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

AUGUST 18, 2004

THE TOWNS OF DURHAM AND WALLINGFORD

INTERROGATORIES
TO THE CONNECTICUT LIGHT AND POWER COMPANY
AND THE UNITED ILLUMINATING COMPANY

The Towns of Durham and Wallingford (collectively hereinafter the "Towns"), hereby request that The Connecticut Light & Power Company ("CL&P") and The United Illuminating Company ("UI") answer the following interrogatories ("Interrogatories"). The Interrogatories, which request that field EMF readings be performed at ten locations within the Towns, are requested in lieu of a response to a pending interrogatory dated June 8, 2004 submitted by the Town of Durham and requesting that field EMF readings be performed at forty-five locations, which interrogatory has not yet been responded to by the Applicants. The Towns request that the Applicants provide responses to the Interrogatories on or before September 1, 2004. In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, the Applicants need only specifically identify where the responsive data or information is located in the record.

If there are objections to the Interrogatories or if providing responses to individual interrogatories would be unduly burdensome, the Towns request that the Applicants contact the undersigned as soon as possible.

INTERROGATORIES

(1) Reference the portion of Cross Section 2 of the Middletown to Norwalk Project (Oxbow Junction to Beseck Switching Station) within the Town of Durham ("Durham").

At the two locations at the low points of the lowest sag on the S/E and N/W edges of the right-of-way ("Low Points") along Cross Section 2 in Durham, please provide the following:

(a) Field measurements of the electromagnetic field ("EMF").

¹/ CL&P and UI are sometimes hereinafter referred to collectively as the "Applicants."

- (b) The Actual Line Load on the relevant transmission line(s) at the time of the measurements described in subsection (a).
- (c) The Average Line Load over 8760 hrs/yr ("Annual Average Line Load") for the relevant transmission line(s) for the most recent year for which such data is available.
- (2) Reference the portion of Cross Section 2 of the Middletown to Norwalk Project (Oxbow Junction to Beseck Switching Station) within the Town of Wallingford ("Wallingford").

At the two Low Points along Cross Section 2 in Wallingford, please provide the following:

- (a) Field measurements of EMF.
- (b) The Actual Line Load on the relevant transmission line(s) at the time of the measurements described in subsection (a).
- (c) The Annual Average Line Load for the relevant transmission line(s) for the most recent year for which such data is available.
- (3) Reference Cross Section 5 of the Middletown to Norwalk Project (Beseck Switching Station to W. Wallingford Junction) in Wallingford.

At the two Low Points in Cross Section 5, please provide the following:

- (a) Field measurements of EMF.
- (b) The Actual Line Load on the relevant transmission line(s) at the time of the measurements described in subsection (a).
- (c) The Annual Average Line Load for the relevant transmission line(s) for the most recent year for which such data is available.
- (4) Reference Cross Section 6 (East) of the Middletown to Norwalk Project (E. Wallingford Junction to North Haven Junction) in Wallingford.

At the Low Points in Cross Section 6, please provide the following:

- (a) Field measurements of EMF.
- (b) The Actual Line Load on the relevant transmission line(s) at the time of the measurements described in subsection (a).

- (c) The Annual Average Line Load for the relevant transmission line(s) for the most recent year for which such data is available.
- (5) Reference Cross Section 7 of the Middletown to Norwalk Project (Wallingford Junction to Cheshire Town Line) in Wallingford.

At the Low Points along Cross Section 7 in Wallingford, please provide the following:

- (a) Field measurements of EMF.
- (b) The Actual Line Load on the relevant transmission line(s) at the time of the measurements described in subsection (a).
- (c) The Annual Average Line Load for the relevant transmission line(s) for the most recent year for which such data is available.

Respectfully submitted,

The Towns of Durham and Wallingford

By_____

Peter G. Boucher Alan P. Curto Halloran & Sage LLP 225 Asylum Street Hartford, CT 06103 Tel: (860) 522-6103

Fax: (860) 548-0006

Its Attorneys

Certification

I hereby certify that a copy of the foregoing has been mailed, e-mailed and/or hand-delivered to all know parties and intervenors of record this 18th day of August, 2004.

Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP 50 Leavenworth St., P.O. Box 1110 Waterbury, CT 06721-1110

Linda L. Randell, Esq. Bruce L. McDermott, Esq. Wiggin & Dana LLP One Century Tower New Haven, CT 06508-1832

Norwalk Association of Silvermine Homeowners c/o Leigh Grant 99 Comstock Hill Road Norwalk, CT 06850

Honorable Robert W. Megna State Representative - 97th District 40 Foxon Hill Road, #54 New Haven, CT 06513

Honorable Al Adinolfi State Representative 103rd District 235 Sorghum Mill Drive Cheshire, Connecticut 06410

Eric Knapp, Esq.
Branse & Willis, LLC
41-C New LondonTurnpike
Glen Lochen East
Glastonbury, CT 06033-2038

Julie Donaldson Kohler, Esq. Hurwitz & Sagarin, LLC 147 North Broad St. Milford, CT 06460

Janis M. Small, Esq. Town Attorney Wallingford Town Hall 45 South Main St. Wallingford, CT 06492

Maryann Boord First Selectwoman Durham Town Hall 30 Townhouse Rd. Durham, CT 06422

Louis S. Ciccarello Corporation Counsel P.O. Box 798 Norwalk, CT 06856-0798

Town of Westport c/o Ira W. Bloom, Esq. 27 Imperial Avenue Westport, CT 06880

Honorable Mary G. Fritz State Representative - 90th District 43 Grove Street Yalesville, CT 06492

David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 Deborah L. Moore, Esq. Legal Department City Hall 142 East Main Street Meriden, CT 06450

Michael C. Wertheimer Assistant Attorney General Office of the Attorney General 10 Franklin Square New Britain, CT 06051

Honorable Raymond Kalinowski State Representative – 100th District P.O. Box 391 Durham, CT 06422

Melanie J. Howlett Associate City Attorney Office of the City Attorney 999 Broad Street Bridgeport, CT 06604-4328

Trish Bradley, President Ed Schwartz, Treasurer Comunities for Responsible Energy, Phase II 45 Ironwood Lane Durham, CT 06422

Bruce C. Johnson Litigation Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051

Honorable Themis Klarides State Representative – 114th District 23 East Court Derby, CT 06418 Lawrence J. Golden, Esq. Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702

Anthony M. Macleod, Esq. Whitman Breed Abbott & Morgan LLC 100 Field Point Road Greenwich, CT 06830

Charles H. Walsh Assistant Attorney General Juris. No. 402623 55 Elm St., P.O. Box 120 Hartford, CT 06141-0120

Honorable Kenneth A. Flatto First Selectman Independence Hall 725 Old Post Road Fairfield, CT 06824

David A. Reif Jane K. Warren Joel B. Casey McCarter & English, LLP CityPlace I Hartford, CT 06103

Monte E. Frank, Esq. Cohen and Wolf, P.C. 158 Deer Hill Avenue Danbury, CT 06810

David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604

Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469 Brian M. Stone, Esq. Sousa, Stone & D'Agosto, LLC 375 Bridgeport Avenue Shelton, CT 06484

Robert E. Earley Connecticut Business & Industry Assoc. 350 Church Street Hartford, CT 06103-1106

Richard J. Buturla, Esq. Town Attorney Berchem, Moses & Devlin, PC 75 Broad Street Milford, CT 06460

Joaquina Borges King Assistant Town Attorney Hamden Government Center 2750 Dixwell Avenue Hamden, CT 06518

Timothy P. Lynch Deputy City Attorney City Attorney's Office 245 deKoven Drive, P.O. Box 1300 Middletown, CT 06457-1300

Honorable Derrylyn Gorski First Selectman Bethany Town Hall 40 Peck Road Bethany, CT 06524-3378

William J. Kupinse, Jr. First Selectman Easton Town Hall 225 Center Road, P.O. Box 61 Easton, CT 06612

Honorable William A. Aniskovich State Senate – 12th District 15 Grove Avenue Branford, CT 06405 David J. Monz Updike, Kelly & Spellacy, P.C. One Century Tower 265 Church Street New Haven, CT 06510

David R. Schaefer, Esq. Brenner Saltzman & Wallman, LLP 271 Whitney Avenue New Haven, CT 06511

Senator Joseph J. Crisco, Jr. 17th District State Capitol Hartford, CT 06106-1591

Franco Chieffalo General Supervisor First District Water Department P.O. Box 27 Norwalk, CT 06852

Honorable Leonard A. Fasano State Senator – 34th District 7 Sycamore Lane North Haven, CT 06473

Elizabeth Gilson, Esq. 383 Orange Street New Haven, CT 06511

Karyl Lee Hall, Esq. Co-Chairman Branford Conservation & Environment Comission c/o Box 3072 Branford, CT 06405

Honorable John E. Opie, First Selectman Branford Town Hall P.O. Box 150, Town Hall Branford, CT 06405 Sebastian N. Giuliano, Esq. Giuliano, Rafala & Scalora P.O. Box 820 Middletown, CT 06457-082

Peter G. Boucher	

C:\NrPortbl\iManage\BONVISO\581245_1.DOC