CT 06513

Honorable Al Adinolfi
State Representative
103rd District
235 Sorghum Mill Drive
Cheshire, CT 06410

Eric Knapp, Esq.
Branse & Willis, LLC
41-C New London Turnpike
Glen Lochen East
Glastonbury, CT 06033-2038

Julie Donaldson Kohler, Esq.
Hurwitz & Sagarin, LLC
147 North Broad Street
Milford, CT 06460

Janis M. Small, Esq.
Town Attorney
Wallingford Town Hall
45 South Main Street
Wallingford, CT 06492

Town of Westport
c/o Ira W. Bloom, Esq.
27 Imperial Avenue
Westport, CT 06880

Louis S. Ciccarello
Corporation Counsel
Norwalk City Hall
P.O. Box 798
Norwalk, CT 06856-0798

Honorable Mary G. Fritz
State Representative
90th District
43 Grove Street
Yalesville, CT 06492

David A. Ball, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
PO Box 1821
Bridgeport, CT 06601-1821

Deborah L. Moore, Esq.
Legal Department
City Hall
142 East Main Street
Meriden, CT 06450

Attorney General Richard
Blumenthal
c/o Michael C. Wertheimer
Assistant Attorney General
Office of the Attorney General
10 Franklin Square
New Britain, CT 06051

Honorable Themis Klarides
State Representative 114 District
23 East Court
Derby, CT 06418

Lawrence J. Golden, Esq.
Pullman & Comley, LLC
90 State House
Hartford, CT 06103-3702

Anthony M. Macleod, Esq.
Whitman Breed Abbott & Morgan
LLC
100 Field Point Road
Greenwich, CT 06830

Arthur W. Gruhn, P.E.
Chief Engineer
Department of Transportation
2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131

Honorable John E. Stripp
State Representative – 135th District
4 Scatacook Trail
Weston, CT 06883

Honorable Kenneth A. Flatto
First Selectman
Independence Hall
725 Old Post Road
Fairfield, CT 06824

David A. Reif
Jane K. Warren
Joel B. Casey
McCarter & English, LLP
CityPlace I
Hartford, CT 06103

Monte E. Frank, Esq.
Cohen and Wolf, P.C.
158 Deer Hill Avenue
Danbury, CT 06810

Andrew W. Lord, Esq.
Murtha Cullina LLP
CityPlace I, 29th Floor
185 Asylum Street
Hartford, CT 06103

Mitchell R. Goldblatt
First Selectman
Town of Orange
617 Orange Center Road
Orange, CT 06477

Robert E. Earley
Connecticut Business & Industry
Assoc.
350 Church Street
Hartford, CT 06103
Richard J. Buturla, Esq.
Town Attorney
Berchem, Moses & Devlin, PC
75 Broad Street
Milford, CT 06460

Joaquina Borges King
Assistant Town Attorney
Hamden Government Center
2750 Dixwell Avenue
Hamden, CT 06518

Timothy P. Lynch
Deputy City Attorney
245 deKoven Drive
PO Box 1300
Middletown, CT 06457

Honorable Derrylyn Gorski
First Selectman
Bethany Town Hall
40 Peck Road
Bethany, CT 06524

Honorable Raymond Kalinowski
State Representative
100th District
PO Box 391
Durham, CT 06422

Melanie J. Howlett
Associate City Attorney
Office of the City Attorney
999 Broad Street
Bridgeport, CT 06604

Trish Bradley, President
Ed Schwartz, Treasurer
Communities for Responsible
Energy,
Phase II
45 Ironwood Lane
Durham, CT 06422

Office of Consumer Counsel
Bruce C. Johnson
Litigation Attorney
Office of Consumer Counsel
Ten Franklin Square
New Britain, CT 06051

William J. Kupinse, Jr.
First Selectman
Easton Town Hall
225 Center Road
PO Box 61
Easton, CT 06612

Honorable William A. Aniskovich
State Senate - 12th District
15 Grove Avenue
Branford, CT 06405

David J. Monz
Updike, Kelly & Spellacy, P.C.
One Century Tower
265 Church Street
New Haven, CT 06510

David R. Schaefer, Esq.
Brenner Saltzman & Wallman, LLP
271 Whitney Avenue
New Haven, CT 06511

Senator Joseph J. Crisco, Jr.
17th District
State Capitol
Hartford, CT 06106

Franco Chieffalo
General Supervisor
First District Water Department
PO Box 27
Norwalk, CT 06852

Peter G. Boucher
Halloran & Sage LLP
225 Asylum Street
Hartford, CT 06103

Brian M. Stone