

January 18, 2005

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OF COUNSEL
Erik L. Kuselias

Pamela B. Katz, PE
Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 272

Dear Chairman Katz:

The City of Milford and the Towns of Woodbridge and Orange ("Towns") respond to the Siting Council's inquiry as to what studies the Towns may perform in this docket. This matter has evolved to a point where the studies that must be run in order to determine the maximum number of underground miles technologically feasible are harmonics and transients studies. There are few companies worldwide with the expertise to conduct the transients and harmonics studies that are required. Further, as a result of the extraordinary nature of these proceedings, the Towns' budgets have been decimated, and the Towns lack the resources to be able to commission these studies. Accordingly, the Towns do not intend to run further studies.

However, the Towns reiterate and renew the request made in the letter from David Ball to the Siting Council dated January 7, 2005, in which the Towns respectfully requested that the Council direct KEMA, Inc. to perform studies to evaluate and mitigate transients and harmonics concerns identified in the ROC Report dated December 20, 2004 (the "Final Report"). KEMA, Inc. has testified in this docket that it has the expertise to perform these precise studies. The Towns specifically have requested that the Siting Council direct KEMA, Inc. to perform, at the minimum, studies relating to the following configurations:

1. "Case 5" (as defined in the Final Report), plus an additional 15 miles of underground cables, originating from the East Devon substation through Milford, Orange, and Woodbridge, and terminating on property owned by CL&P in Woodbridge near the intersection of Route 63 and Clark Road. At the evidentiary hearing on December 14, 2004, KEMA, Inc. testified that it performed harmonics studies assuming an additional 15 underground miles with this potential route in mind.
2. "Case 5" (as defined in the Final Report), plus an additional 3.5 miles of underground cables, through the town of Woodbridge from a point in Southern Woodbridge, beneath public streets, until reaching property owned by CL&P near the intersection of Route 63 and Clark Road. The underground route would traverse Northerly from Johnson Road, to Pease Road, then East on Route 114, across Route 63, North on Cedar Road or Route 63, until reaching CL&P's property. This route

was previously identified in my letter to applicants' counsel dated May 25, 2004, and was the subject of testimony at the evidentiary hearing on June 16, 2004. (See, 6/16/04 Tr. at pp. 189-192.)

3. "Case 5" (as defined in the Final Report), plus an additional 4 miles of underground cables, originating from the East Devon substation beneath public streets through Milford to the Milford/Orange line. An understreet alternative was suggested in the City's filings dated May 28, 2004 and July 19, 2004 and is the subject of prefiled testimony dated January 17, 2005.

The Towns believe that the ROC Final Report failed to identify mitigation measures designed to maximize the number of underground miles technologically feasible, and that more than 24 underground miles can be achieved. The Towns further believe that this analysis can best be performed by the one independent expert in this docket, KEMA, Inc. Accordingly, the Towns respectfully request that KEMA, Inc. be granted the time necessary to perform studies that will enable compliance with P.A. 04-246.

Very truly yours,


JULIE DONALDSON KOHLER

cc: Service List