

June 6, 2005

Chairperson Pamela Katz
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 272- Application of the CT Light & Power Co. and the United Illuminating Co. D&M Plan - OBJECTION TO APPROVAL OF TRAFFIC MANAGEMENT PLAN SUBMITTED BY UNITED ILLUMINATING AND NORTHEAST UTILITIES**

Dear Chairperson Katz:

The City of Bridgeport ("City") is in receipt of the issuance of Interrogatories by the Connecticut Siting Council to United Illuminating and Northeast Utilities dated May 17, 2005. Question six in that document required the submission of a "Traffic Management Plan" by the companies regarding the construction of trenching and pulling of cable. The City objects to the submission of a "Traffic Management Plan" to the Connecticut Siting Council for the reasons set forth below.

The City has the authority to manage the traffic and the excavation of the Public Right of Way on state and local roads within the City pursuant to Sections 7-148(6)(B), 7-148(6)(C), 7-148(7)(B) and 14-297 of the General Statutes of Connecticut. The Department of Transportation ("DOT") and State Traffic Commission have overlapping jurisdiction with the City to manage traffic and the excavation of the Public Right of Way on the State Roads within the City, pursuant to Sections 13a-98f, 13a-98k, 14-297 and 14-298 et seq. of the General Statutes of Connecticut. The City respectfully argues that the only Agencies with the power to approve a traffic management plan are our local traffic engineer and Police Board of Commissioners of the City, and the State DOT and State Traffic Commission, not the Connecticut Siting Council.

Accordingly, while we are happy to take into consideration any concerns that Connecticut Siting Council may have, the approval of the D & M plan of United Illuminating and Northeast Utilities should specifically state that the Traffic Management Plan is not under the jurisdiction of the Siting Council and is, therefore, not approved by that Agency.

Respectfully submitted by:

Melanie J. Howlett
Associate City Attorney

CERTIFICATION

The foregoing document was sent via electronic mail this 6th day of June 2005, to all parties and intervenors on the service list as of this date.

Melanie J. Howlett
Commissioner of Superior Court