

**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 28, 2005

WRITTEN EXCEPTIONS OF THE CITY OF MILFORD

The City of Milford (“City” or “Milford”) files the following written exceptions to the March 23, 2005 Proposed Findings of Fact of the Connecticut Siting Council (“FOF”).

FOF 476. Additional undergrounding beyond 24 miles would result in some changes in resonance characteristics of the system. An extension of two to three miles raises concerns on impacts to the harmonic characteristics of the system. (Tr. 2/17/05, p. 37)”

EXCEPTION: This FOF does not accurately reflect the statement made by the witness. The statement found in this FOF is in response to the question about whether something less than five miles (e.g. “two or three miles anchored to the East Devon

Substation”) was feasible. In context, Dr. Wakefield went on to say “So, from a professional point of view I say, *yeah maybe it’s possible but we don’t know yet.*”(Emphasis supplied) (Tr. 2/17/05, p. 37)

FOF 477. Additional investigations of undergrounding beyond 24 miles are not recommended. Evidence to support this conclusion was found with Appendix E of the final ROC Report. (Tr. 2/17/05, p. 44-45).

EXCEPTION: Again, this FOF does not accurately reflect the statement made by this witness. Dr. Wakefield does make these statements, but taken in context they are in regard to “the severity of TOVS that could potentially occur at *5, 10 and 20 miles.* (Emphasis supplied). (Tr. 2/17/05, p. 45-46) They do not include less than 5 miles of additional undergrounding.

FOF 493. The use of split-phasing is a common industry practice in use for the past 15 years throughout New England and the United States. The reliability of split-phasing has been proven in thousands of miles of 345kV and 500kV lines across the nation. (Tr. 2/17/05, p. 104-105).

EXCEPTION: There is no absolutely no track record for split phasing at 345 KV as a mitigation measure for EMF exposure levels. The record is abundantly clear, that while split phasing of 345 kV transmission lines may have operational history, it has never been used to consistently and reliably reduce EMF levels in the U.S. (Tr. 5/12/04 p 50)

FOF 572 and 744. In Eisenhower Park in the ballfield, using low magnetic field design, the magnetic field would be 4.3 mG in the center and moving to the northwest side in 25-foot increments, the levels would go from 4.3 to 5 mG, 4.5 to 2.9 mG at the edge of the ROW. (Tr. 2/1/05, p. 202-203).

EXCEPTION: This FOF should include the fact that Eisenhower Park is a statutory facility and clarify that the cited EMF levels assuming 15 GW load and optimal mitigation.

FOF 576. The City would prefer higher poles to protect exposure to EMF, over aesthetics (Tr. 1/18, p 71)

EXCEPTION: This statement was made by the Chairman of the Eisenhower Park Committee who made it clear that he was speaking only on behalf of Eisenhower Park. (Tr. 1/18, p 71)

THE CITY OF MILFORD

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Service is hereby
Certified to all parties and
Intervenors on this agency's
Service list.

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