

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**THE CONNECTICUT LIGHT AND POWER
COMPANY AND THE UNITED
ILLUMINATING COMPANY
APPLICATION TO THE
CONNECTICUT SITING COUNCIL
FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED 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

DECEMBER 3, 2004

**THE TOWN OF DURHAM AND
THE TOWN OF WALLINGFORD**

**INTERROGATORIES
TO KEMA**

The Town of Durham and the Town of Wallingford (collectively, the “Towns”), hereby request that the Connecticut Siting Council’s expert KEMA

answer the following interrogatories. The Towns request that KEMA provide responses to the interrogatories on or before December 13, 2004.

If there are objections to the interrogatories, or if providing responses to individual interrogatories would be unduly burdensome, the Towns request that KEMA or the Connecticut Siting Council (as appropriate) contact the undersigned as soon as possible.

INTERROGATORIES TO KEMA

(1) Reference KEMA's response dated December 1, 2004, to Interrogatory 6.c. from the Town of Woodbridge. The referenced Interrogatory asked whether KEMA's study results would change (if at all) if KEMA assumed that approximately five miles of undergrounding in certain cases were located in the portion of Phase II proposed to be sited East of the Beseck switching station.¹ In its response, KEMA stated that it had not studied such a case, but that in general, "small variations in the amount of undergrounding should produce limited variations in the results."

(a) The referenced Interrogatory did not ask about *additional* undergrounding, but the *relocation* of the undergrounding studied by KEMA. How would the referenced study results change, if at all, if KEMA assumes that five miles of the undergrounding in the referenced cases were *relocated* to the East of Beseck, but the total amount of undergrounding in the referenced cases remains the same?

(b) If KEMA cannot respond to question (1)(a) without performing additional studies, please perform such additional studies and provide a response.

(c) How would the study results referenced in (1) *supra* change, if at all, if KEMA assumes that ten miles of the undergrounding in the cases referenced in (1) were *relocated* to the East of Beseck, but the total amount of undergrounding in the referenced cases remains the same?

1/ The Beseck switching station was referred to in the Interrogatory as the "Beseck substation."

(d) If KEMA cannot respond to question (1)(c) without performing additional studies, please perform such additional studies and provide a response.

(2) Reference KEMA's response dated December 1, 2004, to Interrogatory 6.d. from the Town of Woodbridge. The referenced Interrogatory asked whether KEMA's study results would change (if at all) if KEMA assumed that approximately five miles of undergrounding in Case-10 were located in the portion of Phase II proposed to be sited East of the Beseck switching station. In its response, KEMA stated that it had not studied such a case, but that in general, "small variations in the amount of undergrounding should produce limited variations in the results."

(a) The referenced Interrogatory did not ask about *additional* undergrounding, but the *relocation* of the undergrounding studied by KEMA. How would the referenced study results change, if at all, if KEMA assumes that five miles of the undergrounding in the referenced case were *relocated* to the East of Beseck, but the total amount of undergrounding in the referenced case remains the same?

(b) If KEMA cannot respond to question (2)(a) without performing additional studies, please perform such additional studies and provide a response.

(c) How would the study results referenced in (2) *supra* change, if at all, if KEMA assumes that ten miles of the undergrounding in Case -10 was *relocated* to the East of Beseck, but the total amount of undergrounding in the referenced case remains the same?

(d) If KEMA cannot respond to question (2)(c) without performing additional studies, please perform such additional studies and provide a response.

Respectfully submitted,

THE TOWN OF DURHAM and
THE TOWN OF WALLINGFORD

By _____

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Certification

I hereby certify that a copy of the foregoing has been mailed, first-class postage prepaid, to all known parties and intervenors of record this 3rd day of December , 2004.

Peter G. Boucher