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** **JANUARY 28, 2004**

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

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

The above-captioned municipalities (collectively, the "Municipalities"), 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 Municipalities request that the Respondents answer the interrogatories on or before February 16, 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 Municipalities request that the Respondents contact the undersigned as soon as possible. It is the understanding of the undersigned that the Municipalities have authorized him to submit these interrogatories on their behalf.

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,

[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 Municipalities.

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 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.

II. MUNICIPALITIES' FIRST SET OF INTERROGATORIES TO CL&P AND UI

Please identify the Respondent(s) and a witness responsible for each interrogatory response.

1. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 3-1 reference is made to the extensive model of the NU system having been developed. Please provide, on CD in machine readable format, a copy of the model data as used with the ATP/EMTP to perform the transient and harmonic studies reflected in this report.

2. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 2-1, reference is made to the 39 cases performed in the harmonic analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these 39 cases.

3. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 2-2 reference is made to the 22 simulation cases performed in the switching transient analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these 22 cases.

4. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 4-6, reference is made to transformers being the most significant source of 2^{nd} harmonic stimulus.

   a. Would harmonic filtering on transformers reduce this problem? If the answer is no, please explain in detail why not.

b. What would such filtering cost on a 100 MVA 115 kV primary power transformer?

5. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 4-7, reference is made to the fact that changes in system configuration could move the resonance below 2nd harmonic.

   a. Could changes in system configuration move the resonance further above 2nd harmonic? If not, please explain in detail why not.

   b. If so, please describe what types of changes would be likely to have what type of effect.

   c. Have such changes been studied, and if so, please provide a copy of such studies and results.

   d. If such changes have not been studied, please describe why not.

6. On Page E-1 of the "Connecticut Cable Transient and Harmonic Feasibility Study" Final Report dated March 2003, it states that "…a long distance EHV AC transmission cable system is unprecedented."

   a. What is the longest EHV AC cable system of which respondents are aware?

   b. Please provide the voltage, the length, and location, and the operating utility of the system named in a) above.

7. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 4-7, footnote 2 makes reference to a paper from the Proceedings of 8th International Conference on Harmonics and Quality of Power. Please provide a copy of the referenced paper.

8. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 4-7, reference is made to the planned Glenbrook Statcom.

   a. In the switching transient analysis in this study, what was the status of the Glenbrook Statcom.

   b. If no switching transient studies were performed with this Statcom in service, please describe why not.

c. Was the effect of one or more Statcoms installed in different locations from Glenbrook on switching transients studied? If so, please provide a copy of the studies, input data and results.

d. If no switching transient studies were performed with one or more Statcoms in service in different locations, please describe why not.

9. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page 4-6, footnote 1 makes reference to a paper from the IEEE Transactions on Power Delivery. Please provide a copy of the referenced paper.

10. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page E-2, footnote 2 makes reference to 2nd harmonic distortion, caused by a geomagnetic disturbance, causing a blackout in Quebec 1n 1989. Please describe what corrective action Hydro Quebec took to prevent a similar future reoccurrence.

11. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 20 Mile Cable Option (MIN-P2), Final Report" dated December, 2003, on page 3-1 reference is made to the extensive model of the NU system having been developed. Please provide, on CD in machine readable format, a copy of the model data as used with the ATP/EMTP to perform the transient and harmonic studies reflected in this report.

12. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 20 Mile Cable Option (MIN-P2), Final Report" dated December 2003, on page 2-1, reference is made to the 39 cases performed in the harmonic analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these 39 cases.

13. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 20 Mile Cable Option (MIN-P2), Final Report" dated December 2003, on page 2-2 reference is made to the more than 90 simulation cases performed in the switching transient analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these cases.

14. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 20 Mile Cable Option (MIN-P2), Final Report" dated December 2003, on page 4-8, reference is made to the planned Glenbrook Statcom.

a. In the switching transient analysis in this study, what was the status of the Glenbrook Statcom.

b. If no switching transient studies were performed with this Statcom in service, please describe why not.

c. Was the effect of one or more Statcoms installed in different locations from Glenbrook on switching transients studied? If so, please provide a copy of the studies, input data and results.

d. If no switching transient studies were performed with one or more Statcoms in service in different locations, please describe why not.

15. Regarding the GE report "Connecticut Cable Transient and Harmonic Feasibility Study, Final Report" dated March, 2003, on page 2-1 reference is made to the model of the NU transmission system having been developed. Please provide, on CD in machine readable format, a copy of the model data as used with the ATP/EMTP to perform the transient and harmonic studies reflected in this report.

16. Regarding the GE report "Connecticut Cable Transient and Harmonic Feasibility Study, Final Report" dated March 2003, on page 2-2, reference is made to the 30 cases performed in the transient analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these 30 cases.

17. Regarding the GE report "Connecticut Cable Transient and Harmonic Feasibility Study, Final Report" dated March 2003, on page 2-2 reference is made to the 15 cases plus 24 cases performed in the harmonic analysis. Please provide, on CD in machine readable format, the input data and the study results for each of these cases.

18. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page E-3, this report states that "(a)ttempts to avoid the 2nd harmonic resonance by adding 2nd harmonic filters would not be practical."

    a. Please provide any and all studies, reports, analyses or other information on which this statement is based.

    b. Would the use of harmonic filters to avoid 2nd harmonic resonance be technically possible, and if so, at what cost?

    c. Please provide any and all studies, reports, analyses or other information on which the response to the above request segment (b) is based.

19. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page E-3, this report states that "(c)onversion of existing 115 kV capacitor banks into 2nd harmonic filters would require increased size and cost on the order

of about two to three times the replacement costs of the existing capacitor banks."

a. Please provide any and all studies, reports, analyses or other information on which this statement is based.

b. What were the effects on 2nd harmonic resonance of converting existing 115 kV capacitor banks into 2nd harmonic filters?

c. Please provide any and all studies, reports, analyses or other information on which the response to the above request segment (b) is based.

d. Which existing 115 kV capacitor banks were specifically being addressed in the above statement?

e. Please provide any and all studies, reports, analyses or other information which address potential space limitations at the locations of the existing 115 kV capacitor banks referred to in the above statement.

20. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, the system model depicted in Figure 3, page 3-2, does not include all of the breakers, equipment locations, or substations referred to in Table 5-1, which lists the switching transient cases studied. Please provide a more detailed system diagram that does include all the breakers, equipment locations, and substations referred to in Table 5.1.

21. Regarding the GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003, on page E-2, this report states that "(t)ransient overvoltages would be limited sufficiently by surge arrestors to protect the insulation of utility equipment, but utility customer loads may not be protected by these arrestors."

a. Please provide any and all studies, reports, analyses or other information on which this statement is based.

b. Please confirm that substation transformers are among the pieces of utility equipment that surge arrestors could, and normally would, protect.

c. Please identify any and all substation transformers in southwestern Connecticut that cannot be protected by surge arrestors.

d. Please provide any and all studies, reports, analyses or other information on which the response to the above request segment (c) is based.

e. If all substation transformers are protected by surge arrestors from transient voltage surges originating from the bulk power transmission system, please explain how utility customer loads would be unprotected from these surges.

f. Please provide any and all studies, reports, analyses or other information on which the response to the above request segment (e) is based.

22. Regarding the PowerGem Study dated December 31, 2003 that is part of CL&P's Addendum #1 To Supplemental Filing, please provide on CD, in machine readable format, copies of the four base cases supplied by UI, as referred to on page 5 of the study. Please provide in .RAW format and in .SAV format.

23. Regarding the PowerGem Study dated December 31, 2003 that is part of CL&P's Addendum #1 To Supplemental Filing, please provide on CD, in machine readable format, copies of the saved cases that reflect the changes made by PowerGem to the base cases supplied by UI, as referred to on page 5 of the study.

24. Reference page 4 of the December 16, 2003 Supplemental Filing:

a. Provide copies of the studies, analyses, evaluations, and reports prepared by or for each of the cable consulting experts retained by CL&P and/or UI "to assess the viability of various undergrounding options for the 345-kV facilities."

b. Provide copies of the correspondence between CL&P and/or UI and each of these experts related to the assessment of "the viability of various undergrounding options for the 345-kV facilities."

25. Reference page 5 of the December 16, 2003 Supplemental Filing.

a. Provide copies of any studies, analyses, evaluations and draft or final reports prepared by Burns & McDonnell related to its switching study of the underground segments of the Project.

b. Provide copies of the correspondence between CL&P and/or UI and Burns & McDonnell related to this switching study.

26. Reference page 5 of the December 16, 2003 Supplemental Filing. Please provide copies of the correspondence between CL&P and/or UI and GE related to studies that GE was being asked to undertake.

27. Reference page 8 of the December 16, 2003 Supplemental Filing.

a. Provide copies of the analyses, studies, evaluations, reports, and workpapers, prepared by or for CL&P or UI, which form the basis for the following statements:

Extrapolating from the results of the GE studies, the Companies have concluded that it may be technically possible to add in the range of 5 miles of underground cable construction to the Companies' proposed route, provided that the additional length is contiguous to or originating from a substation.

b. Provide on CD in machine readable format, the input data and results of any such analyses, studies or evaluations.

c. Provide copies of the analyses, studies, evaluations, reports, and workpapers, prepared by or for CL&P or UI, which examined the operational, power distortion and/or future expansion effects of adding this amount of additional underground cable construction to the Companies' proposed route.

d. Identify and discuss in detail the factors which form the basis for the conclusion that this additional 5 miles of underground cable construction would have to be contiguous to or originate from a substation.

e. Provide copies of the analyses, studies, evaluations, reports and workpapers which form the basis for the conclusion that this additional 5 miles of underground cable construction would have to be contiguous to or originate from a substation.

f. Provide copies of the analyses, studies, evaluations, reports and workpapers that form the basis for the conclusion that, at most, an additional 5 miles of underground cable construction could be added to the Companies' proposed route.

28. Reference the Black & Veatch HVDC report provided in response to Data Request D-W-01, Question D-W-014. At page 1 the report notes that "This report examines the technical feasibility of a HVDC solution and neither recommends nor excludes an HVDC solution for the Middletown-Norwalk Project." Provide copies of any other analyses, studies, evaluations or reports, prepared by or for CL&P and/or UI, which examined the results of the Black & Veatch report and/or formed the basis for the specific conclusion that "a HVDC transmission line is not a technically and economically practical alternative."

29. Regarding the GE report "Connecticut Cable Transient and Harmonic Design Study for Phase 1, Final Report" dated June, 2003, on page 4-5, reference is made to IEEE 519 and the limits recommended therein. Please provide a copy of IEEE 519.

30. Regarding the GE report "Connecticut Cable Transient and Harmonic Design Study for Phase 1, Final Report" dated June, 2003, on page 3-1, reference is made to cable data which includes technical data on both 345 kV XLPE cable and 345 kV HPFF cable. Recognizing that there are sizable differences between the R0, X0, B0, and B1 characteristics of these two cables, how would the use of XLPE with appropriate compensation in all locations where 345 kV cable is used, in preference to the use of HPFF, affect the study results of the following studies:

    a. The GE report "Connecticut Cable Transient and Harmonic Design Study for Phase 1, Final Report" dated June, 2003,

    b. The GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 40 Mile Cable Option (MIN-P1), Final Report" dated November, 2003,

    c. The GE report "Connecticut Cable Transient and Harmonic Study for Middletown to Norwalk Project, East Devon – Beseck 20 Mile Cable Option (MIN-P2), Final Report" dated December, 2003,

    d. The GE report "Connecticut Cable Transient and Harmonic Feasibility Study, Final Report" dated March, 2003.

31. Regarding the GE report "Connecticut Cable Transient and Harmonic Design Study for Phase 1, Final Report" dated June, 2003, on page 3-1, reference is made to cable data which includes technical data on both 345 kV XLPE cable and 345 kV HPFF cable. Recognizing that there are sizable differences between the R0, X0, B0, and B1 characteristics of these two cables, how would the use of XLPE with appropriate compensation in all locations where 345 kV cable is presumed to be used, in preference to the use of HPFF, affect the conclusions stated in the Company's Supplemental Filing, page 8, i.e., that "…it may be technically possible to add in the range of 5 miles of underground cable construction to the Companies' proposed route…"?

32. Regarding the August 2003 "Middletown to Norwalk 345-kV Transmission Line Project Highway Corridor Study."

    a. Provide copies of the correspondence between CL&P/UI and Burns & McDonnell related to this study.

    b. Provide the workpapers for this study.

    c. Provide copies of any analyses, assessments, or evaluations prepared as part of this study.

    d. The statement is made in several places in this study that transition stations would require 2-4 acre sites. Please state whether this assumes the use of solid dielectric or HPFF cable.

e. Provide the source documents and workpapers for the evaluation of the Interstate 91 Route from Black Pond Junction to Beseck Substation corridor.

f. Provide the source documents and workpapers for the evaluation of the Interstate 91 Beseck Substation to New Haven corridor.

g. Provide the source documents and the workpapers for the evaluation of the possible underground route in New Haven.

h. Provide copies of the source documents and workpapers for the evaluation of the Interstate 95 corridor.

i. Provide copies of the source documents and workpapers for the evaluation of the Wilbur Cross/Merritt Parkway corridor.

Respectfully submitted,

THE MUNICIPALITIES OF
BETHANY, CHESHIRE,
DURHAM, EASTON,
FAIRFIELD, HAMDEN,
MIDDLEFIELD, MILFORD,
NORTH HAVEN, NORWALK,
ORANGE, WALLINGFORD,
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CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, first class postage prepaid, on the above date, to:

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