

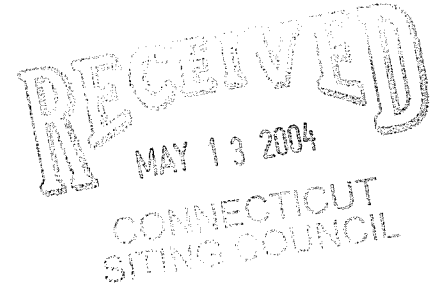
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Office of The Attorney General  
State of Connecticut

May 13, 2004



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

**Re: Docket No. 272 – Connecticut Light and Power Company and United Illuminating Company Application for a New 345-kV Electric Transmission Line Between Scovill Rock Switching Station in Middletown and Norwalk Substation in Norwalk**

Dear Chairman Katz:

Richard Blumenthal, Attorney General for the State of Connecticut, hereby submits his Third Set of Interrogatories to the Connecticut Light and Power Company and the United Illuminating Company (jointly the "Applicants") in the above-referenced proceeding. The Attorney General respectfully requests that the Applicants respond to these interrogatories no later than May 25, 2004.

Very truly yours,

RICHARD BLUMENTHAL  
ATTORNEY GENERAL

By:

A handwritten signature in cursive script, appearing to read "Michael C. Wertheimer".

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cc: Service list

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER	:	DOCKET NO. 272
COMPANY AND THE UNITED	:	
ILLUMINATING COMPANY APPLICATION	:	
FOR A CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION OF A NEW 345-KV	:	
ELECTRIC TRANSMISSION LINE AND	:	
ASSOCIATED FACILITES BETWEEN THE	:	
SCOVILLE ROCK SWITCHING STATION IN	:	
MIDDLETOWN AND THE NORWAL	:	
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	:	
WALLINFORD, 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	:	MAY 13, 2004

**ATTORNEY GENERAL'S THIRD SET OF INTERROGATORIES  
TO THE CONNECTICUT LIGHT AND POWER COMPANY**

Richard Blumenthal, Attorney General for the State of Connecticut, hereby requests that the Connecticut Light and Power Company and the United Illuminating Company answer the following interrogatories in the above-captioned proceeding no later than May 25, 2004. In the event that the information requested herein has been provided in this proceeding, the respondents 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, "concern" and "concerning" mean "relate," "relating," "refer," "referring," "reflect," "reflecting," "about," "constitute" or "constituting."

**E.** As used in these interrogatories, "CL&P" means the Connecticut Light and 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 interpreted 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.

**F.** 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 interpreted 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.

**G.** As used in these interrogatories, "Applicants" refers to CL&P and UI.

**H.** As used in these interrogatories, "document" means all materials and tangible forms of expression in any of the Applicants' possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, messages, bulletins, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, teletypes, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices or advertisements.

## **II. INTERROGATORIES**

**AG-15.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all schools that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the term “schools” includes public schools, private schools and pre-schools and the playgrounds, playing fields, parking lots and similar property associated with the schools.

**AG-16.** For every school identified in response to question AG-15:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the school in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-17.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all community centers that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the term “community centers” includes public and private centers as well as the playing fields, parking lots and similar property associated with the facilities.

**AG-18.** For every community center identified in response to question AG-17:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the community center in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field

Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-19.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all hospitals that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the term “hospitals” includes the parking lots and similar property associated with the facilities.

**AG-20.** For every hospital center identified in response to question AG-19:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the hospital in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-21.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all public parks that are located within 1200 feet of the right of way required for the 345 kV transmission line.

**AG-22.** For every public park identified in response to question AG-21:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the public park in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property value;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-23.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all nursing homes, senior citizens' homes and extended care facilities that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the terms "nursing homes," "senior citizens' homes" and "extended care facilities" include the parking lots and similar property associated with the facilities.

**AG-24.** For every nursing home, senior citizens' home and extended care facility identified in response to question AG-23:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the nursing home, senior citizens' home or extended care facility in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the "Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement" provided in Volume 6 of the Application.

**AG-25.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all houses of worship that are located within 1200 feet of the right of way required for the 345 kV transmission line.

**AG-26.** For every house of worship identified in response to question AG-25:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the house of worship in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property value;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the "Electric and Magnetic Field

Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-27.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all residential areas that are located within 1200 feet of the right of way required for the 345 kV transmission line.

**AG-28.** For every residential area identified in response to question AG-27:

a. specify the distance from the right of way and the extent to which it is in the right of way;

b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the school in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;

c. identify its proximity to the nearest substation; and

d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-29.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all licensed day care facilities that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the term “licensed day care facilities” includes the playgrounds, playing fields, parking lots and similar property associated with the facilities.

**AG-30.** For every community center identified in response to question AG-29:

a. specify the distance from the right of way and the extent to which it is in the right of way;

b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the community center in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;

c. identify its proximity to the nearest substation; and

d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-31.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all licensed youth camps that are located within 1200 feet of the right of way required for the 345 kV transmission line. For the purposes of this question, the term “licensed youth camps” includes the playgrounds, fields, parking lots and similar property associated with the facilities.

**AG-32.** For every licensed youth camp identified in response to question AG-31:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the hospital in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.

**AG-33.** For each alternate route under consideration by the Connecticut Siting Council in this proceeding, identify all public playgrounds that are located within 1200 feet of the right of way required for the 345 kV transmission line.

**AG-34.** For every public playground identified in response to question AG-33:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe the possible means of mitigating the impact of the 345 kV transmission line upon the public park in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property value;
- c. identify its proximity to the nearest substation; and
- d. provide the measured and calculated electric and magnetic fields at the boundaries or location closest to the 345 kV transmission line. Please provide this information in the same format as provided in Table A-1 of the Appendix to the “Electric and Magnetic Field Assessment: Middletown – Norwalk Transmission Reinforcement” provided in Volume 6 of the Application.