

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 18, 2004

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

FOURTH 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 their responses to the Towns' consultant David Schlissel by March 22, 2004, at the following address:²

Synapse Energy Economics, Inc.
22 Pearl Street
Cambridge, MA 02139

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."

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.

² This schedule is made necessary by the Respondents' revised EMF filing of March 15, 2004 and the Council's decision to proceed with a hearing on EMF issues on March 25, 2004.

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 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' FOURTH SET OF INTERROGATORIES TO CL&P/UI

1. Provide the workpapers for the calculations of the revised EMF figures presented in the Applicants' March 15, 2004 submittal.
2. Reference the Applicants' March 15, 2004 revised submittals on EMF issues. If the projected peak load is 27 GW and the average load is 15 GW, specify how many hours of the year the New England load would exceed 15 GW. Please note that this question was not answered in the Applicants' response to Question No. 3 of the Towns' Second Set of Interrogatories dated February 17, 2004.
3. Reference the Applicants' March 15, 2004 revised submittal on EMF issues.
 - a. Provide the workpapers and input and output data files, in Excel readable format, for the new or updated "15 GW Case" and the "27 GW Case" modeled by NU.
 - b. Specify each of the assumptions made by NU concerning the availability of other transmission lines and the operability of generating facilities for this modeling.
 - c. Specify which generators are assumed to be dispatched in the 15 GW and 27 GW cases modeled by NU.
 - d. Specify the loadings in MVA of the proposed 345-kV line calculated in the 15 GW and the 27 GW cases.

- e. Specify the loads assumed in the 15 GW and the 27 GW cases for the Connecticut, Southwestern Connecticut and Norwalk-Stamford sub-areas of New England.
- f. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for New England for the years after 2007.
- g. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for the State of Connecticut for the years after 2007.
- h. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for Southwestern Connecticut for the years after 2007.
- i. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for the Norwalk-Stamford sub-area for the years after 2007.

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 and/or hand-delivered to all known parties and intervenors of record this 18th day of March, 2004.

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