DOCKET NO. 272—The Connecticut Light and Power 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 facilities between the Scovill Rock Switching Station in Middletown and the Norwalk Substation in Norwalk, Connecticut.

PREFILED TESTIMONY FOR THE SITING COUNCIL
SEPTEMBER 29, 2004 EVIDENTIARY HEARING

CONCERNING

THE CONNECTICUT DEPT. OF TRANSPORTATION PREFERRED ROUTES

TESTIMONY SUBMITTED ON BEHALF OF
\Alex A. Knopp, Mayor, City of Norwalk

and

Harold F. Alvord, P.E.,
Director of Public Works, City of Norwalk

The Connecticut Department of Transportation (ConnDOT), in a letter to the Siting Council dated July 19, 2004, proposed an alternative routing to the Northeast Utilities (NU) preferred route for the 345 kV transmission line that will be constructed between Middletown and Norwalk. In a subsequent submission to NU, ConnDOT proposed two (2) additional alternative routes.

Thus Norwalk and the other involved communities, as well as NU, have been reviewing three (3) proposed ConnDOT alternative routes.

The City of Norwalk opposes the three alternative ConnDOT routes and supports the applicants' original submitted route, for the following reasons.

In its July 19 letter, ConnDOT provided three (3) reasons for proposing the then first of its alternative routes (and we assume that similar reasoning would apply to their other proposed alternatives). These were:

First, the proposed alternative offers a minimized number of turns to accommodate the proposed high-pressure, fluid-filled transmission system.

Norwalk responds by stating that the NU preferred route along US Route 1 is the straightest route anyone could possibly find between the start and end points of the project. It doesn't get any straighter even as the crow flies! Conversely, the ConnDOT alternative actually adds a substantial number of acute-angle turns that do not exist in the current NU preferred route (This is also true of all subsequent alternatives that ConnDOT has proposed.)

Thus this reason argues effectively for NOT adopting the ConnDOT proposed alternative.

Second, the DOT claims that the proposed alternative offers lower volume roadways in non-commercial areas.

Norwalk responds by stating that although traffic volumes on the highly residential streets may be less than that on US Route 1 during normal business hours, it is intense in the mornings and evenings. (This is also true of all subsequent alternatives that ConnDOT has proposed.) Traffic volumes on US 1 are significantly reduced during the evening and early morning hours thus facilitating nighttime construction.

Most importantly, unlike the section of US 1 in the western portion of Norwalk that would be affected by the Norwalk to Glenbrook proposed 115kV underground transmission line, the US 1 section in eastern Norwalk is NOT a critical element of the

emergency alternate routing for I-95 nor do motorists routinely use it as an I-95 avoidance route. In eastern Norwalk, due to its proximity to I-95, Route 136 and not US 1 serves this purpose.

Third, the DOT claims the proposed alternative offers reasonable terrain.

Norwalk responds by stating that although the terrain of both routes is generally the same, the DOT alternative route contains many more sections with excessive grades (This is also true of all subsequent alternatives that ConnDOT has proposed.) As we are all now aware, excessive grades are anathema to both the construction and performance of these transmission lines.

In addition to rebutting these three claims raised by the DOT, the City of Norwalk opposes the DOT alternatives for the following additional reasons.

During the coordination meeting of August 19, 2004 held at NU's corporate offices in Berlin, ConnDOT was more forthright in its real purpose for proposing the alternative(s): to minimize the involvement of, and impact on, state roadways. Roughly 66% of the NU route is along state roads while only 19% of the original proposed ConnDOT alternative route involves state roads. ConnDOT stated that it wished to avoid disruption and congestion during construction. ConnDOT also stated that allowing such construction in its right-of-way would significantly increase the cost and complexity of future repairs and/or expansions.

Norwalk and the other communities along the route can empathize with ConnDOT's position since they must deal with the same concerns as regards municipal infrastructure repairs and expansions. But let's be clear: the ConnDOT proposal does not

eliminate this planning and traffic management complexity; it simply shifts the burden to the communities, who are much less capable of dealing with it.

The most important reason Norwalk opposes all of the ConnDOT alternatives is that all of the alternatives add three (3) or more miles to the length of the lines from Middletown to Norwalk and therefore would sabotage the widely-recognized goal of reliably placing underground as much of this transmission facility as possible.

Allowing the DOT to make the line longer would be acutely and concertedly contrary to the huge efforts of NU, Independent System Operators – New England (ISO-NE), the Reliability and Operability Committee (ROC) and all concerned communities over the past weeks to find a solution for a reliable system that maximizes underground construction.

Additional transmission line lengths of this magnitude simply will prejudice and overburden that solution.

Although ConnDOT has provided traffic counts at various points along the two routes, these numbers, by themselves, are undefined absolutes that provide no basis for meaningful comparison of the traffic impacts of construction on the routes. Meaningful comparisons can only be drawn from volume-to-capacity ratios. The most meaningful comparison would be based on a nighttime ratio on the NU route and daytime ratios on the various ConnDOT proposed routes.

The NU preferred route is largely comprised of four traffic lanes while the ConnDOT alternatives are comprised largely of two lanes. Assuming that all other factors are equal, closing one lane for construction in a four-lane road creates far less disruption than closing one lane in a two-lane road. At numerous locations on the ConnDOT

proposed alternative routes, accommodation of construction would require complete closure of extremely narrow roads.

Although day or night construction could be accommodated on US 1, the wider highway and reduced traffic at night suggest that night construction on US 1 remains the least disruptive of the various options. Again, we note that this eastern section of US 1 in Norwalk is fundamentally different than the western section of US 1 in Norwalk that is under consideration for the Norwalk to Glenbrook line because the eastern section is not an alternative route to I-95 whereas the western section is an alternative route.

ConnDOT has also provided lists of planned projects along the NU route, suggesting that construction along the NU route would disrupt those project schedules; the number of planned projects appears to have grown since July 19th.

In considering DOT's argument, one must first question the firmness of the project schedules. Scheduled ConnDOT projects have a long history of extension or postponement. When questioned during the August 19th meeting about one specific project, ConnDOT admitted that the dates had already slipped from those that had just been provided.

Again, Norwalk and the other communities can empathize with ConnDOT on the potential impacts on planned projects for we too must deal with this complexity. It is not at all uncommon for municipal projects to be scheduled in coordination with one or more utility company projects.

The City of Norwalk, along with the other impacted communities, was an active participant in good faith at the August 19 meeting at NU, where the parties attempted to find compromise positions.

Additionally, the City of Norwalk met, on September 22, with NU and ConnDOT to examine in even more detail numerous variations of alternative routes. Although the communities can empathize with many of the ConnDOT concerns, there is simply no apparent compelling reason for adopting any of the ConnDOT proposed alternative routes.

CONCLUSION

All of the analysis and discussion clearly indicate that the NU original preferred route is SHORTER, FLATTER, WIDER and STRAIGHTER than the ConnDOT proposed alternatives.

Given that technical feasibility, reliability, operability, constructability, cost, minimal impact on all parties and—most importantly—maximization of underground installation as a whole are key goals of the Siting Council, then SHORTER, FLATTER, WIDER and STRAIGHTER are the clear compelling reasons for retaining the NU preferred route for Docket No. 272.

Respectfully Submitted on September 24, 2004 by Norwalk Mayor Alex Knopp and by Norwalk Public Works Director Harold Alvord, P.E.