

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

MARCH 23, 2004

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

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

The above-captioned towns (collectively, the “Towns”), each a participant
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 individually as a "Respondent" and collectively as the "Respondents."¹ The interrogatories are addressed to both of the Respondents; the Towns request that the Respondents provide responses to the interrogatories on or before April 6, 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 Respondents 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 Respondent or Respondents answering the interrogatory 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

¹ The undersigned represent solely the towns of Durham and Wallingford in this proceeding. The undersigned have been authorized to proffer the instant interrogatories on behalf of the Towns.

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.

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.

TOWNS' FIFTH SET OF INTERROGATORIES TO CL&P/UI

1. Provide a complete list of the members of the ISO-NE Southwest Connecticut Working Group who participated in the preparation and/or review of the study entitled "Comparison of Middletown to Norwalk Project vs. East Shore Alternative."
2. Provide the notes, minutes, and reports of the meetings of the ISO-NE Southwest Connecticut Working Group at which the comparison of the Middletown to Norwalk Project and the East Shore Alternative was discussed.
3. Provide copies of the correspondence between CL&P, or its personnel or consultants, and the members of the ISO-NE Southwest Connecticut Working Group which discussed or addressed the comparison of the Middletown to Norwalk Project and the East Shore Alternative.
4. Provide copies of the correspondence between UI, or its personnel or consultants, and the members of the ISO-NE Southwest Connecticut Working Group which discussed or addressed the comparison of the Middletown to Norwalk Project and the East Shore Alternative.
5. Provide copies of all drafts of the study entitled "Comparison of the Middletown to Norwalk Project vs. East Shore Alternative."
6. Provide on CD in PTI-compatible machine format, the input and results for each of the analyses discussed in the study entitled "Comparison of the Middletown to Norwalk Project vs. East Shore Alternative" or in the appendices to that study.
7. Provide on CD in PTI-compatible machine format, the input and results for each of the analyses discussed in each of the two PowerGEM reports provided as attachments to Addendum No. 3 to the Supplemental Filing by UI and CL&P.

Respectfully submitted,

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

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Certification

I hereby certify that a copy of the foregoing has been mailed, e-mailed and/or hand-delivered to all know parties and intervenors of record this 23rd day of March, 2004

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